

# Iris Removals & Storage Privacy Policy

*Last Modified: 27th April 2018*

**Iris Removals and Storage are committed to protecting and respecting your privacy.**

Iris Removals and Storage provide a range of “Services” not limited to; Moving, Destination Services, Storage, Immigration, Relocation and/or Assignment (as applicable). To provide our Services, it will be necessary to obtain some Personal information such as Name, Contact Details and other such details that identify you and your family (where applicable).

This Privacy Policy, together with [Terms and Conditions], [our Quotation Acceptance Form, if applicable] and any other documents referred to in any of the (together the “**Policy**”) describes the types of personal information we collect, how we use the information, with whom we share it, and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. In some cases, and where applicable, we may ask you to sign a separate form of letter (“**Data Subject Consent Letter**”) to indicate your explicit consent to our processing of your personal data for the purposes set out in the Policy. However, please note that the absence of (i) such a request, or (ii) a Data Subject Consent Letter signed by you, is not intended to be conclusive of this issue and we shall be entitled to conclude that, by visiting us at [**any of our approved web sites; applications; or Portals**], or agreeing to receive Services from us, you are accepting and consenting to the practices described in the Policy. Notwithstanding this, you have the right to contact us to object to, or make certain requests in relation to, the processing of your personal data (as explained further in the **Your Rights as Data Subject** section of this policy).

According to GDPR regulations you are entitled to know the identity of your “data controller” i.e. the legal entity which determines why and how your personal data is processed.

Your relevant data controller may vary, depending on how you are receiving services from us. For example:

- 1. Corporate Clients:** If you are being relocated as part of your employment, your relevant data controller may be your relevant employer who has engaged us to provide services to you. In such case, this Policy may not apply to you and please refer, instead, to your employer’s privacy policy or employee handbook for further information as to how your personal data may be handled. Even if this Policy does not directly apply to you, Iris Removals and Storage will as data processor process personal data under the data controller’s instructions and will do its best to handle your personal data in line with the principles set out in this Policy.

2. **Direct Individuals:** If you are engaging Iris Removals and Storage directly to provide services for you, then your relevant data controller is likely to be that particular Iris Removals and Storage entity which is providing those services to you, and this will typically be Iris Removals and Storage.
3. **Partners:** If you normally deal with one of our business partners but have been referred to us to receive specific services at the behest of that business partner, then that business partner may be your relevant data controller. In such case, this Policy may not apply to you and please refer, instead, to that business partner's privacy policy. Even if this Policy does not directly apply to you, Iris Removals and Storage will as data processors process personal data under the data controller's instructions and will do its best to handle your personal data in line with the principles set out in this Policy.

If you have any questions regarding the above, please contact us at [help@irisremovals.com](mailto:help@irisremovals.com) or using the details set out in the How to Contact Us section below.

## Information we collect from you

We may collect personal information (including personally identifiable information or sensitive personal data) about you and/or your family ("**Your Data**") in the following ways:

- **Information you give us.** This is information that you and/or your family give us by filling in forms on our websites or by corresponding with us by phone, e-mail or otherwise. This includes when you use our websites or inquire about, or use, any of our immigration, moving, relocation and/or assignment services (the "**Services**"). The information may include your and /or your family's name, address, e-mail address, phone number or other contact details, occupation, role/title/area of responsibilities, credit card information, and other sensitive information (including as required by laws and regulations addressing insurance and related matters or as required to provide the Services).
- Of course, you are not required to supply any of the information that we may request, although this might limit the "**Services**" we are able to offer you. While we make every effort to ensure that Your Data is accurate, complete and up to date, you can help us considerably in this by promptly notifying us if there are any changes to Your Data (please see the **How to Contact Us** section below).
- **Information we collect about you.** We collect information about you to provide "**Services**" that you may have registered an interest in. We, our service providers and other business partners collect certain information by using automated means, such as cookies, when you interact with our advertisements, mobile applications, or visit our website pages. This information may include your IP address, browser type, operating system, the full URLs, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services on our websites and other digital assets, to help us analyse how visitors use our websites and other digital assets.

