

Privacy Policy

The following statement contains ELMO Motion Control's Ltd. (including its European Subsidiaries in: Italy, Poland, Germany, United Kingdom and Switzerland) Privacy policy.

ELMO Motion Control's Ltd. (hereinafter: "**ELMO MC**" or "**We**" or "**Our**") Privacy Policy outlines the types of data collected (personal and other). The purpose of collection, how we collect and use the data, including data retention policy, processing and sharing the data with third parties, etc.

Whenever there's use of the words "you" or "yours" in this Privacy Policy it is directed to all users that use our services (as defined below) and the personal data and other data collected (as defined below) refers to him or her.

We collect personal data and other data through:

1. Our website (www.elmomc.com), where you can find this Privacy Policy. We collect personal data when you register and become a member and when you send emails or requests ("Contact Us") to the company;
2. Official exhibitions held by us;
3. Social media pages (collectively, our "Social Media Pages");
4. Marketing campaigns designated to company's contacts who take part in ELMO MC's exhibitions or surveys.

Collectively, we refer to the Website, the marketing campaigns and our Social Media Pages, as the "**Online Services**" and together with offline channel (Exhibitions), the "**Services**". By using the Services, you agree to the terms and conditions of this Privacy Statement. Please read this Privacy Statement carefully.

ELMO MC is defined as a Data Controller of Personal Data.

You shall be aware that Personal Data (as defined below), may be stored in ELMO MC's database and that collection of the Personal Data is subject to receiving your consent.

However, if you do not provide us with the Personal Data that we request, or prohibit us from collecting such data, we may not be able to provide you with our Services.

Collection of Personal Data and of Other Data

1. "**Personal Data**" means data that identifies you as an individual or relates to an identifiable individual. We collect Personal Data, such as:
 - 1.1. Contact information (Full name, email address, mailing address, phone number, fax number);
 - 1.2. CV's information (company, title, experience, education, certifications);
 - 1.3. Demographic data (country and preferred language);
 - 1.4. Geographical position and other location based information;
 - 1.5. General information submitted as part of support / other requests;
 - 1.6. Legally required purposes: date of birth, ID number, identity cards and information about relevant and significant litigation or other legal proceedings involving Data Subjects.
2. "**Other Data**" means data that does not reveal your specific identity or does not relate to an individual directly. We collect Other Data, such as, browser and device data including IP-address and data collected through cookies, aggregated data relative to your geographical position and responses to promotional offers (landing pages) and surveys.

3. In some instances, we may combine Other Data with Personal Data (such as combining your name with your location). If we do so, we will treat the combined data as Personal Data as long as it is combined.
4. If you submit any Personal Data regarding other people for us or our service providers, you shall have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

How We Collect Personal Data and Other Data

We collect Personal Data and Other Data in a variety of ways:

5. **Online Services.** We collect Personal Data when you register to ELMO MC's website, communicate with us by email, send a request, or otherwise connect with us through social media pages, or sign up for a newsletter or participate in marketing campaigns and/or surveys.
6. **Offline channel.** We collect Personal Data when you visit in ELMO MC's exhibitions and when you attend promotional events that we host or in which we participate. We also collect Personal Data when you visit our properties, information may be collected through such properties closed circuit television systems (CCTV) or other security systems.
7. **Automatic Information:** When you use or interact with our website and/or use other online services, we receive and store information generated by your activity and information automatically collected from your browser or mobile device. For example, like many websites, we obtain certain information when your web browser accesses our website including your IP address, device type, browser type, operating system, sites that were accessed during your visit, pages viewed and access dates. This information helps us to communicate with our customers and provide them with our services and products.
8. **Aggregated Data.** We may aggregate data that we collect and this aggregated data will not personally identify you or any other user.

Use of Personal Data and Other Data

9. We use Personal Data and Other Data for one or more of the purposes detailed below:
 - 9.1. To provide the ELMO MC Online Platforms services and functions and to administer your use of the ELMO MC Online Platforms;
 - 9.2. To ensure an effective performance and management of our business relationship with you;
 - 9.3. To verify your identity (if you registered for a ELMO MC Online Platforms);
 - 9.4. To answer and fulfill your specific requests;
 - 9.5. As reasonably necessary to enforce the applicable terms of use, to establish or preserve a legal claim or defense, preventing fraud or other illegal activities, solving disputes and enforcing our contractual agreements;
 - 9.6. Communicating with Business Partners about products, services and projects of ELMO MC we think may be of interest to you including sending you important information regarding our website, changes to our terms, conditions, policies, or other administrative issues. (E.g. by responding to requests or providing you with technical information about purchased products);
 - 9.7. Planning, performing and managing the (contractual) relationship with Business Partners, e.g. by performing transactions and orders of products or services, processing payments, performing accounting, auditing, billing and collection activities, arranging shipments and deliveries, facilitating repairs and providing support services;

