

## UTC EMPLOYEE PRIVACY NOTICE

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This Privacy Notice describes how United Technologies Corporation and its business segments, units, divisions, and all other operating entities wherever located – including controlled joint ventures, partnerships and other business arrangements where United Technologies Corporation has either a controlling interest or effective management control (collectively, “UTC” or “we”) – collect, process, transfer, share, and retain Personal Information of employees. UTC is committed to securing and protecting employee Personal Information. The term “Personal Information” is defined in [UTC Corporate Policy Manual Section 24](#).

This Notice may be amended from time to time as needed to reflect any changes in UTC’s practices and policies. Notice will be given concerning such amendments by posting on [privacy.utc.com](http://privacy.utc.com). Employees who do not have access to this site may request a copy of the notice from their Human Resources (“HR”) representative and UTC will make efforts to alert employees when we make changes to this Notice. This Notice is intended to cover UTC’s employees globally, so some of the practices described in this Notice may not apply to you. This Notice may be supplemented with a local notice where required by law or to reflect local or regional practices.

### **What Personal Information might UTC collect from employees?**

UTC may obtain your Personal Information directly from you or indirectly, such as from prior employers, recruitment agencies, public records sources, and other third parties. The Personal Information UTC collects is subject to local legal and employee representative agreement requirements.

Because the list below is for all of UTC, there may be data elements included here that do not apply to your specific situation. Please contact your HR representative if you have any questions.

- Name, including given, family, middle, and any suffix (such as Junior or Senior)
- Identification numbers (in whole or in part), such as an employee identification number, tax identification number, social security/insurance number, or other government-issued identification number or card, such as a national identification card, driver’s license, visa, passport, or other government-issued document
- Work contact information, including telephone numbers, facsimile number, email address, pager number, mailing address, and work location
- Home contact information, including home address, home phone numbers, personal mobile phone numbers, and personal email addresses
- Basic identifying information, such as date of birth and gender
- Work experience, education and job history, language skills, other skill categories, licenses, certifications, awards, memberships to and participation in trade associations or professional organizations, and authorizations to perform a certain job
- Information about your job, including job title, department, job function, job type, job classification/grade, employment contract and cost center
- Information about your employer, including company name, company location, and country of incorporation
- Organizational chart information, such as the identification of your supervisor, assistant and/or direct reports
- Information required for badges, such as a photograph and your authorization to access certain locations
- Compensation and benefits information, including identification data for your beneficiaries and dependants (such as name, date of birth, gender, government identification numbers, address, and other data that may be required) and information related to specific benefits programs

- Training, continuing education, development, and performance review information
- Succession planning information
- UTC computer, network, and communications information and logs covering the use of company phones, computers, electronic communications (such as email and electronic calendars), and other information and communication technology, including but not limited to username/login identification, passwords, answers to security questions, and other information required to access UTC applications, networks, systems, and services as well as information that you store, send, submit, or receive through UTC's networks and systems
- Time collection and allocation information
- Work assignments and work product that may include a connection to you, such as but not limited to documents and files with you identified as the author and tasks assigned to you
- Visitor information, including the time, date, and location of visits, information regarding a vehicle for parking purposes, and information necessary to maintain visitor logs and screening
- Event registration information, such as your desire to attend an event, food preferences, and travel arrangements
- Information about your work preferences, such as travel and location preferences
- Information that you volunteer to include in a profile in electronic systems, including but not limited to a nickname, photograph, and interests
- Emergency contact information, which may include information about non-employees, such as family members or friends that you choose to identify as your emergency contact
- Other data required to support human resources applications, payroll, travel and expense administration, including but not limited to bank and credit card account information

Depending on local requirements and law, UTC may also collect:

- Passport information, place of birth, citizenships held (past and present), and residency status
- Screenings required for on-boarding, such as hearing checks, medical examinations, drug screening, and/or background check information
- Information regarding health and injuries, such as disability, sickness leave, maternity leave, and other information that may be required to administer human resources and environmental, health and safety requirements
- Military service information
- Photographs, audio and video, or biometric information (e.g., fingerprint, iris scan, or voice recognition)
- Location information, such as for applications and devices that require global positioning data (also called location tracking)
- Information that may be required for security clearance or international trade compliance regulations to permit your access to certain technologies or other information related to your job, including travel history, personal and/or professional contacts, and other information that may be requested for a substantive contacts screening
- Information about family status and members, such as marital status, the name of your parents, a maiden name, and information regarding your dependants
- Other information, to the extent required by local law, such as race, religion, or political party or trade/labor union affiliation

In countries that impose special protections on Sensitive Personal Information (defined in [Corporate Policy Manual Section 24](#), Exhibit 1), UTC will only collect, process, or transfer your Sensitive Personal Information as required by law or, in circumstances where providing the data is optional, with your explicit consent.

