



# SIRVA PRIVACY POLICY

## **SIRVA RESPECTS YOUR PRIVACY, AND THIS PRIVACY POLICY IS INTENDED TO INFORM YOU OF HOW WE PROTECT YOUR PRIVATE, PERSONAL INFORMATION.**

Sirva, Inc. ("Sirva") maintains this Privacy Policy for all persons to whom we provide services across the Sirva family of companies.<sup>1</sup> Sirva is committed to complying with all applicable privacy laws.

### **Information Covered by this Policy**

Our Policy covers all non-public, personal information received by us that may be used to identify you and as may be further defined by applicable privacy laws ("Personal Information"). This may include a wide variety of information depending upon the services you are set to receive. For example, this could be name and address information (property or household goods moving services); date of birth, or other identification numbers (applications or account setup); banking information (mortgage or expense payment services); and/or passport or driver's licence information (visa & immigration services).

### **How We Obtain Personal Information**

Sirva requires personal information from you in order to provide you with service. We may receive Personal Information about you from:

- You directly, when you complete an application or when you visit us in person, over the phone, through electronic or regular mail, electronic chat, or through our website or application(s);
- Consumer reporting agencies;
- Mortgage companies offering a financial product or service;
- Your employer;
- Anyone who you have authorised to provide information; and
- Other sources, in connection with providing you a financial product or service.

Regardless of its source, Sirva will not process Personal Information without your consent.

Although we do not receive Personal Information from your browser, we do monitor and store certain types of information about visitors to our website – namely, the type of browser

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<sup>1</sup> The following organisations are covered by this Privacy Policy: Sirva Mortgage, Inc.; Sirva Relocation Credit, LLC; Sirva Relocation Funding, LLC; Sirva Worldwide, Inc.; North American Van Lines, Inc.; PCS Moving, Inc.; Global Van Lines, LLC; J.D.C. International, Inc.; Montana Transfer NA LLC; North American International Holding Corporation; North American International N.A., Inc.; Relocation Risk Solutions, LLC; Sirva Freight Forwarding, Inc.; Sirva Move Management, Inc.; Smartbox Solutions, Inc.; BGRS, LLC; BGRS Relocation, Inc.; Sirva Relocation LLC; Sirva Global Relocation, Inc.; Sirva Relocation Properties, LLC; Sirva Settlement, Inc.; Sirva Settlement of Maryland, LLC; Allied Van Lines, Inc.; Allied International N.A., Inc.; Meridian Mobility Resources, Inc.; and Trident Transport International, Inc.

used, the user's country, whether they were referred to us by a search engine, which of our pages they visit, and how those pages perform on the user's computer. This helps Sirva make decisions on how to better design, streamline and improve performance on our websites. If you do not want this information monitored, you may turn off JavaScript. Please be advised, however, that the websites may not provide full functionality if those settings are turned off.

We also use "cookie" technology to improve your experience on our site. For details on our cookie policy, please see our Cookie Policy, available on our website at [www.sirva.com](http://www.sirva.com).

We do not knowingly collect Personal Information from children and will destroy such information if it is disclosed to us without proper parental consent.

## **Information Use, Sharing & Storage**

Depending on the services you are set to receive, your information may need to be shared, used, and/or stored globally. Your personal information will be processed and retained as needed to provide you with your services. This may include a period of time after the services are complete in order to comply with our regulatory, audit, contractual, and other legal obligations.

### **A. Sharing within the Sirva Family of Companies**

To provide you with the full range of services you may need, Sirva takes an integrated approach to the services we provide. In order to be able to provide a full range of services for your needs, we may share Personal Information among the Sirva family of companies to contact you and make recommendations about a variety of the services offered by and through Sirva and its family of affiliated companies.

### **B. Sharing with non-Sirva Family Companies**

To provide you with your services, Sirva may work with and provide your information to companies outside of the Sirva family to provide those services to you. For example, Sirva may share Personal Information to:

- service and support our operations generally and to support your account and services that we provide to you, including administering your mobility benefits with your employer, proposed or actual financing, securitisation, secondary market sale, or similar transactions;
- process or administer a transaction or product in connection with a product or transaction that you have requested;
- data storage and processing;
- those you have authorised us to disclose the information;
- other service providers with whom we have agreements to offer services to you through or with Sirva; or
- other suppliers with which we jointly market or provide products or services.

