

Personal Data Collection & Processing Statement

for Individuals Under the Jurisdiction of the European Union's General Data Protection Regulation
with PZI International Consulting, Inc. (PZI)



PZI Headquarters:

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Collection, Recipients, Processing, Transfers, & Legal Basis

The types of service(s) we perform for you on behalf of our clients (typically, your employer) are the criteria for the data we collect, the recipients of your data, and the purpose(s) for which your data is processed. Under the services listed below, your data will not be processed for automated decision-making, including profiling.

PZI will also transfer your data to a third country or international organization only as needed for the purpose of completing these services. As we have been hired to perform the service(s), we have the legal right to collect and process your data. It is in the legitimate interests pursued by PZI or by a third party, where applicable, to complete the service(s) we have been hired to perform.

Type of Service(s), Purpose of Processing & Controlling	Categories of Data Collected	Categories of Recipients
Assignment Management	Official Identification, Contact, Biometric, Demographic, Insurance, Location, Dependent/Spouse Information	Immigration, Transportation, Legal, Training, Education, Government, Insurance, Medical, Housing, Specialized Consultants
Payroll, Taxation, Accounting	Official Identification, Contact, Demographic, Tax History, Salary, Personal Finances, Banking, Dependent/Spouse Information	Legal, Government, Accounting/Financial, Specialized Consultants
Relocation	Official Identification, Contact, Demographic, Location, Dependent/Spouse Information	Transportation, Housing, Destination Services, Government, Shipping, Specialized Consultants

Storage

Your data will be stored in full for up to 3 years after the completion of our last services performed for you. Following that time frame, PZI will maintain basic information about the service(s) we provided for internal business analysis and improvement.

Requirement to Provide

The required nature of the provision of your data is contractual. We have been hired to perform service(s) for you in relation to your employment. Therefore, possible consequences of failure to provide your data may include, but are not limited to the following circumstances: inability to enter/exit a country or complete your work/assignment, legal problems in your home and/or host country, employment complications, personal struggle or hardship.

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Solving the Human Asset Puzzle and Improving Organizational Performance™



Your Rights Under the European Union's GDPR

1. Regarding your personal data, you have the right to:
 - a. Request access, portability, modification, correction, restriction, or erasure
 - b. Object to processing
 - c. Withdraw consent at any time
 - d. Lodge a complaint with a supervisory authority in the European Union
2. Regarding a request of or information about your personal data, the following will apply:
 - a. When communicating with you about your data and all related controls and processes, PZI will take appropriate measures to provide communication in writing, or where appropriate, by electronic means. If requested, the information may be provided orally, provided that your identity is proven by other means.
 - b. PZI will not refuse to act on your request unless PZI demonstrates that it is not in a position to prove your identity.
 - c. PZI will provide information requested without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, considering the complexity and number of the requests. If you make the request by electronic means, the information will be provided by electronic means.
 - d. If PZI does not act, PZI will inform you without delay, and at the latest within one month of receipt of the request, of the reasons for not acting and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.
 - e. Information will be provided free of charge. If your requests are manifestly unfounded or excessive, in particular because of their repetitive character, PZI may either:
 - i. Charge a reasonable fee
 - ii. Refuse to act on the request and bear the burden of demonstrating the manifestly unfounded or excessive character of the request
 - f. If PZI has reasonable doubts concerning your identity, PZI may request the provision of additional information necessary to confirm your identity.
3. Whether or not personal data are collected from you, PZI will provide you with all of the following information:
 - a. PZI's contact details
 - b. Contact details of PZI's data protection officer
 - c. The recipients or categories of recipients of your data
 - d. The intended purposes and legal basis of the processing of your data
 - e. If PZI intends to transfer your data to a third country or international organization
 - f. The legitimate interests pursued by PZI or by a third party, where applicable, unless such interests are overridden by your interests, rights, and freedoms
 - g. The existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and possible consequences of such processing
 - h. The period for which your data will be stored, or the criteria used to determine that period
4. If your data has not been collected from you, PZI will inform you of the categories of your data.
5. If your data has not been collected from you, PZI will provide you with any available information described in Number 1-4 within one of the following timeframes:
 - a. A reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
 - b. If the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject
 - c. If a disclosure to another recipient is intended, at the latest when the personal data are first disclosed
6. If your data has been collected from you, PZI will inform you of whether the provision of your data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide your data and possible consequences of failure to provide such data.
7. If PZI intends to further process your data, PZI will provide you with information on that other purpose, prior to that further processing.



8. Numbers 1-7 above will not apply if any of the following conditions are true:
 - a. You already have the information
 - b. The right to a copy of the information adversely affects the rights and freedoms of others
 - c. If your data has not been collected from you, and any of the following are true:
 - i. The provision of such information proves impossible or would involve a disproportionate effort
 - ii. The data processing is for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes; and your request is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests
 - iii. Obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect your legitimate interests
 - iv. The personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy
9. If you request the portability of your personal data, PZI will provide it to you in a structured, commonly used and machine-readable format.
10. If you request the erasure of your personal data, and if PZI has made the personal data public, PZI will take reasonable steps, including technical measures, to inform other controllers which are processing your data that you have requested the erasure of any links to, or copy or replication of, those personal data.
11. If your data is processed unlawfully, you will have the right and PZI will have the obligation to erase your data without undue delay, unless you oppose erasure and request restriction instead.

Restrictions to Your Rights Under the European Union's GDPR

1. Union or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided above when such a restriction respects the essence of the fundamental rights and freedoms and is a necessary and proportionate measure in a democratic society to safeguard any of the following:
 - a. National security
 - b. Defense
 - c. Public security
 - d. The prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security
 - e. Other important objectives of general public interest of the Union or of a Member State, in particular an important economic or financial interest of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security
 - f. The protection of judicial independence and judicial proceedings
 - g. The prevention, investigation, detection and prosecution of breaches of ethics for regulated professions
 - h. A monitoring, inspection or regulatory function connected, even occasionally, to the exercise of official authority in the cases referred to in points (a-g) above
 - i. The protection of the data subject or the rights and freedoms of others
 - j. The enforcement of civil law claims
2. A restriction of legislative measure referred to above shall contain specific provisions at least, where relevant, as to the:
 - a. Purposes of the processing or categories of processing
 - b. Categories of personal data
 - c. Scope of the restrictions introduced
 - d. Safeguards to prevent abuse or unlawful access or transfer
 - e. Specification of the controller or categories of controllers
 - f. Storage periods and the applicable safeguards taking into account the nature, scope and purposes of the processing or categories of processing
 - g. Risks to the rights and freedoms of data subjects
 - h. Right of data subjects to be informed about the restriction, unless that may be prejudicial to the purpose of the restriction