## For what purposes might UTC use your Personal Information?

- Managing your employment, including:
  - Compensation and benefits, including establishment and administration of benefit plans
  - Payroll administration, such as for deductions and contributions
  - Career development, performance feedback and progression
  - Rewards and recognition
  - Time collection and allocation
  - Travel and expense reimbursement, including travel and/or credit card administration
  - Training
  - Relocations, letters of assignment, support for expatriate employees, visas, licenses and other right-to-work authorizations
  - Tax reporting and withholdings
  - Maintenance of employee and officer biographies, curriculum vitae and similar information
  - Email systems and organizational charts
- Staffing and succession planning
- Conducting regular business operations, including without limitation:
  - engaging in research
  - designing and developing products, services and technologies
  - analyzing costs and expenses, including without limitation salary and travel and expense data
  - sharing of information with customers and business partners (information shared with customers and business partners is limited to data required for work purposes, such as business contact information)
- Responding to situations involving a risk of health or safety, including an emergency
- Managing communications and notices to employees
- Conducting employee engagement surveys and charity campaigns
- Managing labor and employee relations, including grievance proceedings
- Planning and providing health and safety programs and services, including drug screening, processing of workers' compensation, and similar health and safety programs
- Reporting and statistical analyses, including global enterprise headcount, demographics and reporting required by applicable law, such as right-to-work screening, workplace environment, health and safety reporting, and administration
- Managing physical security, including
  - Access controls and security
  - Facility access and safety
  - Disaster preparedness
- Managing and securing Information Technology ("IT") systems, such as computer networks, email, internet access, Enterprise Resource Planning ("ERP") systems, and workflows, including:
  - Access controls and security for computer and other systems
  - Internet, intranet, email, social media, and other electronic system access
  - Virus, intrusion, and insider threat scanning and analysis
  - Creation and analysis of logs for security and helpdesk purposes
  - Providing helpdesk support and system maintenance activities
  - Backing up and recovering data and providing disaster recovery services
- Overseeing location tracking, duration, and other telematics of certain UTC assets and for certain applications for management of services provided, security, safety and efficiency
- Ensuring compliance with import, export and other international trade controls, including managing registrations and authorizations, determining access to controlled technologies and/or commodities, and screening for sanctioned or restricted countries or parties

- Responding to questions or concerns submitted to the UTC Ombudsman program
- Performing audits and compliance reviews to ensure compliance with applicable policy, regulation, and law
- Evaluating and reporting conflicts of interest
- Conducting and managing internal and external investigations, including Legal, Global Ethics & Compliance, and International Trade Compliance reviews and any resulting disclosures to government agencies
- Prosecuting and defending claims in litigation, arbitration, administrative, or regulatory proceedings, including but not limited to pre-dispute activity, evidence collection, discovery, litigation holds and e-discovery efforts
- Responding to law enforcement and other government inquiries
- Protecting intellectual property rights, including but not limited to patent filings
- Business planning, including planning for or executing mergers, acquisitions and divestitures
- Facilitating investor management activities for those employees who may have rights to UTC stock
- As required or expressly authorized by applicable law or regulation

### **With whom does UTC share the information it collects?**

Internal access to employee Personal Information is provided on an as-needed basis. For example, Human Resources and Payroll professionals within the company worldwide have access to Personal Information related to their areas of responsibility. A limited number of individuals have access to all Personal Information in certain UTC IT systems due to their responsibilities for worldwide human resources programs. Managers and supervisors have access to work-related information about their employees, but not to all Personal Information.

Personal Information is used by and shared among UTC operating companies, subsidiaries, divisions or groups worldwide for the purposes identified above. We may also share your business contact information with customers, potential customers, and business partners to support regular business operations. When UTC transfers your Personal Information among its businesses, it will do so consistent with applicable law and UTC's Corporate Policy Manual, including UTC's [Binding Corporate Rules](#), which are contained in [Corporate Policy Manual Section 24](#).

In addition, UTC may provide access to or share Personal Information on an as-needed basis with third parties, such as trusted service providers, consultants and contractors who are granted access to UTC facilities or systems, and with government agencies and others as required by law. UTC will only share your Personal Information outside the UTC group of companies to:

- Allow service providers UTC has retained to perform services on our behalf. In those cases, UTC will only share the information with service providers for the purposes outlined above. These service providers are contractually restricted from using or disclosing the information except when it is necessary to perform services on our behalf or to comply with legal requirements.
- Comply with legal obligations, including but not limited to complying with tax and regulatory obligations, sharing data with labor/trade unions and works councils, and responding to a court proceeding or a legitimate legal request from law enforcement authorities or other government regulators
- Investigate suspected or actual illegal activity
- Prevent physical harm or financial loss
- Support the sale or transfer of all or a portion of our business or assets (including through bankruptcy)

## Where does UTC store your Personal Information?

Because UTC is a global company with locations in many different countries, we may transfer your information from one legal entity to another or from one country to another in order to accomplish the purposes listed above. These countries include, at a minimum, the United States, Mexico, Canada, many countries in Europe, and other countries, including (without limitation) some in Asia, Africa, and the Middle East. We will transfer your Personal Information consistent with applicable legal requirements and only to the extent necessary for the purposes set forth above.

