

Four Winds Saudi Arabia, Ltd.

" We move those who move the world "

DATA (PRIVACY) PROTECTION CODE OF CONDUCT



We, the undertakers of this agreement affirm to fully comply with the provisions of **Four Winds Saudi Arabia, Ltd.'s Data (Privacy) Protection Policy** in addition to and in accordance with the existing laws and regulations both locally and internationally in assuring mutual Data (Privacy) Protection between Four Winds Saudi Arabia, Ltd., its corporate accounts, partner agents and its supply chain in order to maintain and protect one's own and customer's privacy by collecting, storing and handling data in all honesty, diligence and professionalism in upholding institution and individual rights to data privacy.

1. NOTICE

Four Winds SA., Ltd. collects and maintains personal information so that it can carry out its functions in rendering the required services by its clients and business partners.

Four Winds SA., Ltd. treats all personal information with the utmost confidentiality and with appropriate levels of security. The personal data will be used for a range of clearing, handling and forwarding procedures related to client's existing removal activity. All information (updated as appropriate) will be kept throughout an individual shipment's time as an active or archived file and for such reasonable period (and to the extent necessary) after job completion as may be needed to enable Four Winds SA., Ltd to access for the purpose of audit, settlement of dispute and other purposes that the information stored will serve best.

Personal data will also be available to our employees, management (both at head office and branch regional offices – if necessary) and others including partner agents, contractors and other service providers who are associated with Four Winds SA., Ltd. for the sole purpose of accomplishing the job.

In congruence to the existing laws of the land and the prevailing international statutes regarding data privacy protection, Four Winds SA., Ltd. has internal policies to maintain secrecy and privacy of its database of client personal information compiled in the course of its business activities which is reflected to all its employees, corporate accounts, supply chain and partner agents.

Four Winds SA., Ltd. shall not be held liable of any fraud arising from any violation to this policy and procedures however may assist in providing applicable substance to

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complaints raised against person/s and/or entities who violated certain legal provisions related to data protection and privacy laws of the land or at any applicable court jurisdiction.

Violations emanating from Four Winds SA., Ltd. employees are to be treated as individual violation/s for such Four Winds SA., Ltd. denounces direct or indirect consent to employee's commitment of the act.

Please note that this notice may be amended without prior notice.

2. FOUR WINDS RESPONSIBILITY

- 2.1. **STRAIGHTFORWARD** data collection from customers, corporate accounts, partner agents and supply chain where and when required to facilitate compliance to legitimate requirements of involved process/es, regulations and governing entities.

Properly informing the respondents about the practicality of required information and ensure that concerns and hesitations are adequately addressed.

- 2.2. **OBTAINING DUE CONSENT** whereby explicit consent is evident in standard formularies used in harvesting data from the respondent who consequently signs personally or appoints someone to confirm validity and truthfulness of information provided in the form.

In the absence of formularies whereby information is obtained via any form of electronic messaging and/or via phone conversation is considered implicit consent.

- 2.3. **PRACTICE DATA (PRIVACY) PROTECTION POLICY** as the core principle in taking good care of stored data, proper disposal of overdue database, and secured disclosure to interested parties whenever necessary in compliance to clearance requirements. To ensure that customer restrictions and disposal requests are in-line with the company policy and prevailing laws of the land or otherwise properly justified.
- 2.4. **PROMOTE ACCESSIBILITY** to all who are interested to read about Four Winds Data (privacy) Protection Policy.
- 2.5. **ADHERE** to similar policies implemented by another party whom Four Winds represents.

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3. RESPONSIBILITY OF PARTNERS AGENTS, CORPORATE ACCOUNTS AND SUPPLY CHAIN:

3.1. When appointed by Four Winds Saudi Arabia, Ltd.:

- 3.1.1. To ensure that the Four Winds Saudi Arabia, Ltd.'s Data (Privacy) Protection Policy is understood and strictly observed in addition to one's own policy;
- 3.1.2. Protect all collected personal data from customers endorsed by Four Winds Saudi Arabia, Ltd. and ensure that these data serve only their intended purpose and are not meant to be divulged to other parties except government authority(ies), private entity(ies), regulation and implementation body(ies), and other institution(s) who are directly involved in the inspection, customs clearance and shipping processes;
- 3.1.3. Submit a written statement in company letterhead reflecting authorized signature whenever requested to prove that requested discarding of customer information by Four Winds Saudi Arabia, Ltd. has been performed; and
- 3.1.4. Report to Four Winds Saudi Arabia, Ltd. immediately in the event of compromised data integrity and/or in the presence of threat(s) concerning data privacy.

3.2. When appointing Four Winds Saudi Arabia, Ltd. to perform services on your behalf:

- 3.2.1. Educate Four Winds Saudi Arabia, Ltd.'s correspondent regarding your Data (Privacy) Protection Policy and other related instructions;
- 3.2.2. Properly endorse to party(ies) to whom you will introduce Four Winds Saudi Arabia, Ltd. as your representative; and
- 3.2.3. Whenever possible, provide all available information necessary to Four Winds Saudi Arabia, Ltd. in order to comply with your required services.

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4. CUSTOMER RESPONSIBILITY

- 4.1. Familiarize one's self to the provisions of Four Winds Data (Privacy) Protection Policy;
- 4.2. Practice extreme caution as to what information to disclose, to whom it is meant to be entrusted, why it has to be provided, how will it be used by the interested party, and when data can be stored, retrieved and discarded;
- 4.3. Check accuracy of data supplied and validate truthfulness of information by signing the form/s. Provide a written amendment once necessary;
- 4.4. Submit necessary documents (either originals or copies) requested by Four Winds Saudi Arabia, Ltd. and/or its authorized representative/s; and
- 4.5. When in doubt, verify by asking relevant questions and don't hesitate to escalate concerns.

5. REPORTING VIOLATIONS

- 5.1. Violations of any sort, issues, and suspicions must be reported to the top management the earliest time possible;
- 5.2. Doubts should be clearly described and discussed with the management prior to lodging a formal report;
- 5.3. A report may be in a form of writing and email indicating the name of the suspected violator and clear description of the suspected violation; and
- 5.4. The complaining party must indicate his/her full personal details and affix his/her name and signature in the report.

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6. ACKNOWLEDGEMENT

I have read and fully understood the contents of this agreement and the Four Winds Data (Privacy) Protection Policy. I hereby affix my signature to validate my agreement.

NAME	
COMPANY	
JOB TITLE	
YOUR ENTITY	<i>Tick one box:</i> <input type="checkbox"/> customer <input type="checkbox"/> moving agent <input type="checkbox"/> supply chain (service provider) others (specify): _____
SIGNATURE	
DATE	
<i>(below for Four Winds Saudi Arabia, Ltd. employees only)</i>	
NAME	
JOB TITLE	
SIGNATURE	
DATE	

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7. CHANGE HISTORY

Version #	Effective Date	Significant Changes	Previous Version
FAIM 3.2 V2	25 Feb 19	Reforming the previous "POLICY" into a code of conduct whereby responsibilities of respective parties are described as per items 2,3 and 4. Item #5 is violation reporting instruction. Item #6 is a comprehensive signature form and lastly, item #7 is added as change history. The footer of this document indicates document identification.	"DATA PROTECTION COMPANY POLICY"



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