- 9.8. Administrating and performing customer surveys, marketing campaigns, market analysis, sweepstakes, contests, or other promotional activities or events;
 - 9.9. Maintaining and protecting the security of our products, services and websites, preventing and detecting security threats, fraud or other criminal or malicious activities;
 - 9.10. Ensuring compliance with legal obligations (such as record keeping obligations), complying with legal and regulatory requirements or demands in accordance with applicable law, regulations, or other legal processes including exerting controls;
 - 9.11. We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication (such as groups, meetings and events). The correspondence data may be processed for the purposes of communicating with you and record-keeping;
 - 9.12. For our internal business purposes such as: developing new products, enhancing the website, improving our services, identifying usage trends and visiting patterns, determining the effectiveness of our promotions, evaluating Third Parties performance, predicating our yield and occupancy etc.;
 - 9.13. We may use some or all of the Personal Data and Other Data in order to perform certain statistical calculations, some of which may be presented on the website or other services; In any case, these calculations shall not include any personally identifiable information or details.
10. The legal basis for processing your Personal Data is made up of one or more of the following reasons:
- 10.1. Your consent;
 - 10.2. Providing the Services;
 - 10.3. Compliance with applicable laws, regulations or other legal process;
 - 10.4. Legitimate Business Interests pursued by ELMO MC.

Disclosure of Personal Data and Other Data

11. We share Personal Data and Other Data with the following:
- 11.1. Salesforce ("Salesforce CRM") to manage and strengthen our customer relationships. By doing so, we can understand our customers' needs and solve actual problems by better managing customer information and interactions;
 - 11.2. Other Elmo companies in connection with your use of the Elmo Online Platforms or our business relationship with you;
 - 11.3. Third parties which provide IT services to Elmo and which process such data only for the purpose of such services (e.g., hosting or IT maintenance and support services);
 - 11.4. Our marketing and advertisement partners, to provide you with more-relevant ads on our site and to encourage you to return to our site including taking part in our exhibitions;
 - 11.5. These partners will not use your data for any other purpose than our legitimate interest of direct marketing and you will always have the right to object;
 - 11.6. We may disclose or transfer your Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of ELMO MC business and assets (including any bankruptcy or similar proceedings).

12. We may also disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of ELMO MC, of you or of others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Cross-Border Transfer

13. As a general principal, data processing is held within European Union ("EU") and Israel borders including processing by our third parties.
14. Despite the general principal stated above, some information might be held on a cloud outside the borders of Israel or the EU. The operator of such services is responsible for compliance with the General Data Protection Regulations provisions. In this specific case, be sure that we will verify that appropriate measures have been put in place to ensure that your Personal Data is treated with an adequate level of protection (in particular through standard contractual clauses of the European Commission, the Internal Company Rules or the Data Protection Shield set up between the European Union and the United States).
15. Sometimes the recipients to whom ELMO MC transfers your personal data are located in countries in which applicable laws do not offer the same level of data protection as the laws of your home country.
In such cases, Elmo takes measures to implement appropriate and suitable safeguards for the protection of your personal data.

How Can You Access, Change, or Limit the Use of Your Personal Data

If you reside in the EU the following provisions will apply to you:

16. The right to information regarding the processing of your Personal Data. We would like to provide you with concise, transparent, understandable and easily accessible information on the conditions for processing your personal data, in clear and simple terms.
17. The right to access, rectify, delete your Personal Data. The right of access allows you to obtain from us confirmation that your Personal Data has or has not been processed as well as the conditions of such processing, and to receive an electronic copy (for any additional copy, we are entitled to demand payment of any reasonable fees based on the administrative costs incurred).
18. The right to obtain from us the rectification of your Personal Data.
19. Subject to the exceptions provided by applicable law, you have the right to ask us to delete your Personal Data, when one of the following grounds applies:
 - 19.1. Your Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - 19.2. You wish to withdraw your consent on which the processing of your Personal Data was based and there is no other basis justifying such processing;
 - 19.3. You can prove that your Personal Data has been unlawfully processed;
 - 19.4. Your Personal Data must be deleted in accordance with a legal obligation;
20. The right to restrict the processing of your Personal Data. The applicable regulations provide that this right may be invoked in certain cases, in particular the following:
 - 20.1. When you dispute the accuracy of your personal data;

