

# Privacy Policy



**Document Management Information**

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1.0	31-10-2019		Huzefa Bangdiwala	Tarun Ramrakhiani	October 2020	
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This Data Protection Notice (“Notice”) sets out the basis which the SBU – Writer Relocations of Writer Business Services Pvt. Ltd. (“we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the General Data Protection Regulation (GDPR) for our customers from the European Union. This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

## PERSONAL DATA

As used in this Notice:

“Shipper/Assignee/Transferee” means an individual who (a) has contacted us through any means to find out more about any of our services related to relocation, or (b) may, or has, entered into a contract with us for availing relocation services provided by us; and “personal data” means data, whether true or not, about a shipper who can be identified:

(a) from that data; or (b) from that data and other information to which we have or are likely to have access.

Contact through any means would imply if Shipper has directly contacted us or their personal data is provided by their employer for relocating.

Based on Shipper’s interaction with us, personal data of the individuals and/or family which we may collect from you include your name, identification information such as your contact information, copy of passport, residential address, destination address, your email address, nationality,. ( **Annexure – 3**)

We may update this privacy policy by posting a new online version.

To access the revision history of our privacy policy please visit [here](#).

### 1. Collection of Personal Information

To facilitate relocation and/or immigration services, we may ask you to provide information that personally identifies you (“Personal Information”). This occurs in certain circumstances such as when you request information via our website, when your employer contacts us and provides your personal information for your relocation and/or immigration services, through phone call or email or any other digital media or through global move management portals.

Personal Information refers to any piece of information that can be used to identify a data subject. Example: Name, Address, Telephone Number, Date of Birth, Personal Identification Numbers (SSN, Passport, Taxpayer Identification number etc.), Photographic Images, log in details etc.

Writer Business Services Pvt. Ltd. collects following information:

Type of Information collected	Purpose
Full Name (First Name + Last Name)	1. To identify the data subject 2. To maintain a job file of the services availed from us

Email	To communicate information towards relocation and/or immigration services / send invoice (private enquiry).
Copy and /or Original of Passport	To submit it to third parties involved, to support, administer, manage, or maintain relocation and/or immigration services
Copy of VISA	To submit it to third parties involved, to support, administer, manage, or maintain relocation and/or immigration services
Residential address (at Origin and Destination)	<ol style="list-style-type: none"> <li>1. To visit and conduct a survey of the household goods to be packed for relocation.</li> <li>2. To visit and pack the household goods for dispatch of the shipment.</li> <li>3. To visit, deliver and unpack the household goods.</li> <li>4. To file for immigration application depending on jurisdiction.</li> <li>5. To enter into a personal lease agreement towards rental accommodation</li> </ol>
Certificate (professional/educational/personal)	To submit it to third parties involved, to support, administer, manage, or maintain relocation and/or immigration services
Contact Numbers	To communicate information towards relocation and/or immigration services / send invoice (private enquiry).

Information that is collected through automated means:

Type of information	Purpose
IP address	Writer Relocations use IP address for traceability.
User operating system & Browser version	To identify the operating system and screen size of your device to ensure all content renders appropriately.
Cookies	Refer cookie policy for disclosure

Writer Business Services Pvt. Ltd. encourages you to review the privacy statements of websites you choose to link to from Writer Business Services Pvt. Ltd. so that you can understand how those websites collect, use, and share your information.

We are not responsible for the privacy statements or other content on websites outside of the Writer Business Services Pvt. Ltd. site.

It is possible that Writer Business Services Pvt. Ltd. may also use personal information to inform you of other products or services available from Writer Business Services Pvt. Ltd. or its affiliates.

Writer Business Services Pvt. Ltd. may also contact you via surveys to research your opinions of current services or of potential services.

Writer Business Services Pvt. Ltd. may, from time to time, contact you on behalf of external business partners about particular offerings that may be of interest to you.

## 2. Methods of collection

Method	Purpose
Web Form	If you request additional information via a web form, we collect personal information such as your name and email address to facilitate your request
Corporate employer	If your employer contacts us and shares your personal information for relocation and/or immigration services.
Agent (other relocation companies) / Relocation management companies	If your personal information is shared by/with other relocation companies.

## 3. Cookies

For more information about how we use cookies please visit our [cookie policy](#).

