

Privacy Policy Professional Organizing in accordance with GDPR

1. Responsible Entities

Name and address of person responsible at Professional Organizing Relocation Consult GmbH

The person responsible in terms of Applicable Data Protection law:

*Professional Organizing Relocation Consult GmbH
Remco Rehberg
Brunnenstraße 4
65812 Bad Soden am Taunus
Deutschland
Tel.: +49 (6196) 5946 0
E-Mail: r.rehberg@ProfOrg.com
Website: www.ProfOrg.com*

Name and address of Data Protection Officer

The data protection officer of the person responsible is:

*Ronald Baranowski
External Data Protection Officer
SIX DATENSCHUTZ
Kasselerstr. 30
61118 Bad Vilbel
T: +49 6101 982 94 22
E-Mail: datasecurity@proforg.com
Dipl.-Inform. - DSB –TÜV and ITSiBe/ISB in accordance with ISO 27001 and BSI IT-Grundschutz*

2. General Information

Professional Organizing Relocation Consult GmbH (subsequently "Professional Organizing" and/or "We") is committed to protecting and respecting your privacy in accordance with Applicable Data Protection Laws and beyond.

The security of Your Data is important to us. We are committed to protecting the information we collect, store, transmit and process. We employ administrative, technical and physical safeguards ("Technical and Organizational Measures") to safeguard your personal information and prevent unauthorized access.

Professional Organizing will cause any person or entity acting on our behalf to fully comply with all applicable governmental, legal, regulatory and professional requirements relating to privacy.

Our privacy practices may vary among the countries in which we operate for you to reflect local practices and legal requirements ("Applicable Data Protection Laws"). In most cases this will be the law of the country in which you are located.

According to Applicable Data Protection Laws, you may be entitled to know the identity of your “Data Controller” i.e. the legal entity that determines why and how your personal data is processed. This will generally be the case if you are located within the European Economic Area.

Your relevant Data Controller may vary, depending on how you are receiving Services from us. For example, for Corporate Clients the Controller of Your Data may be your employer. If you usually receive Services from one of our business partners, the business partner may be the Data Controller. In such case, this Policy may not apply to you and please refer, instead, to your employer’s or our business partner’s privacy policy for further information as to how your personal data may be handled.

Even if this Policy does not directly apply to you, Professional Organizing, as a “Data Processor” (person or legal entity that processes data on behalf of a data controller) within the meaning of Applicable Data Protection Laws, will process the personal data under the Data Controller’s sole instructions, and will take all steps necessary to preserve the security and confidentiality of the personal data, and prevent their alteration, damage, loss or access by unauthorized persons.

If you have any questions in regard to the above, please contact us at datasecurity@ProfOrg.com

3. Information we collect from you

We may collect personal information (including personally identifiable information or, where relevant, sensitive personal data within the meaning of Applicable Data Protection Law) about you and/or your family (“Your Data”) in the following ways:

- **Information you give us.** This is information that you and/or your family give us by filling in forms on our websites or other digital assets or by corresponding with us by telephone, email or otherwise. This includes the use of our websites or other digital assets or inquiries about, or use of any of our immigration or relocation or other assignment services (the “Services”). The information may include without limitation your and /or your family’s name, address, e-mail address, phone number or other contact details, marital status, age, occupation, role/title/area of responsibilities, and financial information etc.

Sensitive personal data may include, for example, data about physical health, medical records, sexual orientation, racial or ethnic origin and religious beliefs (where required to be provided under law for example for visa applications or in order to serve your personal preferences i.e. in terms of religious school choices etc.)

- **Information we collect about you.** We, our service providers, and other business partners collect certain information by using automated means, such as cookies, when you interact with our mobile applications, or visit our websites or other digital assets. This information may include your IP address, browser type, operating system, the full URLs, referring URLs and information on actions taken or interaction with our digital assets. We may use third-party web analytics services on our websites and other digital assets, to help us analyze how visitors use our websites and other digital assets
- **Information we may receive from other sources.** We are working closely with third parties (including, for example, employers, business partners, and sub-contractors (including technical, payment and delivery services, analytics providers, search information providers, credit reference agencies, financial institutions, financial advisers, external medical bodies, disclosure and criminal check services, police forces and courts) and may receive information about you from them.

4. Use of Your Data

We may use Your Data in the following ways:

- to provide you and/or your family with the Services (as applicable);
- to administer, operate, facilitate and manage your and/or your family's relationship and/or account with us, and to provide other services for you, including contacting you or, if applicable, your designated representative(s) by post, telephone, email etc.;
- to notify you about changes to the Services;
- to operate, evaluate and improve our business, manage our communications; to ensure the content of our website is presented in the most effective manner for you and for your computer; and performing accounting, auditing, billing, reconciliation and collection activities;
- as may be required by applicable laws and regulations or requested by any relevant judicial process or governmental agency; and
- to comply with industry standards and our strict Professional Organizing policies

5. Disclosure of Your Data

Where required, we may share your Data with selected third parties including:

- Business partners, suppliers, and sub-contractors for the performance of the Services (as applicable).
- Authorities: Municipality Registration Offices, Immigration Offices, Federal Employment agencies, Driver's License and Car Registration Offices. Child and Parental Benefit Centers, Tax and Pension Authorities, Police forces and courts and relevant immigration authorities (like Embassies and Consulates) for the purpose of preparing and processing your visa application.
- Third parties: Banks, Health Insurance Companies, Tax Consultants, Driving Schools, Lawyers, Realtors, Landlords, Utility Providers, Telephone and Internet Service Providers, external medical bodies, disclosure and criminal check services.