UTC relies on available legal mechanisms to enable the legal transfer of Personal Information across borders. To the extent that UTC relies on the standard contractual clauses (also called the model clauses) or Binding Corporate Rules to authorize transfer, UTC will comply with those requirements, including where there may be a conflict between those requirements and this Notice. To read UTC's [Binding Corporate Rules](http://www.utc.com/Pages/Privacy.aspx), please use the dropdown menu on <http://www.utc.com/Pages/Privacy.aspx>.

## What choices do you have about how UTC uses your Personal Information?

Your Personal Information is critical to UTC's human resources management worldwide. As a result, unless contrary to local law, collective bargaining, or works council restrictions agreed to by UTC, collection and use of your Personal Information as described in this notice is generally required for your employment. Your Personal Information is required to pay you, manage your employment, and comply with legal obligations, such as tax laws and compliance regulations.

Depending on the location in which you work, local laws may require that you provide specific consent for the collection, use and/or disclosure of Personal Information in certain circumstances. Where required, UTC will ask for such consent by appropriate and permitted means.

## How long does UTC retain Personal Information?

UTC retains your human resources Personal Information for the length of your employment and for any additional period as required by applicable law or regulation, court, administrative or arbitration proceedings, or audit requirements. For more specific information about retention of your human resources information, please contact your local HR representative.

Otherwise, UTC may retain data that is required for business and legal purposes, such as but not limited to data: (a) required for legitimate business purposes, for example working files on customers, products, services, technologies, business partners and other work-related efforts that may incidentally contain information about you; (b) that you saved in shared storage areas, subject to applicable retention periods; (c) subject an active legal investigation, judicial or administrative proceeding, audit, or other legal requirement; and (d) that UTC is required to retain under a contractual, legal, regulatory, or audit obligation.

## What additional information should specific employees know?

**Employees from the EU and other countries with privacy laws, such as Colombia, Serbia, and the Philippines:** You have the right to request access to and correction or erasure of your Personal Information, seek restrictions on or object to the processing of certain Personal Information, and seek data portability under certain circumstances. To contact UTC about a request to access, correct, erase, object or seek restrictions or portability, please use the contact methods indicated at the end of this notice. You also have the right to lodge a complaint with your national or state data protection authority, which may also be known as a supervisory authority. You may also be provided with a supplement that provides contact information for your national or local government regulator. If you need assistance identifying your data protection authority, contact your Privacy Professional or Data Protection Officer (listed on [privacy.utc.com](http://privacy.utc.com)).

**Employees from the US:** UTC collects Social Security Numbers where required by law, such as for tax and payroll purposes. When UTC collects and/or uses Social Security Numbers, UTC will take proper care by protecting confidentiality, limiting collection, ensuring access on a need-to-know basis, implementing appropriate technical safeguards, and ensuring proper disposal.

**Employees who provide information about family members and others:** For emergency contact information, to cover dependents with available benefits, and to identify beneficiaries, you may choose to provide UTC with information about family members and others connected to you. Before providing that information to UTC, you must ensure that you have the legal authority to do so. To the extent that you provide information as the legal representative of minor children, your choice to provide the information represents consent that UTC may collect, process, and transfer the information for the purposes for which it was provided and as set forth in this Notice.

**How can you access, correct, change, or seek deletion or a copy of your Personal Information?**

Many individuals have direct access to most of their Personal Information contained in various UTC HR systems and can access, correct, change, delete, or copy their Personal Information using that direct access. Upon request, UTC may also grant individuals reasonable access to Personal Information that is otherwise inaccessible. Those individuals who do not have direct access or who seek additional access should contact their local HR representative. For requests related to your Personal Information outside of human resources data, contact your local Ethics and Compliance Officer, your Data Protection Officer, or your Privacy Professional (see below for more details). There may be legal or other reasons why requests for access, correction, change, deletion, or to obtain a copy will be denied either in whole or in part.

**How can you contact UTC?**

If you have a question or concern about your Personal Information or want more information about which UTC entities are the data controllers for your Personal Information, you should contact your local HR representative, local Ethics and Compliance Officer, the Ombudsman program, or your Privacy Professional or Data Protection Officer. You can contact the Ombudsman program by:

Internet	<a href="http://ethics.utc.com/Pages/Ombudsman%20Program.aspx">http://ethics.utc.com/Pages/Ombudsman%20Program.aspx</a>
Mail	United Technologies Corporation, Attention: Ombudsman Program 10 Farm Springs Road Farmington, CT 06032 USA

The list of Privacy Professionals and Data Protection Officers is available on [privacy.utc.com](http://privacy.utc.com). You can contact the UTC Privacy Office at [privacy.compliance@utc.com](mailto:privacy.compliance@utc.com). The list of Ethics and Compliance Officers are available on [ethics.utc.com](http://ethics.utc.com).

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