

# OCEAN Company Privacy Notice

Ocean Company Ltd. ("Ocean") and IRM Ltd. ("IRM") (together – "Ocean Group", "Company"), with its registered office address at Industrial District, Kibutz Yakum 6097200, Israel, adopted this privacy notice ("Privacy Notice") to describe our data collection, protection and use practices, and your related rights, with regard to our relocation services ("Services").

**"Personal Information"** means information that we directly associate with a specific person or entity, which may include without limitations, name, address, telephone number, email address, payment information, IP address etc.

We may collect and process personal and non-personal information about you, as specified below.

By accessing, applying, signing up for, or using our Services, you hereby accept this Notice and agree that we may collect, store, and use information in accordance with this Notice and any applicable laws and regulations.

Please read the following carefully to understand our practices regarding your Personal Information and how we will treat it. This Notice governs the use of the Website and the Services and other communication you may have with us.

If you are not satisfied with any aspect of this Notice, please do not continue to use the Services.

## Information Covered by this Privacy Notice

Our Notice covers all non-public, personal information received by us that may be used to identify you ("Personal Information"). This may include a wide variety of information depending upon the services you are set to receive. For example: name and address information (real estate or household goods moving services); email address, telephone and other contact numbers and financial information; job title; social security, date of birth, or other identification numbers (applications or account setup); family profile; banking information; passport or driver's license information (visa & immigration services); health data (physical health).

## General Data Protection Regulation Information for EU individuals

Natural persons located in the European Economic Area ("EEA Individuals") should review the following information for their specific rights, remedies, and other General Data Protection Regulation ("GDPR") related information.

As a relocation management business, we are entrusted everyday with collecting and managing person-identifiable information of client assignees and transferees. In doing so, we observe the appropriate data protection laws, specifically GDPR.

Our data protection and privacy obligations extend to each of our service partners (supply chain) and other service providers with whom we share personal information as they work on your behalf.

**Controller/Processor:** When we are acting at the direction of a corporate client to provide services to you as part of your relocation or assignment, then the client is responsible as the Data Controller for telling us how your Personal Information should be used and processed.

Under the European Union's GDPR, Ocean is the Data Processor who receives Personal Information and instructions on how to process that Personal Information from the Data Controllers.

Where we act as a Data Controller for services you independently request of us (i.e., where we independently determine how any Personal Information is processed), then we manage your Personal Information according to what you have consented to and the terms of this Notice. Whether acting as a Data Controller or a Data Processor, we maintain the privacy of your information and only use, share, transfer or store it as permitted.

**Legal Basis for processing:**

We use the data collected from you for the specific purposes under the relevant legal basis listed below:

Purpose for processing data	Legal basis for processing data
<ul style="list-style-type: none"><li>• To administer our relationship with you, provide services and respond to enquiries</li><li>• To ensure the billing of any procured services and obtain payment</li><li>• To ensure the billing of any procured services and obtain payment.</li></ul>	To fulfil contractual obligations.
<ul style="list-style-type: none"><li>• To process and respond to any complaints</li><li>• To enable us to meet our legal and other regulatory obligations imposed on us</li></ul>	To fulfil a legitimate interest.

Please be informed that no automated decisions or profiling are made in the course of the processing of your Personal Information.

**Data location:** Our website is hosted by servers located in Israel, and our company is located in Israel; Therefore, all information submitted by you will thus be transferred to Israel and the U.S. regardless of your location. By using our website or our Services, you acknowledge and agree to this Privacy Notice

and the collection, use, and disclosure of your personal data by Ocean as outlined in this Privacy Notice. If you do not agree with the terms described in this Privacy Notice, please do not use these websites or the Services, or submit any personal data. Your continued use of the websites, the Services and/or submission of personal data will be deemed your conclusive acceptance of our Privacy Notice.

### **Collection and Use**

We collect and use personal data to enable delivery of our Services, to operate our business, and improve performance of our website, to communicate with you, to help us provide Services to you in accordance with our client agreements and to enable us to meet our legal and other regulatory obligations imposed on us.

