

RTX UK BCR Summary

RTX Corporation and its affiliates and subsidiaries (collectively, “RTX”) have adopted and obtained approval for Binding Corporate Rules (“BCRs”) under the EU General Data Protection Regulation. These BCRs establish an internal framework for how RTX must Process Personal Information, including when it is transferred to other countries. Following the UK’s departure from the EU, we have obtained a separate approval from the UK Information Commissioner (“Information Commissioner”) to expand the use of our EU BCRs in relation to Personal Information subject to the UK data protection laws, including the Data Protection Act 2018 and UK GDPR. Keeney Hill Limited (“RTX UK”) is the Lead Affiliate for our UK BCRs and has responsibility for remedying breaches of the UK BCRs. RTX UK will work with RTX’s U.S. headquarters (the “RTX Corporate Office”) to remedy any such breaches.

RTX has defined

- **Data Subject** as any person whose Personal Information RTX Processes.
- **Personal Information** as information relating to an identified or identifiable natural person. This is any information relating to a natural person, identified or identifiable, directly or indirectly, in particular by reference to an identifier, such as an identification number, name or one or more factors specific to the person’s physical, physiological, mental, economic, cultural or social identity. Whether an Individual is identifiable depends on the means reasonably likely to be used by RTX or another person to identify the Individual concerned. Where these measures are not reasonably likely to be used for identification is impossible, the data concerned are anonymous and not covered by these UK BCRs. The term includes Sensitive Personal Information. Personal Information includes information collected, processed, and/or transferred regardless of the medium, including but not limited to hard copy, electronic, video recording, and audio recording. For the purposes of the UK BCRs, this definition is limited to Personal Information Processed by RTX that is subject to UK data protection laws.
- **Process** as any operation or set of operations that is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, storage, adaption, or alteration, retrieval, consultation, use, disclosure by transmission, transfer, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.
- **RTX** as the RTX Corporation and the affiliates and subsidiaries for which RTX Corporation has majority ownership and/or control. Both RTX Corporation and the RTX Corporate Office refer to the corporate parent entity. RTX Corporate Office has been added only to distinguish more clearly between RTX (the full set of legal entities) and RTX Corporation (the corporate parent only). This summary refers to an individual RTX legal entity as an **RTX Member**.

Scope of the UK BCRs

RTX's UK BCR's apply to all transfers of Personal Information that are subject to UK data protection laws, including both transfers of Personal Information from the UK and onward transfers of that data.

Personal Information Subject to the UK BCRs

RTX transfers Personal Information including:

- human resources ("HR") information for employees, job applicants, job prospects, and contractors;
- information for emergency contacts, dependents and family members of RTX employees where relevant for benefits and/or provided as an emergency contact;
- business contact information for business customers, suppliers, vendors, sales representatives, and other business partners;
- information from consumers of RTX products, such as name and address and credit card data;
- information on visitors and non-employee sales representatives and distributors; and
- information for stockholders, parties to insurance claims, and individuals who contact us by email (but are not otherwise covered by one of the other categories).

Type and Purpose of Transfer

Personal Information is transferred to other countries either because the digital system in which it is stored is located in another country or to enable individuals with specific expertise to perform the processing for which the data was collected, such as an HR expert providing an answer in connection with an HR enquiry. The bulk of Personal Information is transferred to the RTX Corporate Office, located in the United States.

RTX transfers Personal Information among its legal entities in

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|---------------------------|----------------------------|----------------------------------|-----------------------------|
| 1. Australia | 13. France | 25. Luxembourg | 37. Singapore |
| 2. Belgium | 14. Germany | 26. Malaysia | 38. Spain |
| 3. Brazil | 15. Greece | 27. Mexico | 39. Sweden |
| 4. Canada | 16. Hong Kong | 28. Morocco | 40. Switzerland |
| 5. Cayman Islands | 17. India | 29. Netherlands | 41. Taiwan |
| 6. Chile | 18. Indonesia | 30. New Zealand | 42. Tanzania |
| 7. China | 19. Ireland | 31. Norway | 43. Thailand |
| 8. Colombia | 20. Israel | 32. Oman | 44. Turkey |
| 9. Costa Rica | 21. Italy | 33. Philippines | 45. United Arab
Emirates |
| 10. Dominican
Republic | 22. Japan | 34. Poland | 46. United Kingdom |
| 11. Egypt | 23. Kenya | 35. Qatar | |
| 12. El Salvador | 24. Korea (Republic
of) | 36. Saudi Arabia
(Kingdom of) | |

47. United States
(including Puerto Rico)
48. Vietnam

Privacy Principles

RTX's UK BCRs adopted privacy principals in which RTX has committed that it shall:

- Process Personal Information fairly and lawfully and only to the extent that it is relevant;
- Provide appropriate notice to the Data Subjects whose Personal Information RTX Processes;
- Respect the exercise of any Data Subject's legitimate rights over their Personal Information;
- Implement appropriate technical and organizational security measures;
- Transfer Personal Information outside of the UK only with appropriate safeguards; and
- Implement appropriate accountability measures, include data/transfer impact assessments, data inventory, and privacy by design/default.

