

# Executive Mobility Group B.V.

## Privacy Policy

### 1 Introduction

Executive Mobility Group B.V. ("EMG", "we", "us") is committed to protecting the privacy and security of your personal data. This Privacy Statement explains how we collect, use, and protect your information when you use our relocation, tax, and immigration services.

We process your data in accordance with the General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act (UAVG).

Controller Details: Executive Mobility Group B.V. Building The Base A, Evert van de Beekstraat 1-36 1118 CL Schiphol, The Netherlands

Data Protection Officer (DPO): Max Gorissen (mgo@em-g.nl)

### 2 What Data We Collect

We only collect data that is strictly necessary to arrange your relocation, immigration, or tax affairs. This may include:

- Identity Data: Name, date of birth, marital status, copies of passports/ID cards, BSN (Citizen Service Number).
- Contact Data: Current and future addresses, email, phone number.
- Employment & Financial Data: Employer details, job title, salary specifications, bank account details, 30% ruling applications.
- Relocation Data: Family details (partner/children), housing preferences, school applications.
- Special Category Data: We only process sensitive data (e.g., health data for insurance, criminal records/VOG for visas) when explicitly required by law or with your explicit consent.

### 3 Why We Process Your Data

We process your personal data for the following specific purposes:

- Relocation Services: Arranging housing, schooling, moving services, and settling-in support.
- Immigration Services: Processing visa and residence permit applications with the IND (Immigration and Naturalisation Service).
- Tax Services: Preparing income tax returns and applying for the 30% ruling.
- Legal Obligations: Complying with Dutch tax laws and administrative requirements.

Legal Basis:

- Performance of a Contract: To fulfil our agreement with you or your employer.
- Legal Obligation: For tax filings and immigration compliance.

- Consent: For processing special category data (e.g., health) or optional services.

#### 4 Sharing Your Data

We share your data strictly on a "need-to-know" basis with trusted third parties involved in your relocation:

- Service Partners: Real estate agents, moving companies, schools, and tax consultants.
- Government Authorities: The IND, Belastingdienst (Tax Authority), and municipalities (Gemeente).
- IT Providers: Secure cloud storage and software providers (e.g., RelocationOnline, Office 365) who process data on our behalf under strict Data Processing Agreements.

We never sell your data to third parties for marketing purposes.

#### 5 International Data Transfers

We prioritise processing your data within the European Economic Area (EEA). However, due to the global nature of relocation, it may be necessary to share your data with parties outside the EEA (e.g., if you are moving from a non-EU country, or if your employer's headquarters are located outside the EU).

When we transfer data outside the EEA, we ensure appropriate safeguards are in place:

- Adequacy Decisions: Transferring to countries deemed secure by the European Commission (e.g., UK, Canada, Japan).
- Standard Contractual Clauses (SCCs): For transfers to other countries (such as the USA), we utilize standard EU-approved contracts that guarantee a high level of data protection.

#### 6 Data Security

We take the security of your personal data seriously. As a modern, cloud-native organization, we have implemented robust technical and organizational measures to protect your information against loss, theft, and unauthorized access.

Our security measures include:

- Cloud Security: Data is stored in secure, ISO 27001 certified cloud environments (Microsoft 365, RelocationOnline) utilizing encryption at rest and in transit.
- Access Control: Access to your data is restricted to employees who strictly need it for their work. We enforce Multi-Factor Authentication (MFA) on all accounts.
- Device Protection: All company devices are encrypted and protected by centrally managed anti-virus and anti-malware software (ESET).
- Vendor Management: We have concluded Data Processing Agreements (DPAs) with all software vendors and IT partners to ensure they adhere to our security standards.

## 7 Data Retention

We do not retain your personal data longer than necessary for the purposes for which it was collected, or as required by applicable laws.

Retention periods vary depending on the services provided. For example:

- Immigration and relocation-related data is generally retained for up to 5 years after completion of the service;
- Tax and financial data are retained for a minimum of 7 years in accordance with Dutch fiscal obligations.

Where multiple services apply (e.g. relocation, tax, or 30% ruling), retention periods are determined based on the longest applicable legal or operational requirement. In such cases, data is retained based on the latest relevant trigger (e.g. tax filing date, end of employment, or completion of a service).

Due to the nature of our services, automated deletion is not always feasible. Data is therefore reviewed periodically as part of our retention audit process and securely deleted or anonymised where appropriate.

## 8 Your Rights

Under the GDPR, you have the following rights regarding your personal data:

- Right of Access: You can request a copy of the personal data we hold about you.
- Right to Rectification: You can ask us to correct inaccurate or incomplete data.
- Right to Erasure: You can ask us to delete your data ("Right to be forgotten"), provided there is no legal obligation (like tax laws) preventing us from doing so.
- Right to Restriction: You can ask us to temporarily stop processing your data.
- Right to Object: You can object to processing based on legitimate interest.

To exercise these rights, please contact our DPO at [mgo@em-g.nl](mailto:mgo@em-g.nl). We will respond to your request within one month.

## 9 Cookies

Our website uses cookies to improve your user experience and analyse website traffic.

- Functional Cookies: Necessary for the website to function correctly (e.g., remembering your language preference).
- Analytical Cookies: We use tools (such as Google Analytics) to track anonymous usage statistics to improve our services. These IP addresses are anonymised where possible. You can manage your cookie preferences in your browser settings or via the cookie banner on our website.

## 10 Complaints

If you have a complaint about how we handle your data, we would appreciate the opportunity to resolve it directly with you. However, you also have the right to file

a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens)

