

# Privacy Policy

**SIRVA respects your privacy, and this Privacy Policy is intended to inform you of how we protect your private, personal information.**

**If you do not consent, then you must speak with a SIRVA representative to discuss your concerns.**

## One Policy

SIRVA has one global Privacy Policy for all persons to whom we provide services, that applies to the entire SIRVA family of companies ("SIRVA"). SIRVA is committed to complying with all local and worldwide 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 ("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 (real estate or household goods moving services); social security, date of birth, or other identification numbers (applications or account setup); banking information (mortgage or expense payment services); and/or passport or driver's license information (visa & immigration services).

## General Data Protection Regulation Information

When we are acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then the client is responsible as the Data Controller for telling us how your Personal Information 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. Where we act as a Data Controller for services you independently request of us (i.e., where we independently determine how any Personal Information is processed), then we manage your Personal Information according to what you have consented to and the terms of this policy. Whether acting as a Data Controller or a Data Processor, we maintain the privacy of your information and only use, share, transfer or store it as permitted.

## How We Obtain Personal Information

SIRVA relies upon many sources of information to understand and meet your needs. 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 the mail or through our websites;
- Your transactions with any of the companies in the SIRVA family;
- Consumer reporting agencies;
- Mortgage, Title, appraisal or other companies connected with a financial product or service involved in the sale or purchase of your home;
- Your employer;
- Anyone who you have authorized 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 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 website.

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 Sharing & Storage**

Depending on the services you are set to receive, your information may need to be shared, used, and/or stored globally. Your information will be retained as necessary to provide the 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 financial, relocation, and moving 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 and make recommendations about a variety of the services offered by SIRVA, we may share Personal Information among the SIRVA family of companies.

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

Depending on the type of services you are to receive, SIRVA may work with and provide your information to companies or persons 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 proposed or actual financing, securitization, 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 authorized us to disclose the information;
- other suppliers 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 organizations 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 authorized us to do so or as otherwise indicated in this Policy or as required by law.

We maintain agreements with our external suppliers limiting the use of your Personal Information only for the purposes you have intended in providing the information. These suppliers are bound to uphold our standards and procedures regarding privacy under the terms of our agreements with them.

### Right to Data Portability & Right to Be Forgotten

SIRVA provides you with a reasonable opportunity to access your own Personal Information, to correct that information if inaccurate, or to have it deleted as appropriate--subject to the exceptions stated below.

Reasonable access means, for example, 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 inquiries. 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. In order to update your information, please send your request by electronic mail to [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com), by facsimile to the number (216) 606-7654, or by telephone to the number (216) 606-7912.

You 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 or otherwise decline to provide Personal Information, it may affect your receipt of services.

### 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 unauthorized 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.

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. Verification

Employee training and internal procedures are in place to allow SIRVA to ensure compliance with its Privacy Policy. SIRVA provides for regular internal compliance reviews of its privacy practices, and SIRVA has a Data Protection Office that is responsible for privacy implementation and compliance. For assistance with privacy concerns, you may send comments by electronic mail to [privacy.administrator@sirva.com](mailto:privacy.administrator@sirva.com), by facsimile to the number (216) 606-7654, or by telephone at (216) 606-7912.

### B. Dispute Resolution

SIRVA recognizes the importance of providing you the opportunity to address and resolve complaints about the processing of your Personal Information. Therefore, in addition to any legal remedies that may be available, if you make a complaint with us about the processing of your Personal Information and it is not resolved to your satisfaction internally at SIRVA, you may also file a complaint with the American Arbitration Association ("AAA") at the AAA website, located [here](#), or seek its independent alternative dispute resolution services. 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 reached by telephone at (312) 616-6560 or by facsimile at (312) 819-0404.