

Koyanagi Worldwide Privacy Policy

Last modified: May 2018

Koyanagi Worldwide (hereinafter referred to as “Koyanagi”) are committed to protecting and respecting your privacy.

Please take some time to read this Policy. It contains important information on your legal rights and obligations.

In this Policy references to “Koyanagi”, “us”, “we”, and “our” refer to Koyanagi Worldwide.

Koyanagi provide a range of “services” not limited to our customers. To provide our services, it will be necessary to obtain some personal information from you. This Privacy Policy describes the types of personal information we collect, how we use the information, with whom we share it, and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practises.

Koyanagi take the safeguarding of your personal information seriously. Whenever you provide such information, we are legally obliged to use it in line with the applicable laws concerning personal information, including the Data Protection Act 1998 (DPA) and the General Data Protection Regulation (GDPR) which comes into effect on 25th May 2018 (these laws are collectively in this Policy referred to as the “data protection laws”).

Under the GDPR you are entitled to know the identity of your “data controller”, i.e. the legal entity which determines why and how your data is processed. Your data controller may vary, depending on how you are receiving services from us.

If you have any questions regarding the above, please contact us at enquiry@koyanagiworldwide.com or using the details set out in the Contact Us section below.

Information we collect from you

We may collect personal information (including personally identifiable information or special categories (sensitive))

personal data) about you in the following ways:

Information you give us. This is information we receive from you by your filling in forms on our websites or by corresponding with us by e-mail, telephone or otherwise. The information may include your full name, address, e-mail address, telephone number, employer name and address, occupation, financial and credit card information, photograph, personal preferences and other sensitive information (including information as required by laws and regulations addressing insurance and related matters or as required to provide the services).

You are not required to supply any of the information that we may request, although this may limit the services that we are able to offer you. While we make every reasonable effort to ensure that your data is accurate, complete and up to date, you can help us in this by promptly notifying us if there are any changes to your data, using the Contact Us section below.

Information we collect about you. We collect information about you to provide services that you have registered an interest in. We may collect certain information by automated means, such as cookies or visits to our website pages. This information may include your IP address (i.e. numbers that can uniquely identify a specific computer or other network device on the internet), browser type, URLs and other information on interaction with our digital assets.

Our website may contain links and adverts to websites owned and operated by third-parties. If you select any of these, please note that the websites have their own Privacy Policy, Cookies Policy and Terms and Conditions, which we urge you to review. We cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

Information we may receive from other sources. We are working closely with third-parties (such as, business partners, sub-contractors, your employer, payment and delivery services, financial institutions, government enforcement bodies) and may receive information about you from them.

How will we use your information?

We may use your data in the following ways:

- to provide you with the services (as applicable);

- to administer, facilitate and manage your relationship and/or account with us, and to contact you or, if applicable, your designated representative(s) by post, telephone or email;
- to notify you about changes to the services;
- to evaluate and improve our business through analysis and research;
- as we may be required by applicable laws and regulations or requested by a relevant government agency or judicial process;
- to comply with industry standards and our policies.

We may also use your information for marketing purposes where you have provided consent to provide you, or permit select third parties to provide you with information, recommendations or advice concerning our products and services. Where Koyanagi proposed using your personal information in such way or for any other use, we will ensure that we seek your consent. If you no longer want us to use your data in this way or pass your details on to third-parties for marketing purposes, then you may send a request to withdraw your consent by contacting us at any time using the information in the Contact Us section below.

Disclosure of your data

We may share your data with:

- Any member of our group
- Selected third parties including: business partners, suppliers and sub-contractors for the performance of the services (as applicable)
- Your employer, police forces and courts and relevant immigration authorities for the purposes of preparing and processing your visa application.

Data transfer to third countries

Koyanagi provides services worldwide. To perform these services, it may necessary to transfer personal information to other countries. The personal information that we collect from you may be transferred to and stored outside the European Economic Area (“EEA”). It may also be processed by business partners or sub-contractors who are engaged in providing you with the services (as applicable), the processing of your personal data and the provision of support services. Assurances of adequate protection to personal data are obtained whether it be by contractual arrangements, Data Processing Agreements, Privacy Shield or Model Contracts.

By sharing your data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy. All information to us is stored on our secure servers. We use encryption when we transfer certain personal information.

Data retention

We store your personal information for only as long as it is necessary to fulfil the purpose for which it was collected, unless otherwise required or authorised to do so by applicable data protection laws. We take measures to destroy or permanently anonymise your data if it is no longer required for the purpose for which we collected it, or required to do so by law.

In some instances, we are required to retain personal information in accordance with the law and may therefore be retained for an additional period.

Data Security

The security of your data is important to us. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide, or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your data, we cannot guarantee the security of your data transmitted to our website, therefore any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access in accordance with industry standards.

Your rights as a Data Subject

Under data protection laws, you have certain rights regarding the personal information we maintain about you.

You can choose not to provide personal information to us and/or refrain from submitting information directly to us. However, this may limit your use of our services and we may not be able to provide you with information about our products, services and any promotions.

You may withdraw any consent you have previously provided to us, or object at any time on legitimate grounds to the processing of your data and we will apply your preferences going forward. In some circumstances, withdrawing your consent to our use or disclosure of your data will mean that you cannot take advantage of certain services.

Under data protection law, you may have the right to; obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, update and correct any inaccuracies in your personal information, object to automated decision making and have the information restricted, anonymised or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements.

To exercise these rights, please contact enquiry@koyanagiworldwide.com.

When using your data for marketing purposes, we will usually inform you, before collecting your data, that we intend to use it for such purpose or if we intend to disclose this data. You have the right to ask us not to process your data for marketing purposes. You can also exercise the right at any time by contacting enquiry@koyanagiworldwide.com.

If you provide us with any information or material relating to another individual, you should ensure that the sharing with us and our further use as described to you is in line with data protection laws. You should also inform the individual on the processing of their personal data and obtain their written consent.

Access to information

The GDPR gives you right to access personal information held about you. Any such request should be made in writing, and the best way to contact us would be using the email or address stated in the Contact Us section. We may require you to provide a form of identification. If there is a case where we are unable to supply the information requested, we will provide detailed reasoning. We may reject requests that are repetitive, require disproportionate effort or risk the privacy of others. Where a request is excessive or unfounded we may, in some cases, charge a reasonable fee.

Complaints

If you wish to make a complaint about how your personal data is being processed or how your complaint has been handled, you have the right to lodge a complaint with Koyanagi's Data Protection Office as well as the relevant Supervisory Authority using the details stated in the Contact Us section of this Privacy Policy.

Changes to our Privacy Policy

Any changes to our Policy will be posted on this page. We encourage you to check this Policy from time to time, checking the "last modified" date to see any changed or updates.

How to contact us

If you have any questions or comments about this Privacy Policy, our privacy practices, if you would like to update information or preferences you have provided, or any other general data protection or privacy related queries, please contact us here:

Email: enquiry@koyanagiworldwide.com

Telephone: 0845 009 3325

Address:

Data Protection Officer

Koyanagi Worldwide

c/o Gerson Relocation Ltd

The Heights East

Cranborne Road

Potters Bar

Herts

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