

PANAMA FURNITURE RENTALS, S.A.

PRIVACY & DATA PROTECTION POLICY

(Version 1.1 – April 16th, 2018)

3.1. PPPI Administration

By means of this document, PFR defines, documents and communicates to people, their privacy policy and information protection. Moreover, it assigns responsibility for such policies and procedures.

3.2. PPPI Notification

PFR has a privacy and data protection policy which was established within the internationally accepted principles framework regarding privacy rights and information protection of individuals.

3.2.1. Purposes for collecting, using, retaining and disclosing information

3.2.1.1. Collected Information

PFR will collect personal information in order to provide its beneficiaries with a dedicated service. Nevertheless, we require your explicit consent¹ (written) to collect such information. The information that will be collected is as follows:

- Full name
- Address, city and country of origin and/or destination (only if necessary for the requested service).
- Email
- Mobile and/or residential telephone numbers
- Employer's contact details (in case the costs are covered by the employer)
- Photos of some of the objects or possessions for insurance purposes (fragile and valuable)
- ID and passport copy
- Certificate of ownership for vehicles (if applicable)

¹ You have the right to revoke your explicit consent (written) for using your personal information.

- Credit card copy (both sides) and complete AMEX form (only for AMEX payments)
- Social Security number (required only for relocations to the United States)

3.2.1.2. Use of Collected Information

PFR will use the collected information during the provision of the services agreed with the client.

From the initial contact, PFR will collect personal information such as: full name, address, telephone numbers and email. This information will be registered to our administrative software² so our inspector can visit your home and estimate the approximate total to be packed and transported. During this inspection, it might be necessary to photograph fragile and valuable pieces in order to identify them and provide these details to our operative staff in order to make the wooden box where the piece will be packed and then, the packers can easily identify it once they are at your domicile.

The ID copy is requested in order to be able to continue with the export/import procedures of your possessions. The same applies to the certificate of ownership for vehicles.

For AMEX payments, PFR will request a copy of your credit card on both sides, as well as completely filling out an American Express form along with your ID or passport.

When the service has a destination in the United States, PFR will request your social security number.

3.2.1.3. Personal Information Retention

a. Physical Documentation: This information will be kept in the physical folder that contains all documents related to the service provided. Each folder is archived for a period

² See the privacy policy of our administrative software provider

of 7 years. This is the maximum period in which we have detected that a client may require our services again and this information is critically useful for providing a new required service.

b. Digital Information: Our clients' personal information compiled in our database is managed and retained through the application of the following points:

3.2.2. Disclosure of Personal Information to Third Parties

PFR will disclose your personal information to third parties as long as you have provided explicit consent.

3.2.2.1. How?

Your personal information is shared with our agents through emails, fax, telephone, physically or in any other way that allows the continuity of the operation of the services we provide to our clients.

3.2.2.2. Why?

The management of PFR's clients' possessions is outside of the Republic of Panama and it is carried out through, what we will call from now on, AGENTS. These agents are endorsed by international federations such as FIDI, LACMA, IAM, OMNI. Due to the nature of the services provided, PFR will share personal information with other providers. PFR will ensure to monitor the compliance of such providers with the minimum privacy principles and information protection.

3.3. Election and Explicit Consent of the Interested Party

In order to use the information of the persons during the delivery of the agreed services between the client and PFR, the explicit consent (written) of these persons is required. Nonetheless, this explicit consent may be **revoked** at any time by these persons. PFR states that the consent can never be inferred from silence or inaction of the persons.

3.3.1. Personal Information Disposition

a. Physical Documentation

After 7 years, the folder where the shipment information was stored is destroyed inside the organization's facilities. It will not be moved to a third party's location for destruction nor for any other purpose, such as storage.

B. Digital Documentation

Digital information related to each shipment is destroyed after 7 years. For example: bills of lading (B/L), customs clearance, service evaluation surveys, customer signatures in inventories, etc.

3.4. Personal Information Access

PFR provides our clients with access to their personal information for review, update and when required, adherence to the rights to forget and data portability.

4. Computer Security

When addressing computer security, we must bear in mind that there is not 100% secure or reliable security method. We can only reduce the chances of a system being vulnerable or minimizing the duration and damage caused by an attack.

4.1. Password Protection

For automated systems, individual accounts must be assigned that require a periodic password change.

4.2. Information Recovery (Backup)

PFR keeps a copy of all computer information. Therefore, the information is stored in a portable unit located at any point in Panama City in order to have another backup. In the server's room is the Backup equipment which is comprised of 4 hard drives of 2 Terabytes each. The discs are mirrored configured.

5. PPPI Monitoring and Compliance

PFR monitors the compliance of our suppliers (recipients) with respect to this privacy and data protection policy and it has procedures to address complaints and disputes related to privacy.

6. Responsibility for the Consequences of Disclosing Information to Third Parties

PFR monitors, through mandatory evaluations, the compliance with this privacy and data protection policy and it is responsible for the security of the information it collects and discloses to third parties.

7. Security Breaches

PFR will notify its clients when a violation of personal data security is confirmed. It will communicate to the interested parties about the security breach and will activate the security protocol in the event of personal data security breaches.

8. Personal Data Security Breach Protocol

When a personal data security violation of our servers is identified, PFR will respond as follows:

8.1. We have a procedure for evaluating the risk resulting from the security breach towards individuals.

8.2. We know who supervises our processing activities.

8.3. We have a process to notify the responsible area for information technology (IT) about the security breach within 72 hours of having identified the security violation.

8.4. We know what information we must provide to the responsible IT area about the security breach.

8.5. We have a process in order to inform affected individuals about the security breach when a high risk to their rights and freedoms is evident.

8.6. We know that we must inform the affected individuals as soon as we have the affectation information report.

8.7. We know what security breach information we must provide to individuals and that we must provide advice in order to help them to protect themselves from privacy violation effects.

8.8. We document all security violations, even if not all of them need to be reported.

Declaration approved on o April 17th, 2018 in Panama City, Panama.

President & CEO

Explicit Consent

Dear customer,

Hereby, we kindly request your written consent regarding our privacy policy and information protection, through the means that are most convenient for you.

If you have any questions about our PPPI or PFR supply chain quality & safety processes, please contact h.rodriquez@canalmovers.com.

The undersigned is a Public Translator of English - Spanish and vice versa, who certifies that this is a true copy of the original in Spanish.

Panama, April 25th, 2018.