

# The Otis Global Privacy Notice

Otis Worldwide Corporation and its subsidiaries and affiliates (collectively, "Otis") respect your privacy. We use technical, administrative, and physical measures to safeguard the personal information entrusted to us.

We collect information through our contractual relationships, correspondence, your interactions with our websites and via social media, through our applications and in our interactions with end users of our products, all of which are governed by this Otis Elevator Global Privacy Notice (the, "Otis Privacy Notice") unless otherwise specifically stated or agreed.

The personal information of our Employees and those seeking employment with are us are governed by the Otis Employee Privacy Notice and an Otis Job Applicant Privacy Notice.

This Otis Global Privacy Notice ("Otis Privacy Notice") describes our practices as they relate to the collection and processing of personal information generally. Otis complies with applicable legal requirements and refrains from collecting or using personal information in a location or in a manner prohibited by local law. By providing personal and other information to us you agree to the terms and conditions of this Privacy Notice.

## What personal information does Otis collect?

The types of data that Otis collects are listed below. Because this Otis Privacy Notice covers a wide variety of situations, there may be data elements listed here that do not apply to your specific situation. Please contact us as described in the "[How to Contact Otis](#)" (*located at end of document*) section below if you have any questions.

- Name, including given, family, middle, any suffix (such as Jr. or Sr.) and salutation (such as Mrs. or Mr.)
- Basic identification information, such as date of birth, gender, and/or relationship to Otis (e.g., employee, employee relative, beneficiary, customer, end user, supplier)
- Country of birth, citizenship held (past and present), and permanent residency status, as required or permitted by applicable law
- Language and communication preferences
- Work contact information including telephone number, email address, mailing address and work location
  
- Home address, personal email address and home telephone number, including personal mobile telephone number
- Emergency contact information (which may include third party personal information that you provide to us)
- Device location, including geographic location data, and other security authentication data from your personal computing device or telephone for certain types of employees, vendors pursuant to a contract, and customers and end users who opt in
- Otis computer, network, and communications information and logs covering the use of company phones, computers, electronic communications (such as email and electronic calendars),

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- Information about how you or your company engage with Otis products and services, including your personal preferences
- Employment details including job title, department, job function, cost center, and names of your supervisor and assistant
- Employer details including company name(s), company location(s), company address(es), and jurisdiction of incorporation
- Work experience, education and job history, skill categories including language skills, licenses, certifications, authorization to perform certain work, membership to a participating trade association or union or membership to a professional organization
- Training, development, and performance review 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 or your company
- Military service information as required by applicable law or as submitted to us voluntarily
- Environmental, health and safety information including injury related information
- Agreements, programs, and activities in which you participate
- Payment and invoice-related information, including government identification numbers and bank account numbers
- Information collected through voluntary surveys or promotion or through use of products or services
- Record of any incident that occurs on Otis premises, in or about an Otis vehicle, or at a customer location if the elevator is maintained or made by Otis
- Travel and expense information related to work assignments, including visa information, expense details for any expense submitted for Otis to pay, and information gleaned from audits conducted to ensure compliance to travel policies or vendor contract terms
- Information collected as part of an assignment or access to certain customer or Otis facilities, such as time and attendance data, badge information, photographs, audio, video, biometric information (e.g. fingerprint, iris scan or voice recognition), or geographic location data used for a particular role or assignment but such collection will be known, transparent, and consistent with applicable law
- Required screenings, such as a medical examination, drug screening (where permitted), and background check information as required or permitted by applicable law
- Information that may be required for international trade compliance regulations to permit your access to certain technologies, products or as may be required for a particular assignment or visit as required by applicable law
- Government issued identification numbers (in whole or in part), such as a tax identification number, Otis assigned identification number, social security/insurance number, government issued driver's license number, visa, passport, or other document number
- Qualifications to serve as a vendor, including confirmation of conflicts of interest which may involve third party references
- Visitor information, including time, date, and location of visits, information regarding a vehicle for parking purposes, and information necessary to maintain visitor logs and to conduct denied party screening
- Listing of gifts that may have been provided to you or received from you (nominal or otherwise)
- Location information for certain sites that provide location-based services, such as maps, access to printers based upon location, or availability of nearby conference rooms, but such collection will be known and transparent
- Information relating to your participation in a conference or meeting including without limitation, hotel reservation information, flight information including airport, flight number and arrival and departure times, dietary preferences or restrictions, and travel companions
- Information provided to facilitate a service or request assistance, such in the event of an entrapment in an elevator, or a call to an Otis office or to our OtisLine™ call center

- Information required to process a claim or provide requested benefits or services, which may include health information, government identification numbers, location information, or other information necessary in order for Otis to properly process the claim
- Any information that a person chooses to include in a document that is part of a legal proceeding involving Otis.

