



## Recruitment Privacy Statement

Effective Date: 12-16-2022

**Resideo Technologies, Inc** and its group companies commit to process your personal data for recruiting-related activities in compliance with all applicable data protection legislation. The local Resideo entity to which you apply is the lead controller for your personal data and other Resideo entities act as other joint controllers or service providers, as further explained below. If you are based in Europe, the lead data controller is Pittway SARL.

If you are a resident in California or the European Economic Area (EEA), please note that there are specific sections further below.

### **PERSONAL DATA WE COLLECT ABOUT YOU**

We collect personal data from you or from third parties involved in your recruitment (e.g., recruitment agencies). These categories of data include information relating to your identity (e.g., name, address, e-mail), your education (e.g., diplomas and certifications) and your work history (e.g., professional experience), notably as provided on your resume. We may also from time to time and when warranted by specific circumstances, collect publicly available information about you or where allowed by local law, information relating to your criminal record for pre-employment screening purposes. Certain positions and certain locations may require us to process information about your country of citizenship or national identification if required for a particular position. We do not require you to provide us with sensitive personal data unless it is necessary for the purposes of carrying out our obligations or exercise specific rights according to legal and regulatory requirements, or unless you have provided your explicit consent in accordance with local legislation. For example, we may collect certain sensitive data to accommodate any disability you may have. If you choose not to provide the information necessary in order to process your application, we may be unable to process your application.

### **COOKIES**

For information about the cookies we use on the website through which you submit your application, please see our website privacy statement available at the bottom of our [web page](#).

### **WHY WE PROCESS YOUR PERSONAL DATA**

The processing of your personal data is necessary in order to assess your recruitment, in order to comply with applicable legal and regulatory requirements and in order to establish, exercise or defend a legal claim. Where the recruitment process results in an employment, a new notice will be provided to you. We may also review your personal data and contact you as part of the recruitment for open positions. In these cases,

you would be given the opportunity to confirm your interest and application before your data was processed further.

### **WHO WE SHARE YOUR DATA WITH**

Access to your personal data is restricted to the personnel who may legitimately process your personal data for recruiting-related purposes.

This includes personnel of Resideo and third parties involved in the recruitment process (e.g., recruitment agencies and entities involved in your drug screening and background check if applicable and where permitted by law).

### **YOUR RIGHTS AND OBLIGATIONS**

We rely on you to provide accurate information about you. Depending on the jurisdiction in which you reside, you may have certain rights in respect of your personal data, including the right to access and be given copies of your personal data. If required by law, we will comply with any request by you to exercise your rights in the time and manner required by law.

### **SUPPLEMENTARY INFORMATION FOR APPLICANTS RESIDENT IN CALIFORNIA**

Certain U.S. states have passed specific laws relating to job applicant and employee data privacy, including California (the California Consumer Privacy Act (CCPA), as amended with effect from January 01, 2023, by the California Privacy Rights Act (CPRA)).

These laws (and regulations relating to them) contain additional information that you may find helpful. For example, where these laws define particular terms (such as what constitutes personal information), those definitions apply here, too. Note also that many of these laws are still being refined and further regulations are expected in the future so we will update this U.S. State-specific privacy statement from time to time and encourage you to review it regularly.

This U.S. State-specific privacy statement only applies where any of the laws mentioned above apply and, in that case, takes precedence over our general U.S. job applicant privacy statement and general U.S. employee privacy statement (and related privacy notices concerning the use and monitoring of Resideo IT equipment as well as our Bring-Your-Own-Device Policy) available on our website/intranet (as applicable).

#### The Highlights

The sections below provide you with transparency over how we use your personal information, including the purposes for which we process it. To make this more understandable, we have provided non-exhaustive examples and use cases. We also describe what personal information we collect, from where we obtain it, how we use it, with whom we share it and how we determine for how long to store it. We also summarize the rights you have regarding your personal information where the laws mentioned above apply and how to exercise them.

#### Information We Collect

We collect personal information when we provide our products and services to you, otherwise interact with you, or use information about you. The term "personal information" (also called "personal data") means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household. It includes, for example, your name and other

information relating to your use of our products and services.

We are required under some U.S. state laws to inform you about the categories of personal information that we have collected from job applicants and/or employees within the last twelve (12) months by reference to a specific list:

Data collected by us, with examples:

(A) Identifiers - a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers. Use Case: When you access IT services we provide, such as applicant portals or employee sites, we collect your name and your address.

(B) Categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) - a name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Use Case: This category partially overlaps with Category A, above. When we pay your salary or you file required reports (for example, with benefits providers), we collect financial information.

