

DATA PROTECTION MANAGEMENT POLICY

I. Purpose

This policy describes how Express International Group meets its obligations to individuals and FAIM rules & standards and General Data Protection Regulation 2016/679 in EU Law regarding the safeguarding of data subject personal data which are collected by EIG to perform the services requested. The policy addresses the core principles set out by various accreditation bodies and agents.

II. Definitions

Accountability:

Accountability is the ability to demonstrate compliance with the GDPR. The Regulation explicitly states that this is the organization's responsibility. In order to demonstrate compliance, appropriate technical and organizational measures have to be implemented.

Agent:

An affiliated moving company is authorized to act on behalf of the Booker. The agent may handle the booking and/or destination services.

Booker:

The agent that accepts the order for the customer's move and handles it. The booking agent may or may not be the origin or destination agent.

Consent:

Consent is any "freely given, specific, informed and unambiguous" indication of the individual's wishes by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to personal data relating to them being processed for one or more specific purposes.

Data controller:

Any organization, person, or body that determines the purposes and means of processing personal data for clients, controls the data and is responsible for it.

Data processor:

A data processor processes the data on behalf of the data controller.

Data subject:

A data subject is a natural person. Examples of a data subject can be an individual, a customer, a prospect, an employee, a contact person, etc.

EIG:

Express International Group

FAIM:

FIDI Accredited International Mover

FIDI:

Federation International Des Déménageurs Internationaux

GDPR:

It is denoted for General Data Protection Regulation. The territorial scope of the GDPR includes the European Economic Area (EEA – all 28 EU member states), Iceland, Lichtenstein, and Norway, and does not include Switzerland.

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Personal data:

They are any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

Subject access:

This is the data subject's right to obtain from the data controller, on request, certain information relating to the processing of his/her personal data.

Third party:

A third party is any natural or legal person, public authority, agency, or any other body other than the data subject, the controller, the processor, and the persons who, under the direct authority of the controller or the processor, are authorized to process the data.

Transfer:

The transfer of personal data to countries outside the EEA or to international organizations is subject to restrictions. As with the Data Protection Directive, data does not need to be physically transported to be transferred. Viewing data hosted in another location would amount to a transfer for GDPR purposes.

III. Scope

The EU GDPR, FIDI and this policy apply to all of EIG personal data processing functions, including those performed on customers', clients', employees', suppliers' and partners' personal data, and any other personal data the organization processes from any source.

IV. Principles and Purposes of Processing

EIG, whether it is the Booker or the Agent, 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. Good privacy practices are a part of EIG governance and accountability.

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

V. Types of Data Collected by EIG for Job Requirements

The information includes:

1. 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).
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.

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.

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.

We ensure that EIG treats personal information lawfully and correctly.

VI. 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.

VII. 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.

VIII. Use, Retention & Disposal

This information is only to be used and shared with third 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 of in a timely and guarded manner.

Contacting customer with special offers and other information we believe will be of interest to customer to improve and develop our services or our marketing and promotional efforts. (This is made in accordance with any privacy preferences the customer has expressed to us.)

As an EIG employee, you should help customer by performing your job functions and promoting security; to protect against and prevent fraud, claims and other liabilities; and to manage corporate risk exposure.

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

IX. Subject 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.

X. 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 has been acknowledged).
Data will not be disclosed to a third party 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.

XI. 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, databases and are password protected.
Employees are requested not to share their passwords and acknowledged the obligation to protect our customer's personal information and may not access that information unless there is a legitimate reason for doing so.

XII. 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.
EIG Management will monitor implementation every quarter annum. 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 being taken against them in case of disclosure of Information.

Approved by:

Jerry Nazzal
President