We may also share your Personal Information with these other organisations outside of the Sirva family when required by law. For example, we may share Personal Information to:

- protect against fraud;
- respond to a subpoena or summons; or
- respond to law enforcement or regulatory authorities.

We will not disclose your Personal Information to anyone outside of Sirva unless you have authorised us to do so or as otherwise indicated in this Policy or as required by law.

We maintain agreements with our external service providers limiting the use of your Personal Information only for the purposes you have intended in providing the information. These service providers are bound to uphold our standards and procedures regarding privacy under the terms of our agreements with them. Where an onward transfer to a third party of your Personal Information has occurred, Sirva remains responsible and liable under the EU-US DPF Principles, the UK extension to the EU-US DPF, and/or the Swiss-US DPF Principles if third-parties that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles unless Sirva proves that it is not responsible for the event giving rise to the damage.

## Your Privacy Rights

Sirva provides you with a reasonable opportunity to access your own Personal Information, to correct that information if inaccurate, limit its processing, or to have it deleted as appropriate – subject to the exceptions stated below. In order to make any request regarding your Personal Information, or speak with a Sirva representative about how you can limit the use and disclosure of your Personal Information, please send your request by electronic mail to [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com).

Reasonable access means, that requests for access are made during normal business hours; that you provide requested identification; and that requests are not excessive in number. If, at any time, Sirva denies you access to any Personal Information, we will provide you with reasons for denying access and information about how you may make further enquiries. For instance, Sirva reserves the right to deny access to information related to investigations or potential or actual litigation where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy, or where the rights of other individuals would be violated. Sirva commits to resolve any and all requests or complaints about our collection and use of your Personal Information.

Any Personal Information you provide to Sirva will not be used for a new purpose materially different from that for which it was originally collected or subsequently authorised. You nevertheless have the right to withdraw your consent or opt out of any use of your Personal Information at any time via the contact information above. If you opt out of this policy, choose to limit the processing of your Personal Information, or otherwise decline to provide Personal Information, it may affect your receipt of services. This means that we may not be able to proceed with your move or related relocation services, or that your move and/or relocation services may be delayed.

## For Customers in Australia

Australia's Privacy Act of 1988 covers our customers in Australia and their Personal Information. Customers in Australia have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Information at any time. If you as a customer choose to opt out of this policy or otherwise decline to provide Personal Information, it may affect your receipt of services. In order to make a request for information or to update your information, please send your request by electronic mail to [privacyofficer@sirva.com.au](mailto:privacyofficer@sirva.com.au), or contact us by telephone at +61 2 8868 2819.

## For Customers in Brazil

The Brazilian General Data Protection Law ("Lei Geral de Proteção de Dados Pessoais", or "LGPD") provides individuals in Brazil with additional rights over their Personal Data. For any personal data collected and/or processed in Brazil and for all services offered to individuals in Brazil, Brazilian privacy law will govern and apply.

Concept Mobility Serviços de Mobilidade Ltda. is Sirva's local affiliate in Brazil ("Sirva Brazil"). When Sirva Brazil is acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then Sirva Brazil's client is responsible as the Data Controller for telling us how your Personal Data should be used and processed. Under the LGPD, Sirva Brazil and its family of companies are Data Operators who receive Personal Information and instructions on how to process that Personal Information from the Data Controllers. If you independently request services of us, then Sirva Brazil acts as a Data Controller and manages your Personal Information to provide services according to what you have consented to and the terms of this policy. Whether acting as a Data Controller or a Data Operator, we maintain the privacy of your information and only use, share, transfer or store it as permitted for the specific purpose of providing you with your services.

As mentioned in the Global Privacy Policy above, Sirva Brazil processes Personal Data only for the purpose of completing your services and always in strict accordance with the requirements of the LGPD. Where Sirva Brazil processes any Personal Data in Brazil, it does so under LGPD Art. 7, Item I (with your consent); and under Art. 7 Item II (for the Data Controller's legal obligation); and/or Art. 7 Item V (for the performance of a contract that you may have signed with Sirva Brazil). Depending upon the services that we provide to you, your Personal Data may also need to be shared with other organisations and/or stored in countries other than Brazil. This may include public authorities or government agencies in Brazil if your services require it. How long Sirva Brazil may process and keep your Personal Data will also depend upon the services you receive and any applicable legal requirements.

