



# Silicon Valley Corporate Relocation's GDPR Privacy Policy

Thank you for visiting our website (the "Site"). Silicon Valley Corporate Relocation, LLC ("SVCRElo") recognizes the importance of protecting the privacy of our users and visitors at [www.svcrelo.com](http://www.svcrelo.com) which is owned and operated by Silicon Valley Corporate Relocation, LLC. This GDPR privacy policy describes what information SVCRElo collects, and how the information is used, stored and protected. This privacy notice also describes the choices available by you regarding the use, access and updates of your personal information.

Please read this policy before using the Site or submitting any personal data. This policy explains how we recognize the importance of protecting the privacy of the personal data we collect via our website and private portals used by our clients, their relocating employees or other users. By using the SVCRElo website, you consent to the privacy practices described in this policy and agree to SVCRElo's terms and conditions. If you do not agree to this Privacy Policy, you may not use the site.

## **SCOPE**

The Silicon Valley Corporate Relocation, LLC (SVCRElo "we" or "us") General Data Protection Regulation ("GDPR") Privacy Policy is posted to comply with the GDPR and only applies to personal information governed by the GDPR within the territorial scope of the GDPR.

The GDPR owner is responsible for ensuring that the SVCRElo privacy policy is made available to you prior to collecting and processing your personal data. The SVCRElo Owner and data protection representatives can be contacted as indicated below:

Lisa Carmel  
Silicon Valley Corporate Relocation, LLC (SVCRElo)  
2310 Homestead Ave, Suite C-1 #405  
Los Altos, CA 94024  
[lisa@svcrelo.com](mailto:lisa@svcrelo.com)  
650-7387-3255

## **EU-US & SWISS-US PRIVACY SHIELD**

Silicon Valley Corporate Relocation complies with the EU-U.S. Privacy Shield Framework and the 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, respectively. SVCRelo has certified to the U.S. Department of Commerce’s International Trade Administration (ITA) that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Statement 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/list>.

This policy states how SVCRelo collects, uses, shares and secures the personal information it obtains and subsequently transfers to our third party suppliers under the Privacy Shield Framework including personal data from the EU and Switzerland as well as the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, SVCRelo is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission. In certain situations, SVCRelo may be required to disclose personal data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

## **PERSONAL DATA COLLECTION**

Under the EU’s General Data Protection Regulation (GDPR) personal data is defined as: “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

## **SPECIAL CATEGORIES**

Silicon Valley Corporate Relocation, LLC does not collect data that is classified as ‘special categories’ under the Regulation (race, ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade union membership, genetic data, biometric data, health data, and data concerning a natural person’s sex life or sexual orientation).

## **LEGAL BASIS**

SVCRelo has been contracted by you or your employer to facilitate services related to your relocation benefits. To assist SVCRelo in managing and coordinating relocation services, we partner with third parties such as making arrangements for shipment of household goods and autos, rental home finding temporary housing coordination, destination services, and departure services.

To assist SVCRelo with service delivery, we may work with subcontractors who will perform some services such as your household goods move, housing assistance and other miscellaneous destination services you may be eligible for. The data we collect is kept to the minimum that we need in order to carry out these services and is used solely for that purpose.

## **WHY DOES SVCRELO NEED TO COLLECT AND STORE PERSONAL DATA?**

In order for us to provide you relocation services we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes Silicon Valley Corporate Relocation, LLC would contact you for additional consent.

## **COLLECTION OF INFORMATION**

We collect personal information to enable us to provide the services that we have been contracted to provide by our clients. This may include employee contact information, origin and destination addresses, bank account and routing numbers, salary and bonus information, origin and destination addresses, children names and birthdates. SVCRelo does not share, sell, rent or trade with third parties for their promotional purposes. Relevant information is shared with established and vetted third parties who assist us in service delivery.

## **SOURCES OF INFORMATION**

The personal information we obtain is used to facilitate relocation services which were authorized by you or your employer. It may also come from service providers you authorize to share information with us such as realtors who are involved with the sale and/or purchase of your homes.

## **WHY DOES SVCRELO SHARE MY PERSONAL DATA WITH ANYONE ELSE?**

We may pass your personal data on to third-party service providers contracted to Silicon Valley Corporate Relocation, LLC in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Silicon Valley Corporate Relocation, LLC's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## **SERVICE PROVIDERS**

To assist SVCRelo in managing and coordinating relocation services, we partner with third parties such as making arrangements for shipment of household goods and autos, home finding and sale assistance, temporary housing coordination, international destination services, international visa and work permit coordination, departure and repatriation services. These firms are authorized to use your personal information only to the extent is necessary to provide authorized services. Note that we may be liable for the onward transfer of EU and Swiss personal data to third parties unless SVCRelo proves that it is not responsible for the event giving rise to the damage.

## **HOW WILL SVCRELO USE THE PERSONAL DATA IT COLLECTS ABOUT ME?**

Silicon Valley Corporate Relocation, LLC will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. Silicon Valley Corporate Relocation, LLC is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

## **HOW SVCRELO PROTECT YOUR PERSONAL INFORMATION**

We use reasonable measures to safeguard the security and integrity of your Personal Information through procedures and technology designed for that purpose. You should always safeguard your own Personal Information by protecting any passwords or other identifying information used to access your records with us via the online portal and by safely disposing of any records or reports that are no longer needed.

