

## Privacy Policy

Last updated: May 21, 2018

International Expatriate Consulting, Inc. ("us", "we", or "our") operates the <http://db14.ieconsult.com> website and the GlobeEASE application (the "Service").

This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use our Service.

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing and improving the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

### EU-U.S. Privacy Shield

International Expatriate Consulting, Inc. complies with the EU-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 to the United States. International Expatriate Consulting, Inc. 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/>

### Data Subject – Personal Data Access, Transfer, Removal

Per EU-U.S. Privacy Shield / GDPR, we will comply with personal data access, transfer, or removal requests. Please contact us at: [database@ieconsult.com](mailto:database@ieconsult.com) or 650-587-1874.

We will confirm data subject identity through our controller prior to this action.

In the case of an information request, a machine readable data or print file can be provided with the current personal data.

In the case of a Removal request, the personal data specified will be removed from the system and mark to disallow re-population.

In the case of a specified choice, the personal data can be further restricted from onward transfer or use.

### Information Collection And Use

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you.

We collect this information for the purpose of providing the Service, identifying and communicating with you, responding to your requests/inquiries, servicing your purchase orders, and improving our services.

## Log Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Log Data").

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, screen size, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics. When you access the Service by or through a mobile device, this Log Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use and other statistics.

## Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. We use cookies to collect information in order to improve our services for you.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie.

If you do not accept cookies, you may not be able to use some features of our Service and we recommend that you leave them turned on.

## Service Providers

We may, at your request, employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services and/or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Information only to perform specific tasks on our behalf and are obligated not to disclose or use your information for any other purpose.

## Security

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you.

## International Transfer

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the information, including Personal Information, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

### **Onward / Third Party Transfer**

International Expatriate Consulting, Inc. does not engage third party processing and will not transfer information to any other party without the explicit request of the Data Subject or the controller for that data.

In the event that a controller requests that we transfer Personal Data to a third party, it will be done consistent with existing Data Subject consent and through that controller's process.

International Expatriate Consulting, Inc. remains liable under the Privacy Shield Principles and will ensure onward agents confirm compliance with these Principles.

### **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Children's Privacy**

Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you learn that your Children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a children under age 13 without verification of parental consent, we take steps to remove that information from our servers.

### **Recourse, Enforcement**

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

Stephen Hill [CTO, DPO]  
[database@ieconsult.com](mailto:database@ieconsult.com)  
650-587-1874

International Expatriate Consulting, Inc. has further committed to cooperate with the panel

established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning **human resources** data transferred from the EU **in the context of the employment relationship**.

International Expatriate Consulting, Inc.'s participation in the EU-U.S. Privacy Shield Framework is subject to investigation and enforcement by the FTC (Federal Trade Commission.)

International Expatriate Consulting, Inc. has chosen the EU Data Protection Authorities (EU DPAs) through the United States Council for International Business (USCIB) to serve for dispute resolution.

You may invoke binding arbitration when other dispute resolution procedures are exhausted. More information is available at:

<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>

International Expatriate Consulting, Inc. may be required to disclose personal data 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 May 21, 2017 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. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us at [database@ieconsult.com](mailto:database@ieconsult.com).