To deliver our Services to you, the personal data we may collect and use includes: your name, telephone number, address and email address, and employment information. We may also collect and use more 'sensitive' data such as your bank account information and government-issued identification numbers.

Such personal data may be collected from your employer or any of our corporate clients whom you have authorized to provide Services to you.

We may transfer and disclose to third parties or otherwise use non-personal information at its own discretion.

### **Information Sharing & Storage**

The personal data collected will be used only to communicate with you and to help us provide Services to you in accordance with our client agreements. As necessary for these purposes, we may share your personal data with your employer

#### **Sharing within the Ocean Group**

To provide you with the full range of relocation and moving services you may need, Ocean takes an integrated approach to the Services we provide. In order to be able to provide a full range of services, we may share Personal Information among the companies within the Ocean group.

#### **Sharing with our service suppliers**

To facilitate the delivery of our Services, we engage and use suppliers in many countries throughout the world. The location of the suppliers that will assist us in providing our Services to you will depend on the particulars of your assignment. Ocean works with a global network of relocation partners (supply chain partners) who provide services such as:

- Destination services;
- Visa and immigration assistance;

- Household goods transportation;
- Temporary accommodations;
- School search assistance;
- Tax consultation

In addition, we receive data storage and processing services from third party service suppliers.

These suppliers are given access only to the personal data, if any, that is needed to provide the specific service for which we contract them to provide. They are contractually bound to protect the confidentiality and security of your personal data; further, they must agree to limit the use of your personal data for the purpose intended in providing the service and are prohibited from doing anything with your personal data that we have not authorized them to do. Finally, they are required to treat your personal data in a manner consistent with this Privacy Notice.

Please note that these third parties may be outside the EEA (European Economic Area); In these and similar cases where recipients of your Personal Information are located outside the EEA, we will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Notice, including the use of any adequacy mechanisms required by law to ensure that the transfer is lawful.

### **Sharing in other circumstances**

In the event of a merger, dissolution, reorganization or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal data, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal data as set forth in this Privacy Notice. This Notice shall be binding upon Ocean and its legal successors in interest.

We may be required to disclose personal data in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal data to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas. We also may disclose personal data about you as required or permitted by law.

We also may disclose personal data about you to enforce our contract with you, including investigation of potential violations thereof, and to protect against harm to the rights, property or safety of Company, its users or the public as required or permitted by law.

**Data Retention:** Personal information will be retained as necessary to provide the Services. This may include a period of time after the Services are complete in order to comply with our regulatory, audit, contractual, and other legal obligations.

## Privacy Rights

You may have certain rights under data protection legislation. Where applicable, data protection legislation may also provide the following rights in relation to Personal Information which can also be discussed with us by using the Contact Us section below:

- request us to give you access to it;
- request us to rectify inaccurate or incomplete information, or erase it, where applicable;
- request us to restrict or to stop our using it, in certain circumstances;
- withdraw your consent to our using it;
- data portability, in certain circumstances;
- lodge a complaint with the relevant Data Protection Authority.

## Correcting/Updating Your Information

We are committed to keeping your personal data accurate and up-to-date. If you are a current customer, you may contact us at [sales@oceanrelocation.com](mailto:sales@oceanrelocation.com) in order to update personal data such as: your address, telephone number, email address, you. We will take reasonable steps to comply with your request.

## Security

We restrict access to your personal data only to those of our employees, agents and suppliers who have a “need to know” and based on the Services we or they are providing to you. We maintain reasonable physical, electronic and procedural safeguards designed to protect personal data. Our external suppliers are contractually bound to us to provide at least the same level of privacy protection and security as is required by this Privacy Notice. We regularly review our security standards and procedures to protect against unauthorized disclosure or use of or access to your personal data.

## Contact Us

For questions or complaints regarding this Privacy Notice or our privacy practices, or to exercise any of your rights with regard to your personal data, please contact by email: [Sharon.Frank@ocean-il.co.il](mailto:Sharon.Frank@ocean-il.co.il)