We, our service providers and our business partners may also collect information about your activities on our websites and other digital assets for use in providing you with content and advertising tailored to your individual interests. The information collected for these purposes may include details about things like the particular pages or advertisements you view on our websites and the actions you take on our websites and or other digital assets.

- Information we may receive from other sources. We are working closely with third parties (including, for example, your employer, business partners and technical sub-contractors, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, financial institutions, criminal check services, government enforcement bodies) and may receive information about you from them.

## **Cookies**

Our website uses cookies. A cookie is information that a web site stores on your computer so that it can remember something about you at a later time. Cookies are commonly used on the Internet and do not harm your computer. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. The cookies used on our web sites do not collect any personal information that others could read and understand about you, such as your name.

Our website currently uses cookies for the purpose of collating general, non- personal management information that is used to plan enhancements to our website. For example, cookies help us to understand the popular paths that users take through our website and how often they visit.

If you do not want us to use cookies when you visit our websites, you can configure your browser not to accept them. Disabling the use of cookies should not adversely affect your use of the websites. To find out how to disable the use of cookies, please refer to your browsers help facility or the manufacturers instruction manual.

## **How will we use your information?**

We may use Your Data in the following ways:

- to provide you and/or your family with the Services (as applicable)
- to administer, operate, facilitate and manage your and/or your family's relationship and/or account with us, and to otherwise, including contacting you or, if applicable, your designated representative(s) by post, telephone, email etc.;

- to notify you about changes to the Services;
- to operate, evaluate and improve our business (including developing new products and services, troubleshooting, data analysis, testing and research and statistical and survey purposes); managing our communications; determining the effectiveness of and optimizing our advertising; analysing our products, services, websites, mobile applications and any other digital assets; facilitating the functionality of our websites, mobile applications and any other digital assets; to ensure the content of our site is presented in the most effective manner for you and for your computer; and performing accounting, auditing, billing, reconciliation and collection activities);
- as may be required by applicable laws and regulations or requested by any relevant judicial process or governmental agency;
- to comply with industry standards and our policies.

We may also use your information for Marketing purposes subject to below:

- where you have provided your consent, to provide you, or permit selected third parties to provide you, with information (such as relocation research), recommendations or advice concerning our offers, promotions, products and services, including those products and services which you request from us. If you are an existing customer (and save for where this is permitted under Applicable Data Protection Laws or where you have provided your consent to further marketing) we will only contact, you with information about goods and services similar, to those which were the subject of a previous sale or negotiation of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact only if you have consented to this, save for where this is otherwise permitted under Applicable Data Protection Laws. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, then you may send a request for us to opt out, by Contacting us at any time. (please see the How to Contact Us section below);

## **Disclosure of Your Data**

We may share Your Data with:

- business partners, suppliers and sub-contractors for the performance of the Services (as applicable)

We may also disclose Your Data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose Your Data to the prospective seller or buyer of such business or assets.
- If Iris Removals and Storage or substantially all its assets are acquired by a third party, in which case Your Data may be one of the transferred assets.

- If we are under a duty to disclose or share Your Data to comply with any legal obligation, or to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of our group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and risk reduction.

## **Data retention and transfer of data**

Iris Removals and Storage provides Services worldwide so to perform these Services it may be necessary to transfer personal information to other countries. The personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”) or Switzerland. It may also be processed by business partners or sub-contractors who are engaged in, among other things, providing you and/or your family with the Services (as applicable), the processing of your personal details and the provision of support services. Assurances of adequate protection to Personal data are obtained whether it be by vendor contracts, Data Processing Agreements, Privacy Shield, or Model Contracts.

By submitting Your Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that Your Data is treated securely and in accordance with this Privacy Policy. All information you provide to us is stored on our secure servers. We use encryption when we transfer certain personal information.

