

GDPR / Data (Privacy) Protection Procedure

New World International, Ltd. (NWI) maintains personal information from relocating individuals as a part of the international relocation process. NWI is committed to respect the individual's data by handling all the personal information collected in connection with their international relocation in accordance with applicable local laws, the General Data Protection Regulation (GDPR) as well as our own Privacy Policy. This notice explains our practices with regard to your personal information.

Our Data (Privacy) Protection procedure addresses 11 privacy principles:

These 10 privacy principles are essential to the proper protection and management of individual client's personal and sensitive information. They are based on internationally known fair information practices included in many privacy laws and regulations of various jurisdictions around the world and recognized good privacy practices.

Outlined Summary:

1. Management:

We will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the collection and use of information.
- Meet our legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to fulfill our operational needs or to comply with any legal requirements.

We ensure that we have a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection.

We ensure that everyone processing personal information understands that they are contractually responsible for following good data protection practice aligned with internal procedures and legal requirements.

We collect, process and transfer personal information about relocating individuals through computerized and paper-based data processing systems.

We have established routine processing functions (such as processing FAIM Compliance Procedure applications and FAIM Compliance Procedure audit reporting).

We ensure that all processing and transfers of personal information are subject to reasonable confidentiality and privacy safeguards.

2. Notice:

We provide notice about our privacy policies and procedures in our contract agreements and individual quotations; our notice is also available on the nwvl.com website. We are committed to respect relocating individuals by handling all their personal information collected in connection with their international relocation in accordance with applicable law as well as our own Privacy Policies.

We only process personal information to accommodate relocating individuals with their respective international relocation. For example we identify key contacts to communicate during the FAIM application.

We may process sensitive information if it is needed to for business objectives or if it is required to comply with applicable law. Depending on the origin and destination of your relocation, New World International may collect following personal details:

- Copy passport + copy Visa for Customs purpose
- Social Security # for inbound USA shipments for US Customs purpose
- Employer details for US customs purpose
- Names of immediate family members for US customs purpose
- Address, phone and email addresses for communication and operational purposes
- Flight details for operational purposes
- Value of household goods and personal effects for insurance purposes

In general personal and/or sensitive information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place.

3. Choice and consent:

By engaging New World for your international relocation, you give your explicit consent with respect to the collection, use, and disclosure of personal information as described in this notice. Explicit consent here means you were clearly presented with an option to agree or disagree with the collection, use, or disclosure of personal information.

4. Collection:

We shall obtain and process personal data fairly and in accordance with statutory and other legal obligations. We collect personal information for the sole purposes to facilitate the door to door process of the International Relocation for the relocating individual and his/her family. We use customer information to service our accounts, process claims, ensure proper billing, and to offer you other services and products that may suit your needs.

5. Use, retention, and disposal:

We limit the use of personal information to the sole purpose of executing your International Relocation and for which you have given your implicit consent.

We retain personal information for only as long as necessary to fulfill the stated purposes or as required by law or regulations and thereafter appropriately dispose of such information. For example we will retain your personal information for seven (7) years as required by law. After this time relocation files and personal data are destroyed. Files are kept behind locked doors and are only accessed on an as needed basis

6. Access:

You may reasonably access and update your personal information by contacting New World International.

This notice provides basic information about our processing of your personal information and your privacy rights. Should you have additional questions, you may contact New World's Data Protection Officer at following details:

Edwin Ooms
Managing Director
New World International
5875 N. Rogers Ave, Chicago, IL, USA
eooms@nwwi.com
Tel: +1-773-509-5947

7. Disclosure to third parties:

We shall use and disclose your personal data only in circumstances that are necessary for the purposes for which we collected the data. For example we will disclose your personal information on a need to know basis to: Customs authorities and partners involved in the relocation process. We will never sell your personal information to third parties.

7.1 Vessel Manifest Confidentiality Request:

While New World International works relentlessly in concert with our industry associations to develop processes to protect our customers' Personal Identifiable Information (PII), we also have an obligation to inform you when there is a potential of your personal information being disseminated.

The Code of Federal Regulations (at 19 CFR 103.31) explains that the U.S. Bureau of Customs and Border Protection (CBP) permits accredited representatives of the press to inspect and copy shipping vessel manifests. All of this information is potentially available for copying on inbound manifests. On outbound manifests, the CFR prohibits copying of the consignee's name, cargo marks and numbers, although examination of this information is permitted.

At the same time, this regulation also details how confidentiality of your name and shipping details can be requested. You can request confidentiality of your personal information by emailing your request with this completed [form](#) to vesselManifestConfidentiality@cbp.dhs.gov.

Having mentioned all this, in practice, companies who buy this information will do this primarily for commercial cargo information and it is rarely used to reach private individuals with used personal effects.

8. Security for privacy:

We protect personal data against unauthorized access (both physical and logical) aligned with our internal IT policy and procedures. We take appropriate security measures against unauthorized access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction. Personal data will only be accessible to authorized staff.

9. Quality:

We maintain accurate, complete, and relevant personal information as reasonable possible and only for the purposes identified in this notice.

We retrieve your personal data from emails you shared with us, your employer and/or relocation company and from documents you shared with New World.

Please note that we have shared responsibility with regard to the accuracy of your personal information. Please let us know of any changes to your personal information.

