



## AMR Data (Privacy) Protection Procedure

AMR International Relocation (AMR) maintains personal information from relocating individuals as a part of the international relocation process. AMR committed to respect the individual's data by handling all the personal information collected in connection with their international relocation in accordance with applicable local laws as well as AMR Privacy Policy. This notice explains our practices with regard to your personal information.

Our Data (Privacy) Protection procedure addresses 10 privacy principles:

The privacy principles are essential to the proper protection and management of individual client's personal 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 Principles

#### 1. Management:

Under appropriate management and strict application of criteria and controls:

We will:

- Follow our legal obligations and laws to specify the purposes for which information is used.
- Observe fully conditions regarding the collection and use of personal data.
- Collect and process appropriate information, and only to the extent that it is needed to fulfill our operational needs or to comply with any legal requirements.

We ensure that we have Managing Director with specific responsibility for ensuring compliance with Data Protection.

We ensure that this policy is communicated to all staff, suppliers, vendors, sub-contractors, customs brokers who are involved in the moving and relocation.

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

We collect, process, and transfer personal information about relocating individuals through computerized processing systems.

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**Relocation Service**

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 privacy policies and procedures in our contract agreements and individual quotations; our notice is also available on the amr-relocation.com website. We also list the full policy in our daily communication for example AMR email communication. AMR committed to respect relocating individuals by handling all their personal information collected in connection with their international relocation in accordance with applicable local and international law as well as our own Privacy Policies.

We only process personal information to accommodate relocating individuals with their respective international relocation.

We may process sensitive information if it is needed to for business objectives or if it is required to comply with applicable law. Depending on the origin and destination of your relocation, AMR may collect following personal data:

1. Passport and Visa for Customs purpose
2. Working permit for Customs purpose
3. Home address for packing and delivery purpose only
4. Employer name and stamp for customs purpose
5. Names of immediate family members when required by customs office
6. Phone and email addresses for communication and operational purposes
7. Flight details such as flight itinerary only for customs purpose
8. Goods value for insurance purpose only

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 engaging AMR for your international relocation, 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 facilitate the door-to-door process of the International Relocation for the relocating individual and his/her family. We use customer information to service our accounts, process claims, ensure proper billing, and to offer you other services and products that may suit your needs.

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**5. Use, retention, and disposal:**

We limit the use of personal information to the sole purpose of executing your International Relocation and for which you have given your implicit consent.

We retain personal information for only as long as necessary to fulfill the stated purposes or as required by law or regulations and thereafter appropriately dispose of such information. We will retain your personal information for seven (7) years as required by law. After this time relocation files and personal data are destroyed.

**6. Access:**

You as customer may reasonably access and update your personal information by contacting AMR via **cs@amr-relocation.com**

with your request, we can provide what your private information are with us , basic information about our processing of your personal information and your privacy rights. Should you have additional questions, you may contact AMR Data Protection Officer at following details:

**Allen Lu**  
**Managing Director**  
**Allen@amr-relocation.com**  
**Room 1511, 425 Yishan**  
**Road, Pole Tower, Xuhui**  
**District, Shanghai,China**  
**200235**  
**Tel: +86 21 6302 3565**

**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. For example, we will disclose your personal information on a need-to-know basis to: Customs authorities and partners involved in the relocation process. We will never sell your personal information to third parties.

**8. Security for privacy:**

We protect personal data against unauthorized access (both physical and logical) aligned with our internal IT policy and procedures. We take appropriate security measures against unauthorized access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction. Personal data will only be accessible to authorized staff and third party for moving purposes only

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**9. Quality:**

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

We retrieve your personal data from emails you shared with us, your employer and/or relocation company and from documents you shared with AMR/

Please note that we have shared responsibility with regard to the accuracy of your personal information. Please let us know of any changes ,update, deletion of your personal information by contact at [cs@amr-relocation.com](mailto:cs@amr-relocation.com) or to Data Protection Officer mentioned above

**10. Monitoring and enforcement, escalation**

**A. Regular Audits and Assessments:**

We conduct regular audits and assessments of our privacy practices, policies, and procedures to ensure compliance with applicable laws, regulations, and industry standards. These audits may be conducted internally by our internal team or externally by third-party auditors such as FIDI, to provide independent validation of our compliance efforts.

**B. Employee Training and Awareness:**

We provide comprehensive training to all employees on our company's privacy policies, procedures, and best practices.

We enroll in third party training program and ensure they should pass the training and obtain the training certificate; Training programs cover topics such as data protection principles, handling of sensitive information, data breach response protocols, and customer privacy rights.

We also promote ongoing awareness and communication about privacy-related issues through internal communications, newsletters, and regular updates.

**C. Documented Policies and Procedures:**

Our privacy policies and procedures are documented and regularly updated to reflect changes in laws, regulations, and business practices.

These documents outline the company's commitment to privacy protection, define roles and responsibilities for privacy compliance, and provide guidance on handling personal information appropriately.

And these policies are available on our website and they are communicated via email with hyperlink so our private customers, corporate customer, our agents, suppliers, our employees , all stakeholders involved are aware of them

**D. Incident Response and Monitoring:**

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We have procedures in place to promptly investigate and respond to privacy incidents, breaches, or complaints.

Incident response teams are responsible for assessing the severity of incidents, containing the impact, notifying affected individuals or authorities as required by law, and implementing corrective actions to prevent recurrence.

**E. Privacy-related Complaints and Disputes Resolution:**

We have established procedures for handling privacy-related complaints, inquiries, and disputes from customers, employees, or other stakeholders.

Complaints are promptly acknowledged, thoroughly investigated, and resolved in accordance with our privacy policies and applicable laws.

We maintain communication channels [cs@amr-relocation.com](mailto:cs@amr-relocation.com) always available for individuals to submit privacy complaints or concerns.

This Data Protection Policy will be reviewed regularly (at least once a year) in light of any legislative or other relevant developments.

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