

# DATA PRIVACY PROTECTION PROCEDURE

V/2024

# HARSCH

The Art of Moving Forward

## 1. Introduction

Henri Harsch HH SA (Harsch), located rue Baylon 10, 1227 Carouge, Geneva, Switzerland, collects and manages Personal information from individuals in the context of its international moving activities. Harsch is committed to respect individual's data by handling all the Personal information collected in accordance with applicable laws. This policy complies with the General Data Protection Regulation (GDPR) and the Swiss Data Protection Act (LPD).



## 2. Definitions

Term	Definition
Personal information	Personal information is considered information that is about, or can be related to, an identifiable individual. It includes any information that can be linked to an individual or used to directly or indirectly identify an individual. Examples: Name, Home address, e-mail address, Phone number, Date of birth, Passport / ID card, Identification number, Physical characteristics, financial information (ex: employment contract, personal effects inventory)
Sensitive information	Some Personal information is considered sensitive. Some laws and regulations define the following to be sensitive Personal information: medical or health conditions, racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership, sexual preferences, information related to offenses or criminal convictions
Privacy	Privacy is the rights and obligations of individuals and organizations with respect to the collection, use, retention, disclosure, and disposal of Personal information

## 3. Personal information collected

Harsch may collect the following Personal information:

- Name
- Home address (origin and destination)
- Email
- Date of birth
- Copy of passport / ID card (for customs purpose)
- Immigration documents (for customs purpose)
- Household goods inventory and Personal effects (for insurance purpose)
- Employer details (for customs purpose)
- Flight details (for operational purpose)



Harsch only collects and processes Personal information to the extent necessary to provide its services.

Harsch does not process Sensitive information as part of its services.

Harsch collects Personal information from e-mails received, from employers and/or relocation companies and from documents shared with Harsch. If the Personal information collected is incorrect or out of date, please contact Harsch.

## 4. Data Processing purposes and legal basis

Data may be processed for the following purposes: contract execution, customer and/or third-party owner contact, marketing and customer loyalty programs, customer care, customer service, customer relationship management, prospecting, market research, service information, measures to satisfy the customer and invoicing. Data may also be processed by profiling and/or fully automated decision-making.

By engaging the services of Harsch, the customer consents to the collection, use and disclosure of Personal information as described in this privacy policy. To the extent that the customer has consented to the processing of Personal information provided and/or collected by Harsch, Harsch will process Personal information in the context of and on the basis of such consent, unless there is another legal basis or other good cause. Consent may be revoked at any time; however, such revocation will have no effect on data already processed.

## 5. Personal information usage

Customer data is processed in compliance with the applicable data protection regulations, in particular the GDPR and the LPD. Harsch only uses Personal information in circumstances that are necessary for the purposes for which the data was collected in accordance with Art. 4.

## 6. Data transmission to third-parties

Personal information will not be transmitted, sold or otherwise transferred to third parties, unless this is necessary for the purposes for which we have collected the data, for the execution of the contract or legal obligations, or unless the data subject has expressly consented to this. By way of example, Harsch discloses Personal information, by necessity, for example, to customs authorities and partners involved in the removal, transport or storage process.

Harsch may transfer customers' Personal information to subcontractors or companies of the Harsch group in Switzerland or abroad, who will process such data in accordance with applicable legislation.

Harsch may also store data with external service providers, in Switzerland or abroad, in compliance with applicable legislation.

Harsch may also share data with suppliers and service providers in Switzerland or abroad, in compliance with applicable laws.

If we transfer data to a country that does not offer legal data protection equivalent to that of the EU and Switzerland, we ensure that an appropriate level of protection is in place by means of corresponding contracts with service providers.

## 7. Personal information retention

Harsch will retain Personal information for the period necessary to achieve the purposes mentioned in art. 4, and beyond this period in accordance with legal retention and documentation obligations.

Harsch will also retain Personal information: (i) to the extent that it is required to do so by law, or (ii) if the Personal information may be relevant to any current or future legal proceedings, or (iii) in order to establish, exercise or defend its rights.

In particular, contractual documents are kept for a period of 10 years.

## 8. Rights related to personal information

Customers have certain rights under applicable data protection laws, namely in particular the GDPR and the LPD, with respect to their Personal information, in particular the right to:

a) request access to Personal information processed by Harsch and receive information concerning such data, such as the purposes of the processing, the recipients and the persons to whom the Personal information has been or will be disclosed, the data retention period, details of any automated decision-making and the right to lodge a complaint with a supervisory authority;

b) request rectification of any inaccurate Personal information that Harsch holds about them, and completion of any incomplete Personal information;

c) object to or restrict the processing of Personal information (including processing for direct marketing purposes);

d) request the deletion of their Personal information;

e) object to any decision concerning them that has been taken solely by a computer or other automated process; and

f) contact the data protection supervisory authority in their country if they have any concerns about the use of their Personal information.

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These rights are exercised subject to applicable legislation imposing document retention obligations on Harsch.