6. Data Transfer (third countries) and Storage

Professional Organizing is a German business providing global services. To offer and perform our services, we may, where required, need to transfer your personal information among several countries. We will take all steps reasonably necessary to ensure that Your Data is processed and treated securely and in accordance with this Privacy Policy and with the Applicable Data Protection Law.

However, when transferring your data to countries outside the EU, in cases where the transfer is necessary for the performance of a contract between you and the data controller or the implementation of pre-contractual measures taken for you, we cannot always guarantee the security of your data, despite all efforts to do so. We will only transfer your data outside the EU and the jurisdiction of GDPR if the transfer is in your personal interest and necessary to perform the Services.

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. All information you provide to us is stored on secure servers. We use SSL encryption on a number of our websites from which we transfer certain personal information.

We store Your Data for as long as agreed in the data processing agreement with your data controller unless otherwise required or authorized by you or Applicable Law. Your data is only used to fulfil the purpose or the Service for which it was collected. We take measures to destroy or permanently de-identify Your Data if required by law or if Your Data is no longer required for the purpose, for which it was collected.

Where we provided you with a password, which enables you to access certain parts of our websites or other digital assets, or upload documents and transfer information to us, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

As the transmission of information via the internet may not be completely secure, we cannot guarantee the security of Your Data transmitted to our websites or other digital assets that are in the public domain; Once we have received your information, we use strict Technical and Organizational Measures to prevent unauthorized access and unlawful use.

7. Your Rights

Under Applicable Data Protection Law, you have certain rights regarding the personal information we maintain about you.

You can choose not to provide personal information to us, withdraw any consent, you previously provided (directly or through your data controller), or object and ask the data controller to have your personal data corrected or deleted at any time. However, if you do not provide Your Data when requested, or if you exercise your rights you and/or your family may not be able to benefit from the Services (as applicable), and we may not be able to provide you with the information and Services relevant for the specific assignment.

In addition, you have the right to obtain confirmation that we hold personal information about you, request access to, and receive information and copies about\of the personal information. The right to access personal information may be limited in some circumstances by local law requirements including Applicable Data Protection Law. Any request should be made in writing to your data controller.

In the event of a violation of data protection regulations, you have the opportunity to file a complaint with the supervisory authorities. The designated supervisory authority would be the Commissioner for Data Protection Hessen (<https://datenschutz.hessen.de/>).

8. Data Security\ Integrity and Safeguards

The security, integrity and confidentiality of your Data are of utmost importance to us. We have implemented physical, administrative and technical security controls and safeguards to protect any Personal Data from unauthorized access, modification, disclosure, deletion and misuse. We constantly test and update our measures in accordance with technological development.

In the unlikely event of a Security Incident, we are committed to take all steps necessary and outlined by the Applicable Data Protection Laws including but not limited to: Informing the data controller, where applicable, the individual or group of individuals

concerned if authorized by the data controller, and the relevant Data Protection Supervisory Authority.

Definitions:

“Applicable Laws” means all laws, rules and regulations of any type, which have been issued or enacted by any government, authority or agency anywhere in the world, as amended, extended, repealed and replaced from time to time.

“Data Controller and Processor” means a person who processes data on behalf of a data controller. A data controller decides the purpose and manner to be followed to process the data, while data processors hold and process data, but do not have any responsibility or control over that data.

“Data Protection Laws” means all Applicable Laws in relation to (a) data protection; (b) privacy; (c) interception and monitoring of communications; (d) restrictions on or requirements relating to the Processing of Personal Data of any kind including laws addressing identity theft or security breach.

“Data Protection Supervisory Authority” means a supervisory authority or other government body responsible for the administration, implementation and enforcement of Data Protection Laws as it relates to the Processing under the Agreement.

“Personal Data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal Data also includes any other information about an individual that is combined with any of the above.

“Process” or “Processing” means any act performed on Personal Data, whether or not by automated means, including, but not limited to, collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, blocking, erasure or destruction.

“GDPR” means the General Data Protection Regulation ((EU) 2016/679).”

“Security Incident” means any actual or reasonably suspected accidental, unlawful or unauthorized loss, destruction, alteration, access, use, disclosure of, damage or corruption to Personal Data.

“Subcontractor” means any person or entity contracting with Supplier (or any of Supplier’s Affiliates) to perform the Supplier’s obligations under the Agreement or who otherwise processes Personal Data on behalf of the Supplier.

“The Services” means the Services Professional Organizing was contracted to perform for you or related activities that are necessary to perform those services.