

Privacy Notice for Direct Customers GDPR

Effective Date: May 25, 2018

Updated: April 1, 2021

This **Privacy Notice for Direct Customers** under **GDPR** (this “**Notice**”) describes how Dwellworks, LLC and its worldwide subsidiaries and affiliates (outlined below), collects and processes Personal Information when we provide Relocation Services (“**Services**”) to our direct customers.

Dwellworks, LLC’s subsidiaries and affiliates include:

- Dwellworks Destination Services, LLC;
- Dwellworks Property Advising Services, Inc.;
- Dwellworks Property Advisors, LLC dba Station Cities;
- Dwellworks Residential Services, LLC;
- Dwellworks SAS
- Dwellworks Sarl
- Dwellworks GmbH;
- Dwellworks Relocation Services Ireland Limited;
- County Homeseach International Limited;
- Dwellworks Hong Kong Limited;
- Dwellworks Canada, Inc.;
- Dwellworks Costa Rica Ltda.;
- Dwellworks Mexico S. de R.L. de C.V.
- Dwellworks Australia Pty. Ltd.;
- Dwellworks Netherlands B.V.
- Dwellworks Netherlands II B.V.; and
- Dwellworks Living Pte. Ltd (collectively, “**Dwellworks**,” “**we**,” “**us**,” or “**our**”).

Purpose and Scope

This Notice describes how Dwellworks collects and processes Personal Information in the course of providing the Services, and it applies to all Personal Information we collect or process about you. When we process your Personal Information, we act as a “**Controller**” (as defined in the General Data Protection Regulation (Regulation (EU) 2016/679). It is the Controller’s responsibility to notify Data Subjects about the use of their Personal Information (as described in this Notice), to notify Data Subjects as to what is the legal basis for processing their Personal Information, to ensure the accuracy of the Personal Information they provide to us for processing and to handle requests received from Data Subjects.

Cross Border Transfer

Your Personal Information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for Personal Information under European

Union law. We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information regarding these appropriate safeguards in place, please contact us at the details provided under the “Contact US” section below.

Personal Information We Collect

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual.

You directly provide us with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser’s cookies.

The Personal Information we may collect about you may include:

- Name and contact information
- Demographic information (such as gender, age, date of birth, marital status, nationality, employment details, hobbies, family composition, and dependents).
- Personal identification documentation and related information such as passport numbers and employee identification numbers.
- Financial and payment data such as bank account numbers and transaction information.
- Information related to the provision of the Services.
- Information about your property and assets.
- Statements made by or about you.
- Other as appropriate.
- Human resources data, such as job title and role, benefits and compensation information; dependent information; educational, academic and professional information; emergency contact information.

Depending on your specific needs, you may be asked to provide to us special categories of Personal Information (“**Sensitive Personal Information**”). These include Information about you, your spouse and/or children needing special services such as school search or spouse’s or children’s special needs.

How We May Use Your Personal Information

We use your Personal Information:

- To provide the Services and fulfill our contractual obligations to you;
- To conduct data analysis;
- For fraud monitoring and prevention;

- To help develop new services and to enhance, improve, or modify our Services;
- To operate and expand our business activities which may include emailing you with special offers on other products and services we think you might like;
- To carry out background checks and conduct due diligence (where permitted by applicable law);
- To perform administrative activities in connection with our Services;
- To exercise, defend or protect our legal rights; and
- To comply with legal and professional obligations and to cooperate with regulatory bodies.

We analyze Personal Information for the purposes of risk assessment, fraud prevention and detection, and for internal reporting purposes, which means that we may process your personal information using software that is able to evaluate your personal aspects and predict risks or outcomes. We may also aggregate or anonymize information about you. Aggregated or anonymized data is not capable of being used to identify individuals and is not treated as Personal Information under this Notice.

Legal Basis for Processing Personal Information

We process Personal Information for the performance of the contract between you and us (for example, to provide you with relocation services as requested by you); necessary to comply with legal requirements (for example, to comply with applicable accounting rules and make mandatory disclosures to law enforcement); necessary for our legitimate interests (for example, to manage our relationship with you and to improve the quality of our communications, experiences, and customer service), and based on consent provided by you (for example, to communicate with you about our products and services and provide you with marketing information), which may subsequently be withdrawn at any time by contacting us as specified in the “Contact Us” section of this Notice without affecting the lawfulness of processing based on consent before its withdrawal. The lawful basis for processing Personal Information, as described above, is based on the specific engagement between us and you.

Disclosure of Your Personal Information

We may share your Personal Information with third parties under the following circumstances:

- To any Dwellworks company for the uses and purposes set out above;
- To our intermediaries, advisers, and business partners for the purposes of fulfilling our contractual obligation to you (for example, to deliver our Services and to arrange services for you);
- To third party service providers such as entities providing customer service, email delivery, auditing and other services;
- If we are obliged to disclose your Personal Information under applicable law or regulation, which may include laws outside your country of residence; and
- In the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Organization Security & Retention of Your Personal Information

Dwellworks maintains appropriate technical and organizational security measures to protect the security of your data against loss, misuse, unauthorized access, disclosure or alteration. These measures are aimed at ensuring the ongoing integrity and confidentiality of Personal Information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will retain your Personal Information for as long as is necessary for the provision of Services you. When we no longer need your personal information in connection with the Services, we will then retain your Personal Information for a period of time that reasonably allows us to comply with our regulatory obligations (compliance, tax, legal, and document retention purposes) and to commence or defend legal claims. We may retain aggregated or anonymized data (which is not treated as Personal Information under this privacy notice) for longer.

Choices & Access

Under GDPR, Controllers are responsible for the Personal Information they collect and/or process. Dwellworks is a Controller in relation to its direct customers. Your Personal Information is protected by legal rights, which include your rights to:

- Request access to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully collecting and processing it.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have collected or processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your Personal Information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if

you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your Personal Information to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you would like to review, correct, update, suppress, object to, or restrict the processing of your Personal Information or request a copy of Personal Information about you, you may contact us using the information contained in the “Contact Us” section of this Notice. For your protection, we may only react to requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will respond to your request as soon as reasonably practicable without undue delay and in any event within one (1) month of receiving a request.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

For any complaints that cannot be resolved with Dwellworks directly, Dwellworks has selected the ICDR/AAA as its Independent Recourse Mechanism in relation to such unresolved complaints (as further described in the Privacy Shield Principles). The link to the ICDR/AAA for making complaints is as follows: <http://go.adr.org/privacyshield.html>. Dwellworks will provide, at no cost to the individual, the services of the ICDR/AAA by which the individual’s complaint or dispute will be investigated and expeditiously resolved. A binding arbitration option will also be made available to the individual in order to address residual complaints not resolved by any other means. Dwellworks is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

Changes to Our Privacy Notice

Dwellworks reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated notice on our website and note the date of amendment.

Contact Us

If you have any questions or comments about this Notice or wish to exercise your rights under GDPR, please do not hesitate to contact us at:

Phone: 1800 399 2626

Portal: [Data Subject Access & Erasure Request](#)

Email: compliance@dwelworks.com

Data Protection Officer Germany: www.datenschutz-stalla.de

Data Protection Officer EU/UK: mw@dpocentre.com

EU/UK Representatives: compliance@dwelworks.com

Postal Address:

Dwellworks, LLC

Attn: Compliance Office

1317 Euclid Avenue

Cleveland, Ohio 44115 USA