## 4. Use of Personal Information

- To help you with relocation and/or immigration services.
- Respond to support queries.
- To share invoices.
- To send communications related to our businesses. You may unsubscribe from any of these communications at any time using our email preferences page.

The personal information collected and stored by Writer Business Services Pvt. Ltd. and its 3rd party vendors is only used in compliance with this privacy policy.

## 5. Sharing of Information

Writer Business Services Pvt. Ltd. does not sell or rent any of data subject's personal information. However, Writer Business Services Pvt. Ltd. may share your personal information with:

- Origin agent – (If) appointed to visit and pack the household goods.
- Custom broker agent – For customs clearance
- Destination agent – (If) appointed to visit and deliver your household goods to the destination address.
- Shipping line / Airline / Road / Rail – (If) shipment is send through waterways/airways/overland transportation
- Agent (other relocation companies) / Relocation management companies .
- Internal Teams – (If) Teams to facilitate the process.
- Shipper/Assignee/Transferee – To communicate information/Status update towards relocation and/or immigration services / send invoice.
- Third Party – To provide services on behalf of Writer Business Services Pvt. Ltd. in areas where work is sub-contracted

## **Use of further processors**

Writer Relocations may appoint further processors which could be an Agent (other relocation companies) / Relocation management companies / Third party for delivering relocation and/or immigration services. Only limited and required information is shared with the sub-processors that is absolutely required for the fulfilment of your contract with Writer Relocations.

### **6. Access to your information and correction**

At any time, you may request information about our access and use of your personal information.

At any time, you may unsubscribe from Writer Relocations marketing communications by clicking the Unsubscribe link at the bottom of the email field.

### **7. How long do we keep personal information for?**

Writer Relocations will hold your personal information on the systems for the period of 7 years to fulfil the purpose outlined in the Policy, or until you request that the information be deleted in accordance with your right to erasure subject to compliance with local laws of the land.

### **8. How can you access, amend or take back the personal data that you've given to us?**

You retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

- Writer Relocations. provides data subjects with an option to withdraw consent.
- Writer Relocations provides data subjects with an option to erase their personal information
- Writer Relocations provides data subjects with an option to restrict the processing of their personal information. This means that Writer Relocations can only continue to store data subject's data and will not be able to carry out any further processing activities with it until either
  - Data subject provides consent
  - Exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State
- Writer Relocations provides data subjects an option for porting their personal data. To allow data subjects to do so, Writer Relocations will provide data subjects with their personal information in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform.
- Writer Relocations provides data subjects an option to lodge a complaint with their local supervisory authority.

### **9. Cross Border Data Transfer**

Any data transfers to the third countries will be made only after taking the explicit consent of the data subject or if the employer of the data subject has provided consent. Writer Relocations might not take consent from the data subjects if feels that such transfers are essential to protect the vital interests of the data subject or it must be made available to the legal or regulatory body. However, data subjects will be informed in case of such transfers.

## 10. Security of Personal Information

Writer Relocations is committed to protecting your personal information. We use a variety of security technologies to help guard against unauthorized access, use, or disclosure.

For example, we store the information you provide on computer systems in controlled facilities with strictly limited access. When we transmit highly confidential information (such as a credit card number) over the Internet, we protect it through 128-bit encryption.

### Annexure – 1

How to contact the SBU – Writer Relocations of Writer Business Services Pvt. Ltd.:

India:

Address: 105, Dr. Ambedkar Road Mumbai – 400033

Email: [writer.relo@writerrelocations.com](mailto:writer.relo@writerrelocations.com)

### Annexure – 2

Supervisory Authority: Information Commissioner officer

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

### Annexure – 3

Data Protection Officer Details

Name: Huzefa Bangdiwala

Email: [huz.ban@writerrelocations.com](mailto:huz.ban@writerrelocations.com)

### Annexure – 3

List of documents of Photo and Address ID

- 1) Passport
- 2) Aadhar Card
- 3) Driving License

## Definitions

**Relocation:** Movement of Household Goods including storage and DSP services (look see trip, home search, settling in services, temporary accommodation assistance, lease renewals/novation, departure services, tenancy management, expense management, cross culture training, school search)

### **Immigration:**

- A) Inbound immigration services
  - Pre-arrival immigration service
    - Employment/Business/Dependent VISA

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- Post-arrival immigration service
- B) Outbound/Third country immigration services
- Pre-arrival immigration service
  - Employment/Business/Dependent VISA
- Post-arrival immigration service