

## DATA PRIVACY POLICY

### I. Purpose

This policy describes how **VIKING SHIPPING SERVICES** 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 VSS 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.

#### **VSS:**

VIKING SHIPPING SERVICES

#### **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.

**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 HFI 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**

VSS, 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 HFI governance and accountability. The HFI 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 VSS 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, Cartus and Pakistan Government Law. The lawful and proper treatment of personal information by HFI 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 HFI treats personal information lawfully and correctly.

**VI. Data Protection Principles**

VSS 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 HFI 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.

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

**VIII. 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.

**Controlling Personal information:** The client, customer may restrict the collection or use of their personal information in the following ways. Whenever one is asked to fill-in a form on our website, look for the box that they can click to indicate that they do not want the information to be used by anybody for any other purpose. If one has previously agreed to using the personal information, they may request for the change at any time by writing to department for data processing via [info@vikingislamabad.com](mailto:info@vikingislamabad.com)

One may request details of personal information which is hold under the data protection. This will attract a fee which will be charged. If it is believed that any information held is incorrect or incomplete, the department may be reached via [Viking@comsats.net.pk](mailto:Viking@comsats.net.pk) as and when deemed necessary.

#### **IX. Information Disclosure**

VSS 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.

At the time of submitting personal information one agrees or disagrees to disclose his/her information. One may get the personal information update if any change, for which an advance notification request is required via [Viking@comsats.net.pk](mailto:Viking@comsats.net.pk)

#### **X. 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.

#### **XI. 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.

HFI 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.

### **PROCEDURES OF DATA PRIVACY PROTECTION**

#### **Policy Brief & Purpose**

**Viking Shipping services Data Protection company policy** refers to the company's commitment to treat information of employees, customers, agents or other interested parties with the utmost care and confidentiality.

With this policy we ensure that our company behaves in a fair and moral manner concerning the gathering, storing and handling of data. This process will be carried out with transparency and respect towards the rights of individuals who entrust it with their information.

### **Scope**

This policy applies to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to the company. The policy will be followed by all employees of the company and its subsidiaries as well as contractors, consultants, partners, branches and any other external entity. Generally, it refers to anyone who is in close collaboration with the company or acts on its behalf and may need occasional access to data.

### **Policy elements**

The company will need to obtain and process information of people that will serve its business purposes. The information may refer to any offline or online information that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Corporate responsibility: VSS commits to collect this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to the company, the following rules are mandatory collected, used, retained, disclosed, and disposed of in conformity with the co commitments described in the Applicant's privacy notice

### **Privacy protection procedure:**

- The data will be collected fairly and for lawful purposes only
- The data will be processed by the company within its legal and moral boundaries
- The data will not be stored for more than the specified amount of time,

#### **AS PER THE COMPANY POLICY IE 5 YRS.**

- The data will be accurate and kept up-to-date
- The data will not be distributed to any party other than the ones agreed upon by the owner of the data exempting legitimate requests from law enforcement authorities)
- The data will not be transferred to organizations, states or countries that do not have adequate data protection policies
- The data will not be communicated informally
- The data will be protected against any unauthorized or illegal access by internal or external parties

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically the company must:

- Let people know which of their data is collected
- Inform people about how their data will be processed
- Inform people about who has access to their information

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Allow people to request the modification, erasing, reduction or correction of the data contained in the company's databases

Have provisions in cases of lost, corrupted or compromised data

### **Actions & Procedures**

To exercise data protection the company is committed to:

Develop transparent data collection procedures

Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

Build secure networks to protect online data from cyber attacks

Include contract clauses or communicate statements on how data will be handled

Inform individuals of the amount of time that their data will be preserved

Declare its data protection provisions publicly (e.g. on website)

Ensure all concerned parties have read the policy and adhere to it

Train employees in online privacy and security measures

Restrict and monitor access to sensitive data

Establish clear procedures for reporting breach of privacy or data misuse

### **Data collection**

Informed consent is when

An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data and then gives their consent.

Our company will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form. When collecting data, VSS will ensure that the Individual/Service User:

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- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used

### **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action initiated.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made by the management.

**Note : We have communicated this documents to all our office, warehouse staff members, our customers, vendors, suppliers and services providers etc. Moreover this document is also incorporated in our company's web site i.e. [www.viking-pk.com](http://www.viking-pk.com)**

**DATA RETENTION / TERMINATION:** HP allows DATA to be retained upto 5 years. Thereafter the data is destroyed i.e shredded with complete privacy. The shredded papers, document is recycled, used for packing china ware, fragile items on jobs and not available even after shredded.

**NOTE: We store all our customer data on a password protected Excel sheet "Security for privacy - you protect personal information against unauthorized access"**

**MONITOR POLICY REVIEW: 30<sup>TH</sup> June each year**

**ANNUAL REVIEW: 1st January each year.**