

# Privacy Notice

This document was last updated on May 24th, 2018.

**This is the Privacy Notice of Relocation Management Resources, Inc. (“RMR”) whose corporate headquarters is registered in the state of North Carolina.**

## Who We Are

At Relocation Management Resources, Inc. ("RMR" or "we"), we are committed to maintaining the trust and confidence of our customers before, during and after we provide move management and related services, and in regards to the personal customer data that we hold to perform those services.

## RMR Does Not Sell Your Data

To this end, we do not sell, rent or trade data or email lists with other companies or businesses for the purposes of marketing or tracking. Below we have outlined what data we collect, how we use the data, and under which circumstances we share it.

## Data Processing and Data Collection

In order to allow RMR to perform move management services and act as your agent during and after your relocation, RMR will obtain from you (the customer) personally identifiable data.

## Data Collected by RMR Includes

- Legal name(s)
- Method(s) of Contact, including phone numbers, email addresses and mailing addresses
- Home Address(es)
- Records of communication with RMR Agents
- Information about the contents of your home
- Family Members' details, if relevant to the moving services being provided, including: name(s) of spouse, parents or children

## Your Data Rights

RMR acknowledges that individuals have the right to access the personal information that we maintain about them.

You have the right to access, amend inaccurate data or delete information held on you - so long as RMR has no overriding legitimate reason to keep this data.



If you wish to exercise this Right, then please contact: [privacy@rmronline.com](mailto:privacy@rmronline.com).

## **Data Shared**

When sharing your personally identifiable information, RMR never discloses your information with third parties for any materially different service or purpose other than providing your moving and related services.

In order to fulfill our management service to you, RMR will need to share your personal information with various service providers.

Types of Service Providers Include:

- the moving companies that perform packing, loading, hauling, and storage of household goods
- third-party companies who provide special ancillary moving services like disassembly or re-construction of furniture, crating of televisions, artwork, servicing of washers, dryers, and other appliances, etc.
- automobile transport companies
- international moving agents
- freight forwarders
- van line carriers
- insurance companies

RMR also may be required to disclose an individual's personal information in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

RMR's accountability for personal data that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles.

RMR remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless RMR proves that it is not responsible for the event-giving rise to the damage.

## **Data Storage**

RMR takes great care to ensure customer data is kept safe. To this end we use third party service providers including Microsoft Azure and Amazon Web Services for data transfer and storage; entrusting they utilize their resources and data security processes to fulfill their obligations in handling data encryption at



rest and restricted access.

Further to this, we take steps to ensure that our in-house technology is kept abreast of recent security innovations. Should you discover any issue which may compromise data or cause any concerns, then please report these to [privacy@rmronline.com](mailto:privacy@rmronline.com).

### **Data Retention**

Unless we receive permission to extend or instruction to foreshorten, RMR retains your personal data for up to ten years after the fulfillment of relocation services. This is primarily in order to meet our audit obligations to the upstream clients (e.g. Corporate Employers, Relocation Management Companies, Real Estate Partners, etc.) that refer individual customers to RMR.

Should you wish for this data to be minimized or anonymized - to the extent possible while still fulfilling our obligation to our clients - then please contact [privacy@rmronline.com](mailto:privacy@rmronline.com).

### **Legal Basis for Processing Contractual Obligations**

RMR considers the use of customer data lawful in that it is required to fulfill our contractual obligations to our customers. We do not consider separate consent as required for this processing to take place.

Any other use of customer data - including any future marketing - will only take place after RMR has gained your explicit consent.

### **Legal Obligations**

In the case(s) where it is required to allow RMR to comply with laws, regulators, court orders and other legal obligations, RMR will disclose customer information to those Authorities.

### **Legitimate Interests**

Except for those instances where RMR's interests are overridden by the fundamental rights and freedoms of the Data Subject (you), RMR will continue to process customer data without requesting explicit consent in those cases that it is required for RMR's "legitimate interests".

Our legitimate interests include:

- The enforcement of our terms and conditions
- Communication with the upstream data controller for which we initially act as a data processor
- Customer surveys in connection with our services



- The protection of our rights and property
- The development and improvement of our services

### **Consent**

RMR will request explicit consent from you in the case that we wish to use your data in manners not outlined above.

This consent will be given through an opt-in email.

Possible Reasons for Additional Data Use:

- Future Marketing
- Due diligence in the case of a reorganization or acquisition

Should you wish to withdraw your consent, once given, you can do so by contacting [privacy@rmronline.com](mailto:privacy@rmronline.com).

### **EU Privacy Shield**

RMR complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively.

RMR has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

### **Complaints**

In compliance with the Privacy Shield Principles, RMR commits to resolve complaints about our collection or use of your personal information.

EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact RMR at: [privacy@rmronline.com](mailto:privacy@rmronline.com).

### **Unresolved Complaints**

RMR has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus.



If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please both contact RMR and visit [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/) for more information and to file a complaint.

### **Unresolved Complaint Involving Human Resource Data**

If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by RMR, and your inquiry or complaint involves human resource data, you may have your complaint considered by an independent recourse mechanism: for EU/EEA Data Subjects, a panel established by the EU data protection authorities ("DPA Panel").

To do so, you should contact the state or national data protection or labor authority in the jurisdiction where you work. RMR agrees to cooperate with the relevant national DPAs and to comply with the decisions of the DPA Panel. Should your complaint remain fully or partially unresolved after a review by RMR, BBB EU Privacy Shield and the relevant DPA, you may be able to, under certain conditions, seek arbitration before the Privacy Shield Panel.

### **Additional Privacy Shield Information**

For more information, please visit the Privacy Shield website ([www.privacyshield.gov](http://www.privacyshield.gov)). RMR is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). If this policy is substantively updated, we will update the text of this page and provide notice to you at <https://www.rmronline.com> by writing '(Updated)' in red next to the link to this page (in the footer) for a period of at least 30 days.

### **Contact Us**

For any questions regarding this Privacy Notice please contact us at: [privacy@rmronline.com](mailto:privacy@rmronline.com).

