



Approved by: **George G. Nazzal**

## **DATA PROTECTION MANAGEMENT PROCEDURE**

### **PURPOSE:**

This policy describes how Express International Group meets its obligations to individuals and FAIM3.1 rules regarding the safeguarding of personal data. The policy addresses the core principles set out by various accreditation bodies and agents.

### **SCOPE:**

**Personal data** are defined as "any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity."

### **BACKGROUND:**

(EIG) needs to collect personal information about people with whom it deals in order to carry out its business and provide its services. Such people include customers, companies, embassies and employees (present, past and prospective), suppliers and other business contacts. Remember good privacy practices are a part of EIG governance and accountability.

### **TYPES OF DATA COLLECTED BY EIG FOR JOB REQUIREMENTS:**

1. The information includes Contact information (such as name, postal or e-mail address, and phone or fax number), Business contact information (such as job title, department and name of organization) private and confidential information, sensitive information.
2. Government-issued identification documents (such as Passport, Diplomatic ID or other required documents to verify customer identity for the purposes of conducting customs business on your behalf).



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3. Financial information (such as financial account of Bookers and Origin Agents information used for payment purposes).
4. Country of origin information (from which country customers are coming).
5. Contact information for family or friends or other people customer would like us to contact to process documents or receive / ship customer goods while he is out of the country.
6. In addition, we may occasionally be required to collect and use certain types of such personal information to comply with the requirements of the law. No matter how it is collected, recorded and used (e.g. on a computer or on paper) this personal information must be dealt with properly to ensure compliance with the FIDI, ISO, Harmony Network, Crown Group, Cartus and Egyptian Law.
7. The lawful and proper treatment of personal information by EIG is extremely important to the success of our business and in order to maintain the confidence of our service users and employees.
8. We ensure that EIG treats personal information lawfully and correctly.

**DATA PROTECTION PRINCIPLES:**

EIG fully supports and complies with the principles which are summarized below:

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained/processed for specific lawful purposes.
3. Personal data held must be adequate, relevant and not excessive.
4. Personal data must be accurate and kept up to date.
5. Personal data shall not be kept for longer than necessary.
6. Personal data shall be processed in accordance with rights of data subjects.
7. Personal data must be kept secure.
8. Personal data shall not be transferred outside EIG unless necessary and under adequate protection.



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The policy of the company is to communicate our Data Privacy & Protection Policy to all of our clients, vendors and staff through our work order instructions; our relocation proposal, our Quality Manual, our web site and various written communications

**CHOICE & CONSENT:**

Our Data Privacy Policy is created to assure our clients that how their personal information is used, disclosed and stored. By signing the Relocation Proposal they are giving us their consent to provide the needed information, for the sole purpose clearly set out in our notice.

**USE, RETENTION & DISPOSAL:**

This information is only to be used and shared with parties and authorities that may need this information to process the jobs ordered. Information may be shared with crew supervisors, move coordinators, customs authorities, shipping lines, and airlines and customs brokers.

Customer's personal information is retained for only as long as necessary to fulfill the stated scope of the jobs ordered, or as required by law or regulations and will be disposed off in a timely and guarded manner.

Contact customer with special offers and other information we believe will be of interest to customer (in accordance with any privacy preferences customer have expressed to us) Improve and develop our services or to improve our marketing and promotional efforts.

Help customer, if you are EIG employee, to perform your job functions and to manage our workforce; promote security; to protect against and prevent fraud, claims and other liabilities; and to manage corporate risk exposure

Prevent use for any other purpose about which we provide notice at the time of collection.

**ACCESS:**

Should the customer need to obtain a copy of his personal information he may ask for it in writing and may as well request to update / review his information.



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**Information Disclosure:**

EIG policy dictates and mandates not to disclose or sell the personal information of our customers. (Employee Non Disclosure Agreement by All who deals with Data).

Data will not be disclosed except as necessary for coordinating business or where permitted by the law. We may disclose this information for third parties to facilitate the clearance and process of the move/job.

We require the recipients of such information to protect the information and use it only for the purpose provided.

**Security for Privacy:**

Customer's personal information is guarded through physical, electronic and procedural safeguards. Customer files are kept in locked cabinets and staff computer screens and databases are password locked.

Staff is required not to share their passwords and required to protect our customer's personal information and may not access that information unless there is a legitimate reason for doing so.

**Monitoring & Enforcement:**

If an individual believes that their personal information is not handled in accordance with our privacy policy or the applicable law, then a complaint should be submitted to senior management for their immediate investigation into the complaint.

EIG Management will monitor implementation every quarter. All staff is to be made aware that a breach of the rules or procedures identified in this policy may lead to disciplinary action that might lead to dismissal can being taken against them in case of disclosure of Information

**Signed by**

For: **President / CEO**