



Data Protection & Privacy Policy

Putters International NV (*'Putters'*) maintains personal information about clients/transferees related to their relocation services booked or assigned. *Putters* is committed to respect their clients by handling all the personal information collected in connection with their relocation in accordance with applicable local laws as well as our own Privacy Policy. This notice explains our practices with regard to your personal information.

Our *Data Protection & Privacy Policy* addresses 10 privacy principles.

These 10 privacy principles are essential to the proper protection and management of and sensitive information. They are based on internationally known fair information practices included in many privacy laws and regulations of various jurisdictions around the world and recognized good privacy practices.

Outlined Summary:

1. Management:

We will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.
- Meet our legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to apply as service provider, fulfil our operational needs or to comply with any legal requirements.

We ensure that we have a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection

We ensure that everyone processing personal information understands that they are contractually responsible for following good data protection practice aligned with internal procedures and legal requirements.

We collect, process and transfer personal information about transferees through computerized and paper-based data processing systems.

We ensure that all processing and transfers of personal information are subject to reasonable confidentiality and privacy safeguards.



2. Notice:

We provide notice about our Policies and Terms & Conditions on our website under the Quality section.

We are committed to respect transferees by handling all their personal information collected in connection with their current and future relocation needs in accordance with applicable law as well as our own Privacy Policies.

We only process personal information to accommodate the transferee with their respective relocation. We may process sensitive information if it is needed to guarantee good service, for business objectives or if it is required to comply with applicable law.

In general personal and/or sensitive information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place.

3. Choice and consent:

By confirming our Relocation Quotation and booking Putters services you give your explicit consent with respect to the collection, use, and disclosure of personal information as described in this notice. Explicit consent here means you were clearly presented with an option to agree or disagree with the collection, use, or disclosure of personal information.

4. Collection:

We shall obtain and process personal data fairly and in accordance with statutory and other legal obligations. We collect personal information for the sole purposes to accommodate the transferee before, during and after their relocation procedure.

Personal information can be collected from the transferee, his family members, his employer and/or relocation/moving companies or origin/destination agents related to the relocation procedure in the widest sense.

5. Use, retention, and disposal:

We limit the use of personal information to the purpose of applying for and/or executing your relocation needs.

We retain personal information as long as necessary to fulfil the stated purposes or as required by law or regulations and thereafter appropriately dispose of such information.



6. Access:

You may reasonably access and update your personal information by contacting *Putters*.

This notice provides basic information about our processing of your personal information and your privacy rights. Should you have additional questions, you may contact *Putters Data Protection Officer* at following details: info@putters.be - Tel: +32 2 721 40 40

7. Disclosure to third parties:

We shall use and disclose your personal data only in circumstances that are necessary for the purposes for which we collected the data. We will never sell your personal information to third parties, nor will we use the personal information in an inappropriate way.

8. Security for privacy:

We protect personal data against unauthorized access (both physical and digital) aligned with our internal policy and procedures. We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction. Personal data will only be accessible to authorised *Putters* staff or assigned external auditors.

9. Quality:

We maintain accurate, complete and relevant personal information as reasonable possible and only for the purposes identified in this notice.

Please note that we have shared responsibility with regard to the accuracy of your personal information. Please let us know of any changes to your personal information.

10. Monitoring and enforcement:

We monitor compliance with our privacy policies and procedures and have procedures to address privacy related complaints and disputes. All *Putters* staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them. If you believe that your personal information is not handled in accordance with the applicable law or our privacy policies, you may submit a complaint to the *Putters Data Protection Officer* who will investigate the complaint.

This Data Protection & Privacy Policy will be reviewed regularly in light of any legislative or other relevant developments.