



## **S&M Moving Systems North, Incorporated**

### **Privacy Policy**

Thank you for visiting our web site ("the Site"). This Privacy Policy ("Policy") applies to [smmoving.com](http://smmoving.com).

This Policy describes how we collect, use, share and secure the personal information you provide. It also describes your choices regarding use, access and correction of your personal information. The use of information collected through our services shall be limited to the purpose of providing the relocation services for which our clients (the "Client") have engaged us to provide.

Please read this Policy before using the Site or submitting any personal information. By using the Site, you are accepting the practices described in this Policy.

Note: the privacy practices set forth in this Policy are for this Site only. If you link to other websites, please review the privacy policies posted at those web sites.

### **EU-U.S. & Swiss-US Privacy Shield**

S&M Moving Systems complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. S&M Moving Systems has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, S&M Moving Systems commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact S&M Moving Systems at: 1-800-234-7554, Mike Dahl, [mikedahl@smmoving.com](mailto:mikedahl@smmoving.com) or by mail at:

S&M Moving Systems 48551 Warm Springs Blvd. Fremont, CA 94539 In conformance to the Privacy Shield Framework, S&M Moving Systems is responsible for the processing of personal data it received and subsequently transfers to a third party acting as an agent on its behalf. S&M Moving Systems complies with the Privacy Shield Principles for all onward transfers of personal data.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, S&M Moving Systems is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, S&M Moving Systems may be required to disclose personal data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

S&M Moving Systems has further committed to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information commissioner for Swiss employee with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship. Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

## Collection of Information

Personal information (sometimes referred to as –PII, personal identifiable information) is information that concerns, or can be related to, an identifiable individual. Some examples of personal information are as follows: Name, Home or e-mail address, Date of Birth, National Identification number (for example, a Social Security or Social Insurance Number), and even Physical characteristics (passport photos etc.). The information you provide is used to facilitate the relocation services that we provided to you or as part of our employment benefits and compensation. This information is only used to fulfill your specific request. We do not share, sell, rent or trade PII with third parties for their promotional purposes.

## Pledge to Data Security

S&M Moving Systems acknowledges that you have the right to access your personal information. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query by email to respective sales that liaison with or move coordinator that assigned to monitor their move. Changes on customers' personal details cannot be completed via phone calls.

Your PII is kept secure. Only authorized employees, agents and contractors who have agreed to keep information secure and confidential have access to this information. Emails generated by the Site are for the sole purpose of facilitating your relocation services. An opt-out option is available to you through your move coordinator. Opting out may cause interruptions in and/or loss of, relocation benefits provided to you by your employer. Please contact your move coordinator or call (800) 234-7554 for more information on opting out.

## What is Data (Privacy) Management Protection about?

Data (Privacy) Protection Management is the systematic application of management policies, procedures and practices with respect to the collection, use, retention, disclosure, and disposal of personal information in conformity with the commitments described in the Applicant's privacy notice.

## Protecting Private Information

**We all should be concerned about protection private information, our own, and that of our customers. By nature of our work we all work with personal information every day. Documents with personal information are on our computers and in our files. These documents need to be kept safe so we do not expose ourselves to any unnecessary risks.**

## What do you mean by Personal Information?

Personal information (sometimes referred to as personally identifiable information) is information that concerns, or can be related to, an identifiable individual. Some examples of personal information are as follows: Name, Home or e-mail address, Date of Birth, National Identification number (for example, a Social Security or Social Insurance Number), and even Physical characteristics (passport photos etc.).

## **What are the specific risks of having inadequate privacy policies and procedures related to Data (Privacy) Protection Management?**

If a data leak resulting in data compromise occurs, it can lead to identity theft which can bring damage to individual finances or trust level. Improper use of data can also damage the organization's reputation, brand, or business relationships. Sometimes there are legal liabilities, industry, or regulatory sanctions as a result as well. This could also mean lost business and consequential reduction in revenue and market share which can greatly disrupt our operations. There are many risks, and subsequently many reasons we should all be informed and care about protecting our data.

## **What is a Privacy Notice?**

A privacy notice is a statement of the overall intentions and direction of a company describing its commitment how personal information is collected, used, retained, disclosed, and disposed.

By privacy we mean the rights and obligations of individuals and organizations with respect to the collection, use, retention, disclosure, and disposal of personal information.

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.

## **S&M Moving Systems Adheres to the recommended FIDI 10 privacy principles as follows:**

**1. Management:** All of us are accountable to uphold our privacy policies and procedures.

- 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

**2. Notice:** S&M Moving Systems notifies our clients and customers about our privacy policies and procedures in our contracts and individual quotations. Our notice is also available on the [smmoving.com](http://smmoving.com) website.

