

# PRIVACY POLICY & NOTICE

EFFECTIVE DATE: September 1, 2022

This Privacy Notice (“**Privacy Notice**”) is intended to inform any affected data subjects (“**you**”) about the collection, security, and use of the personal information that AutoVisas Inc., and our related affiliates and subsidiaries\* (collectively, “**AutoVisas**” or “**we**”) receive and process on your behalf.

In addition, we provide information on how to contact us to: (1) exercise your right to object to the processing of certain aspects of your personal information in accordance with applicable laws; (2) access, correct, or delete your personal information; (3) ask any questions you may have about our privacy practices.

In some instances we are engaged directly by corporations, business groups, or related individuals, which results in the processing of your information at their request. Where we refer to “representative” below, it is in these circumstances where a corporation or another entity has engaged us to act. You may at any time, if you prefer, address any concerns directly to your representative, where applicable.

## Personal Information We Collect and How We Use It

### PERSONAL INFORMATION WE COLLECT ABOUT YOU

AutoVisas collects certain personal information about you and, if required, your family members and employer for the purposes of providing immigration consulting services, services, and products. We will not be able to provide the services requested if we are not provided with all relevant personal information.

### INFORMATION RELATED TO REQUESTED SERVICES

For purposes of providing services you or your representative request, AutoVisas collects and processes personal information such as name, address, telephone number, date of birth, marital status, passport number, employment history, educational background, tax status, employee number, job title and function, and expatriate status.

Where required for the service, AutoVisas may collect certain personal documents such as passport copies, educational documents, CVs, visa copies, birth certificates, and other documents. We obtain the personal information from a number of sources, such as through our online portals, our website(s) or applications, and other information you provide directly to us, including by email or in conversation with us.

In addition, we obtain personal information from third-party sources, such as former employers, educational institutions you attended, relocation companies, and your current or prospective employer. We use this information to provide services, including analyzing, completing and processing immigration, visa and related filings and submissions to relevant government agencies, providing consulting advice as to eligibility to obtain immigration benefits.

We also use your personal information in other instances in connection with the services we provide. This use occurs only when there is a legitimate interest to do so that is not overridden by your data protection rights as required by law, such as assisting in the management and administration of our clients' global mobility programs, providing access to online case-management tools, and analyzing immigration trends, such as visa processing times and government approval rates. Where we are engaged by your representative, we process your personal information because it is in our legitimate interests to do so in order to fulfil our contract with your representative for client services.

In addition to providing you or your representative with our services, we process personal information to comply with our legal and regulatory obligations including record-keeping requirements. For example, we process personal information under "know your customer", anti-money laundering regulations, anti-bribery regulations and professional regulations.

## **SENSITIVE PERSONAL INFORMATION**

Certain categories of personal information may be considered "sensitive" and are subject to a higher level of data protection. These categories may include race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, physical or mental health or condition, data relating to offenses and/or criminal convictions, and biometric data, such as fingerprints, when used to uniquely identify you.

In the context of the services we provide, AutoVisas collects sensitive personal information when the submission of such data is necessary to comply with the legal obligations of the country in which you are seeking a visa or work permit. In addition, AutoVisas may need to inquire about certain sensitive information in order to provide consultative advice.

## **INFORMATION REQUESTS**

If you request information about our services directly, you may choose to provide personal information such as your name, address, email address and telephone number. We use your information to respond to your request.

## **OTHER USES OF INFORMATION**

Where it is in our legitimate interests and not outweighed by your data protection rights, we use personal information we collect and process for client and AutoVisas administration, compliance audits, compliance with AutoVisas policies and procedures, ensuring the security and integrity of our services and in ensuring that our IT systems function effectively.

In addition, we process your personal information with your consent, such as when we use your contact details to respond to a request or question by you, or where required by law.

## **INFORMATION WE SHARE**

We will not sell, share, transfer, rent, use, or distribute your information for purposes other than those disclosed here unless required by law or as authorized by you or your representative. We share the information you provide among our subsidiaries, affiliates and your representative(s) or a third party as

your representative instructs us, as appropriate or necessary in connection with the services, or to protect the interests of any person, where permitted by applicable law.

