



ePrivacyseal Global

CERTIFICATE

no. 517/25

ePrivacyseal GmbH
Burchardstr. 14, 20095 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 16. September 2025

Johnson Controls International plc
5757 N. Green Bay Ave., 53201 Milwaukee, USA

as a processor in the sense of art. 4(8) GDPR

operates its product or service

“Orbit AI

version as available 18/08/2025

as defined in annex 1 and to the exclusion of the processing activities in annex 2 to this certificate

in conformity with the criteria catalogue for the “ePrivacyseal EU” (version 3.0 of May 2022)
of ePrivacyseal GmbH.

final audit day: 16/09/2025

next planned monitoring by 15/09/2027

period of validity: 16/09/2025 – 15/09/2027

Annex 1 to certificate no. 517/25

Definition of processing activities

ShopperTrak collects and delivers data from stores or shopping malls which can easily be converted into meaningful insights and actionable outcomes, allowing retailers to make shopping easier, more convenient, and more interesting.

From people counting devices at property entrances to location-based mobile technologies providing shopper movements, ShopperTrak, take a technology-agnostic approach to build a comprehensive view of the shopper journey and customer behaviour inside — and beyond —the stores or enterprise properties, to help you understand what is happening throughout your unique retail space. We install, maintain and devices that can provide this data. Our business model is based on the revenue from the hardware but mostly from the access to the data provided by these devices as all this data will be accessible in our analytical platform (STAn or Advanced Analytics) or through an API or SFTP Feeds.

Annex 2 to certificate no. 517/25

Excluded processing activities

- Any video streams other than the designated one used for Re-ID.
- Cloud providers that process or display video content.
- Administrative access by third parties to the camera infrastructure.
- Edge cases where personal data is processed due to recognition errors or intentional disclosure.
- ShopperTrack as a processing platform.