## How might OTIS use the personal information it collects?

Otis will use your personal information only for legitimate business interests, to fulfill a legal obligation or to meet our contractual obligations as described in this Otis Global Privacy Notice. Because this Otis Privacy Notice covers a wide variety of situations, there may be enumerated uses listed here that do not apply to your specific situation. Please contact us as described in the “How to Contact Otis” section below if you have any questions. Otis may use your data to:

- Conduct regular business operations, including managing our contractual commitments, our obligations to regulators and authorities, supplier management, customer engagement, and the development of new products and services
- Provide the information, item, or service you have requested, this may include the use of geographic location data for certain applications to facilitate services such as granting access to a building or elevator or enabling integrated features of our elevator services
- Provide you with customized services and content relevant to your specific needs and interest
- Manage our local and centralized operational databases including without limitation our enterprise resource planning tools (ERP), our customer database, and our call center database OtisLine™
- Evaluate the effectiveness of our marketing and social media campaigns, usefulness of our products and services (including our apps) by tracking performance, assessing engagement, and conducting business analytics
- Develop new offerings, improve the quality of our products, improve personalized user experience, and better prepare future products and content based upon the collective interests of our users
- Manage invoices and payments for both accounts payable and accounts receivable
- Respond to situations involving a risk of health or safety, including both in an emergency situation as well as the deployment of safety initiatives
- Provide health and safety programs and services, including drug screening (this may include on site health screening, annual health certifications as required by law in some jurisdictions, and drug screening where permitted and deemed appropriate or necessary)
- Manage physical security, including issuance of access controls and disaster preparedness
- Manage, maintain and secure information technology systems, such as computer networks, email, internet access, and access to our product related systems such activity includes
  - Verifying your identity for 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 analytics
  - 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
- Conduct reporting and statistical analysis, including global headcount, demographics and related cost information
- Oversee location tracking, duration, and other telematics of certain assets and applications for management of services provided, security, safety, efficiency, and your convenience
- Ensure and confirm compliance with import, export, and other international trade controls, including managing registrations and authorizations, access to controlled technologies and/or commodities, and screening for sanctioned or restricted countries or parties.

- Respond to ethics questions, concerns, and complaints
- Perform audits and compliance reviews and internal investigations (including those resulting from allegations brought to our attention) to ensure and confirm compliance with applicable policy, regulation and law, ethics, and trade compliance and reporting resulting findings and disclosures to our leadership, management, and where appropriate or required or appropriate to regulators
- Evaluate and report conflicts of interest (including tracking business gifts)
- Address environmental, health, and safety issues, including injury and damage claims and implementation of controls and corrective actions
- Prosecute, defend and negotiate claims which could include litigation, arbitration, administrative or regulatory proceedings, including pre-dispute activities such as mediation, discovery and the collection of evidence
- Secure and protect intellectual property rights including but not limited to patent filings
- Forecast and plan for our business operations
- Plan for, evaluate, or execute mergers, acquisitions, divestitures (including due diligence and integration activities)
- Support the sale or transfer of all or a portion of our business or assets (including through bankruptcy)
- Facilitate investor management and investor services activities
- Document participation in trade associations and professional organizations
- Administer marketing and sales campaigns and customers surveys
- Manage joint ventures, distribution channels and sales representative relationships
- As otherwise reasonably foreseen or as expressly authorized by applicable law or regulation

Otis may transfer your data to third parties to assist Otis in conducting its business as described herein. But Otis will not sell your data.

