



ARGENTINA INTERNATIONAL MOVING SRL

(ARGENMOVE)

DATA PRIVACY PROTECTION PROCEDURES

Policy Brief & Purpose

Our Data Protection company policy refers to the company's commitment to treat the information of employees, customers, agents or other interested parties with the utmost care and confidentiality. With this policy we ensure that our company behaves in a fair and moral manner concerning the gathering, storing and handling of data. This process will be carried out with transparency and respect towards the rights of individuals who entrust it with their information.

Scope

This policy refers to anyone who is in close collaboration with the company or acts on its behalf and may need occasional access to data.

Policy elements

The company will need to obtain and process information of people that will serve its business purposes. The information may refer to any offline or online information that makes a person identifiable. The company commits to collect this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to the company, the following rules are mandatory:

- The data will be collected fairly and for lawful purposes only
- The data will be processed by the company within its legal and moral boundaries

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- The data will not be stored for more than the specified amount of time
- The data will be accurate and kept up-to-date
- The data will not be distributed to any party other than the ones agreed upon by the owner of the data (exempting legitimate requests from law enforcement authorities)
- The data will not be transferred to organizations, states or countries that do not have adequate data protection policies
- The data will not be communicated informally
- The data will be protected against any unauthorized or illegal access by internal or external parties

In addition to ways of handling the data, the company has direct obligations towards people to whom the data belongs.

Specifically, the company must:

- Let people know which of their data is collected
- Inform people about how their data will be processed
- Inform people about who has access to their information
- Allow people to request the modification, erasing, reduction or correction of the data contained in the company's databases

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Actions & Procedures

To exercise data protection, the company is committed to:

- Develop transparent data collection procedures
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization, etc.)
- Build secure networks to protect online data from cyber attacks
- Include communication statements on how data will be handled
- Inform individuals of the amount of time that their data will be preserved
- Declare its data protection politics publicly (e.g. on the website)
- Ensure all concerned parties have read the policy and adhere to it
- Train employees in online privacy and security measures
- Restrict and monitor access to sensitive data
- Establish clear procedures for reporting a breach of privacy or data misuse

Data collection

Informed consent is when:

- A service user individual clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data



- And then gives consent.

Our company will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, we will ensure that the service user individual:

- Clearly understands why the information is needed, i.e. for Customs clearance processes of personal effects and household goods shipments arriving into or departing from the Argentinean Republic
- Grants explicit written consent for data to be processed
- Has received sufficient information on why their data is needed and how it will be used

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action. This policy will be updated to reflect best practice in data management and control to ensure compliance with any changes or amendments made by the management

Used and stored data - change of status:

The Argentinian Civil and Commercial Code establishes a generic mandatory term of ten years to keep backup documents in perfect shape. Our company commits to storing them in compliance without any external access and until the moment the documents are destroyed together with tons of other documents and non-usable packing paper transforming all into paper and cartons of good quality for packing and protecting household goods shipments.

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How to proceed in a potential data breach

1. Identify the breach: Detect and confirm the existence of an information leak and the contents.
2. Containment: Once the leak is identified, it is essential to take immediate measures to contain it and prevent further leakage of information.
3. Notify competent authorities.
4. Notify those affected: The notification should be clear and provide details about the nature of the violation and the actions we are taking to remedy the situation.
5. Internal investigation: Conducts an internal investigation to determine how the leak occurred and what measures can be implemented to prevent future similar incidents.
6. Implement corrective measures: Based on the results of the investigation, take corrective actions to improve data security and prevent future breaches.
7. Risk assessment: Assesses the extent of the leak and the potential risk to those affected.
8. Communication: Throughout the process, be sure to maintain transparent communication with authorities, those affected, and other relevant stakeholders.
9. Review of policies and procedures: Analyze the data security policies and procedures to strengthen them and ensure they are aligned with best practices and applicable regulations.

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CYBERSECURITY MANAGEMENT

Purpose

This is an extension of our Data Protection Policy, ensuring the confidentiality, integrity, and availability of sensitive information, such as customer data, trade secrets, and proprietary information.

It is our aim to reduce on daily basis the exposure to cybersecurity threats, including data breaches, unauthorized access, malware, and other cyber-attacks.

Scope

This extension applies to all employees, contractors, and third-party personnel who have access to Argentina International Moving SRL information technology resources.

1. Cybersecurity Responsibilities

- a. Management: Senior management is responsible for establishing a cybersecurity framework, allocating resources, and ensuring compliance with this policy.
- b. Employees: All employees are responsible for adhering to this policy and reporting any suspicious activity or security breaches promptly.

2. Access Control

- a. User Accounts - User accounts must be created, modified, and terminated as per defined procedures.
- Passwords must be strong, and two-factor authentication (2FA) is encouraged. - Users must not share passwords and should log out of their accounts when not in use.

All passwords are requested to be changed every 6 (six) months in every e-mail account and computers.

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b. Data Access - Access to sensitive data should be granted based on a need-to-know basis. - Data access permissions should be regularly reviewed and updated.

3. Data Protection

a. Data Classification - Data should be classified based on its sensitivity and importance. - Different levels of protection and access controls should be applied according to data classification.

b. Encryption - Sensitive data in transit and at rest should be encrypted using strong encryption methods. Such as creating passwords for different PDF files that can only be deciphered by those who have the code or key.

4. Security Awareness and Training

a. Regular Training - Employees receive cybersecurity training on an ongoing basis to stay informed about the latest threats and best practices.

b. Reporting Incidents - Employees must recognize and report security incidents promptly to their supervisor.

5. Security Measures

All the computers in the company use Windows 10 and Windows Defender is activated by default as Antivirus and Anti-Malware. These are updated automatically by Windows 10 every week.



6. Incident Response Plan

- a. Argentina International Moving SRL (Argenmove) maintains an incident response plan to address cybersecurity incidents promptly and effectively.
- b. Incident response plan can be found in the Quality Manual.

7. Vendor Management

Vendors and third parties should adhere to cybersecurity standards, and their contracts should include cybersecurity clauses.

8. Compliance

ARGENMOVE will adhere to all relevant cybersecurity regulations and standards.

9. Enforcement

Non-compliance with this cybersecurity policy may result in disciplinary actions, up to and including termination of employment or contract.

10. Review and Updates

This policy will be reviewed and updated regularly to reflect changes in the threat landscape and technology.

Argentina International Moving SRL (Argenmove) is committed to maintaining a secure and resilient cybersecurity posture. All employees are responsible for implementing and upholding this policy to protect our organization and its stakeholders.

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