



*Travelcargo International Removals*  
*-a division of-*  
*ATC Global Solutions Oy Ab.*

## **GENERAL DATA PROTECTION POLICY**

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## GENERAL DATA PROTECTION POLICY

### INTRODUCTION

#### PURPOSE

This policy describes the procedures in place for ensuring compliance with the requirements of the GDPR (General Data Protection Regulation), - in compliance with the Article 24 of the GDPR, that specifies that organizations create a policy in order to "demonstrate that processing is performed in accordance with this regulation"- for the company ATC Global Solutions Oy Ab and its division Travelcarga International Removals. In this document "ATC", "Travelcarga" and the term "the company" are going to be used, but they apply interchangeably to ATC Global Solutions Oy Ab and to Travelcarga International Removals.

#### SCOPE

GDPR, General Data Protection Document is a data protection law that applies in the European union introduced from 25/5/2018. As this is a European regulation, it applies directly to all EU Member States.

As a European company located in the EU that has services within the EU, the GDPR applies to ATC Global Solutions Oy Ab and all its divisions. Under the terms of the legislation, the company acts as "data controller" when is providing a service directly, and as "data processor" when the service provided falls under the category of carrier or agent.

This policy applies to all ATC Global Solutions Oy Ab / Travelcarga International Removals employees and staff responsible for the processing of personal data on behalf of the company. It sets the expected behaviors in relation to the collection, use, retention, transfer, disclosure and destruction of any personal data belonging to ATC Global Solutions Oy Ab. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanctions.

#### POLICY STATEMENT.

ATC Global Solutions Oy Ab is committed to conducting its business in accordance with all applicable data protection laws and regulations and in line with the highest standards of ethical conduct.

The company processes personal data which is required to complete a transport contract for its clients (such as removal transport, pet transport, general cargo transport, logistical solutions or other cargo services), business contract subcontractors and transporters and with employees. When personal data is collected for purposes other than the completion of contracts, the company will ask for the written consent of the data subject.

The company is committed to collecting, processing, storing and destroying all information in accordance with the General Data Protection Regulation, the Finnish data protection law and any other associated legal or regulatory body rules or codes of conduct that may apply to our business and/or the information we process and store.

#### ACCOUNTABILITY.

- The Company has implemented measures that meet the principles of data protection by *design* and data protection by *default*. To ensure that all data protection requirements are identified and addressed when designing new systems or processes and/or when reviewing or expanding existing systems or processes, each of them must go through an approval process before continuing.
- The company has implemented appropriate *Technical and Organizational Measures* (TOMs) to always ensure that data is processed in line with the principles set out in the GDPR, to guarantee protection of the data processed. These measures include, where applicable, multi-factor authentication (MFA), access controls, secure cloud-based systems, cybersecurity awareness training, phishing and smishing prevention measures, monitoring of information security risks and incident response procedures.
- Data protection impact assessments will be used, when appropriate, following the company's "*Data Protection Impact Assessment (DPIA) procedure*" for new and/or revised systems or processes when they may represent a risk.
- In order to ensure and demonstrate that the processing personal data at ATC is lawfully, fairly and carried in a transparent manner, clear and transparent Privacy Notices are available to inform the different data subjects about how the processing will occur (transparency), that it matches the description given to the them (fairness), and that it is done for one of the purposes specified in the applicable data protection regulation (lawfulness).

(*Privacy Notice for the website, Privacy Notice for Customers, Privacy Notice for Employees and Privacy Notice for Recruitment*)

- Additional internal records of the Company’s processing activities are maintained and kept up to date. The company’s internal *Record of processing activities*- document includes the following:
  - Name and details of the organization.
  - Responsible department of each process.
  - Purpose(s) of the processing.
  - Description of the categories of individuals and personal data.
  - Retention schedules.
  - Categories of recipients of personal data.
  - Technical and organizational security measures.
  - Lawfulness/base for the processing.
  - Details of transfers to third countries /external recipients.

## DATA PROTECTION PRINCIPLES

The data protection principles outline the basic responsibilities for organizations handling personal data. Article 5(2) of the GDPR stipulates that “the controller shall be responsible for, and be able to demonstrate, compliance with the principles. ATC has adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of personal data

### 1. DATA COLLECTION

#### 1.1. Why does ATC collect and processes personal data?

Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. ATC has analyzed the data collected and specified in internal documents what the personal data collected will be used for how the processing of that personal data is limited to only what is necessary to meet the specified purpose. (Data mapping, Record of processing activities)

#### 1.2. What kind of data is collected?

ATC Global Solutions Oy Ab needs to collect personal information about the people that it employs, work with or have a business relationship with, to effectively and compliantly carry out the company’s everyday business functions and activities, and to provide with products and services. This information includes, amongst other, name, address, email address, private address, data of birth, insurance information, identification information, address at destination, contact details, payment details, employer, business address, qualifications, work experience, bank details ...and other similar types of data that under GDPR fall under the category of personal data (information relating to an identified or identifiable natural person).

