

Additional Data Privacy Terms Annex for Location Insights

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 Location Insights. It replaces Annex I of the Data Privacy Terms document available at www.siemens.com/dpt.

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 Controllers 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.

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

Persons to whom Customer may associate Tag IDs (outside of Location Insights).

Categories of personal data transferred

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

1) Tag ID (the tag ID may be Personal Data for customers making an association between a person and a given tag/badge/wristband numerical ID). Location Insights does not hold the tag ID association. Location Insights provides the tag ID (which is alpha-numeric sequence) and the location of that tag.

2) Location information of tag ID (the location information of the tag ID may be Personal Data for customers making an association between a person and a given tag/badge/wristband numerical ID. Location information of the tag. (Location + Tag ID are all that Location Insights provides; the association is made elsewhere (another service such as BlueGPS that uses the Location Insights API)

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 the tag ID 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 location data and other status information via APIs. 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.

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 BlueGPS or other third-party applications, which are out of scope of the core API itself. The API does not have the capability to store this association. 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 or BlueGPS.

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 battery level, geo-fencing, or other customer-defined statuses and alerts). The real time data may become personal data if a customer makes an association between a person and a given tag/badge/wristband numerical ID (outside of Location Insights).

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

Data is stored transiently only.

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

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

Technical and organisational measures

The description of the technical and organizational measures (TOMs) for the Offering Location Insights implemented by Siemens and its Subprocessors to protect Siemens' and Subprocessors' IT-systems and applications is contained in Annex II of the Data Privacy Terms document available at www.siemens.com/dpt.

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

List of approved Subprocessors

The primary processor for Location Insights is:

Building Robotics, Inc., 3979 Freedom Cir Suite #210, Santa Clara, CA 95054, USA

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

Entities engaged in the storage/hosting of content

Entity Name, registered address and contact	Data Center Location	Transfer Safeguards in case of Restricted Transfers
Entity name: Amazon Web Services Registered Address: 410 Terry Ave N, Seattle 98109, WA	USA	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____

Entities engaged in the Processing of Personal Data for non-storage/hosting purposes

Entity Name, registered address and contact	Country/Region where Processing is performed	Description of processing operation	Transfer Safeguards in case of Restricted Transfers
Entity name: [...] Registered Address: [...]	[insert location of where the data are processed, e.g. European Union]	[please describe; please also indicate where necessary the duration of the processing]	<input type="checkbox"/> No Restricted Transfer <input type="checkbox"/> Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____