In addition to the privacy rights listed in the preceding section, Sirva Brazil provides additional resources for its customers in Brazil. If you are in Brazil and wish to update, transfer, correct, or delete your personal data, please contact [compliancebr@sirva.com](mailto:compliancebr@sirva.com). If you have specific questions about how your personal data is processed or about opting out of processing, you may also contact Sirva's Data Protection Officer in Brazil via email at [dpobrasil@sirva.com](mailto:dpobrasil@sirva.com).

## For Customers in Canada

Canada's Personal Information Protection & Electronic Documents Act ("PIPEDA") covers our customers in Canada and their Personal Information. Customers in Canada have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Information at any time. If you as a customer choose to opt out of this policy or otherwise decline to provide Personal Information, it may affect your receipt of services. In order to make a request for information or to update your information, please send your request by electronic mail to [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com).

## For Customers in China

China's Personal Information Privacy Law provides our customers in China with additional rights over their Personal Information. When Sirva is acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then Sirva's client is responsible as the Personal Information Processor for telling us how your Personal Information should be used and processed. Under applicable privacy law, Sirva and its family of companies are Entrusted Parties who receive Personal Information and instructions on how to process that Personal Information from the Personal Information Processor. If you independently request services of us, then Sirva acts as a Personal Information Processor and manages your Personal Information to provide services according to what you have consented to and the terms of this policy. Whether acting as a Personal Information Processor or an Entrusted Party, we maintain the privacy of your information and only use, share, transfer or store it as permitted.

## For Customers in California

California law provides consumers in California with additional rights over their Personal Information. If you are a customer in California, you also have rights to storage limitation and data minimisation for any Personal Information that has been collected. This means that you may contact us to ask that we only collect or retain certain, essential Personal Information. You may also request that we remove your Personal Information from our systems after a specific amount of time, or after it is no longer needed for our business purposes (which may include a retention period as needed for our regulatory, audit, contractual, and other legal obligations).

As part of its routine business operations, Sirva upholds the principle of data minimisation by only collecting and processing Personal Information as absolutely necessary to provide services. Nevertheless, if you wish to opt out of any processing of your Personal Information, or wish to exercise either of the additional rights shown above, please contact us with your request via email at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). Your services may be affected depending upon the nature of your request.

Sirva respects your privacy and does not sell Personal Information.



## For Customers in the European Union

The laws of the European Union provide individuals in the European Union with additional rights over their Personal Data. When Sirva is acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then Sirva's client is responsible as the Data Controller for telling us how your Personal Data should be used and processed. Under the European Union's General Data Protection Regulation, Sirva and its family of companies are Data Processors who receive Personal Information and instructions on how to process that Personal Information from the Data Controllers. If you independently request services of us, then Sirva acts as a Data Controller and manages your Personal Information to provide services according to what you have consented to and the terms of this policy. Whether acting as a Data Controller or a Data Processor, Sirva complies with the EU-US Data Privacy Framework (EU-US DPF) as set forth by the US Department of Commerce. Sirva has certified to the US Department of Commerce that it adheres to the EU-US Data Privacy Framework Principles (EU-US DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-US DPF. If there is any conflict between the terms in this privacy policy and the EU-US DPF Principles, the Principles shall govern. EU individuals with enquiries or complaints regarding our handling of personal data received in reliance on the EU-US DPF should first contact [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). To learn more about the Data Privacy Framework (DPF) programme, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

## For Customers in India

India recently passed the Digital Personal Data Protection Act (DPDPA) in 2023 that covers our customers in India and their Personal Information. Customers in India have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Data at any time. However, if you as a customer choose to opt out of this policy or otherwise decline to provide Personal Data, it may affect your receipt of services. In order to make a request regarding your Personal Data, please send your request by electronic mail to the privacy office at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). Your services may be affected depending upon the nature of your request.

