



Privacy Policy Statement

May 2018

DT Moving Limited including DT Moving France SARL is a Gosselin Mobility group company. This privacy policy explains how we manage and use personal data that we collect from you.

1. Your data controller

This privacy policy statement relates solely to information supplied by you to us either directly or indirectly. DT Moving Limited is registered in England and Wales under company number 1165167 and whose registered address is at 49 Wates Way, Mitcham, Surrey, CR4 4HR, United Kingdom (“DT Moving”). Any reference to DT Moving shall also include reference to or any of the DT Moving associated companies including its holding companies, subsidiaries, and affiliates. The data controller in respect of any Personal Data provided is DT Moving Limited and other controllers identified in section 15. We shall respect the privacy of your personal data, treat it as confidential and keep it secure subject to the provision of the UK Data Protection Act 2018 and/or the EU General Data Protection Regulations (May 2018).

2. Processing your Personal Data

This privacy policy covers the information about you (“Personal Data”) that you provide to us either directly or indirectly via third parties that authorise our services on your behalf, including but not limited to your employer, agent or relocation service provider.

Collection of Personal Data: We collect Personal Data about you, subject to applicable law, from a variety of sources as follows:

- We obtain your Personal Data when you provide it to us (e.g. by phone or via e-mail (or by any other means)).
- We collect your Personal Data in the ordinary course of our relationship with you (e.g. whilst managing your relocation and/or storage).
- We collect Personal Data that you manifestly choose to make public, including via social media (e.g. we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We receive your Personal Data from third parties who provide it to us, e.g. entities who authorise our services on your behalf, such as your employer, agent, relocation service provider, and/or insurers, previous landlords, credit reference agencies, etc.

Creation of Personal Data: We may also create Personal Data about you that we may Process, subject to applicable law, as follows:

- Personal details: given name(s); preferred name; nickname(s), gender, date of birth / age; marital status; social security number; Passport number(s), other Government(s) issued numbers (tax identification number, Green Card(s) number(s) including Driving Licence number; nationality; images of Passports, images of Visas (Work / Residence permits); images of Driving Licences, images of Gun Licences, images of Signatures.
- Family member details: similar information for family members assisting you with your relocation and/or moving with you (e.g. your spouse, partner, children)
- Contact details: address, telephone number(s); fax number; e-mail address; and social media profile details.
- Financial details: billing address, bank account numbers; credit or debit card numbers; cardholder or account holder name and details, for the purpose of making authorised payment deductions or transfers; instruction records and transaction details.
- Views and opinions: any views and opinions, such as customer satisfaction questionnaires, that you choose to send to us, or publish about us (including on social media platforms).

- Details about your relocation, move or storage requirement: including lists and photographs e.g. for the purpose of assessment, pick-up or delivery vehicular access and condition (of goods). Where photographs of goods or the location are required we will not take photographs of people in your home.
- Valuation of goods details: Bills, receipts, lists or other valuations (of your goods) e.g. for insurance and/or customs declaration purposes
- Electronic Identifying Data: IP address cookies, logs, online identifiers, device ID's geolocation.
- References: reference information from banks, previous and current employers, previous landlords
- Guarantor information: details relating to any guarantors including name and proof of employment or other evidence to guarantee payments on behalf of the tenant.

3. Processing activity and lawful basis for Processing

DT Moving collects and processes your Personal Data in connection with any contract you may enter into with us, for one or more of the following purposes:

- Creation and management of your account. (*lawful basis: consent / contract*)
- Administering relationship and related services. (*lawful basis: consent / contract*)
- Performance of tasks necessary for the provision of the requested services. (*basis: consent / contract*)
- Communicating with you in relation to those services. (*lawful basis: consent / contract*)
- Improving the performance of DT Moving and our Website (*lawful basis: consent / legitimate interest*)
- Managing complaints and claims. (*lawful basis: contract / legitimate interest*)
- Managing our communications systems; operation of IT security. (*lawful basis: legitimate interest*)
- Health and Safety assessments and record keeping, and compliance with legal obligations. (*lawful basis: legitimate interest*)
- Physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems). (*lawful basis: legal obligation / legitimate interest*)
- Regulatory and Statutory compliance under applicable law. (*lawful basis: legal obligation*)

Processing your Special Category Data: We do not seek to collect or otherwise Process your Special Category Data, except where:

- The Processing is necessary for compliance with a legal obligation;
- The Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law;
- You have manifestly made your Special Category Data public;
- The Processing is necessary to protect the vital interests of any individual; or
- We have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Special Category Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); or
- Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.

