



# **SECTION 24:**

## **Data Privacy**

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## **A. SUMMARY**

Carrier's aspiration is the creation of solutions that matter for people and our planet because we are convinced that technological innovation and new uses of data play an integral role in helping to solve the societal and ecological challenges we are facing today.

In doing so, Carrier serves as a catalyst for innovation and emerging technologies, including cloud-native platforms and other connected products; data and analytics are deeply embedded into our processes and decisions.

At Carrier, we believe that technological innovation must be accompanied by strong and enforceable safeguards to respect the privacy of all individuals. We believe that respecting privacy means building a transparent culture, establishing rules and procedures to foster accountability, and which values our customers and stakeholders alike. We believe that it is possible to build a world where innovation and data privacy coexist.

Therefore, Carrier is firmly committed to protecting the privacy of all individuals from whom we collect, process, or transfer Personal Information, including our directors, officers, employees, temporary staff, contractors, sub-contractors, customers, end-users of our products and services, as well as our suppliers, and, in all our business activities, to only process Personal Information in accordance with the principles stipulated in this policy (hereafter referred to as the "Policy").

To ensure a maximum in security, Carrier is taking appropriate technical and organizational steps to safeguard Personal Information under our control from misuse, unauthorized access, disclosure, alteration, or destruction. We will only disclose Personal Information to our employees, temporary staff, contractors, sub-contractors and Service Providers, as well as other Third Parties having a legitimate business, and on a strict need to know basis, as permitted by applicable law, and under appropriate legal and contractual restrictions.

## **B. PRIVACY PRINCIPLES**

In all their activities, Carrier and its Segments will adhere to the following privacy principles:

- Collect and process Personal Information fairly, lawfully and in a transparent manner by providing appropriate written notice to the individuals whose Personal Information it collects, processes, and/or transfers ("Data Subjects") about its practices regarding Personal Information.
- Identify the specified, explicit and legitimate purpose(s) for which it is collecting Personal Information and not process the Personal Information in a manner that is not compatible for any different purpose(s), unless supported by consent, a legal obligation, a threat of physical harm, or (as permitted by law) a legitimate interest.
- Endeavor to ensure that the collection, processing, and transfer of Personal



Information is adequate, relevant (the minimum amount needed) and not excessive in relation to the purpose(s) for which the information is processed.

- Maintain the Personal Information in its possession accurate and current.
- Not keep Personal Information in a form that permits identification of Data Subjects for longer than needed for the purpose(s) for which it was collected, unless otherwise required by law or with consent.
- Enable Data Subjects to exercise their rights under the applicable Data Privacy Laws, including the rights of access, correction, objection, and portability.
- Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing, as well as the risk of varying likelihood and severity for the rights and freedoms of the Data Subjects, use and maintain appropriate technical, physical and organizational measures to ensure a level of security appropriate to the risk and to prevent unauthorized or unlawful processing of Personal Information and to prevent against accidental loss or destruction of, or damage to, Personal Information.
- Not transfer Personal Information from one country to another or from one legal entity to another, unless properly supported by law and an adequately secured technical and contractual process, such as an intra-group data processing and transfer agreement or the Carrier Binding Corporate Rules. The Carrier Binding Corporate Rules (<https://corporate.carrier.com/BCR>) form therefore part of this CPM24.
- Offer appropriate opportunities to opt-out when using Personal Information for direct marketing.
- Ensure that an individual is given the chance to discuss the results of any automated decision-making (such as background checks).
- Collect and process Sensitive Personal Information only as permitted by applicable law, explicit consent, or any legitimate lawful basis.
- Maintain a robust Personal Information Breach Response Plan to respond to and remediate any Personal Information Incident.
- Process Personal Information in a manner that always can demonstrate the way in which Carrier, and its Service Providers, process Personal Information in accordance with the requirements set forth in this Policy and the applicable Data Privacy Laws.

### C. OWNERSHIP AND APPROVAL

This Policy is owned by the Carrier Chief Privacy Officer (“CPO”) and will be reviewed by the Carrier CPO annually following its issuance and changed where needed, or as dictated by changing legal requirements. Carrier will notify employees of any material changes of this Policy and publish pertinent updates to required notices.

### D. DEFINITIONS

All capitalized terms are defined either in [CPM 1: Governance and Definitions](#) or in CPSW 24A 1.0