## **SECURITY**

The security of your personal Information is important to us. SVCReLo maintains its systems in accordance with reasonable industry standards to reasonably secure the Information of its customers against unauthorized access, accidental or intentional manipulation, and loss, both during transmission and once it is received. However, no data transmission over the Internet can be guaranteed to be 100% secure, and you use the site at your own risk. If you have any questions about the security of your personal information, you can contact us using the address noted in the “Contact Us” section below.

## **TRACKING TECHNOLOGIES**

Technologies such as cookies or similar technologies are used by SVCReLo and our marketing partners and customer support. These technologies are used in analyzing trends, administering the site, tracking users’ use of the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as on an aggregated basis.

We use cookies for session control and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

## **SOCIAL MEDIA WIDGETS**

Our site includes Social Media Feature, such as the Facebook button. These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Social Media Features and widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

## **SVCRELO PUBLIC SITE**

Users can visit our public website, without providing any personal information at <http://www.svcrelo.com>. Limited data can be provided as follows:

- Data that is provided by users by completing forms and requests for information.
- Usage data is collected on known users for client-specific targeted content.
- IP addresses, and non-personal information related to that IP address, such as the referring web site, date and time of visit, and the browser type and version used for those individuals browsing the public site. This information is not linked to any personal information, remains anonymous and is used for administrative purposes only such as tracking the effectiveness of marketing campaigns.

## **SVCRELO PRIVATE WEBSITE**

Access to our website is optional and provided to SVCReLo clients and/or their relocating employees. Clients may submit requests for relocation services along with personal information such as contact information, benefit eligibility, salary and bonus information. Employees can access the portal to obtain important information concerning their relocation such as third party providers, relocation resources, and policy and expense management information. We may retain your information for as long as your relocation is active or as needed to deliver services, comply with applicable laws and regulations, resolve disputes and meet our contractual obligation with clients.

## **UNDER WHAT CIRCUMSTANCES WILL SVCRELO CONTACT ME?**

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

## **CAN I FIND OUT WHAT PERSONAL DATA SVCRELO HOLDS ABOUT ME?**

Silicon Valley Corporate Relocation, LLC, at your request, can confirm what information we hold about you and how it is processed. If SVCRElo does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organization that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Silicon Valley Corporate Relocation, LLC or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organization, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## **WHAT FORMS OF IDENTIFICATION WILL I NEED TO PROVIDE IN ORDER TO ACCESS THIS INFORMATION?**

Silicon Valley Corporate Relocation, LLC accepts the following forms of ID when information on your personal data is requested: Passport, driving license, birth certificate, utility bill (from last 3 months), etc.

## **CHANGES TO PRIVACY POLICY**

SVCRElo reserves the right to amend this GDPR Privacy Policy at any time. Any changes made to this GDPR Privacy Policy will be effective the date they are posted online. Your ongoing use of this site serves as your implied agreement with the revised terms. SVCRElo's Privacy Policy is always available for viewing at <http://www.svcrelo.com/mission--goals.html>

## **HOW TO ACCESS INFORMATION, COMPLAINTS AND OTHER RIGHTS**

In the event that you wish to make a complaint about how your personal data is being processed by Silicon Valley Corporate Relocation, LLC (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with Silicon Valley Corporate Relocation, LLC 's GDPR Owner:

Silicon Valley Corporate Relocation, LLC  
Lisa Carmel, Co-Founder and Privacy Manager  
2310 Homestead Ave, Suite C-1, #405  
Los Altos, CA 94024  
[lisa@svcrelo.com](mailto:lisa@svcrelo.com)

## RECOURSE MECHANISM

In compliance with the EU-US and Swiss-US Privacy Shield Principles, SVCRelo commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact us at:

Silicon Valley Corporate Relocation, LLC (SVCRelo)  
Lisa Carmel, Co-Founder and Privacy Manager  
2310 Homestead Ave, Suite C-1, #405  
Los Altos, CA 94024  
[lisa@svcrelo.com](mailto:lisa@svcrelo.com)

SVCRelo has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, a panel of the EU Data Protection Authorities and the Swiss Federal Data Protection and Information Commissioner. **If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, EU individuals may contact the DPA's here [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en) Swiss individuals may contact the FDPIC here <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>**

Finally as a last resort and under limited circumstances EU and Swiss individuals with residual complaints may invoke a binding arbitration option before the Privacy Shield Panel. See <https://www.privacyshield.gov/article?id=ANNEX-I-introduction> for more information about this option.

## LIMITATION OF LIABILITY

UNDER NO CIRCUMSTANCES shall SVCRelo be held liable for any special, incidental or consequential damages, which may result from the use of information or materials made available on SVCRelo's website in cases of misinterpretation or failure to follow instruction. SVCRelo's liability is limited to items held within the Principles of the Privacy Shield. In regards to onward transfer, SVCRelo retains the responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. SVCRelo shall only remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

## USER OPTIONS AND OPT OUT

We acknowledge the individual's right to access their personal data. Upon request, SVCRelo will provide you the ability to access, correct, or delete any of your personal information. You can ask us to choose whether your personal information is *(i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by you*. Be advised that if you are currently engaged in transactions with SVCRelo, this personal information is needed to continue to provide services. You may also opt out of regular SVCRelo communications by contacting us at <http://www.svcrelo.com/contact-us.html>.

**PRIVACY CONTACT INFORMATION**

If you have any questions or concerns regarding SVCRElo's Privacy Policy, please contact:

Silicon Valley Corporate Relocation, LLC

Lisa Carmel, Co-Founder and Privacy Manager

2310 Homestead Ave, Suite C-1, #405

Los Altos, CA 94024

[lisa@svcrelo.com](mailto:lisa@svcrelo.com)