



Data (Privacy) Protection Management

The CMS Companies Privacy Policy:

The CMS Companies are committed to protecting the rights of our customers and securing and protecting the information that is shared with us throughout the operation of our services. This privacy notice discloses the privacy practices for The CMS Companies, and the collection, use, retention, disclosure and disposal of personal information as needed and pertaining to our moving and relocation services.

What is personally identifiable information?

Personally, identifiable information, or sensitive personal information is known as information that can be used to identify, contact or locate a single person. This information may include, name, social security number, date and place of birth, employment, home address etc.

How we obtain this information: This information can become available to our company in regards to our services through move documentation, customs docs, visas and passports. It is our responsibility and duty to you to handle your information with the utmost care and protection.

We are the sole owners of the personal information collected in regards to your move. Only authorized personnel have access to the information that you voluntarily give us via email in preparation for your relocation. We will not sell or rent this information to anyone. Your information will only be shared with those necessary in assisting with the moving/relocation process.

The CMS Companies observe and operate within the FIDI 10 Minimum Privacy Principles:

- 1. Management:** All personnel involved in the move management process are informed of and held responsible for upholding these privacy policies and procedures.
 - a. Review fully the policies and procedures in regards to collecting, obtaining and maintaining customers personal information.
 - b. Collect and process appropriate information necessary for the move and relocation, hold onto information only as long as legally necessary and then the information is to be properly deleted or shredded.
- 2. Notice:** The CMS Companies notify our clients and customers about our privacy policies and procedures in our contracts and communications. Our notice is also available on the sullivanunited.com website, and a link is provided at the bottom of each of our email signatures.

3. **Choice and Consent:** The CMS Companies describe the options available to the individual in regards to the collection, use and disclosure of personal information when asked to do so. By appointing The CMS Companies for your international relocation, you are giving your implicit consent regarding the collection, use and disclosure of your personal information.
4. **Collection:** The CMS Companies collect and manages personal information that obtains to an individual's international relocation. This information collected is only shared with employees who need the information to perform a specific job, i.e. customer services, customs processing, billing.
5. **Use, Retention, and Disposal:** The CMS Companies collect and retain personal information for only as long as necessary to fulfil the stated purposes or as required by law. Personal information is then appropriately and safely disposed of.
6. **Access:** The CMS Companies provide individuals and clients access to personal information upon request for review and update. Personal information is only shared with those employees who need to view the information to handle a specific job duty regarding the order, customer service, customs processing, billing and operations.
7. **Disclosure to Third Parties:** The CMS Companies share personal information to third parties only for necessary work purposes and with the implicit or explicit consent of the individual. All third party, supply chain members are advised via email of our policies, procedures and expectations. As each new vendor is set up, they are provided with a copy of our Data Privacy Protection Policy, and our email signatures serve as a constant reminder.
8. **Security for Privacy:** The CMS Companies protect personal information against unauthorized access (both physical and logical). Personal data is only viewed and accessible to authorized staff.
9. **Quality:** The CMS Companies only maintain accurate, complete and relevant personal information that has been submitted to us directly from the transferee, employer or relocation company via email or completed forms.
10. **Monitoring and Enforcement:** The CMS Companies monitor compliance regarding our company's privacy policies and procedures. Complaints and disputes are taken very seriously and addressed by our VP/General Manager and IT Manager to be sure the situation is rectified immediately. All staff has been informed of our policies and procedures and is aware that any breach of these policies may lead to disciplinary action.

What do The CMS Companies do to protect Personal Information?

The CMS Companies work hard to protect our customer and employee data through a combination of management efforts, notifications to clients and customers, internal safeguards, access control points, monitoring and enforcement mechanisms.

- The CMS Companies maintain a private network. (Domain LAN with a Connectwise (Formally LabTech) Managed Network).
- Maintain updated virus protection and patches on all machines. (Webroot Secure Anywhere updates are automatic. Threat protection is now performed "in the cloud", and always up to date.
- Data backups are run daily.
- Firewalls are in place to ensure that outside attacks are kept from our data.
- Management conducts monitoring and reporting on all systems, software, and hardware daily.
- IT department keeps up to date on the health and accounting of our IT infrastructure.
- Protects data internally by limiting access to only appropriate associates whose duties require them to access the data through Group Policy.

- Access to The CMS Companies Network and its data is managed through Active Directory & Group Policy. We manage the ability of our employees to access data and can disconnect their access at any time.

Any questions regarding our Privacy and Data Protection Policy, Contact Us:

The CMS Companies

5704 Copley Drive, San Diego, CA 92111

800-854-2600 / 858-874-2600

custserv@sullivanunited.com