Privacy policy

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1. Objective and Scope of Policy

Armstrong Partnership LP ("Armstrong") is committed to protecting your privacy. The following policy describes how we collect, store, use and distribute the information of individuals for whom Armstrong services are rendered.

The intent of this policy is to generally describe Armstrong's use and protection of your private information. Due to the nature of our services, we may revise or expand upon this policy on a per-engagement basis.

Our goal is to collect, use and disclose only that information reasonably required to enable us to provide the product or service that you have requested, to maintain our client/visitor lists and/or to respond to your inquiries or feedback and for other purposes further described in this policy.

2. Acceptance of Terms

By using our services, you voluntarily consent to the collection, use and disclosure of various types of information as specified in this privacy policy. Clients will be notified of any material amendment to this privacy policy by email (sent to the email address specified in your account), by postal mail (sent to the billing address specified in your account), or by way of another notification appropriate to the service. The latest version of this policy is available upon request and on our website.

Duly authorized representatives from client organizations are required to review this policy and consent to the access required by Armstrong to provide our services prior to finalizing a Service Contract.

3. Collection of Information

Three types of information may be collected through use of our services: Personal Information, Non-Personal Information and Confidential Information.

"Personal Information" means any personally identifiable information, such as your name, address, telephone number, and/or email address. At the time of collection, we will set out clearly the information that we are collecting and the purposes for which we will use it. It is always your choice whether to provide Personal Information. If you choose not to provide the requested Personal Information, you will not be able to use certain features of our services.

We may also receive Personal Information from our business partners and other third parties, provided that such third parties confirm to us that their use of the Personal Information conforms to applicable privacy laws.

Business contact information that is specific to an individual, such as an individuals' job title, work email address, work phone number, etc., is considered Personal Information and is treated as such. Personal Information does not include business names, business addresses, generic email addresses or any other generic business information.

"Non-Personal Information" is information that is collected or derived by us while operating our services. We need this information to operate our services, but we do not share it with any third parties. This policy does not restrict our use of Non-Personal Information.

For example, our web servers may automatically collect information of an anonymous nature — such as an Internet Protocol Address (IP Address), the domain and the type and version of browser or operating system being used to access a website — provided through your browser or stored on a Cookie when you choose to visit our website.

Aggregate information — such as demographic statistics of our users (e.g., average age or geographical allocation of our users), number of visitors, what pages users access or visit, average time spent on our website and information volunteered by the user, such as survey information — is also considered Non-Personal Information.

"Confidential Information" refers to information that might be confidential to your organization. Armstrong only has access to the Confidential Information of our clients through the course of providing our services and does not have access to the Confidential Information of visitors to our website. We do not use or retain any Confidential Information except where such retention and use are ancillary to providing our services to our clients.

In addition to the three types of information, "Cookies" are used by Armstrong to track content usage and traffic on our website. Armstrong uses Cookies to help us compile aggregate statistics about usage of our website, such as how many users visit the website, how long users spend viewing the website, and what pages are viewed most often. This information is used to improve the content of our website.

4. Use of Information

Armstrong collects information mainly to

- contact and correspond with you;
- enable your use of our services;
- understand your needs and develop and recommend suitable products and services;
- process transactions and payments; and,
- meet legal and regulatory requirements.

Your Personal Information will not be used without your consent for any purpose other than the reasons stated at the time of collection. Armstrong does not collect personally identifiable user information for the purpose of sale or marketing in a way that specifically identifies the individual. In other words: we do not sell client lists.

The Confidential Information of our clients will not be used for any purpose other than to deliver our services. Only that Confidential Information which is needed to deliver our services will be accessed and used by Armstrong as described in this policy.

5. Disclosure of Information

Armstrong feels very strongly about the confidentiality of your Personal Information and of our clients' Confidential Information. Armstrong will not share this information with any third party, except as indicated below.

From time to time we may employ or partner with third parties to provide various technologies and services (e.g., hosting, database management, maintenance, etc.). These third parties may have access to Personal Information and/or Confidential Information solely for the purpose of helping us to provide our services.

