



# How has United Technologies addressed the GDPR requirements

## What is the GDPR ?

The General Data Protection Regulation (“GDPR”), effective May 25, 2018, is a law intended to protect Personal Data<sup>1</sup>.

GDPR requires companies to implement certain practices addressing the proper collection, processing and sharing of Personal Data. The GDPR applies to the processing of Personal Data in the context of activities of any entity based in the EU, whether or not the processing itself takes place within the EU, and to entities processing the Personal Data of Data Subjects who reside in the EU, where goods or services are offered to such Data Subjects or the behaviour of such Data Subjects is monitored in the EU.

To ensure that companies are treating such Personal Data with adequate care, they must put in place appropriate processes to

collect, process and share Personal Data of above mentioned Data Subjects :

- **collection** : Companies must identify the purpose(s) for which they collect Personal Data and provide adequate notice to the Data Subjects whose Personal Data they are collecting ;
- **processing** : Companies must process Personal Data based on, at least, one of the lawful basis identified in the GDPR and subject to appropriate technical, administrative and contractual protections, as well as in accordance with the major principles set forth in the GDPR ;
- **sharing** : Companies must implement certain technical and contractual protections when sharing Personal Data with other companies, especially when they are sent across borders.

## How is UTC complying with the GDPR ?

We, at United Technologies Corporation (“UTC”), are committed to protecting the Personal Data of our customers, employees, contractors, and business partners.

We developed a GDPR action plan following review of our policies, processes and products.

The major components of that action plan are :

- updating our internal policies on how we collect, process and share Personal Data ;
- updating our **privacy notices** to provide all of the details required by GDPR ;

- revising our contract clauses for processing and sharing Personal Data ;
- establishing appropriate mechanism for the international transfer of Personal Data, including the adoption of Binding Corporate Rules (“BCRs”), which are considered the gold standard for data protection and are publicly available in multiple languages at <http://www.utc.com/Pages/Privacy.aspx> ; and
- implementing data protection by design (also known as privacy by design) so that our products, services, and technologies incorporate privacy principles into the design.

## How does this affect UTC products ?

We want to help our clients and partners comply with GDPR requirements. We understand our customers, as end-users of our products, shoulder the primary responsibility for collecting, processing and managing Personal Data.

That’s why we are committed to integrating “Privacy by Design” and “Privacy by Default” principles in our product development. Privacy by Design means we consider data protection from conception in our systems and product design, rather than as

a post-design add-on. As part of its product assessment, UTC involves its Data Privacy experts in the design process to make GDPR compliance easier for our customers and their end-users. Privacy by Default means that we provide products pre-set with privacy settings and allow customers to configure the options.

UTC is committed to data privacy compliance. If you have any remaining concerns or questions, please contact : [privacy.compliance.ccs@utc.com](mailto:privacy.compliance.ccs@utc.com)

<sup>1</sup> Personal Data is any information relating to an identified or identifiable natural person (called a “data subject” in GDPR) ; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.