### **Does Otis use your personal information to contact you?**

Yes. In addition to contacting you as described above, Otis may also use the information it gathers to communicate with you regarding new and modified products and services offered by Otis, or other special offers or contests. Otis may use the information to notify you of any safety concerns. Otis will of course ensure that any marketing communications will provide a simple method for you to opt-out or unsubscribe.

### **Does Otis share your information with third parties?**

Otis will not sell your personal information. Otis may share your personal information outside the Otis group of companies to:

- Service providers that Otis has retained to perform services on our behalf or on behalf of our building clients pursuant to a contract that restricts further sharing of your information except to perform services contracted for by us or as may be required to comply with legal requirements, for example, cloud service providers, system and software providers, or business consultants.
- Comply with legal obligations such as in order to respond to a legitimate legal request from law enforcement authorities or other government regulators;
- Investigate suspected or actual unethical or illegal activity;
- Prevent physical harm or financial loss; or

- Support the sale or transfer of all or a portion of our business or assets (including through bankruptcy). Secure access rights to Otis or customer facilities for the personnel of our suppliers and subcontractors;

For individuals who interact with Otis on social media sites, Otis may disclose your personal information to contacts associated with your and Otis' social media accounts, to other website users and to your social media account provider in connection with your social sharing activity as it relates to Otis, including any sweepstakes or contests that you might enter on our site. Should you elect to post information on message boards, chat, profile pages, blogs and other services to which you are able to post information and materials (including without limitation, our Social Media pages), such communications would of course be subject to the privacy notice of the social media platforms on which your content is posted. Otis is not responsible for those platforms.

### **Does Otis transfer personal information to other countries?**

Because Otis 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. We will transfer your personal information consistent with applicable legal requirements.

Otis relies on available legal mechanisms to enable the legal transfer of personal information across borders.

### **How does Otis use cookies or other tracking technologies?**

Otis may use cookies on its websites and applications. Cookies are small text files sent to and stored on user computers that allow websites to recognize repeat users, facilitate user access to websites, and allow websites to compile aggregate data for content improvement purposes. Cookies do not damage user computers or files. If you do not want cookies to be accessible by this or any other Otis website or application, you should adjust the settings on your browser program or system in your electronic device to deny or disable the use of cookies. Please note that in doing so, you may impair or fully disable your ability to use the full functionality of Otis' websites, computer and mobile applications, and social media platforms.

When you are on an Otis website, you should know that Otis monitors user traffic patterns according to a user's domain name, browser type, date and time of access and pages viewed. This information is collected in order to measure the number of visitors to our website and to determine which areas our visitors find useful. Otis uses this information to enhance a visitor's experience and to better prepare future content. A visitor to our website may be asked to provide personal information. In that event the collection of personal information will be transparent to you. You will be provided an opportunity not to share such personal information, but please know that your decision not to provide certain information may reduce the functionality or even restrict your ability to participate fully in the site's offerings. Your mobile service provider may also impose its own privacy policy on your use of their device. Otis is not

responsible for and does not control how others may collect and process your personal information.

## **What should you understand about the third-party links that may appear on this website?**

In some instances, Otis may provide links to non-Otis controlled websites, which Otis will make reasonable efforts to identify as such. Otis does not control such third-party websites, however, and cannot be responsible for the content or the privacy practices employed them.

## **How long does Otis retain personal information?**

Otis will retain personal information so long as needed to comply with its contractual and legal obligations. If the personal information is not subject to contractual or legal obligations, Otis will retain the data for as long as is required for the original purpose for which it was collected. Any personal information collected online regarding a user that has not accessed an Otis website, application or media site will be deleted from our files within a reasonable period of time unless prohibited by applicable law or required to fulfill our contractual obligations.

## **What choices do you have with respect to your personal information?**

Where possible, Otis will provide you with the opportunity to decide whether to provide your personal information. There may be circumstances in which you will not be provided with a choice, such as for IT security purposes like virus and malware screening for individuals with access to Otis networks. Some jurisdictions give individuals rights, including the right to request access, corrections, and updates to their personal information. Otis will provide a prompt response to such requests and will comply with all legal requirements concerning your personal information. Otis will use reasonable efforts to update information timely, and where required by law shall remove your personal information from the Otis files. To protect user privacy and security, Otis will take steps to verify the user identity before making any requested change. To access, change, or delete your personal information, to ask questions, or to raise concerns send an email to Otis at [privacy@otis.com](mailto:privacy@otis.com). Some of our websites, apps, and social media accounts allow you to make corrections directly at the site without need to further contact Otis.

