

SCLogic, LLC EU-U.S. Data Privacy Framework Privacy Statement

This Statement describes how SCLogic, LLC (“SCLogic”), which provides services through the FacilityOS platform, processes personal information received from the European Union under the EU-U.S. Data Privacy Framework. This Statement supplements the [FacilityOS Privacy Policy](#) and applies specifically to personal information that SCLogic receives from the EU in reliance on the EU-U.S. Data Privacy Framework.

1. Adherence to the Principles

SCLogic, LLC adheres to the EU-U.S. Data Privacy Framework Principles (the “Principles”) issued by the U.S. Department of Commerce regarding the processing of personal information transferred from the European Union to the United States. SCLogic has self-certified its adherence to the Principles and is included on the Data Privacy Framework List maintained at <https://www.dataprivacyframework.gov>.

SCLogic commits to apply the Principles to all personal information it receives from the European Union in reliance on the EU-U.S. Data Privacy Framework. If there is any conflict between the terms of this Statement and the Principles, the Principles will govern.

2. Personal information we receive from the EU

SCLogic receives the following categories of personal information from EU customers and individuals through the FacilityOS platform:

- Identification information, such as name, photograph, and signature
- Contact information, such as email address, phone number, and employer
- Visit-related information, such as date and time of entry and exit, and purpose of visit
- Other information voluntarily provided by visitors as required by the customer’s facility

3. Purposes of processing

SCLogic processes personal information received from the EU for the limited and specified purpose of providing facility, visitor, and emergency management services to its customers, and for related operational, security, audit, and legal compliance activities. SCLogic does not process personal information in a way that is incompatible with these purposes.

4. Disclosures to third parties

SCLogic discloses personal information to the following types of third parties:

- Cloud infrastructure providers, such as Microsoft Azure, for data storage and hosting
- Subprocessors providing data processing services in support of the FacilityOS platform

- Auditors and security assessors, for compliance and audit purposes
- Public authorities, where required by law

A current list of subprocessors supporting the FacilityOS platform is available at <https://trust.facilityos.com/subprocessors>.

SCLLogic enters into written agreements with each agent or subprocessor that requires the recipient to provide at least the same level of protection for personal information as is required by the Principles.

5. Liability for onward transfers

SCLLogic, LLC remains liable for onward transfers of personal information to third parties acting as its agents, in accordance with the EU-U.S. Data Privacy Framework Principles.

6. Individual rights: access, correction, and deletion

EU individuals have the right to request access to the personal information that SCLLogic holds about them, to request correction of inaccurate personal information, and to request deletion. Where SCLLogic holds personal information on behalf of a customer, requests will be referred to that customer for handling. Where SCLLogic processes personal information for its own purposes, SCLLogic will respond to access requests within 30 days. If SCLLogic cannot grant access, it will provide justification.

7. Choices and limiting use and disclosure

EU individuals have the right to opt out of disclosure of their personal information to a third-party controller, or its use for a purpose materially different from that for which it was collected.

8. Independent recourse and cooperation with EU Data Protection Authorities

In compliance with the Principles, SCLLogic commits to cooperate with the panel established by the EU Data Protection Authorities (“DPAs”) and to comply with their advice in the investigation and resolution of complaints brought under the Principles. EU individuals may direct complaints to the DPA in their jurisdiction; this recourse mechanism is provided free of charge.

Complaints may also be directed to SCLLogic at privacy@facilityos.com, to which SCLLogic will respond within 30 days.

9. Binding arbitration

EU individuals have the right to invoke binding arbitration for residual claims under the conditions set forth in Annex I of the Principles.

10. FTC jurisdiction

SCLLogic, LLC is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (“FTC”) with respect to its compliance with the Principles.

11. Lawful requests by public authorities

SCLogic may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

12. If we exit the Data Privacy Framework

If SCLogic withdraws from the EU-U.S. Data Privacy Framework, SCLogic will continue to apply the Principles to personal information it received under the Framework for as long as such personal information is retained.

13. Changes to this Statement

This Statement may be revised from time to time. Revisions will be posted on the FacilityOS website with an updated effective date.

14. Contact information

EU individuals with questions or complaints regarding this Statement may contact:

SCLogic, LLC

Attention: Privacy

275 West Street, Suite 400

Annapolis, MD 21401

United States

Email: privacy@facilityos.com

EU local contact:

SCLogic, AB

Textilgatan 31

120 30 Stockholm, Sweden

Email: privacy@facilityos.com

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