

# XONEX Relocation LLC

## Privacy Policy

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### Privacy Policy

Last updated: 06/13/2019

XONEX Relocation LLC ("XONEX", "us", "we", or "our") operates <https://gateway.xonex.com> (the "Site" or "Gateway" or "Portal"). This document informs you of our policies regarding the collection, use, and disclosure of Personal Identifiable Information we receive from users of the Site. We use Personal Information to assist us in offering top-service, as well as improving the Site. All initiated transferees and assignees are thoroughly counseled on PII, and can instruct XONEX to allow them to "opt out" of releasing their PII. Furthermore, any transferee or assignee whose origin or destination is within the European Union (EU) or Switzerland will be provided an "opt in" or "opt out" option on their personal web portal. (See Privacy Shield details below.) In either case, opting out will prevent XONEX from providing any personal contact or preference information directly to outside vendors.

#### **Personal Identifiable Information (PII) Collection and Usage:**

The National Institute of Standards and Technology (NIST) defines Personal Identifiable Information as:

"any information about an individual maintained by an agency, including (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information."

To offer the best relocation experience we collect certain PII. The information is supplied to us via our online Gateway, phone conversations, emails, mobile app or other electronic means. Information can come from the transferee/assignee, the company (client), or gathered and provided by one of our service partners, such as home sale closing services provider. Personal identifiable information XONEX collects includes, but is not limited to, name, address, phone number, email address, employee id, salary, and bank account information. Any information that we might share with outside parties, can be found within the transferee/assignee's individualized Gateway web portal.

*Vendors:* XONEX shares certain elements of PII with approved vendors. The information we share may include name, address, email and phone numbers. This information is used by the vendors so they can supply the requested service. We do not share information with any Vendors without your knowledge. The vendors who might receive such information include: home sale closing services provider; household goods carriers; temporary living service providers; real estate agencies; mortgage lenders; destination service providers; spousal employment agencies; and other service providers deemed possibly useful in the specific relocation process.

**Onward Transference** - Although many of XONEX service partners have notified us that they are either compliant or working toward compliancy with Privacy Shield (Detailed below) and the EU's General Data Protection Regulation (GDPR), not all have done so. If you are concerned that a vendor XONEX has, or intends to utilize might not protect your PII adequately, please notify XONEX to discuss and/or exercise your opt-out option within your personal Employee Gateway portal. In cases of onward transfer to third parties of Personal Data received pursuant to the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield, XONEX is potentially liable.

*PII Retention:* For reporting information, we will keep your name, address and email address(es) on file for the life of our contract with your company. However, banking information, which is used to send payment to you, will be removed 3-months after your internal file has been marked completed. If, after your file is closed you need to receive payment, your file will be reopened, and you will be required to enter your banking information. The process of removal of banking information will start over from the new file completed date.

*Social Security Number (SSN):* We do not require, and strongly discourage, clients from supplying social security number data. However, in some cases, the client still chooses to share this information with us for payroll and identification purposes. SSN information, if provided to XONEX, is automatically masked to anyone beyond the Expense Analyst for whom it is intended. This information will never be shared with any outside party.

## **Log Data**

Like many site operators, we temporarily collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, operating system, browser type, browser version, the pages of our Site that you visit, date of your visit, and other statistics. This log data is used for security and site management purposes to monitor, enhance, and troubleshoot our website.

## **Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. Your computer will share this information in the cookie with the website that provided it, and no other website can request it.

Like many sites, we use "cookies" to collect information and use them to enhance your visit to our site. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you will not be able to log into or access our site. We do not use cookies to track you or to collect any data from you, they are only used for navigation and ease of use purposes.

## **Security**

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

We take the following steps to secure the information we collect:

- Employ internal access controls to ensure that only personnel who have access to your information are those with a need to do so to perform their official duties.
- Train appropriate personnel on our privacy and security policies and compliance requirements.
- Secure the areas where we retain paper copies of the information we collect online. We follow a destruction schedule having all retained paper information properly destroyed 3 years after your file is completed.
- Perform regular backups of the information we collect online to insure against loss.
- Use technical controls to secure the information we collect online including, but not limited to:
  - Secure Socket Layer (SSL)
  - Encryption
  - Firewalls
  - Password protections
- Periodically test our security procedures to ensure personnel and technical compliance.
- Employ external access safeguards to identify and prevent unauthorized access by outsiders that attempt to “hack” into, or cause harm to, the information contained in our systems.

Notification of Breach – Should XONEX information be breached. All possibly impacted persons will be notified as to the nature and scope of the breach, as well as any counter measures taken.

XONEX complies with the EU-U.S. Privacy Shield Framework and 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. XONEX has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy 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/>

**You have a right to access, update or correct your personal data.** To do so, contact your day to day counselor, or the GDPR officer noted below.

In compliance with the Privacy Shield Principles, XONEX commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact XONEX at:

Michael Canning  
 GDPR Compliance Officer  
 20 East Commons Blvd.  
 New Castle, DE 19720  
[mcanning@xonex.com](mailto:mcanning@xonex.com)  
 302-323-6181 ext. 3390

XONEX has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship.

If your complaint is not resolved after following the recourse mechanisms described above, you may have the ability to invoke binding arbitration. Additional information is available [here](#).

XONEX is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

- ❖ **Please note when required by law, XONEX will disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.**

### **Changes To This Privacy Policy**

This Privacy Policy is effective as of 13 June, 2019 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. We welcome feedback if you have any questions regarding our privacy policy or the use of your information. Please contact us at [webmaster@xonex.com](mailto:webmaster@xonex.com) or XONEX IT/Security Department  
20 East Commons Blvd  
New Castle, DE 19720

