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APPLICABILITY

Corporate	Yes
U.S. Divisions and majority owned subsidiaries	Yes
Non-U.S. divisions and majority owned subsidiaries	Yes
Consolidated joint ventures and affiliates.....	Yes
Unconsolidated joint venture affiliates	**
** At the discretion of business unit management.	

INTRODUCTION

The purpose of this Privacy Policy and the associated Global Privacy Program is to address the rights of employees, candidates, interns, former employees, dependents, beneficiaries, contractors, consultants, temporary agency workers, customers, consumers, suppliers and vendors; and the obligations of Johnson Controls with respect to the processing of Personal Data, including collection, use, retention, disclosure, and destruction, in compliance with applicable local laws and the commitments set forth in the Johnson Controls Ethics Policy. “Personal Data”, sometimes referred to as personally identifiable information (PII), is defined as information that is or can be related to an identifiable individual.

This Privacy Policy outlines how Johnson Controls protects Privacy; defines a Privacy vision and mission, from which derive four fundamental Privacy Principles, and which in turn are managed using thirteen Privacy Management Processes integrated in the Global Privacy Program and aligned to our Binding Corporate Rules.

SCOPE

This policy applies to all worldwide locations and legal entities controlled by Johnson Controls and that process Personal Data.



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POLICY AND RESPONSIBILITIES

Vision and mission

The Johnson Controls Privacy Mission is:

Consistent with business needs, ensure appropriate management of Johnson Controls privacy and security risks associated with the collection, use, protection, retention, disclosure and disposal of Personal Data.

That mission in turn supports the Johnson Controls Privacy Vision:

Fair and lawful processing of Personal Data entrusted to the company.

Core Privacy Principles

Johnson Controls' Core Privacy Principles are Transparency, Proportionality, Controls and Local Legal Requirements.





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1. Transparency and Fairness

Our global operational processes appropriately inform the customer, employee, vendor and consumer data subjects on the purposes for which personal Data is collected, the types of data collected, who will be processing the information, where it will be processed, their rights as data subjects, with regards to the processing of their Personal Data, as well as any other information to ensure fair processing. We also maintain processes to ensure data subjects can exercise their rights of control over their personal Data. Furthermore, we ensure that Personal Data is accurate and, where necessary, kept up-to-date.

2. Legitimate Purpose, Finality & Proportionality

Our operational processes entrust Personal Data only to stakeholders who need it for specific, explicitly defined and legitimate purposes and is collected or used lawfully and in a proper and careful manner. We ensure that the Personal Data is adequate, relevant, and not excessive in relation to the purpose for which they have been collected or processed. We also take measures to ensure that Personal Data is not kept in an identifiable format for longer than necessary for the purpose for which it has been collected or further processed.

3. Controls & Monitoring

Our global functional policies and standards define preventive controls including relevant awareness training, required to assure that the physical and/or digital collection, handling, transmission, and processing of Personal Data, occurs in accordance with the Privacy Policy. Our processes ensure that appropriate technical and organizational measures are put in place to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access and all other forms of unlawful processing. This includes procedures for the reporting and handling of (i) potential privacy concerns; (ii) complaints; and (iii) information security incidents. Appropriate monitoring of applicable controls will be in place, including the regular audits of Personal Data processing and related processes.

4. Local Legal Requirements

We are committed to respecting applicable data privacy legal requirements everywhere we conduct business. We only collect and use Personal Data in line with applicable local laws. Personal Data that is



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considered sensitive is only used if necessary and with the individual's consent, where required. We also establish and maintain clear ownership for specific regulatory administration processes.

Binding Corporate Rules

Johnson Controls has adopted Binding Corporate Rules that are aligned with this Privacy Policy and enforced through an Intra Group Agreement. This Intra Group Agreement binds all legal entities where Johnson Controls has management control. "Johnson Controls International SA/NV" located in Belgium has taken the delegated responsibility for compliance with these Binding Corporate Rules. The coordination with Privacy authorities on these rules is managed by the Chief Privacy Officer.

A copy of these Binding Corporate Rules is available on Johnson Controls public website and on the employee Privacy portal.

Privacy Management Processes

The Global Privacy Program activities are structured around **13 Privacy Management Processes**. This is also the basis for measuring Johnson Controls' level of maturity and organizing privacy audits.

1. **Maintain a Privacy governance structure and clear responsibilities.** Ensure that there are individuals responsible for data privacy, accountable management, and management reporting procedures. Responsibilities are defined in this Policy below.
2. **Maintain Personal Data inventories.** Maintain an inventory of the location of key Personal Data storage or Personal Data flows with defined classes of Personal Data.
3. **Maintain the Privacy policy.** Maintain a Privacy policy that meets legal requirements and addresses operational risk.
4. **Embed Privacy in operational policies and procedure.** Maintain operational policies and procedures consistent with the data privacy policy, legal requirements, and operational risk management objectives.



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5. **Organize Privacy training & awareness.** Provide ongoing training and awareness to promote compliance with the privacy policy and to mitigate operational risks.
6. **Manage information security risks.** Maintain an information security program based on legal requirements and ongoing risk assessments.
7. **Manage third-party risks.** Maintain contracts and agreements with third parties and affiliates consistent with the privacy policy, legal requirements, and operational risk tolerance.
8. **Maintain notices.** Maintain notices to individuals consistent with the privacy policy, legal requirements, and operational risk tolerance.
9. **Maintain procedures for inquiries & complaints.** Maintain effective procedures for interactions with individuals about their Personal Data.
10. **Monitor for new operational practices.** Monitor operational practices to identify new processes or material changes to existing processes and ensure the implementation of Privacy by Design principles.
11. **Maintain Privacy breach management procedures.** Maintain an effective data privacy incident and breach management program.
12. **Monitor data handling practices.** Verify that operational practices comply with the privacy policy and operational policies and procedures.
13. **Track external criteria.** Track new compliance requirements, expectations, and best practices.

