

## Privacy Policy

This Privacy Policy (“Privacy Policy” or “Policy”) applies to the QuickLink Network and any services provided by Elemica or available through our website (the “Services”). This Privacy Policy describes how Elemica collects and uses your information, our disclosure and security practices, and the choices available to you. In this privacy policy, “you,” “your” and “yours” refer to you as an individual and, where applicable, to the company or legal entity on whose behalf you are viewing this Privacy Policy. Elemica, Inc. and its affiliates and subsidiaries are together referred to as “Elemica,” “us,” “we” or “our.”

Your privacy is important to us, and we are committed to protecting and carefully handling the information that you provide. Please read this Privacy Policy carefully; by using our Services, you consent to our collection and use practices.

We comply with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection use and retention of personal information from European Union member countries and Switzerland. We have certified that we adhere to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view our certification, please visit <http://www.export.gov/safeharbor/>

## Collection and Use of Customer Information

**In General.** To use the Services we require that you create an account profile by providing certain identification, contact, and certification information, such as your name and your company’s name, email address, postal address and telephone number. We may collect and maintain any Customer Information that you provide us through the Services or in any other manner. “Customer Information” means the information you provide and that we maintain about you, your company, your accounts, and your transactions. We do not collect sensitive information as defined by the Safe Harbor framework. We use Customer Information in the Services, including: (1) to respond to or fulfill your requests; (2) to evaluate the quality of our products and services; (3) to communicate with you about our products, services and related issues; (4) to notify you of and administer marketing campaigns; (5) for internal administrative and analytics purposes; (6) to comply with our legal obligations, policies and procedures; and (7) to assist you in managing your use of the Services.

**Product Suites.** To facilitate the provision of the Services, we must transfer some of your Customer Information to your trading partners and/or third party service providers. We transfer Customer Information as provided by you, and other information that is directed by you, to your trading partner or third party service provider. If you use any of the notification and documentation features, information about your transaction may be transmitted to you via telephone, email, pager, or other wireless device that you have identified to us. We may be unable to protect the information transmitted through these services. We may also contract with financial services providers to help you manage invoices and payments, and we will provide them the Customer Information needed to manage the settlement requirements that you select.

**Records.** We establish and maintain transaction records, which become part of the account history for you and your trading partners. We also retain records about your customer service and technical service requests. We use these records only to service your request, maintain appropriate business records, and assess and improve the Services.

**Reports and Aggregated Information.** We provide a variety of tools that allow you to report and analyze your use of the Services. We will periodically generate statements for internal use that contain statistical information regarding transaction volume and value, and we may periodically report and publish aggregate general performance metrics. The reports and aggregated information will not be linked to you, and we will not commercially exploit your Customer Information for other purposes without your consent.

## Disclosure of Customer Information

**In General.** We do not share Customer Information with third parties. We will not disclose your Customer Information unless we are required by law or have a good faith belief that such action is necessary to: (a) comply with a judicial proceeding, court order or legal process; (b) protect and defend our rights or property; (c) protect the personal safety of our users, our website, or the public; or (d) enforce our agreements or Terms of Use. We may transfer your Customer Information if we buy or sell any or any portion of our business.

**Consultants and Outsourcers.** We sometimes employ or work with consultants, temporary workers, software developers, or outsourcers to complete a business process or provide a Service (e.g., delivering products, offering online software applications, or sending email messages on our behalf), and we may need to provide them with information about your account. Except in limited circumstances, these agents and developers are prohibited through their contracts with us from using that information or disclosing it for purposes other than to offer or complete the service that we are outsourcing.

## Security and Integrity

**Data Security.** We recognize industry standards and employ administrative, technical and physical designed to protect Customer Information from loss, misuse, unauthorized access, disclosure, alternation and destruction. We encrypt the transmission of sensitive information using secure socket layer technology (SSL) and store your information on our secure servers. Please note that no security methodology is 100% safe, we cannot guarantee information security, and it is important for you to protect yourself against the unauthorized access to your information.

**Data Integrity.** We take reasonable steps to ensure that the Customer Information we collect is accurate, complete and current and is relevant and reliable for its intended use. We depend on our customers to update and correct their Customer Information whenever necessary.

**Enforcement and Oversight.** We conduct compliance audits of our privacy practices to verify adherence to this policy.

## Notice, Choice and Access

Our approach to responsible data handling is founded on providing notice of our information practices and other privacy issues to allow you to make informed decisions regarding your use of the Services.

