



Data Privacy Compliance

Carrier recognizes the importance of data privacy laws and has implemented privacy-related governance and a global policy to enhance compliance.

HOW CARRIER ADDRESSES DATA PRIVACY REQUIREMENTS

Data Privacy Laws

National and regional governments around the world are adopting data privacy laws, introducing new and more stringent requirements on the use and retention of Personal Data*. Many data privacy laws contain extended jurisdiction, meaning that they apply to entities established outside of the region who have business or data subjects in that region. Carrier recognizes the importance of these data privacy laws and has implemented, on a global level, an internal privacy-related governance scheme and privacy policy.

How is Carrier complying with Data Privacy Laws

Carrier Corporation ("Carrier"), is committed to protecting the Personal Data of our customers, employees, contractors, and business partners. We developed a Global Data Privacy and Compliance Program, following the review of our policies, processes and products. The major components of that program are:

- Ensuring that processes linked to personal data protection are up to date, correctly implemented, applied by all personnel, globally, and adapted where needed;
- Updating our privacy notices to provide all of the details required by Data Privacy Laws;
- Revising our contract clauses and putting in place the necessary data processing agreement for processing and sharing of Personal Data;
- Assessing high risk data and processing activities and developing mitigating solutions to prevent or reduce risks;
- Implementation of a robust 'Personal Data Breach Response Plan', which addresses the appropriate response to and remediation of any actual data breaches;
- Process for handling requests for rights and complaints;
- Application of robust data protection and information security policies and procedures;
- Establishing appropriate mechanism for the international transfer of Personal Data;
- Implementing data protection by design (also known as "privacy by design") so that our products, services, and technologies incorporate privacy principles into the design;
- Regular and ongoing employee training (online and in-person);
- DPIA (risk assessment) of tools, systems, and suppliers beyond GDPR and other local legal data privacy requirements;
- Practical and ongoing phishing awareness campaign for all employees and consultants working on Carrier's network;
- A maintained governance infrastructure capable of ensuring compliance with data privacy.
- A reporting channel called "Speak Up" to report data breaches and suspected non-compliance of our privacy program, anonymously if preferred.



Identify

Make sure you know where Personal Data is kept.



Comply

Manage processing, access to and deletion of Personal Data and comply with Data Subject requests.



Protect

Establish security procedures to protect Personal Data.



Record

Keep a record of your procedures.



Monitor

Prevent data breaches and report them.

How does this affect Carrier products

We want to help our clients and partners comply with data privacy requirements. We understand our customers, as well as the end users of our products, depending on the circumstances, bear 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. Privacy by Default means that we provide products pre-set with privacy settings and allow customers to configure the options. Please consult our products-related leaflets for more information.

Carrier BCRs — the Gold Standard regarding data protection

Carrier has secured BCRs ("Binding Corporate Rules"), internationally recognized as the Gold Standard for protecting and transferring Personal Data Approved Binding Corporate Rules | European Data Protection Board (https://edpb.europa.eu/our-work-tools/accountability-tools/bcr_en).

Authorities regard BCRs as the best option for protecting individuals' privacy rights within a group of companies, like Carrier. They are recognized as a lawful transfer mechanism to internally safeguard Personal Data transferred out of the European Union (EU) and the UK. They provide a consistent set of rules on internationally transferring the Personal Data of employees, customers and other involved individuals, regardless of where such data is processed.

The Carrier BCRs are embedded within our existing global policies and procedures, providing Personal Data with an extra level of governance. The Carrier BCRs became legally binding once the Data Protection Authorities approved them in 2021. The content of Carrier's BCRs are published here: link (<https://corporate.carrier.com/BCR>).

Carrier is committed to data privacy compliance. If you have any further questions, please contact privacy@carrier.com.

* Personal Data means information relating to an identified or identifiable natural person. This is any information relating to a natural person, identified or identifiable, directly or indirectly, in particular by reference to an identifier, such as an identification number, name or one or more factors specific to the person's physical, physiological, mental, economic, cultural or social identity.