Privacy Policy

<u>Collection</u>: United Technologies Corporation and its subsidiaries and affiliates, including International Comfort Products collectively, "ICP"), as well as its licensors, suppliers, and service providers (collectively, "International Comfort Products Suppliers") are committed to protecting the privacy of visitors to its website and users of its Applications. International Comfort Products and International Comfort Products Suppliers collect your information at icpusa.com and icpusa.com sub-domains (each, a "Site") in several ways. International Comfort Products and International Comfort Products' Suppliers have implemented technical, administrative, and physical measures to safeguard any personal information that we may collect.

<u>Mailing List Information</u>: You may choose to submit your email address via a submission form located on our Site. Your email address may be used to send you news about International Comfort Productsrelated services, products or promotions. We may use one or more service providers to administer these messages or perform other tasks for us, and we will share your email address with those third party service providers as necessary to provide services to you. You may later choose to stop receiving news about International Comfort Products-related services, products or promotions via the Unsubscribe form also located on our Site.

<u>Device Usage information</u>: If you are logged into your International Comfort Products account, we record the IP address from which you visit our website, and if you have an internet connected type of thermostat or device, we or one of our third-party service providers, record adjustments you make to the product through the website interface. We store this data along with your email address, information about your International Comfort Products device, data collected directly by the device, a history of your device settings, and any other information we have collected about your use of International Comfort Products products and services.

Website Use Information: Like many websites, we and our third party service providers analyze log file information and other data collected through cookies, web beacons, and other tracking technology, to collect information about your browsing behavior when you visit our website, including for example, your browser type, domains, page views, IP address, referring/exit pages, information about how you interact with our Site's webpages and with third party links, traffic and usage trends on the service, etc. We use session cookies to keep you logged in while you use features of our web application; these disappear after you close your browser. We also use persistent cookies, which stay in your browser and allow us to recognize you when you return to the Site. We use this to remember your information so you will not have to re-enter it, to better understand how you use our website, to diagnose and fix technology problems, and otherwise enhance our services. In some of our email messages, we use a "click-through URL" linked to content on the Site. We track this click-through data to help us measure the effectiveness of our customer communications. We also use third party analytics tools to assist us with analyzing and improving our service. Most Internet browsers automatically accept cookies, but you may be able to change the settings to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you set your browser to reject cookies, parts of our Site may not work for you. Please note, depending on your type of device or browser, it may not be possible to delete or disable all tracking mechanisms on your device.

Online Tracking and Your Choices:

- As discussed above, because we track website usage information through the use of cookies for analytic and internal purposes only, your selection of the "Do Not Track" option provided by your browser may not have any effect on our collection of cookie information for these purposes. The only way to completely "opt out" of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or mobile device to delete and disable cookies and other tracking/recording tools. However, getting a "Do Not Track" signal actually to work as you might want is actually very hard. Using browsers as an example, not all tracking technologies can be controlled by browsers; unique aspects of your browser or device might be recognizable even if you disable a tracking technology; not all settings will necessarily last or be effective; even if a setting is effective for one purpose data still may be collected for another; and even if one website observes a "Do Not Track" signal, that website usually will not be able to control what websites do.
- We permit third party advertising partners to use cookies and other technology to collect information about your browsing activities over time and across different websites when you use our Site. For example, we use advertising services provided by third party ad partners, to market our services to you on other websites. Through a process called "retargeting," each service places a cookie on your browser when you visit our Site so that they can identify you and serve you ads on other sites around the web based on your browsing activity. To avoid tracking by these third party ad partners, you can change your browser settings to reject cookies or to notify you when cookies are set and you could select the Do Not Track option on your browser, though we have no control over and cannot confirm whether these third party ad parties honor the Do Not Track browser signal. Additionally, many advertising companies are members of the NAI or DAA and/or provide opt-outs on those industry pages at networkadvertising.org/choices or aboutads.info/choices.

<u>Third Party Sites and Features</u>: Our Site may contain links to other websites operated by third parties and may include social media features such as Facebook and Twitter buttons (such as "Like," "Tweet" or "Pin"). These third party sites may collect information about you if you click on a link and the social media sites may automatically record information about your browsing behavior every time you visit a site that has a social media button. Your interactions with these features are governed by the privacy policy of the company providing the feature, not by our privacy policy. We do not control what information these third parties collect. Please review your privacy settings on your social media sites and think carefully before clicking on links which may take you to a third party website.

