



Creating Intelligent Solutions with Privacy as a Priority

As a Carrier company, LenelS2 recognizes the importance of data privacy laws and LenelS2 has implemented privacy-related governance and policies on a global level to enhance its compliance.

Data Privacy Laws

Since the adoption of the General Data Protection Regulation ("GDPR"), national and regional governments around the world have begun implementing comprehensive data privacy legislation to govern the use and retention of personal data. The GDPR defines personal data as "any information relating to an identified or identifiable natural person, who can be connected, directly or indirectly, to the data, in particular by reference to an ID number or to one or more factors specific to his/ her physical, physiological, mental, economic, cultural or social specifications¹." This encompasses a wide array of data that is processed by companies every day, which is why data privacy compliance has become a top priority for organizations around the world.

LenelS2 recognizes the importance of protecting personal data in accordance with the varying data privacy laws and has implemented, on a global level, policies and programs to protect the personal data of our customers and employees. Carrier has also obtained its Binding Corporate Rules ("BCR"), which are considered the gold standard for data protection in the European Union and has allowed LenelS2 to implement a comprehensive privacy program on a global level.

[\(Approved Binding Corporate Rules | European Data Protection Board \(europa.eu\)\)](#).

1 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

Privacy Principles

LenelS2 has implemented the following privacy principles throughout its organization:

- **Transparency:** Whether you're a customer, employee, or an interested party, LenelS2 will inform you how your personal data will be handled through our relevant privacy notices.
- **Purpose Limitation & Minimization:** LenelS2 will only collect and use the minimum amount of personal data necessary to achieve its identified business purposes.
- **Data Accuracy:** LenelS2 has processes in place to accommodate data subject requests to ensure the personal data collected is accurate and up-to-date.
- **Data Security:** LenelS2 ensures its products and services are protected in accordance with respected industry security standards.
- **Due Diligence on Third Parties:** LenelS2 performs due diligence on the third parties it engages with to ensure that they have appropriate privacy policies in place when handling personal data on LenelS2's behalf.

How does this relate to the LenelS2 Elements platform?

The LenelS2 Elements™ solution includes features that can help enable end-customers comply with applicable data privacy requirements. Personal Data is inherently required for a security management system to function, but this can only be entered into the system as part of the installation, commissioning, and day-to-day use of that system. As the manufacturer of the Elements security management system, LenelS2 does not determine what Personal Data is input into an end-customer's system; those decisions are made by the end-customer.

However, LenelS2's Elements solution offers varying levels of security to protect the Personal Data of end-customers' employees and visitors. Respected industry standards and ISO-compliant encryption methods can be configured in the LenelS2 Elements solution such as DESFire between card and reader, OSDP Secure Channel between reader and controller, and TLS between the controller, gateway and the LenelS2 Elements solution. Moreover, the LenelS2 Elements solution supports comprehensive system restrictions to limit access to authorized personnel and supports the application of limited data fields, to that which is minimally required for the system to function.

Privacy by Design

LenelS2 adheres to "Privacy by Design" principles, which are now a legal requirement under many data privacy laws for organizations that create products and services. At its core, Privacy by Design calls for the inclusion of data protection as an integral part of the design of systems. LenelS2 is committed to the cyber security and data protection capabilities of its products and services and is continually working to improve its products and services with those goals in mind. To support this, Carrier, the parent company of LenelS2, has a dedicated Cyber Security Group and a Global Privacy Team.

LenelS2 has built its Elements solution from day one using Privacy-by-Design methodologies in order to ensure we can meet guidelines and expectations of the growing set of global regulations around data-privacy and personal data. Details follow below on how we protect your data:

- The LenelS2 Elements solution is only intended to collect data needed to provide security features for your workforce and facilities.
- Optional product features allow you to "opt in" before we store your data. For example, if you don't want us to send you emails, we won't store your email address and if you don't use photos, we don't require photos.
- Data about your security system events and user activities is kept with the LenelS2 Elements solution for a limited time, then deleted. Since such events and activities contains personal data, such as identity and location, we don't keep it within the LenelS2 Elements solution for longer than needed to provide the intended services. If you choose, you will still be able to download and archive this data on your own servers.



[LenelS2.com](https://www.lenels2.com)

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- Your data is encrypted everywhere within the LenelS2 Elements solution. When data moves from security sensors to the Elements cloud and to your browser, it is encrypted every step of the way, and when the LenelS2 Elements solution stores data it is encrypted at rest too.
- Every new feature and change we plan to offer is reviewed to ensure personal data use by and storage within the LenelS2 Elements solution is kept to a minimum, and alternative options to personal data storage are considered.

Cybersecurity at the Core

LenelS2 is committed to maintaining the security of our products and services amidst a constantly evolving landscape of computer and network-based threats and is tirelessly working to deliver on that goal.

LenelS2 does not treat cybersecurity as a simple checkbox to be marked for compliance before a product is released, but rather as an essential component to be integrated into all phases of product development. This approach is considered, in industry terms, a Software Development Life Cycle or SDLC. The LenelS2 SDLC consists of a number of security-related activities that are integrated into each phase of product development for each and every feature of the Elements solution.

The LenelS2 Elements solution's robust security controls offer the highest level of security resiliency to preclude access to exploitable vulnerabilities and Oday exploits, including the following:

- Zero trust microservice architecture with tokens validated for identity and privilege at each point of contact with Elements services to ensure the client is a user who has privileges to perform requested actions
- Built from the ground up with Privacy by Design to meet modern privacy requirements such as the GDPR and California Consumer Privacy Act (CCPA)
- Access restricted using the principle of least privilege
- Data encrypted at rest and in transit
- Robust serverless architecture built on Microsoft® Azure® public customer cloud
- Microservices as a leading design principle
 - Faster distribution of important security components
 - Isolated attack surfaces
 - Simpler code structures
 - Functionality shielding redundancy
- Web standard communications
- Hardened and tested secure-by-default deployment
- All user actions are recorded in an audit log
- Usability testing and refinement to ensure user understands the actions they are taking

Empower people with the right to control their data

The Elements web portal provides a full view to all personal information stored within the LenelS2 Elements solution. Every authorized administrator of the system can update or remove this data in response to requests from individuals. Personal information stored as part of transactional records will automatically be purged from the system as they expire without additional user intervention.

**For more information, please contact
your LenelS2 sales representative today.**