- 20.2. When you consider and can establish that the processing of Personal Data is unlawful but you oppose the deletion of Personal Data and demand instead that the processing be limited;
 - 20.3. When we no longer need your Personal Data but they are still necessary for you to establish, exercise or defend your legal rights;
 - 20.4. When you object to the processing that would be based on the legitimate interest of the controller, during the verification whether the legitimate grounds pursued by the controller prevail over those of the person in question.
21. The right to data portability.
 - 21.1. When the processing is based on your consent or a contract, this right to portability allows you to receive the Personal Data you have provided to us with in a structured, commonly used format, and to transmit this Personal Data to another data controller without us hindering it.
 22. The right to withdraw consent.
 - 22.1. When we process your Personal Data on the basis of your initial consent, this latter may be withdrawn at any time using the means provided for this purpose (procedure indicated below of this Policy). On the other hand, and in accordance with applicable law, the withdrawal of your consent is only valid for the future and cannot therefore call into question the lawfulness of the processing carried out before this withdrawal.
 23. The right to decide the fate of your Personal Data after your death.
 - 23.1. To organize the fate of your personal post-mortem data through the adoption of general or specific guidelines. We are committed to respecting these guidelines. In the absence of directives, we recognize the possibility for heirs to exercise certain rights, in particular the right of access, if it is necessary for the settlement of the deceased's estate; the right to object to the closure of the deceased's user accounts; and the right to object to the processing of their data.
 24. The right to lodge a complaint with a supervisory authority. If, despite our effort to preserve the confidentiality of your personal data, you feel that your rights are not respected, you have the right to lodge a complaint with a supervisory authority. A list of control authorities is available on the European Commission's [website](#).
 25. If you reside anywhere outside the EU (including Israel) your rights to review, edit or amend Personal Data held in our Databases will be governed applicable Israeli law, including the provisions of the Protection of Privacy Law, 5741-1981.

Security

26. We implement reasonable administrative, organizational and technical safeguards and security measures to protect Personal Data from unauthorized access, disclosure, destruction or alteration, accidental loss, misuse or damage. We regularly review and monitor such safeguards and security measures.
27. When disclosure of data to third parties is necessary and authorized, we ensure that these third parties guarantee the same level of data protection as that offered to them by us and requires contractual guarantees so that the data are exclusively processed for the purposes you have previously accepted, and with the required confidentiality and security.
28. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contact Us" section, below.

Retention

29. To the extent permissible by applicable law, we will retain your Personal Data for such period as necessary to satisfy or to fulfill the following:
- 29.1. The purposes for which that Personal Data was provided;
 - 29.2. An identifiable and ongoing business need, including record keeping;
 - 29.3. A requirement to retain records that may be relevant to any notified regulatory investigations or active legal proceedings;
 - 29.4. Comply with any applicable law, regulation, legal process, including, without limitation, court orders and/or compulsory disclosures required by governmental authorities;
 - 29.5. Fulfill legitimate interests of ELMO MC and third parties, such as, defend in cases of legal procedures etc.

Sensitive Data

30. Unless specifically requested, we recommend that you don't send us, or disclose, on or through the Services or otherwise, to us, any Sensitive Personal Data (national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, administrative or criminal proceedings and sanctions).

Use of Services by Minors

31. ELMO MC does not knowingly collect Personal Data from any person under the age of 18.

Updates

32. We are entitled to change and update this Privacy Policy from time to time, at our sole discretion, without having to provide notice thereof. Responsibility for becoming familiar with the changes, if any, made by this Privacy Policy is your responsibility.

Cookies

33. Like many other websites, in order to enhance your experience on our website, some of our web pages may use "cookies". Cookies, by themselves, do not expose your personally identifiable information unless you choose to provide this information to us (by, for example, registering for one of our services). However, once you choose to provide the site with your personally identifiable information, this information may be linked to the data stored in the cookie.
34. A cookie is a small text file containing small amounts of information which is placed by a website onto a computer or device. Cookies are designed to assist a computer or device to remember something the user has done within that website, for example remembering that the user has logged in, or which buttons have been clicked.
35. We use cookies to understand site usage and to improve the content and offerings on our sites. We may use cookies to personalize your experience at our web pages and to offer you relevant products, programs, or services as well as interest-based or targeted advertising.
36. **Disabling Cookies.** Your browser may give you the ability to control cookies; certain browsers can be set to avoid cookies collection. If you do not agree to the use of cookies please disable them by following the instructions for your browser set out [here](#). Please note that certain features on our website may not work properly. Some cookie organizations provide an

automated disabling tool in respect of its cookie(s), see the list of these 3rd party cookies with a link to its automated disabling tool. In other cases you can disable & control them if you want through 3rd party control tools like [this](#).

37. We may use **Session Cookies**. These Cookies are stored only temporarily during a browsing session and are deleted from your device when you close the browser. We use Session Cookies to support the functionality of the site and to understand your use of the site, for example which pages you visit, which links you use and how long you stay on each page.

38. The Website uses the following third party cookies:

38.1. **Google cookies**. Google analytics cookie are used to collect information about how visitors use our site. We use the information to compile reports and to help improve our site. These cookies collect information in an anonymous form, for example determine the number of visitors, from where the visitors come to the site and what buttons the visitor clicked. To read Google's privacy policy in respect of Google Analytics [click here](#) to opt out of Google analytics [click here](#). Google cookies also include Google AdWords & DoubleClick cookies for marketing, advertising & remarketing these enable to recognize visitors on the websites of our advertising partners and to address them with interest-related information or ads. To find out about Google's double-click cookies [click here](#).

Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us at info-il@elmomc.com

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