## For Customers in Japan

Japan's Act on the Protection of Personal Information (APPI) covers our customers in Japan and their Personal Information. Customers in Japan have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Data at any time. However, if you as a customer choose to opt out of this policy or otherwise decline to provide Personal Data, it may affect your receipt of services. In order to make a request regarding your Personal Data, please send your request by electronic mail to the privacy office at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). Your services may be impacted depending upon the nature of your request.

## For Customers in Malaysia



Malaysia's amended Personal Data Protection Act (PDPA) of 2010 covers our customers in Malaysia and their Personal Data. When Sirva is acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then Sirva's client is responsible as the Data User for telling us how your Personal Information should be used and processed. Under applicable privacy law, Sirva and its family of companies are Data Processors who receive Personal Information and instructions on how to process that Personal Information from the Personal Data User. If you independently request services of us, then Sirva acts as a Personal Data User and manages your Personal Information to provide services according to what you have consented to and the terms of this policy. Whether acting as a Data User or as a Data Processor, Sirva maintains the privacy of your data and only uses, shares, transfers or stores it as permitted.

Customers in Malaysia have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Data upon reasonable notice. If you are a customer in Malaysia, you also have rights to data portability for any Personal Information that has been collected. This means that you may therefore request that we provide your personal data for you to transfer elsewhere.

If you as a customer choose to withdraw your consent or otherwise decline to provide Personal Data, it may affect your receipt of services. In order to make a request regarding your Personal Data, please send your request by electronic mail to the privacy office at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com).

### **For Customers in New Zealand**

New Zealand's Privacy Act of 2020 covers our customers in New Zealand and their Personal Information. Customers in New Zealand have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Information at any time. If you as a customer choose to opt out of this policy or otherwise decline to provide Personal Information, it may affect your receipt of services. In order to make a request for information or to update your information, please send your request by electronic mail to [privacyofficer@sirva.com.au](mailto:privacyofficer@sirva.com.au), or contact us by telephone at +61 2 8868 2819.

### **For Customers in the Philippines**

The Data Privacy Act (DPA) of 2012 covers our customers in the Philippines and their Personal Information. Customers in the Philippines have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Information at any time upon reasonable notice. However, if you as a customer choose to opt out of this policy or otherwise decline to provide Personal Information, it may affect your receipt of services. In order to make a request regarding your Personal Information, please send your request by electronic mail to the privacy office at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). Your services may be affected depending upon the nature of your request.

### **For Customers in Singapore**

The Singapore Personal Data Protection Act (PDPA) of 2012 covers our customers in Singapore and their Personal Data. Customers in Singapore have the right to withdraw their



consent to our Privacy Policy or the processing of any of their Personal Data upon reasonable notice. However, if you as a customer choose to opt out of this policy or otherwise decline to provide Personal Data, it may affect your receipt of services. In order to make a request regarding your Personal Data, please send your request by electronic mail to the privacy office at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). Your services may be affected depending upon the nature of your request.

### **For Customers in South Korea**

The Personal Information Protection Act (PIPA) of 2020 and its subsequent amendments cover our customers in South Korea and their Personal Information. Customers in South Korea have the right to withdraw their consent to our Privacy Policy or the processing of any of their Personal Information at any time. However, if you as a customer choose to opt out of this policy or otherwise decline to provide Personal Information, it may affect your receipt of services. In order to make a request regarding your Personal Information, please send your request by electronic mail to the privacy office at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). Your services may be affected depending upon the nature of your request.

### **For Customers in Switzerland**

The Swiss Data Protection Act and upcoming Federal Act on Data Protection provide individuals in Switzerland with additional rights over their Personal Data. When Sirva is acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then Sirva's client is responsible as the Data Controller for telling us how your Personal Data should be used and processed. Under Swiss law, Sirva and its family of companies are Data Processors who receive Personal Information and instructions on how to process that Personal Information from the Data Controllers. If you independently request services of us, then Sirva acts as a Data Controller and manages your Personal Information to provide services according to what you have consented to and the terms of this policy. Whether acting as a Data Controller or a Data Processor, Sirva complies with the Swiss-US Data Privacy Framework (Swiss-US DPF) as set forth by the US Department of Commerce. Sirva has certified to the US Department of Commerce that it adheres to the Swiss-US Data Privacy Framework Principles (Swiss-US DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-US DPF. If there is any conflict between the terms in this privacy policy and the Swiss-US DPF Principles, the Principles shall govern. Swiss individuals with enquiries or complaints regarding our handling of personal data received in reliance on the Swiss-US DPF should first contact [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). To learn more about the Data Privacy Framework (DPF) programme, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

