



# Privacy, Personal Data Protection, and Cookies Policies

Last Updated: August 22, 2018

# Introduction

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This document explains our principles and commitment to the protection of your Personal Data, and aims to inform you about:

- The Personal Data that ATMANCO collects and the reasons for their collection,
- How this Personal Data will be used,
- Your rights as party concerned by our data processing.

These policies apply to all of ATMANCO's services, regardless of their nature (website, applications, services, etc.) following the General Data Protection Regulation which has been in effect since May 25th, 2018.

# Definitions

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The following capitalized terms shall have the meaning ascribed to them below:

“**Privacy Policy and Personal Data Protection**” and “**Policy**” refer to this Policy describing the measures taken for the processing, operation, and management of your Personal Data, as well as your rights as a party concerned by our data processing.

“**Personal Data**” means any identifiable information related to you, whether direct or indirect.

“**Processing**” means any transaction or set of transactions applied to your Personal Data.

“**Person in Charge of Processing**” designates ATMANCO who carries out the processing of your Personal Data.

“**Personal Data Violation**” means a breach of security that inadvertently or unlawfully causes the destruction, loss, alteration, disclosure, or unauthorized access to your Personal Data.

“**Recipient**” means the service or company that receives communications and can access your Personal Data.

# Person in Charge of Processing

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The Person in Charge of Processing your data is ATMANCO. The contact details are:

- Name: Ms. Nathalie Tremblay
- Mailing Address: 1050, rue De La Montagne, Suite 300, Montreal, Quebec, H3G 1Y8
- Telephone: +1 514 935-5959
- Email: [gdpr@atmanco.com](mailto:gdpr@atmanco.com)

# How ATMANCO implements the protection of Personal Data

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ATMANCO undertakes measures to ensure the protection of your Personal Data and privacy when designing the services offered to you (*Privacy by design*). ATMANCO also implemented measures to ensure the security of your Personal Data, and to guarantee the respect for and the effective exercise of your rights (*Privacy by default*).

# How Personal Data is used by ATMANCO

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ATMANCO is committed to only collecting data that is strictly necessary for the effective operations of its services.

In cases where optional data is requested, ATMANCO will clearly inform you of the Personal Data required for the effective operations of its service.

Personal Data is collected directly from you and is only used for the purposes that were brought to your attention upon consenting to the evaluation of our services.

Personal Data is used to propose additional services only if you have agreed to receive commercial communication.

# Who can your Personal Data be sent to?

Your Personal Data may be transmitted to:

- Internal services at ATMANCO: the various departments who are in charge of executing the subscribed services, including Customer Service, Sales Administration, and others,
- External service providers under contract with ATMANCO,
- Personnel at ATMANCO who may require access to personal information for the performance of their mandate, entrusted by a petitioning organization,
- ATMANCO and its collaborators in research, development, and publications of scientific journals. ATMANCO is a contributor to the improvement and advancement of the field, and may, therefore, use data for such a purpose. Should it become necessary, the use of data will be done in strict confidentiality to ensure anonymity, making it impossible to associate responses and/or results with a particular individual.

# How long does ATMANCO keep your Personal Data?

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ATMANCO will keep your Personal Data for at least five (5) years since the last documented intervention in the evaluation file. All data will be kept strictly confidential and will not be used or disclosed, except as described above or as permitted or required by applicable laws.

Your results are considered valid for a period of two (2) years and you will not be allowed to redo the questionnaire(s) before the end of this period.

# Is your Personal Data protected?

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ATMANCO is committed to taking all the measures necessary to ensure the security and confidentiality of Personal Data, particularly to prevent it from being damaged, erased, or made accessible to unauthorized third parties.

In the event of a security incident affecting your Personal Data (destruction, loss, alteration, or disclosure), ATMANCO is committed to respecting its obligation to notify parties of Personal Data breaches, particularly with the CNIL

# What are your rights on your Personal Data?

You have, at any time, the ability to exercise your rights with ATMANCO as per applicable regulations relating to Personal Data, subject to the following conditions:

- Right to access: you may receive a copy of your Personal Data subject to processing by ATMANCO;
- Right to rectify: you may update your Personal Data or to rectify your Personal Data processed by ATMANCO;
- Right to refuse, notably to receiving commercial communication: you can expressly demand to no longer receive commercial communication from ATMANCO, or request that your Personal Data no longer be subject to processing;
- Right to erase: you can request the deletion of your Personal Data by contacting the Recipient;
- Right to limitation: you can request the suspension of the processing of your Personal Data;
- Right to portability: you can ask ATMANCO to recover your Personal Data in order to dispose of it.

When subscribing to a service that collects your Personal Data, you are provided with the address (postal and/or electronic) to which to send your request to exercise your rights.

All requests must be accompanied by proof of identify. ATMANCO commits to responding to your requests to exercise your rights as quickly as possible and, in any event, in compliance with legal deadlines.

# Changes to the Privacy Policy and Personal Data Protection

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We may update this privacy statement to reflect changes in our information practices. If we make any major changes to this policy, we will notify you by email (using the email address provided in your account), or by a notice on this site before the changes come into effect. We encourage you to check this page regularly for the latest updates on our privacy practices.

# Cookie Policy

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The website ATMANCO and all its web pages use cookies to distinguish you from other users of the site. This allows us to improve services and optimize your user experiences.

A cookie is a string of text information transferred from a website to your computer's hard drive so that the website can remember you. Cookies can help a website adapt its content to your interests more quickly. The majority of prominent website use cookies. Generally speaking, a cookie contains the name of the domain where the cookie originated; the "lifetime" of the cookie, and a value, namely a randomly created unique number.

On the ATMANCO website, there are two types of cookies:

- Temporary cookies, which remain on your browser's cookie file until you leave the website, and
- Persistent cookies, which remain in your browser's cookie file for a longer period of time (the duration depends on the lifetime of the cookie in question).

Temporary cookies are used to allow you to transfer information from one page to another on our site without having to re-enter them, and to allow you to access saved registration information.

Persistent cookies are used to help us identify you as a visitor when you return to our website (using a number, not personally) to allow us to tailor content or advertisements to your interests, or to avoid showing you the same information multiple times. Persistent cookies are also used to compile anonymous aggregate statistics that help us understand how visitors use our website and help us improve its structure. We cannot personally identify with persistent cookies.

You have the option to accept or decline cookies by changing your browser settings. However, you may lose some interactive features of the service if cookies are disabled.

You can delete and block all cookies from the ATMANCO website. To do this, change the settings of your browser to block some or all cookies. Please note that if you decide to block cookies via your browser, some elements of our website may not work as intended.

# ATMANCO Applications

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We use analysis tools, such as Google Analytics, on the ATMANCO application. These tools are used to compile anonymous global statistics that allow us to understand how our customers use the ATMANCO application and help us improve it. This data does not identify you personally.

You can choose to disable the application's scanning tools in your device's settings.