Where our services are retained by your representative on your behalf, we share your personal information as instructed by your representative, for tax purposes, to assist you in obtaining relocation services, and for any other purpose required to provide the services as permitted by applicable law.

In addition, as part of the services we have been directed to provide, AutoVisas discloses personal information to government agencies, immigration authorities, your former, current, or prospective employer and its related entities.

We also share the information with certain service providers we have retained in connection with the services we provide, such as translators, evaluation services, couriers, or other necessary entities. These service providers are authorized to use the information only as necessary to perform services on our behalf or to comply with law or legal process.

In addition, we will disclose information about you: (1) if we are required to do so by law or legal process, (2) to law enforcement authorities or other government officials, (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss in connection with an investigation of suspected or actual illegal activity; or (4) if necessary to protect the vital interests of any person.

## HOW WE PROTECT PERSONAL INFORMATION

We seek to ensure that any personal information that we hold about you is accurate, complete, current and otherwise reliable based on data provided to us in order to provide the services. We seek to collect only that personal information that is adequate, relevant and not excessive for these purposes.

We maintain commercially reasonable and appropriate administrative, technical, organizational, and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration, or destruction of personal information, including by third parties who assist in our provision of services.

We retain personal information for only as long as we need it to provide the services you or your representative has requested, for our own administration and internal purposes, and for any periods that are mandated by law or otherwise agreed to with our clients, after which, we take steps to delete or anonymize the information.

## INFORMATION WE TRANSFER

### *Transfers required for the services*

When we transfer your information to other countries, we will use, share and safeguard that information as described in this Privacy Notice. We transfer personal information to third countries where it is necessary to provide you the service you (or your representative) requested. For example, the Government requires certain personal information in order to review applications, screen foreign nationals, issue visas and other work authorization documents, etc. We also provide your personal information to local advisors, translators and other service providers where it is necessary to provide the service you requested.

#### *Transfers to other service providers*

Your personal information will be shared with companies providing services under contract to us for the purposes described in this Privacy Notice. If you reside in the EEA, we may use standard contractual data protection clauses, which have been approved by the European Commission to facilitate transfer outside the EEA. For further information, including to obtain a copy of the documents used to protect your information, please contact us as described in the How to Contact Us section below.

## **YOUR CHOICES AND RIGHTS**

As set out above, AutoVisas may collect certain information about you in conjunction with providing requested services.

We will respect your decision if you or your representative subsequently informs us that you wish to opt-out of further use of your personal information. If sensitive personal information is involved for the delivery of a new purpose we will only use your information if you or your representative communicate your consent to this processing to us, when it is necessary to deliver requested service, or in accordance with the requirements of applicable laws.

We also will assist you or your representative with access to your personal information and, as applicable, with the ability to review and correct inaccuracies, delete unnecessary personal information, and receive a copy of your personal information in a structured machine-readable format. We may, where applicable, use reasonable efforts to assist your representative in responding to a request to access, correct, delete or restrict processing of your personal information or, where required by law, to respond directly to such a request within a reasonable period of time. In the event that either you or your representative informs us in writing that you wish to opt-out of future processing of personal information we will respect your request. Where we rely solely on your consent, you may withdraw it at any time. You may also object to processing that is based on our legitimate interests alone. In such instances, our business interests must be found to be compelling and to not jeopardize your individual rights before further processing may continue. To exercise these rights, please contact your representative or AutoVisas.

To help protect your privacy and the security of your information, AutoVisas takes commercially reasonable steps to verify your identity before granting access to information.

If you have unresolved concerns, where provided by local law, you may have the right to complain to a data protection authority where you reside, where you work or where you believe there has been an infringement of data protection laws.

## **UPDATES TO OUR PRIVACY NOTICE**

This Privacy Notice may be updated periodically without prior notice to you to reflect changes in our information practices. We will post a notice on our applicable websites or materials to advise of any significant changes to our Privacy Notice and indicate in the notice when it was most recently updated. In certain countries, additional or different procedures not inconsistent with this Privacy Notice may apply as necessary to satisfy local legal requirements.