

# Privacy Policy

At Chartwell Technology Inc. your privacy is important to us. We are committed to maintaining the confidentiality, security, and accuracy of your personal information. The following information explains the policy of Chartwell Technology Inc. (together with its subsidiaries, collectively “CHARTWELL”) regarding the collection, use and disclosure of your personal information.

## What is Personal Information?

For the purposes of this Privacy Policy, “personal information” means the information about an identifiable individual. This does not include the name, title, business address or telephone number of an employee of an organization, when used for business communications.

CHARTWELL collects and uses personal information in order to: manage and develop our business and operation; conduct market research and track sales data; understand your needs and preferences; develop, enhance, market and provide products and services; personalize and facilitate the ease and efficiency of your visit to CHARTWELL’s Web site; administer and discharge CHARTWELL’s obligations in relation to any agreement you have with us; and meet legal requirements.

## Collecting, Protecting and Using “Personal Information”

Except as set out in this privacy policy, we will not disclose your personal information without your consent unless we are legally required or entitled to do so. Personal information may be collected directly from you or from third parties. This information may be collected in person, over the telephone, through the mail, or over the internet. When CHARTWELL collects personal information from you, we will explain how we intend to use it, will collect only what we believe is reasonably necessary to meet those purposes, and will not use or disclose it for other unrelated purposes without your consent, unless legally required or entitled to do so.

CHARTWELL may share your personal information with third parties, such as channel partners, service providers or other organizations (i) where the third party or CHARTWELL has your consent; (ii) where legally required or entitled to do so; (iii) where the third party is acting as our agent, contractor or service provider and has agreed to handle your personal information in confidence and in accordance with applicable laws; and (iv) where business mergers, divestments or acquisitions are involved.

## Security

CHARTWELL’s business processes will be designed and applied to appropriately safeguard your personal information, having regard to the sensitivity and use of that information.

If you don’t want your personal information disclosed to others, or if you would like to be removed from any of CHARTWELL’s subscription lists, please email CHARTWELL. CHARTWELL will not sell or rent your personal information to any other organization without your explicit permission.

## **Access to “Personal Information”**

We aim to keep your personal information as accurate as possible. If you would like more information about CHARTWELL's privacy practices or would like to request access to or update your personal information, please contact CHARTWELL's Privacy Officer at: [info@chartwelltech.com](mailto:info@chartwelltech.com)

CHARTWELL respects the concerns of individuals regarding their personal information, and will respond within a reasonable timeframe and within the time required by law.

## **IP Addresses**

CHARTWELL collects IP addresses for system administration and internal tracking. When you visit CHARTWELL's Web site, our servers log the IP (internet protocol) address, length of each visit, number of requests per visit, operating system and browser type. CHARTWELL does not link this information to any personal information that an individual may otherwise voluntarily submit.

## **Cookies**

Some of CHARTWELL's Web pages may use “cookies” so that we can better serve you with more tailored information when you return to CHARTWELL's Web site. Cookies are pieces of information that are transferred to your computer's hard drive for record-keeping purposes. The information stored will make it faster and easier for you to use CHARTWELL's Web site because it allows you to use the Web site without having to re-enter information on each visit.

CHARTWELL does not use cookies to retrieve information from your computer that was not originally sent in the cookie, and it does not use information transferred through cookies for any promotional or marketing purposes. Some CHARTWELL Web pages use cookies to track usage patterns in order to improve the usefulness and effectiveness of CHARTWELL's Web site. This information is not shared or sold to any third parties whatsoever.

CHARTWELL may also scan internet communications for system management and security purposes, in order to detect inappropriate software and unauthorized access. Privacy and confidentiality may not be possible when using unencrypted internet communications.

In cases where CHARTWELL uses third parties to process transactions that include personal information, reasonable efforts are taken to ensure they apply comparable or higher standards concerning collection, use and disclosure.

By using CHARTWELL's Web site, you signify your consent and agreement with the CHARTWELL Privacy Policy. CHARTWELL reserves the right, at its discretion, to change, modify, add, or remove portions of this policy at any time. Your continued use of this Web site following changes to these terms means you accept those changes.