The company may also occasionally be required to collect and use certain types of personal data to comply with the requirements of the law and/or regulations.

GDPR defines sensitive data as: “data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation”.

ATC Global Solutions Oy Ab do not process customer’s sensitive data. If processing is needed, we will only handle sensitive data when the data subject has expressly consent to such processing or when the lawful bases for processing are clear (e.g. when processing is necessary for the establishment, exercise or defense of legal claims., when it is specifically authorized or required by law...)

In any case prior to the processing of sensitive personal data, existing mechanisms for ensuring lawful processing, integrity, availability and confidentiality are to be considered and evaluated separately. Additional security measurements will be taken.

#### 1.3. How is personal data collected?

In general terms, ATC Global Solutions Oy Ab collects personal data only from the data subject unless one of the following applies:

- The nature of the business purpose requires the collection of personal data from other persons or bodies.
- The collection must be carried out under emergency circumstances in order to protect the vital interests of the data subject or to prevent serious loss or injury to another person.

*If personal data is collected from someone other than the data subject, the data subject will be informed as soon as possible of the collection. We do not personally profit from opportunities arising within our professional activity or from the use of the company's assets and information.*

## 2. CONSENT

The company will obtain personal data only by lawful and fair means and, where appropriate with the knowledge and consent of the individual concerned. Due to the nature of the Company's business, consent is not needed because data processing is necessary for the performance of a contract to which the data subject is party. Where a need exists to request and receive the consent of an individual prior to the collection, use or disclosure of their personal data, ATC is committed to seeking such consent. This currently applies to online quote requests.

ATC Global Solutions Oy will **not** process personal data unless at least one of the mentioned requirements are met. If for some circumstances personal data must be further processed for purposes that go beyond the original purpose for which the personal data was collected, guidance and approval must be obtained prior to such processing may commence.

### 2.1. Data Subject Notification.

The company will, when required by applicable law, contract, or where it considers that it is reasonably appropriate to do so, provide data subjects with information as to the purpose of processing their personal data. Privacy Notices are available for customers, website users, applicants and employees.

Company's customers can get information on how their data is processed through the company's website or upon request.

## 3. DATA MINIMIZATION

The general rule for data handling at ATC Global Solutions Oy Ab is that we do not collect, process or save more data than is strictly necessary. ATC settles the means of storing data and ensures that personal data stored is limited to what is strictly required. (Data retention policy, Documents Disposal) in order to ensure personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

## 4. DATA PROCESSING.

### 4.1. Accuracy

ATC keeps data accurate and up to date considering the purposes for which it is processed. The company has in place mechanisms for updating and correcting data when necessary or required by the data subject. (DSAR Procedure) ensuring data is erased or rectified promptly, when appropriate

### 4.2. Confidentiality, Integrity.

Considering the available security measures, the implementation cost, and the likelihood and severity of possible risks, the Company uses and continuously revises the appropriate Technical and Organizational Measures (TOMs) to ensure confidentiality, integrity and availability of personal data. These measures may include multi-factor authentication (MFA), user access management, secure cloud services, endpoint protection, cybersecurity awareness training, phishing prevention measures, regular risk assessments and incident response procedures.

### 4.3. Data Retention

Considering the available security measures, the implementation cost, and the likelihood and severity of possible risks, the Company uses and continuously revises the appropriate Technical and Organizational measures to ensure data confidentiality and integrity. (Risk assessments, TOMs).

We only use the information we receive for the purpose that it was given to, and we have policies and notices in place in compliance with GDPR and Finland's Data Protection Act regarding data processing.

## 5. PROFILING AND AUTOMATED DECISION MAKING

ATC Global Solutions Oy Ab does not engage in profiling and automated decision-making.

## 6. DIGITAL MARKETING

As a rule, ATC Global Solutions Oy Ab will not send promotional or direct marketing material to a data subject through digital channels. If this situation changes in the future and personal data processing is needed /going to be used for digital marketing purposes, the data subject will be asked for consent at the point of first contact and informed of his/her right to object, at any stage, to having their data processed for such purposes.