In certain countries, such as those in the European Union, you have the right to lodge a complaint with your national or state data protection authority, which may also be known as a supervisory authority.

Please note that while we will assist you in protecting your personal information, it is up to you to protect your passwords and other access credentials from others.

## INFORMATION FOR SPECIFIC GROUPS OF PEOPLE

### For individuals in Connecticut and the rest of the United States

Otis does not collect Social Security Numbers through its websites or applications. Otis does, however, collect Social Security Numbers where required by law, such as for tax purposes. When Otis collects and/or uses Social Security Numbers, Otis 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.

### For Residents of California

Under the California Consumer Privacy Act (CCPA) California residents have certain rights concerning their personal information as enumerated in the California Code in sections 1798.110, 1798.115 and 1798.125, these include the right to:

- request details about the personal information that Otis has about you, including the categories of information, the purpose for which we use it, with whom we share it, and specific information, if any, that we have about you as an individual;
- request that your data be deleted; and
- direct Otis not to sell your data, (NOTE: Otis does not sell personal information).

Note: The rights in this section of our Otis Privacy Notice do not extend to California residents who apply or who interact with Otis as employees or those for whom Otis has your information because of your relationship with our employees (such as family members receiving health benefits or emergency contacts), contractors, job applicants or those whose information we have because of a relationship with our job applicants (such as references), and those whose information we have as a result of business-to-business interactions (such as personnel of a business customer or vendor).

If you have questions or concerns or would like to exercise your rights under provision you should contact Otis either by calling 833-833-3001 or emailing us at [privacy@otis.com](mailto:privacy@otis.com).

Please provide your name, a way for Otis to contact you (such as an email address), your relationship to Otis (customer, vendor, a member of the riding public), and the specific action you would like us to take. We will seek to verify your identity and to determine what if any of your personal information we may have. We will respond within 30 days regarding your inquiry. In some instances we may not be able to comply with your request, but we will provide you with a rationale in that event.

Otis will not sell your personal data, but may share it with third parties as described above in the section of this Otis Privacy Policy labeled **Does Otis share your information with third parties?** When we do share with third parties it will be done pursuant to terms that restrict what our vendors may do with your personal information.

In addition, the California's "Shine the Light Law", gives California residents the right to request on an annual basis information about how Otis shares personal information with other businesses for their own direct marketing use. We note, however, that Otis does not share your personal information with other businesses for their own direct marketing use.

### **For individuals in countries with privacy laws (including the EU)**

You 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 also have the right to (a) withdraw consent, (b) request access to and correction or erasure of your personal information, (c) seek restrictions on or object to the processing of certain personal information, and (d) seek data portability under certain circumstances. Otis will not use your data in automated decision making or for purposes not disclosed to you. To contact Otis about these rights or for specific details for the data controller or to contact the local Data Protection Officer please use the email address [privacy@otis.com](mailto:privacy@otis.com) and we will direct your query to the right person.

### **For parents and legal guardians**

Although the OTIS web site is not directed at children, OTIS is committed to complying with all applicable laws and requirements, such as the Children's Online Privacy Protection Act in the United States and the General Data Protection Regulation ("GDPR") in the European Union (when in effect). OTIS does not knowingly collect information from children under the age of 13 (except for employee dependents or other beneficiaries). If OTIS learns that personal information relating to a child under the age of 13 (other than that of employee dependents or other beneficiaries, including Otis scholarship or award winners) has been provided, OTIS will delete that information from its systems.

### **How might Otis change this policy?**

As Otis expands and improves this website, we may need to update this policy. This policy may be modified from time to time without prior notice. We encourage you to review this policy on a regular basis for any changes. Substantive changes will be identified at the top of the policy. We note that under the new California CCPA we are required to revisit and update this Privacy Notice annually.

### **How can you contact Otis?**

If you have questions about Otis's privacy practices in general, please email us at [privacy@otis.com](mailto:privacy@otis.com) . Or you can call us at 833-833-3001.

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