

PRIVACY POLICY

Purpose

This Privacy Policy is designed to comply with applicable privacy legislation in Canada. It is also designed to help individuals understand how their personal information is managed at ELM Technologies Ltd.

Scope

Those individuals protected by this Privacy Policy include customers and prospective customers. This Privacy Policy applies only to information collected during the course of commercial activities.

Exceptions

If the policies and procedures outlined in this document do not address a specific situation, individuals are expected to contact ELM Technologies' Chief Privacy Officer for guidance or clarification.

The Principles

Our Privacy Policy is designed to comply with applicable privacy legislation in Canada. It incorporates the following 10 principles:

1. Accountability
2. Identifying Purpose
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy of Personal Information
7. Safeguarding Personal Information
8. Openness
9. Access to Personal Information
10. Challenging Compliance

If we change our Privacy Policy in the future, those changes will be included in updates to our official Privacy Policy, wherever it is made available. Thus, you will always know what information we collect, how we use it and how we protect it. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified to you prior to use.

Accountability

ELM Technologies Ltd. is responsible for maintaining and protecting the personal information under its control. Accountability for this function within our organization is held by:

Chief Privacy Officer
ELM Technologies Ltd.
4141 Sladeview Cr., Unit 11
Mississauga, ON L5L 5T1
contactprivacy@elmtechnologies.com

Identifying Purpose

ELM Technologies will identify to an individual the purposes for which personal information is collected at or before the time the information is collected. Generally, ELM Technologies collects personal information for the following purposes:

- to manage and develop ELM Technologies' business and operations, including personnel and employment matters; and
- to meet legal and regulatory requirements.

However, there may be other circumstances that require such information to be collected and used.

ELM Technologies Ltd. collects the following personal information from individuals during the course of normal commercial activities. The information obtained includes name, business title, rank, function and general contact information, levels of interest for our services and topics, and transaction activity with ELM Technologies Ltd.

This information is used primarily to determine an individual's entitlement to ELM Technologies Ltd. 's services. In addition, this information may be used to:

- Enable individuals to tailor the presentation of our services to better meet their needs (e.g. customized service offerings, selected distribution of our marketing, sales and support materials).
- Inform individuals about ELM Technologies' products and services that we believe may be of interest to them.
- Better understand an individual's interests in our products and services.
- Develop, enhance or improve products and services.

ELM Technologies Ltd. routinely collects anonymous, non-personal information through our Web servers. This is information that is not associated with or traced back to a specific individual. Gathered electronically, this information includes the type of Web browser used, the level of encryption a browser supports and the Internet Protocol address. This information may be used for research and analytical purposes, to examine how the Web site is being used and to determine how it can be improved.

ELM Technologies Ltd. also uses cookies. A cookie is a small piece of information that is sent to your computer when you access a Web site. There are two kinds of cookies. A session cookie is stored temporarily in your computer's memory. A session cookie is destroyed as soon as you close your browser. A persistent cookie is a more permanent line of text that gets saved to your hard drive.

We use session cookies on ELM Technologies' Web site, to allow you to gain access to a document you requested prior to being signed in. Persistent cookies are used to store your encrypted user ID and password, so that you won't have to type it in each time that you access our e-Library. This persistent cookie is set if you click on "Remember my sign-in information." A persistent cookie is also set by our web analytics service to collect anonymous, non-personal information. This information is not associated with or traced back to a specific individual. This information may be used for research and analytical purposes, to examine how the Web site is being used and to determine how it can be improved.

Consent

An individual's knowledge and consent are required before ELM Technologies is allowed to collect, use or disclose his or her personal information, except where inappropriate. Where possible, ELM Technologies will obtain consent directly from the individual concerned at the time of collection. After having provided consent, an individual has the right to withdraw consent at any time by providing reasonable notice to ELM Technologies' Chief Privacy Officer.

By subscribing to our services, registering for a seminar, requesting service information, or access to our on-line information services, using other ELM Technologies customer services, or otherwise indicating approval, individuals consent to the collection and use of their personal information for the purposes identified in this Privacy Policy.

ELM Technologies will not require you to consent to the collection, use or disclosure of personal information beyond that required to provide our products or services to you. If you wish to withdraw your consent or to opt out of the uses or disclosures of your information for the purposes identified in this Privacy Policy, you may do so by contacting our Chief Privacy Officer. If your request requires that we delete your registration information, we will no longer be able to provide you with the services or products for which you have subscribed. Cancellation will be subject to the terms and conditions of the subscription or services provided, as applicable.

In limited circumstances, ELM Technologies may use or disclose personal information without the knowledge or consent of the individual, for example, for purposes of debt collection, breaches of agreements, as required by governmental bodies acting with authority, or as authorized or required by applicable legislation.

Limiting Collection

ELM Technologies Ltd. collects only the information that is necessary for the purposes outlined in this Privacy Policy.

Limiting Use, Disclosure and Retention

ELM Technologies Ltd. does not use personal information for purposes other than those for which it was collected, except with an individual's consent or as required by law. Once personal information is no longer required to fulfill the identified purposes or other legal requirements, it will be destroyed, deleted or made anonymous.

ELM Technologies Ltd. sometimes uses the services of external firms to assist us in communicating with individuals (e.g., surveys and mail distribution) or as a means of providing more effective and efficient services to these individuals (e.g., technology support). Our external suppliers are contractually obligated to keep the information confidential, to use the information only for the purpose requested and to destroy the information when it is no longer required.

Customer information is shared with external service providers only to the extent required for the provision of such services. Furthermore, ELM Technologies Ltd. does not sell personal information to a third-party organization. In certain circumstances, we allow basic contact information to be shared amongst customers. Examples of this include providing testimonials and examples of specific services or service applications or sharing contact information amongst customers of our executive networks, to facilitate ongoing communication.

Personal information is retained only as long as necessary for the fulfillment of the purposes stated in this policy.

Accuracy of Personal Information

Personal information is kept as accurate, complete and up to date as necessary for the purposes for which it is to be used. Individuals are encouraged to provide updates to their personal information as changes occur, to enable us to continue to provide services to them.

The personal information of customers can be reviewed by contacting our Web site administrator.

Web Services
ELM Technologies Ltd.
4141 Sladeview Cr., Unit 15
Mississauga, ON L5L 5T1
info@elmtechnologies.com

Safeguarding Personal Information

Personal information, whatever its form, will be protected by security safeguards appropriate to the sensitivity of the information. The safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. The measures of protection include:

- physical measures, for example, locking filing cabinets and restricted access to offices;
- organizational measures, for example, security passes and limiting access to the personal information on a “need-to-know” basis;
- technological measures, for example, the use of passwords and encryption; and
- procedural measures, for example, the shredding of sensitive personal information.

Openness

ELM Technologies is committed to being open about its policies and practices with respect to the handling of personal information. Our Privacy Policy is available through our home page and our e-Library Web sites. If a hard copy or additional information is required, requests for such information may be made to the Chief Privacy Officer.

Access to Personal Information

Individuals may request a copy of their personal information held at ELM Technologies Ltd. by submitting a written request to the Chief Privacy Officer at the address above. Acceptable proof of identification is required before such information is given out. If you feel the information we have about you is inaccurate, you may request that it be reviewed and, if inaccurate, changed, by contacting the Chief Privacy Officer.

Challenging Compliance

An individual can challenge compliance with the above policy by providing written details of the challenge to the Chief Privacy Officer.