We only process Criminal Offences Data, and national identification numbers to the extent required or permitted by applicable law.

4. Sharing your Personal Data

The Personal Data provided by you may also be shared with other organisations in order for us to perform tasks necessary for the provision of the requested services and for us to comply with any legal or regulatory requirements. For the purposes detailed above, your information may be disclosed to:

- Any other branches or companies within our group of companies;
- Any regulatory, supervisory, governmental or quasi-governmental authority with authority and jurisdiction over us;
- Any applicable Customs and/or Border Agency and/or equivalent border control agency from and to which removal goods either originate, transit or are destined;
- Any agent, contractor, third-party service provider, international or domestic carrier (such as shipping lines, road and rail transport operators, airlines and freight forwarders), professional advisor or any other person under a duty of confidentiality to DT Moving;
- Any Insurance company and/or their appointed agent with a lawful interest
- Any financial institution with which we have or propose to have dealings

5. Overseas transfers

We may transfer your Personal Data to countries located outside of the European Economic Area (EEA), e.g. overseas. This may happen in circumstances where your goods or you are destined to or based in an overseas location or because your relocation service provider is based in an overseas location. We may transfer your personal data under certain circumstances (e.g. where it is necessary to perform our contract with you). The data protection laws of these countries may not be as comprehensive as those that apply within the EEA – in these circumstances we will take steps to ensure your privacy and confidentiality rights are respected.

Where we transfer your Personal Data to other countries we do so on the basis of:

- European Commission's adequacy provisions;
- Suitable Standard Contractual Clauses; or
- Other valid transfer mechanisms.

6. Personal Data on vessel manifests / USA shipments

If you are **moving your personal belongings to or from the United States of America**, certain of your Personal Data are declared on the vessel manifest, as required by US law. We draw your attention to the applicable US privacy legislation.

According to United States Code of Federal Regulations *Privacy statute 19 CFR 103.31(d) 'Information on vessel manifests and summary statistical report'*, the public is allowed to collect manifest data at every port of entry. Reporters collect and publish names of importers/shippers from vessel manifest data unless an importer/shipper requests confidentiality.

If you wish to prevent your Personal Data which is declared on the vessel manifest from being collected and published (e.g. on reports, public websites etc), you must contact the Privacy Branch of US Customs and Border Protection in writing (see below):

Request confidential treatment of my personal data and that it may not be copied or published from the vessel manifest'

E-Mail: vesselmanifestconfidentiality@cbp.dhs.gov or Fax: +1 202 325-0154

Send to:
CBP Privacy Officer
U.S. Customs and Border Protection
90 K Street, N.E.
10th Floor
Washington D.C. 20229-1177

What information should I include in my request?

- Identify what type of confidentiality you are requesting (e.g. import or export shipment, or both);
- Which party you are (e.g. the importer/consignee (for shipment arriving in USA) or the exporter / shipper (for shipment leaving the USA), or both);
- Your Name and US address (as given for the vessel manifest)
- Your E.I.N. (Employer Identification Number) if available;
- Shipping information including: Vessel Name, Voyage Number, Bill of Lading Number, Date of Sailing, Port of Departure; Port of Arrival/Discharge (you may obtain this information or a copy of the Bill of Lading) from us or the applicable freight forwarder, mover or relocation service provider who is arranging your shipment of personal belongings)

Expiration and Renewal?

Renewal requests must be sent to arrive 90 days prior to the expiration of the two year confidentiality period. There is no fee associated with the request for confidentiality.

7. Third Party information

If you provide us with information about another person, you confirm you already have explicit confirmation that such other person has appointed you to act for them to consent to the processing of their Personal Data by us. This means that you have informed them of our identity and the purpose for which their Personal Data will be processed, namely to verify their name and address and otherwise only in connection with you. You agree to keep us, and any Gosselin Mobility Group company or relevant third party fully indemnified for your not having complied with this requirement.