Responsibilities

1. The **Chief Ethics & Compliance Officer** is responsible for and will act as sponsor for the Global Privacy Program, reviewing the Global Privacy Program on an annual basis, promoting continuous improvement, and reporting compliance progress to the Executive Compliance Council and the Governance Committee of the Board of Directors. The Global Privacy Program is part of Johnson Controls' Ethics and Compliance Program.



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2. The **Privacy Office** shall manage the Global Privacy Program operations to ensure that it meets its goals and operational targets, and is communicated effectively within the enterprise. The Privacy Office will also ensure that the members of the Global Privacy Community are properly involved in the Global Privacy Program. The Privacy Office will provide adequate communication platforms for the Privacy Community for best practice exchange access to privacy related resources.
 - a. The Privacy Office will consist of:
 - i. The Chief Privacy Officer;
 - ii. The Privacy Program Leader and Managers; and
 - iii. Privacy Counsels.
 - b. The **Chief Privacy Officer** is responsible for providing guidance to the Global Privacy Program, including responsibility for promoting compliance with applicable regulations, defining organizational requirements in alignment with applicable local and international legal requirements, and with Johnson Controls' Global Privacy Program. The Chief Privacy Officer is the enterprise lead of the Global Privacy Program and is responsible for managing the Binding Corporate Rules and the cooperation with regulatory authorities. The Chief Privacy Officer shall periodically report to the Chief Ethics & Compliance Officer and senior leadership regarding the activities and efficacy of the program.
 - c. The **Privacy Program Leader and Managers** are responsible for organizing the activities of the Global Privacy Program in line with the Privacy Management Processes as described in section 6. They will also act as project managers for the program.
 - d. The **Privacy Counsels** are responsible for providing advice and counsel regarding privacy laws and regulations within their respective regions.
3. The **Privacy Community** shall consist of the members of the Privacy Office, the Data Privacy Officers, Local Data Privacy Coordinators, Subject Access Request Coordinators, and such other members as the Privacy Office shall request from time to time.
4. The **Data Privacy Officers (DPO's)** are responsible for coordinating, reporting and promoting compliance with locally applicable data protection regulations in alignment with Johnson Controls



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Global Privacy Program for a defined geography, business, and/or group of legal entities (hereafter Business Area). The DPO reports to the local entities' general management and to the Chief Privacy Officer (dotted line). DPOs will be appointed to comply with local legal requirements. Where DPOs are optional, Johnson Controls may appoint DPOs at its discretion. DPOs will act as the primary point of contact for the local Data Protection Authority (DPA). DPOs must maintain sufficient knowledge of and expertise in the applicable Data Protection Regulation in their Business Area. The DPO role can be performed in addition to another role within Johnson Controls, provided, however, that the combination of roles does not constitute a conflict of interest.

5. The **Local Data Privacy Coordinators (LDPC's)** are responsible for coordinating, reporting and promoting compliance with locally applicable data protection regulations in alignment with Johnson Controls Global Privacy Program for a Business Area. Such LDPC's will be part of the Privacy Community and support the Privacy Office in Privacy compliance activities related to the LDPC's Business Area. Such LDPC role can be assigned in jurisdictions where the appointment of an official DPO is not required.
6. The **Subject Access Request Coordinators (SAR Coordinators)** are responsible for receiving, coordinating and responding to subject access requests in compliance with local law and in conjunction with the applicable Privacy Counsel.
7. **Business and functional leaders** are responsible for ensuring that their specific activities, processes and policies are in compliance with the Global Privacy Program within their Business Unit(s), region or area of responsibility, as applicable, including adherence to the Privacy Policy and the Binding Corporate Rules.
 - a. The **Vice President, Human Resources** is responsible for employee data privacy and employee related processes.
 - b. The **Chief Information Technology Officer** is responsible for providing support to the Global Privacy program and ensuring IT processes are in compliance with the Global Privacy Program.
 - c. The **Vice President of Internal Audit** is responsible for providing input and resources to the program and supporting the auditing process of the Global Privacy Program.



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- d. The **Chief Information Security Officer** is responsible for defining IT policies and controls in compliance with the Global Privacy Program.

Continuous Improvement

The Privacy Office shall review the Privacy Policy on a regular basis to ensure its continuing suitability and adequacy in light of changes in privacy regulations, laws, and advances in technology and the Johnson Controls business.

Privacy Documentation

The Privacy Office will maintain and structure program documentation, policies and procedures related to the Global Privacy Program and make them available to the appropriate audiences. Public documents will be published on Johnson Control's public website, internal documents for employees will be made available on the employee Privacy portal, and the documents intended for the Privacy Community will be stored on a structured and secured repository.

Privacy audits

The Privacy Office supports the Internal Audit team to maintain the Privacy audit protocol and to perform a yearly cycle of Privacy audits according to the agreed protocol.

The local management of the audited locations, the local Privacy Point of Contact (DPO, LDPC, HR Data Stewards), the Vice President of Internal Audit, the Chief Privacy Officer, and the Chief Ethics & Compliance Officer will be informed about Audit findings and responsible for follow-up actions.

Non compliance

All Johnson Controls employees should respect the principles described in the Privacy Policy, the corresponding rules in the Binding Corporate Rules and the related policies and procedures.

Noncompliance with Johnson Controls Privacy Policy results in violation of the Ethics Policy. Violations of the Ethics Policy are subject to disciplinary action up to and including termination.



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References

- a. Johnson Controls Code of Ethics
- b. Employee Personal Information Privacy Notice
- c. Public Privacy Notice
- d. Privacy Data Subject Rights Policy
- e. Binding Corporate Rules