### **For Customers in the United Kingdom**

The laws of the United Kingdom provide individuals in the UK with additional rights over their Personal Data. When Sirva is acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then Sirva's client is responsible as the Data Controller for telling us how your Personal Data should be used and processed. Under the UK



General Data Protection Regulation (UK GDPR), Sirva and its family of companies are Data Processors who receive Personal Information and instructions on how to process that Personal Information from the Data Controllers. If you independently request services of us, then Sirva acts as a Data Controller and manages your Personal Information to provide services according to what you have consented to and the terms of this policy. Whether acting as a Data Controller or a Data Processor, Sirva complies with the EU-US Data Privacy Framework (EU-US DPF) and the UK Extension to the EU-US DPF, as set forth by the US Department of Commerce. Sirva has certified to the US Department of Commerce that it adheres to the EU-US Data Privacy Framework Principles (EU-US DPF Principles) with regard to the processing of personal data received from the United Kingdom in reliance on the UK Extension to the EU-US DPF. If there is any conflict between the terms in this privacy policy and the EU-US DPF Principles, the Principles shall govern. UK individuals with enquiries or complaints regarding our handling of personal data received in reliance on the UK Extension to the EU-US DPF should first contact [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com). To learn more about the Data Privacy Framework (DPF) programme, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

## Data Integrity & Security

Sirva will make every reasonable effort to keep Personal Information accurate while we are using that information to serve you. Sirva appreciates your cooperation in maintaining complete and up-to-date Personal Information and will facilitate your efforts in this regard. Sirva retains Personal Information for as long as we have determined it is needed for the purposes for which it was received or as required by contractual, record keeping, or other legal requirements.

We limit access to Personal Information about you to those employees who need to know that information to provide products and services to you. We do not sell your Personal Information.

We maintain physical, electronic and procedural safeguards to protect your Personal Information. We regularly assess security standards and procedures to protect against unauthorised access to Personal Information.

We store your Personal Information on servers that may be located in various countries, but always in compliance with this policy and all applicable data privacy laws and regulations.

You should always safeguard your own Personal Information by protecting passwords used to access a Sirva system and by safely disposing of records and reports no longer needed.

As and when required by law, Sirva will notify and work with regulatory and/or law enforcement officials as required by law to address any issues or security breaches where they arise.

## Enforcement

### A. Questions & Comments

Sirva and its family of companies are subject to the investigatory and enforcement powers of



the Federal Trade Commission (FTC). Van lines in the Sirva family of companies are also subject to the investigatory and enforcement powers of the Department of Transportation (DOT). Employee training and internal procedures are in place to support compliance with our Privacy Policy and applicable privacy laws. Sirva provides for regular internal compliance reviews of its privacy practices, and Sirva has a Data Protection Officer responsible for privacy implementation and compliance. For assistance with privacy concerns, please send an electronic mail to the privacy office at [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com).

In compliance with the EU-USS DPF and the UK Extension to the EU-USSDPF and the Swiss-USS DPF, Sirva commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-USS DPF and the UK Extension to the EU-USS DPF and the Swiss-USS DPF in the context of the employment relationship.

#### B. Dispute Resolution

Sirva recognises the importance of providing you the opportunity to address and resolve complaints about the processing of your Personal Information. In compliance with the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF, Sirva commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-US DPF, the UK Extension to the EU-US DPF, and the Swiss-US DPF to the American Arbitration Association ("AAA"), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit the AAA website, located [here](#), for more information or to file a complaint. If your complaint cannot be resolved through the above channels, under certain conditions, individuals may invoke binding arbitration in the resolution of their privacy claims. The services of the AAA are provided at no cost to you. The American Arbitration Association ("AAA") is also located at the following address:

225 North Michigan Avenue, Suite 2527

Chicago, Illinois 60601-7601 USA

The AAA can be contacted by telephone at (312) 616-6560 or by facsimile at (312) 819-0404.

