



## **Privacy Statement**

Effective May 7, 2018

This Notification of our Privacy Policy is to inform you that protection of your privacy is extremely important to The Right Move Group, LLC, and to ensure that you are aware of data that we collect and how it is protected while in our care. The following discloses our information gathering and dissemination practices for the following websites: [www.therightmovegroup.com](http://www.therightmovegroup.com) and <https://app.therightmovegroup.com>, and describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

### **Our Company**

The Right Move Group, LLC, (TRMG) offers destination services assistance to employees of our clients relocating to the areas we serve in the United States. We assist individuals to make sound decisions about finding the right home in the right community. The Right Move Group provides these services to corporations and full-service relocation management companies to support their employees and/or clients' employees.

### **Collection of Data**

#### **Why we collect data:**

The Right Move Group collects personally identifiable information that is voluntarily and knowingly provided to us for the sole purpose of providing you with authorized services related to your relocation.

#### **What data we collect:**

We may collect the following personally identifiable information in order to provide authorized relocation related services: Your name, address(es), employer, employee identification number(s), telephone number(s), fax number(s), e-mail address(es), date and place of birth, driver's license number, passport number, social security number, and those of family members traveling with you.

#### **How we collect data:**

We may collect this information from your own applications via fax, website or emails; from your employer's provided information, directly or via their relocation management company; or from anyone else that you have authorized to provide this information.

We do not use cookies on our website to track visitors. We do not use cookies or similar technologies to analyze trends, administer the website, and track users' movements around the website. We do not collect information about our visitors from other sources, such as public records, public bodies or private organizations.

## **Who We Share Information With**

The Right Move Group shares information with entities that you have authorized us to share with such as schools, rental agencies, landlords and other service providers involved in your relocation. We do not sell or share information for marketing. Other than the above, we will not share your personal information with anyone outside of The Right Move Group unless you have authorized us to do so.

## **Your Options to Limit Use**

You have two options to limit the use of personally identifiable data about you.

1. You may direct us to not disclose personally identifiable data to a third party, such as those listed above. Please note that if you do so, it may inhibit our ability to provide you with authorized services.
2. You have a right to direct us not to use personally identifiable data for a purpose that is incompatible with the purpose(s) for which it was originally collected or authorized by you. You may communicate these wishes at any time in writing to your TRMG customer service contact or by writing to The Right Move Group, LLC, 235 Montgomery Street, Suite 1035, San Francisco, CA 94104, Attn: Director Operations.

## **Sensitive Information**

Please know that TRMG does not collect data that is unnecessary for the provision of services. Specifically, we do not collect information about medical or health conditions, racial or ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, or trade union membership.

## **Transfer of Data to Other Parties**

The Right Move Group will only transfer personal information to parties outside our company under the following circumstances. TRMG's liability is limited based on our contractual agreements in these cases.

1. When necessary to provide the services that you, your employer or your employer's relocation management company have contracted for in accordance with the above stated uses.
2. When required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **Social Media Widgets**

Our website includes Social Media Features, such as the Facebook Like button, and Widgets, such as the Share This button or interactive mini-programs that run on our website. These Features may collect your Internet protocol address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy statement of the company providing it.

## **Data Integrity & Security**

The Right Move Group takes all reasonable steps to ensure personal information is safe while in our care. Specifically:

1. We utilize extremely secure firewall protection throughout our technology infrastructure. All systems are password protected and access can be tracked.
2. Only those employees who need to service your needs have access to your personal information.

3. We require any external person or organization to have unique username and passwords to access information via electronic means and we do not use "cookies" on our website for tracking and verification purposes.

### **Your Rights to Ensure Proper Use**

You have the right to verify that The Right Move Group is properly using your information. You may contact us by writing to The Right Move Group, LLC, 235 Montgomery Street, Suite 1035, San Francisco, CA 94104, Attn: Director Operations, with any concerns or to verify what information we have on file, as well as to ensure that your personal information is accurate and up to date. We will make all reasonable efforts to accommodate you. If we cannot accommodate you for legal or security reasons, we will explain why and give you alternative recourse information.

### **Compliance with the EU-US Privacy Shield Framework**

The Right Move Group LLC complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. The Right Move Group LLC has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

### **How We Ensure Enforcement**

The Right Move Group wants you to understand how we ensure that our privacy policy and processes are followed:

#### **Communication and Verification:**

Each TRMG employee is notified of our privacy policy and given the tools necessary to ensure adherence. Regularly scheduled internal and external audits are conducted to ensure that our privacy policy is properly and consistently implemented.

#### **Remedies and Dispute Resolution:**

We will make all good faith efforts to respond to your concerns as explained in Your Options to Limit Use and Your Rights to Ensure Proper Use sections of this document. We will update and correct information within 48 hours that you tell us is incorrect after proper verification. Please note that TRMG is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

In compliance with the Privacy Shield Principles, The Right Move Group LLC commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact TRMG at: [lindsay@therightmovegroup.com](mailto:lindsay@therightmovegroup.com). TRMG has further committed to refer unresolved Privacy Shield complaints to our alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or 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>.