**Notice.** We provide notice of our Customer Information practices through (i) this Privacy Policy; (ii) customer agreements, if applicable; and (iii) specific notices on our website. Your privacy is important to us and this Privacy Policy is intended to provide you with notice regarding the information we collect in connection with our website, the fair information practice principles that govern our use of such information and the choices available to you regarding our use of your information.

**Choice and Opting Out.** We believe that it is important to give you the opportunity to choose how your personal information is collected and used. We will not use your Customer Information for any purposes other than those described in this Policy or any service-specific privacy notices without first obtaining your explicit consent. We identify the required information that is necessary to provide the Services, and we identify any additional or optional information appropriately.

You may opt-out of receiving promotional emails from us by following the opt-out instructions provided in those emails or by emailing [support@elemica.com](mailto:support@elemica.com) with your request. Opt-out requests will not apply to transactional service messages, such as security alerts and notices about your current account and Services.

**Access.** You may review your account and transaction history at any time by using the "View Reports" option of the "Login"/QuickLink Portal section of Elemica.com. You may access, update, amend, delete or correct other Customer Information at any time by contacting Elemica Client Services via email at [support@elemica.com](mailto:support@elemica.com) or via telephone at 1-800-ELEMICA (U.S. and Canada) or 00-800-4-353-6422 (Europe, except Scandinavia).

## Site Navigational Information

**Cookies.** Like most websites, our Services use "cookies," which are small pieces of data our server may send to your browser while you are using the Services. To register and have access to the Services, you will need to accept the cookies that our server sends to your browser. As a registered user, you may receive a session-based cookie that is maintained by your browser and contains your identifier. This cookie may be used to authenticate your identity and provide you with access to the Services.

**Website Usage Data.** We keep track of usage data, such IP addresses and/or domain names, the dates and times of page requests, the names and/or IP addresses of referring websites, and other Uniform Resource Locator ("URL") parameters. We use this information for aggregated and statistical reporting and to better understand usage in the aggregate. This information is stored in log files and is not linked to other Customer Information.

## Miscellaneous

**Data Transfers.** By submitting Customer Information, you understand and agree that the information may be transferred across national boundaries and may be stored and processed in any of the countries in which we maintain offices, including the United States. You also acknowledge that, in certain countries or with respect to certain activities, our trusted vendors may collect, transfer, store, and process your Customer Information.

**Information Retention.** We will retain your information for as long as your account is active or as needed to provide you Services, comply with our legal obligations, resolve disputes, and enforce our agreements. At the end of the data retention period, Elemica will delete your Customer Information so that it cannot be reconstructed or read. You may request that we purge specific information from our databases and archives prior to the expiration of the retention period.

**Children.** Our Services contain business-related content and are for adult use only. We do not knowingly solicit or collect personal information from or about individuals under the age of 18 years.

**Dispute Resolution.** Any questions or concerns regarding the use or disclosure of Customer Information should be directed to our legal department. We will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of Customer Information in accordance with the principles contained in this Policy. For complaints that we cannot resolve, we have agreed to participate in the dispute resolution procedures of the panel established by the European or Switzerland data protection authorities to resolve disputes pursuant to the Safe Harbor principles.

**Changes to this Privacy Policy.** We reserve the right to modify or amend this Privacy Policy. If we make significant changes, we will post the revised Policy to our website at least 30 days before such changes take effect.

**Submission of Information.** If you use Elemica's QuickLink Portal, be aware that any information you submit may be viewed by others. Elemica cannot ensure the security or privacy of any information that you provide through the QuickLink Portal, and we are not responsible for, and cannot control, others' use of any such information. Before submitting any personally identifiable information about

any individual (e.g., a company contact), obtain that individual's consent for the collection, transfer, processing, and use of that information in accordance with this Policy.

## **Contacting Us**

We are committed to protecting Your Customer Information and helping you manage your privacy. If you have any questions or concerns about this Privacy Policy, please refer to the appropriate contact below:

### **Accessing or Correcting Customer Information and General Inquiries:**

Email: [support@elemica.com](mailto:support@elemica.com)

Phone: 1-800-ELEMICA (U.S. and Canada) or 00-800-4-353-6422 (Europe, except Scandinavia).

### **Questions about Marketing Communications:**

Email: [mediarelations@elemica.com](mailto:mediarelations@elemica.com)

### **Questions about this Privacy Policy or our use of Customer Information:**

Email: [legal@elemica.com](mailto:legal@elemica.com)

### **Mailing Address:**

550 East Swedesford Road, Suite 310

Wayne, Pennsylvania 19087 USA

This Privacy Policy was last updated on April 1, 2015.