

## Data (Privacy) Protection Management Policy

- **Management:** Data Protection is becoming more and more important in the increasingly technological orientated world. Our in-house computer system is already equipped with an array of functions to protect confidential data. Staff are also trained by senior personnel to understand the importance of data management.
- **Notice:** We provide information to our Customers and to our overseas agents and staff members. We try to work with Agents with likeminded attitude to Data Security Management such as FIDI Agents and Harmony Relocation Network Agents.
- **Choice and Consent:** By accepting our quotation, due to the nature of our industry, our customers are authorizing us to use sensitive data in order to carry out and complete the relocation. It is at the consent of the customer to provide additional information that may not strictly be required in the course of the relocation.
- **Collection:** We will ask Customers to provide us with confidential information either through e-mail (as our security measures in the office are very well defined) or by personal pick-up.
- **Use, Retention and Disposal of Data:** Staff are trained on the importance of data confidentiality. Use of data, such as Passport Copy etc. is limited to the purposes of the relocation only. All correspondence between Move Coordinators on any given file is entered into the log, again for greater security and transparency.
- In Hong Kong all Files must be retained for a period of 7 years. Information stored on the computer is protected (see below details) and hard files will be shredded after that period. Soft files deleted.
- **Access:** Each staff member has a log in username and pass code to enable access to their own computers. Other staff members will not be able to access their files. The Assistant General Manager is able to view all incoming e-mails, in case a staff member is absent and redirect to an appropriate person.
- **Disclosure to Third Parties:** Disclosure to third parties will only be made where the agent or supplier acts as an agent to Asian Express with likeminded principles.

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- **Security for privacy:** In order to protect private data, only the surveyor and coordinator are able to access the file in the computer system corresponding to an individual customer. Other employees will automatically be blocked from access to those files.
- Individual coordinators handle specific corporate accounts and only they will have access to those files.
- Likewise in the "CRM" Client Relationship Management system, only the sales person in charge of that account or government organization will be able to access the details in the computer system pertaining to that account.
- The General Manager and Sales Manager will be able to access all accounts. This way data protection is heightened and access to personal data is limited to only key staff members.
- In an effort to become paper free, all communication is attached within the computer system. Therefore the person responsible for the file is able to upload any document and send it to the Corporate Account or private customer on demand.
- **Quality:** Data is limited to each file in our QIS System, this also provides a system to ensure accurate, complete and relevant personal information is uploaded in the computer in each correct file to increase efficiency and security.
- **Monitoring and enforcement:** We provide in house training to ensure proper use of the QIS System and also to make staff aware of the importance of Data Protection.
- Any complaint or escalation regarding data privacy would immediately be communicated by the Move Coordinator to his/her line Manager. For a serious matter the Assistant General Manager would get involved and the case reported to the local authorities such as the Police Force.
- **Review Procedure:** We review all aspects of the FIDI FAIM Quality Manual on an Annual Basis. There will also be individual meetings and training to make sure that the above procedure is being adhered to.

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