In principle, the exercise of such rights requires that data subjects provide clear proof of their identity (e.g. by means of a copy of an identity card if identity is unclear or cannot be verified in any other way).

To assert their rights, persons affected by the processing of Personal information may contact Harsch at the following address:

Henri Harsch HH SA,  
Attn: Isabelle HARSCH,  
Rue Baylon 10,  
1227 Carouge, Geneva (Switzerland).

By email: [compliance\(a\)harsch.ch](mailto:compliance(a)harsch.ch).

Tel: +41 22 300 43 00

Any person concerned also has the right to take legal action or lodge a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## 9. Guarantees

Harsch management ensures that:

- Each employee working with Personal information is fully trained to manage and maintain this information.
- Each employee, ready to respond to requests for Personal information, knows exactly what to do.
- Each transmission of Personal information complies with these procedures

To fulfill these responsibilities, Harsch management will ensure that:

- All Personal information is collected and used solely for these operational purposes
- All Personal information used is up to date
- All Personal information is stored securely

## 10. Security and Privacy

Harsch ensures that Personal information is safely kept at all times against unauthorized or unlawful loss or disclosure, by implementing the following measures:

- Physical access to offices is strongly secured (key / badge)
- Offices are equipped with security systems
- IT infrastructure access secured and regularly audited

## 11. Monitoring

This procedure is reviewed every year to ensure it remains up to date and compliant with the laws. 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 any individual notices a breach of privacy they should immediately notify Isabelle Harsch by email [compliance\(a\)harsch.ch](mailto:compliance(a)harsch.ch) who will investigate the complaint.

## 12. Website usage

### 12.1 Cookies and technologies tracking

Our website <https://www.harsch.ch/> uses "cookies". A cookie is an element of data stored on a site visitor's computer to help us improve access to our website and identify repeat visitors. Cookies may also enable us to track and target the interests of our users to enhance their experience on our website. Information such as browser type, Internet service provider, language, region, age group or area of interest. This data is rendered anonymous.

Users can, however, configure their browser so that no cookies are stored on their computer, or so that they are always informed when they receive a new cookie. In principle, our website can be used even without cookies, although certain functions may be limited.

We are using different kind of cookies on our website:

- Necessary cookies

They help make the website usable by enabling basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Name	Supplier	Objective	Validity	Data sent to
_grecaptcha	Google	This cookie is used to distinguish between humans and robots. This is beneficial for the website to create valid reports on site usage.	3 months	USA
consent	Youtube	Used to detect whether the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for the website's compliance with data protection regulations.	2 years	USA
li_gc	LinkedIn	Stores the user's permission to use cookies for the current domain	3 months	USA

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- Preference cookies

Preference cookies enable the website to remember information that modifies the way the site behaves or displays, such as the visitor's preferred language or region.

Name	Supplier	Objective	Validity	Data sent to
wp-wpml_current_language	Harsch	Designates the country code calculated on the basis of the user's IP address. Used to determine which language should be used for users	Session	Switzerland
lidc	LinkedIn	Records which server group serves the visitor. This is used in the context of load balancing to optimize the user experience.	1 day	USA

- Statistics cookies

Statistical cookies help the website owners, by collecting and communicating information anonymously, to understand how visitors interact with the website.

Name	Supplier	Objective	Validity	Data sent to
_ga	Google	Stores a unique identifier used to generate statistical data on how visitors use the site	2 years	USA
_ga_#	Google	Used by Google Analytics to collect data on the number of times a user has visited the website and the dates of the first and most recent visits.	2 years	USA
_gat	Google	Used by Google Analytics to drastically reduce query rates	1 day	USA
_gid	Google	Stores a unique identifier used to generate statistical data on how the visitor uses the site.	1 day	USA
campaign	Harsch	Used to analyze the performance of marketing campaigns by storing information about a click on a Google ad made in the past.	1 year	Switzerland
ln_or	LinkedIn	Records statistical data on the behavior of visitors to the website. Used for internal analysis by the website operator.	1 day	Ireland
Analytics SyncHistory	LinkedIn	Used to synchronize data with a third-party analysis service	1 month	USA
collect	Google	Used to send data to Google Analytics about the visitor's device and behavior. Follows the user across devices and marketing channels	Session	USA

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- **Marketing cookies**

Marketing cookies are used to track visitors through the website. The aim is to display ads that are relevant and interesting to the individual user and therefore more valuable to third-party publishers and advertisers.

Name	Supplier	Objective	Validity	Data sent to
_fbp	Facebook	Used by Facebook to provide a range of advertising products such as real-time offers from third-party advertisers.	3 months	UK
bcookie	LinkedIn	Used by the social networking service, LinkedIn , to track the use of integrated services	1 year	USA
remote_sid	YouTube	Necessary for the installation and operation of YouTube video content on the site	Session	USA

## 12.2 Contact form

In order to collect requests, each visitor is invited to complete a contact form, providing information such as name and e-mail address. This information is used to contact the visitor about the services on our website in which he or she has expressed an interest.

## 13. Application

By using Harsch's services, the customer accepts this privacy policy.