**3. Choice and consent:** S&M Moving Systems describes the choices available to the individual with respect to the collection, use, and disclosure of personal information when asked to do so. By engaging S&M Moving Systems for your international relocation, you give your explicit consent with respect to the collection, use, and disclosure of personal information.

**4. Collection:** S&M Moving Systems collects personal information only for S&M Moving Systems work purposes. We use customer information to service our accounts, process claims, ensure proper billing, and to offer the customer other services and products that may suit their needs.

**5. Use, retention, and disposal:** S&M Moving Systems retains personal information for only as long

as required by law or regulations and thereafter appropriately disposes of such information.

**6. Access:** S&M Moving Systems provides individuals with access to their personal information for review and update.

**7. Disclosure to third parties:** S&M Moving Systems discloses personal information to third parties only for work purposes and with the implicit or explicit consent of the individual.

**8. Security for privacy:** S&M Moving Systems protect personal information against unauthorized access (both physical and logical). Personal data will only be accessible to authorized staff.

**9. Quality:** S&M Moving Systems maintains accurate, complete, and relevant personal information 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 share with S&M Moving Systems.

**10. Monitoring and enforcement:** S&M Moving Systems monitors compliance with its privacy policies and procedures and has procedures to address privacy related complaints and disputes. All S&M Moving Systems staff is aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

### **What does S&M Moving Systems do to protect Personal Information?**

- S&M Moving Systems does a great job of protecting our customer (and employee) data through a combination of management efforts, notifications to clients and customer, internal safeguards, access control points, monitoring and enforcement mechanisms.
- S&M Moving Systems maintains a private network. (Domain LAN with an EVOLVE Managed Network).
- S&M Moving Systems also maintains updated virus protection and patches on all machines. (McAfee Virus Scan Enterprise version).
- Data backups are done hourly which are encrypted and sent off-site daily. (Barracuda backup Hardware runs daily at all our sites and is replicated to our Data Center Daily as well).
- Firewalls are in place to ensure that outside attacks are kept from our data. (Evolve Managed Network)
- Management conducts monitoring and reporting on all systems, software, and hardware daily. (S&M's IT department keeps up to date on the health and accounting of our IT infrastructure.
- S&M Moving Systems also protects data internally by limiting access to only appropriate associates whose duties require them to access the data through Group Policy. Some Group Policies in place prevent users from uploading or downloading data to external media. (Access to the S&M Network and its data is managed through Active Directory & Group Policy. We manage the ability of our employees to access data and can disconnect their access at any time.
- Passwords are changed every 180 days by the user and an idle timeout feature has been implemented for

all users on all machines.

- Customer's personal information is classified "Private and Important" S&M Moving Systems and its appointed service providers shall protect the information collected from customers. S&M Moving Systems shall brief customers about the usage of their information how we use and make of it in the course of the services S&M Moving Systems provide.  
Customer can change or update their personal details by email to respective sales that liaison with or move coordinator that assigned to monitor their move. Changes on customers' personal details cannot be completed via phone calls.
- Upon customer accepting S&M Moving Systems move quotation, the customer agrees to release their personal details to S&M Moving Systems and appointed supply chain providers for move process. Customer may choose not to allow the sharing of their information with third parties. But, if customer does not allow sharing of their information, S&M Moving Systems will not be able to process their move services. Customer's option allowing or denying the Information to be shared shall affect the final move process. S&M Moving Systems need to obtain written confirmation from customer in even customer decided not to share their personal details to S&M Moving Systems supply chain vendors.
- These standards required personal data such as passport photo copy, full name, home address, mobile/telephone contact, email address or other Information collected from customers to be share only with S&M Moving Systems appointed supply chain service providers that expedite customers' relocation service. All third parties are prohibited from using customer personal information except to provide services for their relocation. Supply Chain service providers are required to maintain the confidentiality of customer information at all times. Passport photo copy (hard copy) used for custom clearance; to be disposed of within a period of 14 days after completion of each shipment from supply chain job file. A soft copy can be save to company i-Cloud that is password protected that only the General Manager / Branch Manager can access. Complete delete or remove of personal data especially passport copy from i-Cloud storage is maximum 3 years from completion of shipment.
- Move Quote that provided by sales or surveyors to customers must contain "Data (Privacy) Protection Management" clause that clearly mentioned "all personal documents (especially) passport copy will disposed of after 14 days completion of move job."
- Data users, including S&M Moving appointed freight forwarders are also required by these standards to have a schedule of disposal for S&M Moving customer's personal data where it has been inactive for a period of 14 days. These standards are considered the "minimum" standards to be observed by data users, as each and every requirement of these standards must be implemented as part of the data user's policy in its handling of personal data of S&M Moving customers. Data users including S&M Moving appointed freight forwarders failures comply with the 14 days disposed of period shall be terminated from their duty or appointment.  
In order to assure that the freight forwarders or appointed agents comply with the above-mentioned requirement, Data Privacy Protection Management will be acknowledged by each freight forwarders or appointed agent annually.

