

# Data Protection Policy, including Key Procedures



**Van der Ent Group**  
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## Data (Privacy) Protection Procedure

Van der Ent Group needs to keep certain information on its employees to carry out its day to day operations, to meet its objectives and to comply with legal obligations. The organization is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organization. *This policy covers employed staff and data of our clients*

**The Data (Privacy) Protection procedure addresses the following principles;**

### 1. Management:

We, the management of Van der Ent Group, will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely.

To meet our responsibilities staff will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

Training and awareness about the Data Protection Act and how it is followed in this organization will be in the form of a General training/ Awareness raising once a year.

### 2. Privacy Policy:

Van der Ent Group provides notice about the policies and procedures in all contract agreements and individual quotations; the policies and procedures are also available on the website, [www.vanderentgroup.com](http://www.vanderentgroup.com). Depending on the origin and destination of your relocation, Van der Ent Group may collect the following personal details:

- Name;
- Address, phone and email addresses for communication
- Date of Birth
- Physical characteristics
- Personal insurance documentation
- Bank account number
- Copy of passport
- Social Security
- Value of household goods and personal effects
- Flight details, if necessary
- Employer details, if necessary

Personal information is kept in the following forms:

- In physical maps;
- AGP



### **3. Choice and consent:**

By engaging Van der Ent Group for your international relocation, you give your explicit consent with respect to the obtaining, using, holding, amending, disclosing, destroying and deleting of data 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:**

Before personal information is collected, we will consider what details are necessary for your purposes and how long you are likely to need this information. We will inform people whose information is gathered about why the information is being gathered. We will also send out reminders to customers asking them to check their details to keep our information up to date.

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

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

In line with the Data Protection Act 1998 principles and EU General Data Protection Regulation (May 2018), Van der Ent Group will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose. We Confirm Van der Ent will never and under no circumstance sell or trade personal information with third parties. Information will only be used for relocations. Van der Ent cares about protecting our customer's data.
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary, we will keep your data for maximum 7 years, which is mandatory by Dutch law.
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)
- Information obtained when visiting our website will only be used to analyze visiting patterns. Our goal is to improve our website and serve our clients better.

### **6. Access:**

Anyone whose personal information we process has the right to know what information we hold and process on them, how to gain access to this information, how to keep it up to date and what we are doing to comply with the Act. They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Data Protection Officer at following details:

Van der Ent Group  
Attn: Christiaan van der Ent  
Lorentzweg 25  
3208 LJ Spijkensisse Netherlands

The following information will be required before access is granted:

- File number;
- Passport

We may also require proof of identity before access is granted. Groups of people within the organization who will process personal information are: Staff, all office employee's with access and all office employee's with a AGP login. Queries about handling personal information will be dealt with swiftly and politely.

*Complaints:* if clients feel their data is incorrectly used by Van der Ent Group you have the option to complain to following Dutch Authority:

*Autoriteit persoonsgegevens*

*P.O Box 93374*

*2509 AJ The Hague*

*The Netherlands*

#### **7. Disclosure to third parties:**

The organization will take steps to ensure that personal data is kept secure at all times against unauthorized or unlawful loss or disclosure. Any disclosure of personal data will be in line with our procedures. Any unauthorized disclosure of personal data to a third party by an employee may result in a first warning for employed staff, after rehearsal resignation will follow!

When an agent (overseas relocation company) from another country will take over the household goods shipment, it is inevitable that information must be shared. All our agents are compliant with our Service Level Agreement (SLA), in which protection of data is agreed.

Furthermore, personal information will be used for the purposes of the relocation and topics related to the relocation such as: insurance, customs, government officials (such as police), city hall.

#### **8. Security for privacy:**

The organization will take steps to ensure that personal data is kept secure at all times against unauthorized or unlawful loss or disclosure. The following measures will be taken:

- Using lockable cupboards ( restricted access to keys )
- Camera detection;
- Alarm;
- After 3 login attempt the entrance will be blocked;
- Renewing password every 3 months;
- It is stored in a cloud based bunker.

#### **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 Van der Ent Group. Please note that we have shared responsibility with regard to the accuracy of your personal information. If the collected personal data is incorrect or outdated please contact us.

## **10. Monitoring and enforcement:**

This policy will be reviewed at the beginning of every year to ensure it remains up to date and compliant with the law. All employees and staff who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles. If you believe that your personal information is not handled in accordance with the applicable law or our privacy policies, you may contact the Van der Ent Group's Data Protection Officer..

## **Definitions of Terms**

### **Processing**

Is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer. The organization will seek to abide by this code in relation to all the personal data it processes, i.e.

### **Data Controller**

Is responsible for understanding and communicating obligations under the Act, identifying potential problem areas or risks, producing clear and effective procedures, notifying and annually renewing notification to the Information Commissioner and notifying of any relevant interim changes

### **Explicit consent:**

Is the freely given, specific and informed agreement by a relocating individual in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data of our customers.