(C) Characteristics of protected classifications under California or federal law - race, color, national origin, citizen status, genetic information, disability, religion, sexual orientation, sex, gender identity, gender expression, age. Use Case: When you join Resideo or apply for a job and provide your title, we will address you accordingly (for example as Mr. or Mrs. or as you instruct us).

(D) Commercial information - records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. Use Case: When you use our IT systems (for example, when requesting new IT software), we collect records about your requests.

(E) Internet or other electronic network activity information - browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement. Use Case: When you interact with our website, we collect information about your activity on our website.

(F) Geolocation data - physical location or movements. Use Case: Certain of our sites have card or key-based access restrictions so when you use your card/key to access the site, we collect a log of the site you entered. We do not collect geolocation from your personal mobile devices if you use our Bring-Your-Own-Device program.

(G) Sensory data - audio, electronic, visual, thermal, olfactory, or similar information. Use Case: We operate Closed-Circuit Television (CCTV) at certain sites, as further explained in the CCTV notice for the relevant site. These CCTV systems can record camera feeds so when you are in view of a CCTV camera at our sites, we collect audio and video information (depending on the site).

(H) Professional or employment-related information - this includes professional or employment-related information such as job title, employer, skill set, professional interests, years of service, performance information. Use Case: As part of submitting a job application, we collect information about your skills and previous work experience, for example.

(I) Sensitive Personal Information - this includes your Social Security number, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; racial or ethnic origin, religious or philosophical beliefs, or union membership; the content of private communications (if you make reasonable personal use of our IT equipment in line with Resideo's IT acceptable use policy); personal information collected and analyzed concerning your health; personal information collected and analyzed concerning your sex life or sexual orientation.. Use Case: This partially overlaps with (A), (C) and (F) above. For example, as part of absence management you may provide us with information about your health status.

(J) Inferences drawn from personal information listed in Categories (A) – (I) - inferences drawn from any of the personal information collected to create a profile your preferences, characteristics, behavior, abilities, and aptitudes. Use Case: Some of our job application processes involve automated skill tests that can generate aptitude/skill profiles. Similarly, some of our IT security systems spot phishing emails or other malicious IT usage by comparing established usage patterns against current patterns.

Data not collected by us, with examples:

(K) Biometric information - imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information. Use Case: We do not collect biometric information. Some of our products can recognize faces. However, this biometric information stays on your device and is not collected by us.

(L) Education information, as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99) - records that are directly related to a student and maintained by an educational agency or institution or by a party acting for the agency or institution. For example, class lists, grades and transcripts. Note, though, that as part of a job application we may collect education-related information – this is addressed in section (B) above.

Sources of Personal Information

Below are the categories of sources from which we derived and collected personal information during the last 12 months:

Directly from you. The main source of personal information are our job applicants and employees. For example, where you apply for a role and as part of your employment relationship with us, you provide personal information directly to us.

Indirectly from third parties. For certain roles, we engage third parties to verify the information you provided or to make other types of assessments (for example, competency-related assessments). These third parties then provide us with personal information about you.

Directly and indirectly via our websites and services. For example, when you access our job application portal or intranet, we collect personal information about this.

From other business units within Resideo. For example, some of our business units provide services to other business units in the Resideo group and personal information is collected in this context.

### Purposes of Collecting Your Personal Information

The business or commercial purposes for collecting your personal information during the last 12 months are described in our general U.S. job applicant privacy statement and general U.S. employee privacy statement (and related privacy notices concerning the use and monitoring of Resideo IT equipment as well as our Bring-Your-Own-Device Policy) available on our website/intranet (as applicable).

In limited cases (such as where you participate in a product trial or pilot), we collect personal information for additional purposes which we describe to you at the time you agree to participate in the trial or pilot. Also note that your normal use of our products and services outside of any employment relationship with us is covered by our general U.S. Privacy Statement (along with the U.S. State-Specific Privacy Statement) that applies to the use of our products, services, apps and websites.

### Retention Periods of Your Personal Information

The period during which we store your personal information varies depending on the purpose for the processing. For example, we store personal information needed as part of the employment relationship for so long as you are our employee and, thereafter, for an additional period as required to comply with regulations and laws (for example, as part of meeting our financial auditing and Health & Safety record keeping obligations). We store your personal information as part of a job application for as long as your application is under active review, as long as you maintain a profile within our portal, as required to comply with applicable record keeping and audit requirements and as long as you choose to be contacted by us with interesting career opportunities, whichever is longer. In all other cases, we store your personal information for as long as is needed to fulfill the purposes outlined in this privacy statement, following which time it is either anonymized (where permitted by applicable law), deleted or destroyed.

### Selling and Sharing Your Personal Information

We have not sold personal information in the last 12 months, nor do we use your sensitive personal information (as defined in the CPRA) for purposes other than those you would reasonably expect, as described in this U.S. State-Specific Privacy Statement.

