

## **EDM Americas, Inc. Privacy Statement**

EDM Americas, Inc. is committed to protecting privacy and securing personally identifiable information. This Privacy Policy applies to all EDM Americas, Inc. services.

Due to the nature of EDM Americas services, we have occasion to collect, store and use personal information from a variety of different sources.

EDM Americas, Inc. requires employees, independent contractors, vendors and other users of systems and documents that may contain personal information to protect such personal information from unauthorized disclosure or use; and destroy or delete such personal information when no longer required for the purpose intended or by law, whichever is longer.

EDM Americas, Inc. requires each employee, independent contractor, vendor or other user of personal information to apply appropriate measures to protect personal information where collected, used or stored in accordance with the applicable and enforceable laws.

EDM Americas adheres to the U.S.-**E.U. Safe Harbor** privacy framework and the seven principles of Notice, Choice, Onward Transfer, Security, Data Integrity and Access and Enforcement. For information visit <http://export.gov/safeharbor>.

### **Use of your Personal Information**

EDM Americas collects and uses personal information to operate the EDM Americas Web site and deliver the services our clients have requested. EDM Americas also uses personally identifiable information to inform of other products or services available from EDM Americas and its affiliates. EDM Americas may also contact clients via surveys to conduct research about opinion of current services or of potential new services that may be offered.

EDM Americas does not sell, rent or lease its customer lists to third parties. EDM Americas may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, EDM Americas may share data with trusted partners to help us perform statistical analysis, send email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using personal information except to provide these services to EDM Americas, and they are required to maintain the confidentiality of information.

EDM Americas keeps track of the Web sites and pages our customers visit within EDM Americas, in order to determine what EDM Americas services are the most popular. This data is used to deliver customized content and advertising within EDM Americas to customers whose behavior indicates that they are interested in a particular subject area.

EDM Americas will disclose personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on EDM Americas or the site; (b) protect and defend the rights or property of EDM Americas; and, (c) act under exigent circumstances to protect the personal safety of users of EDM Americas, or the public. Permitted transfers of information, either to third parties or within EDM, include the transfer of data from one jurisdiction to another, including transfers to and from the United States of America. Because privacy laws vary from one jurisdiction to another, personal information may be

transferred to a jurisdiction where the laws provide less or different protection than the jurisdiction in which the personal information originated.

## **Use of Cookies**

The EDM Americas Web site use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize EDM Americas pages, or register with EDM Americas site or services, a cookie helps EDM Americas to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same EDM Americas Web site, the information you previously provided can be retrieved, so you can easily use the EDM Americas features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the EDM Americas services or Web sites you visit.

## **Security of Personal Information**

EDM Americas secures personal information from unauthorized access, use or disclosure. EDM Americas secures the personally identifiable information on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as a credit card number) is transmitted to other Web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

## **Changes to this Statement**

EDM Americas periodically reviews and will occasionally update this Privacy Policy to reflect company, customer feedback, and conformity with the Safe Harbor Principles. EDM Americas encourages you to periodically review this Statement to be informed of how EDM Americas is protecting your information.

## **Contact Information and Dispute Resolution**

Questions and comments regarding this Privacy Policy shall be directed to the Chief Compliance Officer at [compliance@edmamericas.com](mailto:compliance@edmamericas.com).

With respect to any disputes relating to this Policy that cannot be resolved through our internal processes, EDM Americas participates in the dispute resolution procedures of the panel established by the European Union Data Protection Authorities to resolve disputes pursuant to the Safe Harbor Principles.

If a complaint is not satisfactorily addressed within a reasonable time frame, you may contact the Federal Trade Commission at <https://www.ftccomplaintassistant.gov/>, or via phone at 1.877.382.4317.