Unigroup also maintains a robust data protection program that focuses on protecting the confidentiality, integrity, and availability of information. Unigroup employs enterprise-class technologies that provide network-based intrusion detection and multiple-firewall segmentation to protect the network infrastructure. End-user workstations are protected using host-based intrusion prevention, anti-virus, and anti-malware software. Corporate laptops are in the process of being further protected with drive encryption software. Production applications are hosted in a multi-tier secured data center environment that utilizes mid-range virtual application servers and mainframe transactional and database services. Credit card transactions are tokenized removing all risk associated with payment card processing.

### **What else can S&M Moving Systems or I do to protect personal data?**

You can be aware of what personal data is and be careful when handling or sharing it. In our business, we outsource services to other agents all over the country and all over the world. Outsourcing increases the complexity for dealing with privacy. Complexity increases when the entity that performs the outsourced service is in a different country and may be subject to different privacy laws or perhaps no privacy requirements at all. In such circumstances, S&M Moving Systems notifies our agents that they also need to ensure that they are managing their privacy responsibilities appropriately. S&M Moving Systems will review Data Privacy Protection on annual basis, update to meet local law and the moving industry requirement. We also regularly update our employees with the importance of data privacy information.

S&M Moving Systems advise our agents worldwide that we uphold the standards of data privacy.

Customers who have inquiry about Data Privacy Protection or feel that S&M Moving Systems has not taken the appropriate steps to protect their privacy of the Information, the customer can contact S&M Moving Systems at 1-800-234-7554, Mike Dahl, General Manager or [mikedahl@smmoving.com](mailto:mikedahl@smmoving.com)

### **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.

**Data (Privacy) Protection Management:** Systematic application of management policies, procedures and practices with respect to the collection, use, retention, disclosure, and disposal of personal information in conformity with the commitments described in the Applicant's Privacy Notice.

**Privacy Notice:** Statement of the overall intentions and direction of a company describing its commitment how Personal Information is collected, used, retained, disclosed, and disposed.

**Personal information:** (sometimes referred to as personally identifiable information) information that concerns, or can be related to, an identifiable 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

**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

### **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.

**Explicit consent:** “Explicit” in the data protection world generally means “specific”. In other words the consent must specify the particular types of data, the specific purposes for which they may be used and/or the countries to which they may be disclosed.

**Implicit consent:** “Implicit” refers to “not specific” It is consent which is not expressly granted by a person or company, but rather inferred from a person or company’s actions and the facts and circumstances of a particular situation.

**Supply Chain:** A Supply Chain is a system of organizations, companies, people, activities, information, and resources involved in moving a product or service from supplier to customer.

**Supply Chain Management:** The network created amongst different companies producing, handling and/or distributing a specific product or service. Specifically, the supply chain encompasses the steps it takes to get a good or service from the supplier to the customer. Supply chain management is a crucial process for many companies, and many companies strive to have the most optimized supply chain because it usually translates to being able to deliver a higher overall quality performance resulting in lower costs for the company.

## **Privacy Policy-Website**

Please read this Policy before using the Site or submitting any personal information. By using the Site, you are accepting the practices described in this Policy.

Note: the privacy practices set forth in this Policy are for this Site only. If you link to other websites, please review the privacy policies posted at those web sites.

### **Personal identification information**

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, phone number. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

### **Non-personal identification information**

We may collect non-personal identification information about Users whenever they interact with our Site. Non- personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

### **Web browser cookies**

Our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

### **How we use collected information**

S&M Moving Systems may collect and use Users personal information for the following purposes:

- | *To run and operate our Site*  
We may need your information display content on the Site correctly.
- | *To improve customer service*  
Information you provide helps us respond to your customer service requests and support needs more efficiently.
- | *To personalize user experience*  
We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.
- | *To improve our Site*  
We may use feedback you provide to improve our products and services.
- | *To send periodic emails*  
We may use the email address to send User information and updates pertaining to their order. It may also be used to respond to their inquiries, questions, and/or other requests.

### **How we protect your information**

We adopt appropriate data collection, storage and processing practices and security measures to protect

against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

### **Sharing your personal information**

We do not sell, trade, or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

### **Third party websites**

Users may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing.

### **Changes to this privacy policy**

S&M Moving Systems has the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our Site. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

### **Contacting us**

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us.

1-800-234-7554

*This document was last updated on May 17, 2018*