Like most other companies we have disclosed personal information to our suppliers and (where this is part of the job application process or employment relationship) your service providers for one or more business purposes in accordance with our general U.S. job applicant privacy statement and general U.S. employee privacy statement (and related privacy notices concerning the use and monitoring of Resideo IT equipment as well as our Bring-Your-Own-Device Policy) available on our website/intranet (as applicable). For example, when you apply for a job, the application portal is maintained by one of our third-party service providers and, similarly, when you are paid as part of your regular employment with us, those payments are processed using third parties.

### *Categories of personal information disclosed for a business purpose*

In the last 12 months we have disclosed the following categories of personal information for one or more of our business purposes:

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In the last 12 months we have disclosed the following categories of personal information for one or more of our business purposes:

- (A) Identifiers
- (B) Categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- (C) Characteristics of protected classifications under California or federal law
- (D) Commercial information
- (E) Internet or other electronic network activity information
- (F) Geolocation data
- (G) Sensory data
- (I) Sensitive Information

*Categories of third parties to whom we disclose personal information for a business purpose*

In the last 12 months we have disclosed personal information for one or more business purposes to the following categories of third parties:

With other companies within our group. For example, some of our affiliated companies provide services to other companies in the Resideo group and personal information is shared in this context.

With our service providers. For example, some of our IT infrastructure is provided by leading data hosting providers that store our data (including personal information) for us.

With independent third parties. For example, where we are required to make employment-related filings with local governmental agencies.

As required to comply with, enforce or protect our rights and obligations and as otherwise legally required. For example, where we are audited, relevant personal information may be shared with the auditor as part of the audit. Similarly, where we are ordered by a competent court to share personal information, we will comply with such court order.

*Your Rights*

If you are a job applicant or employee and resident in California, you have (or will have, once the relevant laws enter into force) specific rights regarding your personal information. We have summarized these rights below.

Note that many of these rights are not absolute – that means that in some cases we may only partially fulfill your request or not at all. Also note that these rights only apply to personal information that is subject to the laws set out in the beginning of this U.S. State-specific Privacy Statement – that means that your rights as described below will not apply to the extent we have anonymized, aggregated or deidentified your personal information (so that it can no longer be reasonably linked to you) or where your personal data is otherwise not regulated by these laws (for example, health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) or personal information covered by certain sector-specific privacy laws, including, but not limited to, the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), the Driver's Privacy Protection Act of 1994, and particular sections of the Vehicle Code).

*Your right to request specific personal information*

You have the right to request that we disclose the categories and specific pieces of personal information that we have collected about you, over the last 12 months. We will provide this information to you when we receive a request that can be verified as having come from you. We normally provide this information within 45 days in electronic and portable form. In some

cases, we may need to extend this period for a further 45 days and in such instances, you will be notified prior to the extension.

Note that there are several exceptions to this right as described in the relevant law – this means that we will not provide specific personal information where doing so would adversely affect the rights and freedoms of other individuals, for example.

#### *Your right to request deletion*

You have the right to request that we delete your personal information. We will delete the personal information to which your request applies as soon as reasonably possible when we receive a request that can be verified as having come from you.

Note that there are several exceptions to this right as described in the relevant law – this means that we will not delete all personal information in all circumstances. For example, we will not delete personal information that is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of the employment contract, provide a service requested by you, or reasonably anticipated within the context of our ongoing application/employment relationship with you, or otherwise perform a contract between us.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another individual to exercise that individual's right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the business' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
- To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the business.
- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

#### *Your right to request information about how we use personal information*

You have the right to request that we disclose to you the following:

- The categories of personal information we have collected about you.
- The categories of sources from which we collect your personal information.
- The business or commercial purpose for collecting or selling your personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about you (for further information on this, please see "*Your right to request*

*specific personal information” above).*

We will provide this information in respect of the last 12 months and by reference to the categories of personal information we have listed in the *“Information we collect”* section above. We will do this when we receive a request that can be verified as having come from you. We normally provide this information within 45 days in electronic form. In some cases, we may need to extend this period for a further 45 days and in such instances, you will be notified prior to the extension.

#### *Your right to request information about how we share personal information*

You have the right to request that we disclose to you the following:

- The categories of personal information and specific information that we have collected about you.
- If we sold personal information about you, the categories of personal information that we sold about you and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each category of third parties to whom the personal information was sold.
- If we disclosed personal information about you for a business purpose, the categories of personal information that we disclosed about you for a business purpose.

We will provide this information in respect of the last 12 months and by reference to the categories of personal information we have listed in the *“Information we collect”* section above as well as the categories of third parties with whom we have shared personal information (see *“Sharing your personal information”*). We will do this when we receive a request that can be verified as having come from you and subject to any exemptions that apply under the CCPA and CPRA. We normally provide this information within 45 days in electronic form. In some cases, we may need to extend this period for a further 45 days and in such instances, you will be notified prior to the extension.