<u>Minors</u>: Our Site is not intended to be used by children under the age of 18. Our Site does not knowingly collect or store any personal information about children under the age of 18. If you (e.g., a child's parent or guardian) believe that your child may have provided personal information to us, contact us by using the contact information provided in the "Contact Us" section below and we will use commercially reasonable efforts to delete that personal information, subject to applicable law and our privacy policy.

<u>California Minors</u>: If you are a California resident who is under 18 and a registered user of our Site (e.g., created a International Comfort Products account on our Site), this section applies to you. International Comfort Products may provide registered users the functionality of posting information on our Site. If and to the extent CA Bus. & Prof. § 22581 applies, you may request and obtain removal of content or information posted by you (as a International Comfort Products account holder) subject to the exceptions

provided in this "California Minors" section. If you can accomplish removal on your own by following the instructions on our Site, then follow those instructions. If that won't work, contact us by using the contact information provided in the "Contact Us" section below by specifying the information or content and each location of it in enough detail so that we reasonably can find it and meet your request in the ordinary course of our business. CA Bus. & Prof. § 22581 provides exceptions to your ability to request and obtain removal of content or information posted by you on our Site. Those exceptions in CA Bus. & Prof. § 22581 are: (1) federal or state laws requiring us or a third party to maintain the content or information; (2) the content or information isn't covered by the law (e.g., someone other than you posted it or your posting is stored, republished, or reposted by a third party); (3) we turned your content or information among other users' content or information; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. If any one of the above exceptions applies, we are not required to remove your content or information from our Site.

REMOVAL OF YOUR POSTED CONTENT OR INFORMATION FROM OUR SITE DOES NOT ENSURE COMPLETE OR COMPREHENSIVE REMOVAL OF THAT CONTENT OR INFORMATION. The law does not require us to actually eliminate the information posted by you; the law is satisfied if we keep it but render it invisible to other users and the public. Also, some information will already be beyond our control (e.g., a user or other third party might have already copied it). Law enforcement may obtain the content or information pursuant to certain court orders.

<u>Data Sharing</u>: We share your information with International Comfort Products Suppliers, our service providers, vendors, or consultants that perform services on our behalf in connection with delivering or improving International Comfort Products products and services, which could include identifying and serving targeted advertisements, content or service fulfillment, billing, or providing analytics services. Our service providers will be given access to your information as is reasonably necessary to provide the service under reasonable confidentiality terms. Our service technicians, International Comfort Products Supplier employees and other International Comfort Products employees have access to your information so they can answer your questions if you contact us for help and so they can monitor our servers for technical problems.

Except as described in this Privacy Policy, (for example, this "Data Sharing" section and the "Business Transitions" section), we will not share your information with third parties. We may provide information about our users, including personally identifiable information, to a third party if required by law; in the good-faith belief that such action is necessary to comply with state and/or federal laws or respond to a court order, subpoena, or search warrant; protect against fraud; investigate suspected or actual illegal activity; prevent physical harm or loss; and conduct investigations to ensure compliance with, and comply with, legal obligations.

<u>Business Transitions</u>: We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use the personal information you have provided through the Sites in a manner that is consistent with this Privacy Policy.

<u>Security</u>: International Comfort Products takes security seriously and cares about the integrity of your personal information. We use commercially reasonable physical, administrative, and technological methods to transmit and store your data securely including HTTPS, SSL, and at least 128bit encryption using internal or cloud based storage services hosted in the United States or Canada. However, International Comfort Products cannot guarantee that unauthorized third parties will never be able to defeat our or our service provider's security measures or use your personal information for improper purposes. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

<u>International Visitors</u>: The International Comfort Products websites are hosted in the United States and Canada and are intended for United States and Canadian visitors. If you are accessing the site from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal data to the United States and/or Canada by providing your personal data you consent to that transfer.

<u>Changes to Privacy Policy</u>: Please note that this privacy policy may change from time to time. We will not reduce your rights under this privacy policy without providing you with notice on the Site or by contacting you and the opportunity for you to stop using the Site.

<u>California Shine the Light Law.</u> Annually California residents may request and obtain information that International Comfort Products shared with other businesses for their own marketing use within the prior calendar year (as defined by California's "Shine the Light Law"). If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which International Comfort Products shared this information in the preceding calendar year. To obtain this information, please send an email message to <u>privacy.compliance@utc.com</u> with "California Shine the Light Privacy Request" in the subject line as well as the body of your message.

<u>Contact Us</u>: If you have any comments or questions or if there are other things we can do to maximize the value of this Site to you, please email communications@utc.com. If you have questions about UTC's privacy practices in general, please email <u>privacy.compliance@utc.com</u>.

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