RTX requires appropriate governance and staffing to oversee the implementation of these principals. These UK BCRs are mandatory for the RTX entities covered by them.

Data Subject Rights and Third-Party Beneficiary Rights

All Data Subjects have the rights under RTX's UK BCRs. They have the right to:

- Obtain information about how RTX Processes their Personal Information, including information about the purposes for which RTX will process their information, RTX's legal basis for doing so, and their rights;
- Obtain information about RTX's BCRs, including a copy of the UK BCR Addendum approved by the Information Commissioner;
- Seek access to their Personal Information, including asking for a copy of their Personal Information;
- Request correction, updating, deletion, or portability of their Personal Information;
- Request that RTX stop Processing their Personal Information in whole or in part, including but not limited to withdrawing any consent they have given to Processing of their Personal Information;
- Not be subject to any decision made on an entirely automated basis that has a legal or similarly significant effect on them, except in limited circumstances (e.g., with their explicit consent, where permitted by law, or where necessary to comply with or take steps prior to entering into a contract);
- File a complaint with the Information Commissioner; and
- Seek a judicial remedy from courts in the UK in the event of an infringement of the commitments set out in the UK BCRs, namely RTX's commitments to:
 - comply with the data privacy principles described above;

- honor Data Subjects' rights outlined in this section;
- notify relevant RTX covered entities in the event that laws applicable to an RTX covered entity may interfere with their compliance with the UK BCRs;
- provide access to and make available a complaints procedure for prompt resolution of complaints and concerns brought by Data Subjects in relation to their data, without prejudice to their ability to bring a complaint before the Information Commissioner; and
- cooperate with competent supervisory authorities, including in relation to auditing and audit reports, reporting changes to the BCRs and resolution of disputes.

Where a Data Subject establishes material or non-material damage caused by an infringement, they may have the right to receive compensation, and have the right to have a third party to assert these rights on their behalf

If any Data Subject has a question or seeks to exercise their rights, RTX can be contacted using the following means:

- **Employees:** contact your HR representative or use any of the other contact methods below
- **Contractors:** contact your assigned Ethics and Compliance Officer or use any of the other contact methods below
- **All:** contact the Privacy Office at privacy@rtx.com or the Speak Up Helpline at
 - Within the US and Canada: 1-800-423-0210 or <https://rtxspeakuphelpline.weblinesai360.com/>
 - Outside of the US and Canada: <https://rtxspeakuphelpline.weblinesai360.com/>

RTX will respond to any complaints a Data Subject raises within one month, which may be extended two additional months based on the complexity and number of requests. If RTX extends the response time, it will inform the Data Subject accordingly. If a complaint is substantiated, RTX will work with the Data Subject to take reasonable steps to rectify the concern. If a Data Subject is dissatisfied with RTX's handling of the complaint or if the complaint is rejected, they can consider enforcing their rights as described above.

Keeney Hill Limited shall be responsible for ensuring that (1) actions are taken to remedy any breach of the UK BCRs committed by any RTX covered entity; and (2) compensation that is awarded by courts of the United Kingdom to Data Subjects for breaches of the UK BCRs by an RTX covered entity is paid. Keeney Hill Limited will be liable for any breaches of the UK BCRs caused by any non-UK BCR Member. Where a Data Subject can demonstrate that they have suffered damage, then it shall be for Keeney Hill Limited, in cooperation with the RTX Corporate Office, to prove that there was not a breach of obligations under the UK BCRs.

To contact the Information Commissioner, UK Data Subjects can:

- Start a [live chat](#); or
- Call the Information Commissioner's helpline on 0303 123 1113.

For more information, the Information Commissioner's website is available at <https://ico.org.uk/>.

Cooperation with the Information Commissioner

RTX shall provide any necessary assistance reasonably required by the Information Commissioner in connection with any enquiries related to the UK BCRs. RTX shall abide by the decisions of Information Commissioner are final, i.e., decisions against which no further appeal is possible or decisions which RTX decides not to appeal. RTX accepts that its compliance with the UK BCRs may be audited by the Information Commissioner in compliance with applicable laws.

Conflicts with Applicable Law

If applicable law conflicts with the UK BCRs in that it might prevent any RTX Member from fulfilling its obligations under the UK BCRs and has a substantial effect on the guarantees provided therein, the RTX Member concerned shall promptly notify the Chief Privacy Officer (“RTX CPO”), except where providing such information is prohibited by a law enforcement authority or law. The RTX CPO, in cooperation with the RTX Corporate Office and the RTX Member concerned, shall determine the appropriate course of action and, in case of doubt, consult with the Information Commissioner.

Modification

RTX shall maintain an up-to-date list of all covered entities. RTX will only make any material or substantive amendments to these BCRs with the approval of the Information Commissioner or as otherwise required by law. RTX will provide the Information Commissioner with an annual update of these BCRs to reflect the updated list of covered entities and any non-material changes, such as corrections of typos.

Communication

RTX will ensure that the BCRs (including this summary) are posted on www.rtx.com.