#### *Your right to request that we correct your data*

You have the right to correct personal information relating to you that is inaccurate and that we have collected. In some cases, you can do this by going to the page on which you provided the information. You can help us to maintain the accuracy of your information by notifying us of any change to your mailing address, phone number or e-mail address.

#### *Non-Discrimination*

We will not discriminate against you if you choose to exercise your rights under the laws set out above – this means that unless permitted by law, we will not do any of the following as a result of you exercising your rights under these laws:

- 1) Deny goods or services to the job applicant/employee.
- 2) Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- 3) Provide a different level or quality of goods or services to you.
- 4) Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

#### *Exercising your rights*

We provide you with two ways of exercising your legal rights relating to your personal information:

- 1) You can call us at 888-671-0086 Monday through Friday from 7:00a.m. to 5:00p.m. Central Standard Time.

2) You can email us at [privacy@resideo.com](mailto:privacy@resideo.com) to exercise any of your legal rights relating to your personal information.

Your request must (1) provide sufficient information so that we can reasonably verify who you are; and (2) describe your request in sufficient detail so that we can reasonably determine whether your request is valid and what scope it has.

Once we have received your request, we will review it to ensure it is valid. We will then attempt to verify your identity which normally involves matching one or more pieces of information you provided in your request to information we hold about you (or the person on whose behalf you submit the request). You must not obtain or seek to obtain personal information relating to other persons (unless you are duly authorized or legally entitled to do so) as this can constitute a criminal offense. Some of your rights can only be exercised twice in any 12-month period.

While we do not normally charge a fee if you choose to exercise your rights under the CCPA, we may do so if you exercise your rights in a way that is excessive, repetitive, or manifestly unfounded. If we determine that we will charge a fee for a particular request, we will provide you with a cost estimate in advance before completing your request.

This privacy statement has been formatted so that you can easily print it out using your web browser's printing function.

#### Changes to this U.S.-State Specific Privacy Statement

We update this U.S. State-Specific Privacy Statement from time to time to ensure it remains up to date. You can see the date it was last updated at the top of this statement

#### **SUPPLEMENTARY INFORMATION FOR APPLICANTS RESIDENT IN THE EEA**

If you are resident in the EEA, we would like to make you aware that the persons with whom we may share your personal data (as described in the section above titled "**Who we share your data with**") may be located outside the EEA and Switzerland. We take steps to ensure that all transfers of personal data outside the EEA and Switzerland are lawful. Such data transfers are normally subject to prior execution of EU Standard Contractual Clauses, although we may rely on other legal mechanisms for the transfer of personal data outside the EEA or Switzerland from time to time. Further information on, and where applicable copies of, these legal mechanisms are available upon request to the address set out below. We will retain your personal data for up to three years or a shorter period if required by applicable law.

If you are resident in the EEA, you may contact us to request more information about how your data is processed or to exercise any of the rights set out below. We usually act on requests and provide your personal data at no cost to you. We may charge a reasonable fee to cover the administrative costs of providing your personal data if your request is baseless, excessive or repeated. Alternatively, we may refuse to act in those cases. Please bear in mind that your rights in respect of your personal data are not absolute and that, whilst we will always strive to cooperate with you, there may be circumstances in which we are not legally required to comply with your request.

- **Requesting access to your personal data**

You can request copies of paper and electric records that we hold about you. We may request further information to help us locate your

data if your request is unclear.

- **Correcting and erasing your personal data**  
You have the right to obtain the rectification of inaccurate personal data concerning you. You also have a right to have your personal data erased in certain circumstances.
- **Restricting processing of your personal data**  
You have the right to restrict the processing of your personal data in certain circumstances. We will notify you if we decide to lift any restriction on processing.
- **Objecting to the processing of your personal data**  
You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on our legitimate interest. Unless we show compelling legitimate grounds for processing your personal data, or we need your information to establish, exercise or defend legal claims, we will stop using the data.
- **Taking your personal data with you**  
You may have the right to data portability in certain limited circumstances, where a) you provided the information to us, b) the processing is necessary for the performance of your contract, and c) the processing is automated.
- **Data supervisory authorities**  
If you have any complaints with how we process your personal data, you are entitled to complain to the data protection supervisory authority in your jurisdiction.
- **Notifying third parties**  
We will take reasonable steps to notify any third parties with whom it has shared your information that you have made a rectification, restriction or erasure request.

## **CONTACT US**

If you have any question or complaints about how your personal data is processed or wish to exercise your rights, please contact our Data Protection Office at [privacy@resideo.com](mailto:privacy@resideo.com).