10. Monitoring and enforcement:

We monitor compliance with our privacy policies and procedures and have procedures to address privacy related complaints and disputes. All New World staff is aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them. If you believe that your personal information is not handled in accordance with the applicable law or our privacy policies, you may submit a complaint to New World's Data Protection Officer who will investigate the complaint.

11. Your Rights

11.1 Right to access to personal information

You have the right to obtain written confirmation from us whether your personal information is being processed by us or by a third party.

You have the right to access any personal information we hold about you.

Upon receipt of the subject access request, we will ask you to provide sufficient information to prove your identity before any personal information is released to you.

If you make a subject access request through a third party, such as a solicitor, it will be the responsibility of the third party to provide evidence to demonstrate that they are entitled to act on your behalf. This can take the form of a power of attorney or an appropriate written authority.

Although there is no fee for meeting your request we reserve the right to charge a reasonable fee if, in our reasonable judgement the request is manifestly unfounded, excessive, or repetitive.

Any fee charged will be based upon the administrative cost of providing the information.

We have one month from the date of receipt of your request to comply.

If you request large amounts of information we may ask you to specify in more detail the information you require.

11.2 Right to rectification

You have the right to request that we rectify personal information which is inaccurate or incomplete.

In the first instance contact your New World move coordinator in writing specifying the inaccurate or incomplete personal information, provide them with the correct personal information and ask them to rectify it.

We are required to rectify the information within one month. This can be extended to two months if the request for rectification is complex.

If you feel that your request for rectification is not being dealt with, you can escalate your request to the Data Protection Officer at the address given above.

11.3 Right to erasure (to be forgotten)

You have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing. Individuals have a right to have personal data erased and to prevent further processing in the following circumstances:

- Where the personal information is no longer necessary in relation to the purpose for which it was originally collected or processed;
- When you withdraw your consent for your personal information to be processed;
- When the individual objects to the processing and there is no legitimate interest for the personal information to be processed;
- Personal information has unlawfully been processed;
- Personal information must be erased on the order of the courts.

We may refuse to comply with your request for erasure if we are required to comply with a legal or statutory obligation or if the personal information will be required for the purpose of resolving a claim, complaint or in the defense of a claim or complaint.

11.4 Right to restrict processing

You have the right to restrict the processing of your personal information in the following circumstances:

- Where you contest the accuracy of the personal information which is being processed. You can ask for the restriction to be put in place until you are satisfied that the inaccuracies have been rectified
- The processing of the information is deemed to be unlawful but you do not want your personal information to be erased
- The personal information is no longer required by us but you would like us to retain it to establish, exercise or defend a legal claim

11.5 Right to object

You have the right to object to the processing of your personal information related to direct marketing even if you have previously consented to your personal information being processed for that purpose.

If you object we will cease processing your personal information for marketing purposes as soon as we receive your written objection.

You can raise your objection at any time.

Glossary of Terms

Privacy: The rights and obligations of individuals and organizations with respect to the collection, use, retention, disclosure, and disposal of personal information.

Personal information: (sometimes referred to as personally identifiable information or PII) information that is about, or can be related to, an identifiable individual. It includes any information that can be linked to an individual or used to directly or indirectly identify an individual.

Individuals, for this purpose, include prospective, current, and former customers, employees, and others with whom the entity has a relationship. Most information collected by an organization about an individual is likely to be considered personal information if it can be attributed to an identified individual. Some examples of personal information are as follows:

- Name
- Home or e-mail address
- Date of Birth
- Identification number (for example, a Social Security or Social Insurance Number)
- Physical characteristics
- Consumer purchase history

Sensitive information: Some personal information is considered sensitive. Some laws and regulations define the following to be sensitive personal information:

- Information on medical or health conditions
- Financial information
- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Sexual preferences
- Information related to offenses or criminal convictions

Non-personal information: information about or related to people that cannot be associated with specific individuals. This includes statistical or summarized personal information for which the identity of the individual is unknown or linkage to the individual has been removed. In such cases, the individual's identity cannot be determined from the information that remains because the information is de-identified or anonymized. Non-personal information ordinarily is not subject to privacy protection because it cannot be linked to an individual. However, some organizations may still have obligations over non-personal information due to other regulations and agreements.

Privacy or Confidentiality?

Unlike personal information, which is often defined by law or regulation, no single definition of confidential information exists that is widely recognized. In the course of communicating and transacting business, partners often exchange information or data that one or the other party requires be maintained on a “need to know” basis. Examples of the kinds of information that may be subject to a confidentiality requirement include the following:

- Transaction details
- Engineering drawings
- Business plans
- Banking information about businesses
- Inventory availability
- Bid or ask prices
- Price lists
- Legal documents
- Revenue by client and industry

Also, unlike personal information, rights of access to confidential information to ensure its accuracy and completeness are not clearly defined. As a result, interpretations of what is considered to be confidential information can vary significantly from organization to organization and, in most cases, are driven by contractual arrangements.

Data Protection Officer:

The person responsible for ensuring that New World International follows its data protection policy and complies with local legislation.

Explicit consent:

Is a freely given, specific and informed agreement by a relocating individual in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Processing:

Means collecting, amending, handling, storing or disclosing personal information.

This Data Protection Policy will be reviewed regularly in light of any legislative or other relevant developments.