Personal data, however, may be processed for marketing and business development purposes where a lawful basis exists, such as consent, legitimate interest, or a customer relationship, in accordance with applicable legislation. Individuals will be informed of such processing through the relevant Privacy Notices and may exercise their rights at any time.

## 7. DISCLOSURE AND DATA TRANSFER

### 7.1. Base for data transfer/disclose:

There are situations in which we may have to disclose or transfer personal data to internal, external service providers or third-party recipients. In such situation disclosure or transfer of data will take place only:

- If the data subject has given consent to the proposed transfer or the transfer is necessary for the performance of a contract with the data subject.
- If the transfer is necessary for the implementation of pre-contractual measures following a data subject's request.
- If the transfer is necessary for the conclusion or performance of a contract concluded with a third party in the interest of the data subject.
- If the transfer is obligatory by law, for purposes of national security, taxation and/ or criminal investigations.

In all situations, ATC Global Solutions Oy Ab will transfer personal data to countries that have an adequate level of legal protection for the rights and freedoms of the relevant data subjects. When that certainty is not possible, and data needs to anyway be transferred, it should be made in compliance with approved-safe transfer mechanisms.

### 7.2. Order processing/ subcontractors- data processors.

External service providers who process personal data on behalf of the company must sign a data processing agreement in accordance with Art. 28, para. 3, GDPR. In such situations, the company's Data Processing Agreement must be signed by the service provider, together with the service agreement/ contract, and in some cases the Letter of Commitment of Data Secrecy is included as well. Data processors are those that process the Company's personal data for reasons other than for which it was collected (e.g. The maintenance of IT systems/computing systems by external companies).

The company may use cloud-based service providers such as Microsoft 365 and other business software providers acting as data processors under appropriate contractual safeguards.

The use of the following service providers is not considered data processing in the sense of the regulation: personnel administration, staff recruitment, financial advice, tax advice, management advice, auditing, collection activity with transfer of claims.

Subcontractors that process personal data on behalf of the company to fulfil the contract signed with the data subject will sign a confidentiality contract with ATC Global Solutions Oy Ab (Letter of commitment of Data Secrecy).

### 7.3. Other reasons for disclosure.

ATC may be legally blinded to disclose personal data without the knowledge or consent of the data subject. (e.g. for the prevention of a crime, by a court order...). These cases will be studied separately and evaluated independently.

## 8. DATA SUBJECT REQUESTS.

The company recognizes and acknowledges the data subject rights under GDPR and informs data subjects of them through Privacy Notices. ATC Global Solutions Oy Ab has mechanisms and procedures in place to respond to any data subject that may want to exercise those rights (DSAR Procedure Policy, DSAR form).

## 9. RESPONSIBILITIES

### 9.1. Implementation and Training

It is Top management's responsibility to ensure that all employees are aware of and comply with the contents of this policy. The training and instruction obligations resulting from this legislation are carried out within the context of our training plan pursuant to our Quality Management System (ISO 9001). Employees that have access to personal data must be aware of their responsibilities under this policy, and aware of the data protection environment of the company.

Top Management will also make sure all their data processors are aware of the principles stated in this policy and carry out their business activities accordingly. It is as well employee's responsibility to obtain assurance of such compliance prior to granting them access to personal data controlled by the company.

### 9.2. Data Breach Reporting

Any individual who suspects that a personal data breach has occurred because of the theft or exposure of personal data must immediately notify it following the guidelines outlined in the company's "Data breach Response and Notification Policy". All suspected personal data breaches shall be reported immediately and assessed to determine whether notification to the supervisory authority or affected data subjects is required under GDPR.

### 9.3. Complaints Handling

ATC Global Solutions Oy Ab has notified the Data subjects of their right to complain, and they have different channels available to do so. When a complaint has been received, an investigation will be carried out to the extent that is appropriate based on the specific case. The data subject will be informed of the progress and the outcome of the complaint within a reasonable period. If the issue cannot be resolved then the data subject may, at their option, seek redress through mediation, binding arbitration, litigation, or via complaint to the Data Protection Authority, the Ombudsman in Finland.

This policy will be made available upon request. ATC Global Solutions Oy Ab/ Travelcargo International Removal's staff are encouraged to revise their knowledge of the information outlined in this policy and to consult it whenever in doubt. For more advice and support in relation to this policy- or any other data protection related issues- employees- and any other individual- can send an email to [tietosuoja@travelcargo.fi](mailto:tietosuoja@travelcargo.fi)

This policy will be reviewed every three years, unless there are any changes to regulations or legislation that would enable a review earlier or internal procedures modified.

