

Going-there Privacy Policy

Our contact details:

Going-there Global Destination Services York House, 1 Seagrave Road, London SW6 1RP, UK Tel: +44 208 648 2302 Email: <u>info@going-there.com</u>

Introduction

This policy sets out how Going-there protects privacy of individuals and clients. Goingthere is registered with the UK Information Commissioner's Office, registration number ZA151068.

Information held on individuals who subscribe to or are subscribed to Going-there services is held securely in compliance with UK data protection and privacy directives exclusively for service delivery purposes.

Data Protection Principles

Going-there adheres to the following principles of data privacy:

- Data is obtained and processed fairly and lawfully.
- Personal data is obtained only for one or more specific and lawful purposes and not used or processed further in any manner incompatible with the reason for which it was collected.
- Personal data gathered is adequate and not excessive in relation to the purpose for which it is processed.
- We aim to ensure all personal data is accurate and kept up date relevant to the purpose for which it was collected.
- Personal data is not kept for longer than is necessary for delivery of service(s).
- Personal data is processed only in accordance with the rights of data subjects under the UK GDPR. Individuals have a right to access a copy and to prevent use or retention of data contrary to their wishes.
- Personal data is protected by technical and organisational measures to prevent unlawful processing, accidental loss or destruction or damage.
- Personal data is not transferred to territory outside the UK that does not ensure an adequate corresponding level of protection.

The Type of Data We Collect

Going-there requests information relevant to the purpose of its core business of delivering Destination Services to individuals and families. These services include personalised assistance to individuals and families when in the process of relocation. Data is retained for a specified period for later services that may be required, for instance, in the case of repatriation ('Departure Services').

Data gathered is relevant only to the specific needs of the service to be supplied and may include:

- Contact details (email address, phone number)
- Family size and details necessary for service delivery (accompanied by spouse, number and ages of children, spouses contact details if spouse is involved with practical relocation matters).
- Employer name and HR contact where relevant.
- Details regarding individual matters that need to be known specifically to deliver service (e.g. a disability which may require mobility assistance, a child special education needs to ensure referral to appropriate schools).
- Any further personal details as required specific to the delivery of an assignment service.

Where We Get Your Data

Our data for a particular Destination Service comes from two sources:

- The company or relocation managers who commission a service for a particular individual or family.
- The relocating individual or family, when specifying their needs.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- A. Your **consent**. You are able to remove your consent at any time. You can do this by contacting [contact details]
- B. We have a **contractual obligation** to deliver appropriate services, according to your needs.
- C. We need it to **perform tasks on your behalf**, such as home-searches or negotiating leases, and may require it for later commissioned services in connection with your relocation or repatriation.

Storage and Security

Personal data is stored to industry-recognised standards. We have both application and server security in place. Access to data is strictly controlled through restricted IPs and through protected remote access. In the case of service outages, Going-there has a defined business continuity procedure to ensure data recovery.

Retention of Data

Data is retained in accordance with our Data Retention Policy (available on request). Our standard time for retention of personal data is currently 7 years, to allow for later or multiple additional services. Data is then destroyed.

Sharing of Data

Data is shared internally within the organisation purely for the delivery of a specific service and only such data as is needed to deliver the service. Going-there does not collect or share information obtained from users for marketing or commercial purposes. Nor is data shared internally excessive to the needs of a particular assignment. Personal data given to the company (name, email address) is shared to relevant personnel enabling them to communicate in the provision of the subscribed service.

Data is not shared externally with third parties unless that party is delivering assistance connected with a specific part of the subscribed service (e.g. school tours, local registrations, lease preparations).

In addition, all Going-there consultants undergo specific training devoted to data protection and privacy which they must complete on joining the firm.

Your Data Protection Rights

Under data protection law, you have rights including:

- Your **right of access** You have the right to ask us for copies of your personal information.
- Your **right to rectification** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- Your **right to erasure** You have the right to ask us to erase your personal information in certain circumstances.
- Your **right to restriction of processing** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your **right to object to processing** You have the the right to object to the processing of your personal information in certain circumstances.
- Your **right to data portability** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us via <u>richard.tyrrell@going-there.com</u> (Tel: +44 208 648 2302 if you wish to make a request.

Disclosure

In keeping with UK law, Going-there may be obliged to disclose personal data in the following circumstances:

- by or under any UK enactment;
- by any rule of common law; or
- by an order of a court or tribunal in any jurisdiction.

In no other circumstances does Going-there disclose data.

Going-there 2023