Important Exceptions

We may disclose your Personal Information to a third party without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other website or service users, or anyone else that could be harmed by such activities. We may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

Unless agreed otherwise, we may also disclose your Personal Information in connection with a corporate reorganization, a merger or amalgamation with another entity, or a sale of all or a substantial portion of our assets provided that the information disclosed continues to be used for the purposes permitted by this privacy policy by the entity acquiring the information.

6. Outside Parties and Sites

Through Armstrong, you may be introduced to a variety of third-party vendors and websites. The privacy policies of these third parties are not under our control and may differ from our own. The use of any information that you may provide to any third party, or the use of Cookie technology by any third party, will be governed by the privacy policy of that third party. If you have any doubts about the privacy of the information you are providing on another website, we recommend that you contact the owners of that website directly for more information and review the privacy policy for that website.

7. Security and Data Transfers

The security of your Personal Information and Confidential Information is important to us. We use commercially reasonable efforts to ensure that your Personal Information and Confidential Information are stored and maintained in a secure environment and are encrypted during transmission to/from Armstrong using industry-standard authentication and encryption technologies.

Armstrong is a global business. The country in which you are located may differ from the country in which your data is collected, stored or transferred. Armstrong complies with the applicable legal requirements concerning the protection of Personal Information and will protect your Personal Information in accordance with this policy.

We will never ask you for your password in an unsolicited phone call or in an unsolicited email.

8. Retention

Armstrong will keep your Personal Information for as long as it remains necessary for the identified purposes in Section 4 or as required by applicable law, which may extend beyond the termination of our relationship with you.

You acknowledge and agree that if you request your name be removed from our databases, it may not be possible to completely delete all of your Personal Information due to technological and legal constraints.

The Confidential Information of our clients is not retained by Armstrong, except where retention is necessary to deliver our services. If an organization ceases to be an Armstrong client, certain Confidential Information, such as that contained in Customer Relationship Management (CRM) tools, will be retained as long as necessary to complete final reporting and billing cycles, as well as to complete and comply with year-end financial reporting requirements.

9. Amendment of this Policy

If we find it necessary or desirable to change our privacy policy in the future, we will post an appropriate notice on our website. Any change to this privacy policy will become effective 30 days following the date the change is posted and will apply to information collected from the date of the posting of the revised privacy policy and to existing information held by Armstrong. The date on which the latest update was made is indicated at the top of this document. We recommend that you print a copy of this privacy policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. You will be notified of any material changes to this policy as described in Section 2 above.

10. Access and Accuracy

You have the right to access your Personal Information to verify the Personal Information that we have collected in respect of you. Upon receipt of your written request, we will provide you with a copy of your information. We will make every reasonable effort to keep your Personal Information accurate and up to date, and we will enable you to revise the Personal Information as appropriate. Having accurate Personal Information about you enables us to give you the best possible service.

You can help us ensure the accuracy of the data we hold about you by keeping us informed of any changes such as a change of address or telephone number. If you would like to access your information, verify your information, restrict or erase your data, or if you have any questions, comments or suggestions about this privacy policy or Armstrong's privacy practices that were not answered here, please contact us by email at privacy@armstrongpartnership.com.

Armstrong will endeavor to deal with all such requests for access and modifications in a timely manner.

11. Additional Privacy Protections for Children

Armstrong joins the industry in recognizing that children, including young teens, may not be able to make informed choices about Personal Information requested online. Accordingly, Armstrong does not solicit or collect the Personal Information of children or teenagers younger than eighteen years of age. In addition, Armstrong will encourage children to seek the consent of their parents before providing any information about themselves or their households to anyone on the internet.

12. Enforcement

This policy will be enforced by the Armstrong Senior Leadership team. Violations may be remedied through suspension, restriction of access, or more severe penalties up to and including termination of services. Where illegal activities or theft of company property (physical or intellectual) are suspected, Armstrong may report such activities to the applicable authorities.

13. Definitions

Information: All files and records, whether digital or printed, including communications, attachments and records submitted via our website, collected while providing our services, and entered into line-of-business applications.