



September 1st, 2011

Protect Your Clients' Privacy

Update: Distribution of Personally Identifiable Information to Third Party Vessel Manifest Companies: How to Request Confidentiality

Over the past year and a half, IAM has publicized how Third Party Vessel Manifest companies are able to access and examine vessel manifests and summary statistical reports of U.S. inbound and outbound shipments. They are able to copy this information for publication and often distribute it via paid subscription online. An example of a third party vessel manifest company is Import Genius. Understandably, many household goods shippers are upset when they find their name and shipment information freely available on the internet.

The regulation (19 CFR 103.31) that enables this data sharing also details how a person or a company may request confidential treatment for their shipments. IAM members and their clients can request confidentiality by emailing privacy.cbp@dhs.gov with the necessary information and data elements.

On the following page, IAM has created a standard form that all IAM members and their clients can utilize in order to request confidentiality on their shipments.

Please note that household goods shipments must be done on a case-by-case basis. In order to effectively safeguard a client's privacy, ensure that any and all variations of their names are listed when filling out the form. It is also important that no personal identifying information (PII) is listed in the "marks and numbers" field on the bill of lading. Any data listed in the "marks and numbers" field is fair game and confidentiality cannot be requested to protect this information from being distributed. If a shipping line is advising that certain data elements must be placed in this field, please notify IAM.

IAM will remain updated on this matter and notify members should the regulation be altered. If you have any questions, please contact IAM Program Manager, Brian Limperopulos, at BrianL@IAMovers.org.



Vessel Manifest Confidentiality Request Form for Individual Importing or Exporting Personal Effects and / or Household Goods

To request confidentiality on a shipment, the owner of the goods or its third-party authorized agent must fill out the below table. Once the table has been completed, verify all information, save it, and send it electronically to privacy.cbp@dhs.gov. The mover, upon obtaining authorization from the client, may request confidentiality on behalf of that client.

Requestor Name	
Address Line 1	
Address Line 2	
City	
State / Province	
Zip / Postal Code	
Phone	
Email	
Requestor Role*	
Relationship of party making request**	
Date of Submission	
Type of Confidentiality***	
Variation of Names to be Protected	

* The **requestor** may be one of the following for household goods shipments:

- For import shipments to the United States, the requestor is the “Importer”.
- For export shipments from the United States, the requestor is the “Shipper”.

** The **relationship of the party making request** can either be the *first party* (owner of the goods) or the *third party authorized representative* (if the company managing their shipment requests confidentiality on the owners’ behalf)

*** The **type of confidentiality** refers to whether the shipment is an import or export.

- For Import shipments, the type of confidentiality is *Inward Manifest*.
- For Export shipments, the type of confidentiality is *Outward Manifest*.