

## **Additional Data Privacy Terms Annex**

### **Enlighted Location Intelligence**

#### **Annex I to DPT (and, where applicable, the Standard Contractual Clauses)**

##### **Description of the Processing Operations**

This Annex contains a specific description of the processing operations (including, but not limited to, the subject-matter of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects) for the Offering Enlighted Location Intelligence. It prevails over any deviating description contained in the Agreement.

#### **A. LIST OF PARTIES**

##### **Customer (and, where the Standard Contractual Clauses apply, data exporter):**

**Name, address and contact person's name, position and contact details:** Name and address of the Customer as well as contact details of a contact person are contained in the Agreement and/or collected as part of the Customer onboarding process.

**Role (Controller/Processor):** Customer acts as Controller for the processing activities provided by Siemens vis-à-vis Customer and, as the case may be, as Processor under the instructions of its Further Processors for Processing activities provided by Siemens vis-à-vis such Further Controllers.

##### **Provider (and, where the Standard Contractual Clauses apply, data importer):**

**Name, address and contact person's name, position and contact details:** The provider / data importer providing the Processing services hereunder is the Siemens company specified in the Agreement. Point of contact for data privacy inquiries is the Office of the Siemens Data Protection Officer, Werner-von-Siemens-Straße 1, 80333 Munich, Germany, E-Mail: [dataprotection@siemens.com](mailto:dataprotection@siemens.com).

**Role (Controller/Processor):** Siemens acts as Processor Processing Personal Data on behalf of Customer and, as the case may be, Customer's Further Controllers.

#### **B. DESCRIPTION OF TRANSFER / PROCESSING OPERATIONS**

##### **Categories of data subjects whose Personal Data is transferred/Processed**

- 1) Customer's admin users
- 2) Registered users of the Service: Employees and other persons visiting the customer's premises (e.g., guests, patients)

##### **Categories of personal data transferred**

The Personal Data transferred/Processed concern the following categories of Personal Data:

- 1) Business contact data: name, office address, e-mail address, phone number
- 2) Location information of registered users: Location of people equipped with a tag or badge with room level accuracy. Location information contains building, floor, room, zone.

##### **Sensitive data transferred (if applicable)**

The Offerings are not intended for the processing of Sensitive Personal Data and Customer and its Further Controllers shall not transfer, directly or indirectly, any such Sensitive Personal Data to Siemens.

##### **The frequency of the transfer (e.g., whether the data is transferred on a one-off or continuous basis)**

Siemens hosts Personal Data on behalf of Customer and, as the case may be, Further Controllers.

##### **Nature of the processing and purpose(s) of the data transfer and further processing**

The purpose of the processing is to provide real time and historical location and other status information via APIs and/or visualizations. Other location-based services may be provided on top of the location data, such as analytics of how tags move through different areas over time, or how tag statuses change based on location or time of day. This additional processing is

specific to the customer use cases and may include things like patient flow, patient journey analysis, asset tracking and utilization analysis, custom logic around button presses on the tags, alerts, geo-fencing etc.

Data inputs: BLE (Bluetooth Low Energy) beacons emitted by wireless, battery-powered tags of different form factor (asset tag, badge, wristband, etc.). Each transmitted signal contains the following data: tag ID (integer), motion status levels (tag motion level, sensor(s) PIR motion level), beacon sequence number, battery level, button(s) press status, firmware version numbers, signal strength level detected by the sensor(s), timestamps recorded at the sensor(s). In addition, during the commissioning process, the floor plans and area names (or IDs) are provided along with initial calibration data which consists of BLE input signals and ground truth location/zone information.

All input data is anonymous until a tag is associated with a particular category, asset or person. The customer may choose to make these associations or not within Enlighted Location Intelligence. They may, for example, choose to keep the tag IDs in their numeric form and only create meaningful associations within their own asset tracking system.

The input data is processed as follows: the BLE data stream is analyzed in near real time and each tag's location is output as a result of a location algorithm. The location consists of a floor ID, zone name/ID specified as just a name/ID or coordinates on the floor plan. The various status levels are also processed, and appropriate alerts may be generated (such as batter level, geo-fencing, or other customer-defined statuses and alerts). Historical information is also kept up to a period of 2 years. The real time, or historical data may become personal data if a customer makes an association between a person and a given tag/badge/wristband numerical ID.

**The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period**

The Personal Data will be retained for the period of the Agreement. Customer has the ability to rectify, erase or restrict the Processing of Personal Data via the functionalities of the services, or (ii) Siemens rectifies, erases or restricts the Processing of Personal Data as instructed by Customer.

**For transfers to (sub-) processors, also specify subject matter, nature and duration of the processing**

The subject matter, nature and duration of the processing are specified per Subprocessor in [Annex III](#).

**COMPETENT SUPERVISORY AUTHORITY**

For Customers located in the European Union, the supervisory authority responsible for the Customer shall act as competent supervisory authority. A list of the supervisory authorities in the EU is available here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

**Annex III to DPT (and, where applicable, the Standard Contractual Clauses)**

**List of approved Subprocessors**

Unless Building Robotics, Inc. is a party to the Agreement, the primary subprocessor for the Services is:

**Building Robotics, Inc., 1504 Franklin Street, CA 94612, Oakland, USA**

The further processors engaged by Building Robotics, Inc. are listed below.

**Entities engaged in the storage/hosting of content**

<b>Entity Name, registered address and contact</b>	<b>Data Center Location</b>	<b>Transfer Safeguards in case of Restricted Transfers</b>
Google, Inc.  1600 Amphitheatre Pkwy, Mountain View, CA 94043	USA	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: __