

Data Privacy Protection Procedure

In line with our Data Privacy Policy the following procedures have been implemented in support of this Policy to ensure that our client's personal information and data is collected, used, retained, disclosed and disposed of in line with our Policy.

Management

Personal information and data is defined as any personal information that is collected from our clients in the course of doing business. This information can be defined as follows...

- Client's names, physical addresses, email addresses and phone numbers (current and future)
- Family member names
- Identification numbers, passport details and respect visas they may hold
- Travel plans, itineraries and E-tickets
- Credit card information and bank account details
- Utility bills
- Details of their possessions and their values

It is inevitable that to perform the services we are being paid to do some, or all, of the information noted above will come into our possession. However we must **ONLY** request and collect the barest information needed to satisfactorily complete the actual service required by our customer eg: for local moves we do not need Passports, visas, travel plans etc.

This personal information is received from a number of sources...

- Directly from our customers
- Our local Corporate Accounts
- Our overseas partners and agents
- Third parties (sales lead generators eg: AsiaXpat)
- Our website

This personal information comes into our possession for all our business streams (local moving, export, imports and storage) and as such everybody in the Company will at some time 'touch' and be privy to our customer's personal information.

This information is shared internally within the office but also shared externally with our suppliers eg: contracted packers, container cartage contractors, sea and airfreight forwarders, shipping and airlines, insurance company and overseas partners and agents.

It is the responsibility of all our staff, in their respective roles, to ensure that only the barest information is shared with the respective contractor to enable them to satisfactorily complete the required service and / or to meet any legal, governmental or industry based (eg: IATA) obligations that they must fulfil.

Notice

Notice of our Privacy Policy is available to interested and effected parties via our website (refer 'Downloads'), via our email footer and via relevant letters and forms presented to our clients in the normal course of business.

Choice and Consent

In accordance with our Privacy Policy by engaging the services of our Company or our partners the customer is willingly authorising us to collect, use, retain and disclose the personal information we collect from, or about, them.

They have the choice not to share or release their personal information to us (or allow us to disclose it to third parties) however it obviously stands to reason that we will not be able to provide or perform the required services for them if they deny consent.

Collection

We only request the minimal personal information required to complete the service being provided. Invariably this information is collected and disseminated via email as attachments.

Use, retention and disposal

Our staff are only interested in collecting the personal information from the client or agent needed to fulfil the service they are responsible for. They are fully aware of the need to suitably protect the information in their possession and that it is only to be used for the purpose it was given to us for.

In Hong Kong all files must be retained for 7 years. Information stored on our computer system is duly 'protected'.

For disposal we use an authorised waste disposal company who collect and safely and confidentially destroy all records taken by them.

Access

Should an individual client or Corporate Account want access to the personal data we have retained about them as per our Privacy Policy they can email us at a dedicated address dataprotection@aemovers.com.hk

We will respond with the information we hold on them and seek their instructions accordingly.

Disclosure

We will only disclose personal information needed by our contractors, agents and partners that they need to fulfil their particular role in the supply chain. No more, no less.

We do not seek permission from the client or Corporate Account to disclose this information to other parties. As noted under 'Choice and Consent' earlier in this procedure by engaging our services the clients are fully aware that we will be using their personal information, and sharing it with relevant parties, to fulfil the services they are paying us to do.

Security for Privacy

Individual employees have unique 'log in' details to access the QIS ('in house' computer programme). They are restricted to certain levels (depending on their role and seniority) and cannot access the system remotely.

Also refer to the section 'Data Security' and 'Back Up Procedures'.

This procedure has been circulated to all personnel who are well aware of the sensitivity of the personal information they have access to and the need to protect this accordingly.

The Company has developed a Data Breach Policy which will be implemented in the event of a data breach.

Quality

All personal information is linked, and retained, in the client's individual file in the QIS (which as previously noted is 'passworded' for each individual employee). This ensures all relevant personal information is retained in one place, its integrity remains safe / intact and that it is available as and when needed for the purpose it was collected for.

Monitoring and Enforcement

We monitor compliance with our various 'privacy' policies on a continual basis in the course of our day to day work with a formal emphasis during our annual FIDI FAIM Internal audit.

Senior management have access to all individual client's files on the QIS and it is an easy task to monitor that personal information has been linked to that individual's file.

In the unlikely event of a complaint or dispute over a data privacy issue this would immediately be brought to the attention of the Global Mobility Director for investigation and resolution.

Updated and current as at December 2024