8. Data Security

We maintain reasonable security measures to safeguard Personal Data from loss, interference, misuse, unauthorised access, disclosure, alteration or destruction. You are responsible for ensuring that any Personal Data that you send us are securely sent.

We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

9. Data Accuracy

We take reasonable steps designed to ensure that:

- Your Personal Data that we process are accurate and, where necessary, kept up to date; and
- Any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay. From time to time we may ask you to confirm the accuracy of your Personal Data that we hold.

10. Data Minimisation

We take reasonable steps designed to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this policy statement.

11. Data Retention

We take every reasonable step to ensure your Personal Data are only processed for the minimum period necessary for the purposes set out in this statement. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- (1) We will retain copies of your Personal Data in a form that permits identification only for as long as:
 - We maintain an ongoing relationship with you (e.g. where you are the recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or
 - Your Personal Data is necessary in connection with the lawful purposes set out in this statement, for which we have a valid legal basis (e.g. where your personal data are included in a contract between us and you or your employer, agent or relocation service provider, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data.

Plus

- (2) The duration of:
 - a. Any applicable limitation period under applicable law (i.e. any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant); and
 - b. An additional twelve (12) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

And

- (3) In addition, if any relevant legal claims are brought, we may continue to Process your Personal Data for such additional periods as are necessary with that claim.

During the periods noted above in paragraphs (2)a and (2)b, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any legal obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data;
- archive your Personal Data so that it is beyond use; or
- anonymize the relevant Personal Data

12. Business changes

If DT Moving or the Gosselin Mobility Group undergoes a group reorganisation or is sold to a third party, the Personal Data provided to us may be transferred to that reorganised entity or third party for the purposes set out above.

13. Your rights

With limited exceptions, you are entitled, in accordance with applicable law, to object to or request restriction of processing of your Personal Data, and to request access to, rectification, erasure and portability of your Personal Data. This service is provided free of charge unless requests are manifestly unfounded or excessive. In these circumstances, we reserve the right to charge a reasonable fee, or, refuse to act on the request. You can write to us, please see Contact Information in section 14 below.

If any of the information that we hold about you is wrong, please tell us and we will put it right.

Subject to any applicable local laws or regulations, if you prefer not to be kept informed of our services, please let us know.

You may lodge a complaint with a Data Protection Authority* if you consider our processing of your Personal Data may infringe applicable law.

*DT Moving Limited is registered with the Information Commissioner's Office, registration reference: Z6597751. You can find out more about your personal data rights or make a complaint at:

www.ico.org.uk

14. Contact Information

You can raise any issues regarding the processing of your Personal Data by contacting the Data Protection Officer at anytime:

By E-Mail to: London@dtmoving.com

By post to: DT Moving Limited, 49 Wates Way, Mitcham, Surrey, CR4 4HR, UK

15. Controllers

DT Moving Limited

49 Wates Way, Mitcham, Surrey, CR4 4HR, UK

DT Moving France SARL

12 Rue de Fourqueux, 78100 St Germain en Laye, France

Gosselin Mobility UK Limited

49 Wates Way, Mitcham, Surrey, CR4 4HR, UK

Glossary of Terms

Controller	The entity that decides how and why Personal Data is Processed, In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
Data Protection Authority	An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
Personal Data	Information that is about any individual, or from which any individual is identifiable.
Process or Processed or Processing	Anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Personnel	Any current, former or prospective director, officer, consultant, employee, temporary staff, individual contractor, intern, seconded person and other personnel.
Processor	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller)
Criminal Offences Data	Personal Data about any actual or alleged criminal offences or penalties.



About DT Moving

DT Moving (A Gosselin Mobility group company) is one of the world's longest established and most respected international relocation companies, helping organisations across the globe achieve their workforce mobility goals. Our services include international removals, destination services, client consultancy and ancillary services, delivered by DT Moving's award-winning move management team. With headquarters in London, UK, DT Moving's global footprint includes 56 offices in 34 countries across Europe, the Caucasus and central Asia, in addition to a worldwide network of audited and accredited partners.

DT Moving Limited

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