The security of Your Data is important to us. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide, or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

We store Your Personal Data only for as long as it is necessary to fulfil the purpose for which it was collected, unless otherwise required or authorised by Applicable Data Protection Law. We take measures to destroy or permanently de-identify Your Data if required by law or if Your Data is no longer required for the purpose for which we collected it.

In some instances, Iris Removals and Storage are required to retain personal information in accordance with the law such as Tax and Audit purposes and may therefore be retained for an additional period.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your Data, we cannot guarantee the security of Your Data transmitted to our website or other digital assets that are in the Public domain; any transmission is at your own risk. Once we have received your information, we will use

strict procedures and security features to try to prevent unauthorised access in accordance with industry standards.

## **Your rights as a Data Subject**

Under Applicable Data Protection Law, you have certain rights regarding the personal information we maintain about you. We also offer you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you.

You can choose not to provide personal information to us. You also may refrain from submitting information directly to us. However, if you do not provide Your Data when requested, you and/or your family may not be able to benefit from the Services (as applicable), and we may not be able to provide you with information about our products, services and promotions.

To the extent provided by applicable law, you may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of Your Data. We will apply your preferences going forward. In some circumstances, withdrawing your consent to our use or disclosure of Your Data will mean that you cannot take advantage of certain Services.

Subject to Applicable Data Protection Law, you may have the right to: obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, receive copies of the personal information we maintain about you ( paper or electronic means for portability ), update and correct inaccuracies in your personal information, object to the automated processing of your personal information including profiling, and have the information blocked, restricted, anonymised or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements. To exercise these rights, please contact: [help@irisremovals.com](mailto:help@irisremovals.com)

You have the right to ask us not to process Your Data for marketing purposes. We will usually inform you (before collecting Your Data) if we intend to use Your Data for such purposes or if we intend to disclose Your Data to any third party for such purposes. You can exercise your right to prevent such processing by advising us before we collect Your Data. You can also exercise the right at any time by contacting us at [help@irisremovals.com](mailto:help@irisremovals.com)

If you provide us with any information or material relating to another individual, you should make sure that the sharing with us and our further use as described to you from time to time is in line with applicable laws, so for example you should duly inform that

individual on the processing of their personal data and obtain their consent, as may be necessary under Applicable Data Protection Laws.

## **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with Applicable Data Protection Laws. For example, where you are based in the UK, this will usually be the DP Act 1998 and EU Directive 95/46/EC and from 25th May 2018 GDPR regulation / DP Act 2018. Any request should be made in writing, and the best way for you to do so is to contact us at the address stated below. As we must be able to identify the person making the request. Due to technological constraints and/or information security considerations, it may be inappropriate to use social media to supply information in response to any request by you for access to information, and so please provide an alternative delivery address for our response.

We may reject requests that are repetitive, require disproportionate technical effort, risk the privacy of others or would be extremely impractical. In some cases where a request is excessive or unfounded a reasonable fee may be charged. In an event where a request is rejected, we will provide you with a reason as to why. If you are not satisfied, please refer to the section on **Complaints**.

## **Data Security and Integrity**

The security, integrity and confidentiality of your information is very important to us. We have implemented controls to protect data from unauthorised access, modification, disclosure and misuse. We encrypt our data in transit and constantly review new technologies to protect your personal data. Please bear in mind that despite our best efforts to safe guard your data, no security measures are perfect or impenetrable.

## **Complaints**

If you wish to make a complaint about how your personal data is being processed or how your complaint is being handled, you have the right to lodge a complaint with the Supervisory authority and Iris Removals and Storage; see How to Contact Us

## **Changes to our Privacy Policy**

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

## **How to contact us:**

If you have any questions or comments about this Privacy Policy, our privacy practices or if you would like us to update information or preferences you provided to us, please click [here](#). You also may e-mail us at [help@irisremovals.com](mailto:help@irisremovals.com) or write to us at:

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