

## Privacy Policy

Thank you for visiting our web site (“the Site”). This Privacy Policy (“Policy”) applies to suddath.com, si.suddath.com (Relocation Zone), [www.suddathinternational.com](http://www.suddathinternational.com), and suddath.skyrelo.com which are owned and operated by The Suddath Companies and its U.S. subsidiaries (collectively, “Suddath”, “us”, “our” or “we”). This Policy describes how we collect, use, share and secure the personal information you provide. It also describes your choices regarding use, access and correction of your personal information. The use of information collected through our services shall be limited to the purpose of providing the relocation services for which our clients (the “Client”) have engaged us to provide.

Please read this Policy before using the Site or submitting any personal information. By using the Site, you are accepting the practices described in this Policy.

Note: the privacy practices set forth in this Policy are for this Site only. If you link to other websites, please review the privacy policies posted at those web sites.

### **EU-U.S. Privacy Shield**

Suddath participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Suddath is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework’s applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce’s Privacy Shield List. [<https://www.privacyshield.gov/list>]

Pursuant to the Privacy Shield Framework, Suddath is responsible for the processing of personal data it receives and subsequently transfers to a third party acting as an agent on its behalf. Suddath complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, The Suddath Companies is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Suddath may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Suddath has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

Under certain conditions, more fully described on the Privacy Shield website

[<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>], you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Suddath complies with the U.S. – Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from Switzerland. Suddath has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Suddath’s certification, please visit <https://safeharbor.export.gov/swisslist.aspx>.

### **Collection of Information**

We collect personally identifiable information, like SSN, passport related information, government ID, names, postal addresses, email addresses, etc. (“PII”), when voluntarily submitted by our visitors. The information you provide is used to facilitate the relocation services that we provide to you or as part of your employment benefits and compensation. This information is only used to fulfill your specific request, unless you give us permission to use it in another manner (ex. to add you to one of our mailing lists). We do not share, sell, rent or trade PII with third parties for their promotional purposes.

### **Cookie/Tracking Technology**

Suddath and its partners use cookies or similar technologies to analyze trends, administer the website, track users’ movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

As is true of most websites, we gather certain information automatically. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.

### **Sharing**

We will share your personal information with third parties only in the ways that are described in this Policy.

### **Service Providers**

We may use other third parties to provide various services, such as packing, loading, shipping, delivery, and storage of goods. When, pursuant to the requested services, you utilize any of the services listed above, we will share only that PII which is relevant to the specific services being provided by the third party. These third parties are prohibited from using your PII for any other purpose.

### **Distribution of Information**

We reserve the right to disclose your PII (i) to governmental agencies or other companies assisting us in fraud prevention or investigation; (ii) as required by law; and (iii) when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on the Site. We will only disclose PII to governmental agencies or other companies when trying to protect against or prevent actual or potential fraud or unauthorized transactions or investigating fraud which has already taken place. PII is never provided to these governmental agencies or

companies for marketing purposes. We may also disclose your personal information to any other third party with your prior consent.

### **Commitment to Data Security**

Your PII is kept secure. Only authorized employees, agents and contractors (who have agreed to keep information secure and confidential) have access to this information. Emails generated by the Site are for the sole purpose of facilitating your relocation services. An opt-out option is available to you through your relocation counselor. Opting out may cause interruptions in, and/or loss of, relocation benefits provided to you by your employer. Please contact your relocation counselor or call (904) 390-7100 for more information on opting out.

The security of your PII is important to us. When you enter sensitive information (such as bank account information) on the Relocation Zone portal, we encrypt that information using secure socket layer technology (“SSL”) and secure HTTP. To learn more about SSL, follow this link:  
<http://www.webopedia.com/TERM/S/SSL.html>

We follow generally-accepted industry standards to protect PII submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your PII, we cannot guarantee its absolute security. If you have any questions about security on the Site, you can email us at [privacy@suddath.com](mailto:privacy@suddath.com).

### **Updating Your PII**

Upon request, Suddath will provide you with information about whether we hold any of your personal information. You can update, change or delete your PII by accessing the Relocation Zone® and signing in using your username and password. Once you sign in to the Relocation Zone, you can update your PII by clicking on the “My Profile” button and then the “Start Change Request” button. We will respond to your request within a reasonable timeframe.

Suddath acknowledges that you have the right to access your personal information. Suddath has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to our Client (the data controller). If requested to remove data we will respond within a reasonable timeframe.

In certain circumstances we may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing a service, resolve disputes or enforce our agreements.

### **Our Mobile Application**

When you download and use our mobile apps or services, we automatically collect information on the type of device you use, operating system version and system and performance information. We do not ask for, access or track any location based information from your mobile device at any time while downloading or use our mobile apps or services. We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application,

aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

### **Our Service Platform**

Suddath collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Clients.

If you forget your password when signing in to the Relocation Zone, there is a link you can click on which will email you a new password. If you forget your username, you need to contact your relocation counselor.

### **Privacy Contact Information**

If you have any questions, concerns, or comments about our Policy you may contact us using the information below:

By e-mail: [privacy@suddath.com](mailto:privacy@suddath.com)

By Phone: (904) 390-7100

By Mail: The Suddath Companies, 815 South Main Street, Jacksonville, Florida 32207; attn: Director of Internet Marketing.

The effective date of this Policy is September 30, 2016.

We reserve the right to make changes to this Policy. Any changes to this Policy will be posted.

### **Opt-out**

You may sign-up to receive [email or newsletter or other communications from us]. If you would like to discontinue receiving this information, you may update your email preferences by [using the "Unsubscribe" link found in emails we send to you or at your member profile on our website or by contacting us at [privacy@suddath.com](mailto:privacy@suddath.com)].

### **Changes to this Policy**

If we decide to change our Policy, we will post those changes to this Policy, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this Policy at any time, so please review it frequently. If we make material changes to this Policy, we will notify you here, by email, or by means of a notice on our home page. Any changes to the Policy will only apply to activities and information on a going forward, not retroactive, basis.