



General
Data
Protection
Regulation



HOW HAS CARRIER 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 Data¹.

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, administration 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 Carrier complying with the GDPR ?

We, at Carrier Corporation ("Carrier"), are committed to protecting the Personal Data of our customers, employees, contractors, and business partners.

We developed a GDPR compliance program, following the review of our policies, processes and products.

The major components of that compliance program 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; 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 Carrier products ?

We want to help our clients and partners comply with GDPR 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. As part of its product assessment, Carrier 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. Please consult our products-related GDPR leaflets for more information.

Carrier is committed to data privacy compliance. If you have any remaining concerns or questions, please contact :

privacy.compliance@carrier.com

¹ 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.



GDPR effective
at 25 May 2018