



## Purpose of this Privacy Policy

Elemental Machines Inc. is committed to protecting the privacy and security of your personal data by complying with all data protection laws applicable to EU, UK and US citizens.

We greatly respect your privacy and will do our utmost to keep the information you provide to us secure. This includes information that you submit to us via our website, in-person, by telephone or through use of any of our measurement data products and services.

The purpose of this privacy policy is to explain clearly the information we collect, how we use and share it, how to manage your marketing preferences and a confirmation of your rights. It is important that you read this privacy policy when we are collecting or processing personal information about you so that you are aware of how and why we are using your personal information.

It is likely that we will need to update this privacy policy from time to time so please return to this page periodically to keep yourself up to date with any changes. When we make significant changes to the policy we will also notify you accordingly where we have accurate contact details and where you would expect to receive communications from us.

If you have any questions regarding our privacy policy or you object to any changes made in the future, please contact the Helpdesk using the contact details at the end of this policy.

For brevity throughout this policy, 'we', 'us' and 'EM' are used to refer to Elemental Machines Inc.

## Who we are

Elemental Machines Inc. is a corporation registered in Delaware, USA and with offices at 185 Alewife Brook Parkway, Suite 401 Cambridge MA 02138 USA.

## Why we collect personal data

We collect and process personal data so that we, as a provider of measurement products and data collection, visualization, and analysis services, may provide a service and fulfill any obligations to you (as a visitor, user or our customer). We may do this because:

## Consent

Where we have obtained your explicit consent we may send you marketing, advertising and promotional material. For example, where you have subscribed to blogs or microblogging, or where you have opted in to receive such material by ticking a box to receive such information.

You have the right to withdraw your consent to marketing at any time by contacting us through the Helpline or unsubscribing from the individual services (e.g. by clicking on the 'unsubscribe' link at the bottom of marketing e-mails).

## Contractual obligations

Where we have a contract with you or your employer, we will process your personal data to provide the agreed services through Elemental Machines Insights Dashboard. For example, where our measurements indicate a lab freezer is warming above a threshold set in an Alert rule by yourself or the lab manager, we will send an Alert message to the recipient nominated in that Alert.

## Legal compliance

Where we have, or are likely to have, a duty to add your personal data to our records we will do so. For example, we monitor environmental conditions for many of our customers so that they can in the future submit these records to e.g. the US FDA to show their environments have been managed properly during their studies; in this case if you are responsible for recalibrating a sensor, we must identify you in our records. Since we cannot anticipate which data may be important in future studies, we will maintain an audit log of all your actions through our Dashboard so that we may form a complete and accurate record of any of our measurements in the future.

## Legitimate interest

Where you have circulated your contact details to various platforms applicable to Elemental Machines' professional interests, we may send you marketing information we feel is relevant to you. Platforms may include professional conferences, seminars and mailing lists, social media platforms and publicly available websites.

You have the right to opt out of marketing at any time by contacting us through the Helpline or unsubscribing from the individual services (e.g. by clicking on the 'unsubscribe' link at the bottom of marketing e-mails).

## Information we may collect about you

Personal data means any information relating to a person that can be used to identify them, either directly or indirectly.

- Personal data includes identifiers such as a name, an identification number, location and contact data or an online identifier. We collect only enough of your personal identifier data to support our services

- There are also special categories of personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and there is also the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and finally there is Criminal Offense data. We do not collect, keep or process any of these special categories of data.
- Personal data does not include data where the identity has been removed.

We have grouped the different kinds of personal information we may collect, use, share or otherwise process about you in the tables below:

For users of Elemental Machines Insights Dashboard

Data classification	Types of information
Identity Data Data that can be used to identify you	First name, last name and internally used ID numbers for pseudonymization.
Contact Data Data that can be used to contact you, e.g. for an Alert message	Email, mobile number
Technical Data Data about the device, browser, operating system and method used to access the Dashboard	During a session: Internet protocol (IP) address, login data, browser type and version, internet connection type, time zone setting and location, browser plug-ins and versions, operating system and platform and other technology on the devices you use to access our website.  After a session, the last sign-in IP and sign-in time are stored for comparison with the next sign-in.
Profile and preference data	Password, dashboard preferences
Marketing preferences	Your preference to receive marketing emails from us about our products and services.
Dashboard activity	User changes to e.g. Alerts settings or instrument calibration settings are logged as we described in the legal compliance section above.
Usage Data Data about your usage of the Dashboard	Information about how you use the dashboard, including movement between pages and reference to help files, to identify patterns in user difficulties.

## For communicating with the Helpdesk

We maintain a complete record of all correspondence with the helpdesk, so all personal data you share with the Helpdesk will be saved permanently. This includes any of the personal data you share for resolving difficulties with the Dashboard (see table above) or regarding marketing (see table below).

## For marketing

Data classification	Types of information
Identity Data Data that can be used to identify you	Data you share with us when you subscribe to our blogs and microblogging (e.g. Twitter)  First and last name you share with us when you complete a 'Contact Us' form on our website or communicate with our sales/marketing team
Contact Data Data that can be used to contact you	Email, address, and/or phone number you share with us when you subscribe to our marketing through links in our blogs and microblogging (e.g. Twitter).  Email, address, and/or phone number you share with us when you complete a 'Contact Us' form on our website or communicate with our sales/marketing team
Technical Data Data about the device, browser, operating system and method used to access our website	Internet protocol (IP) address, login data, browser type and version, internet connection type, location, browser plug-ins and versions, operating system and platform and other technology on the devices you use to access our website.
Technical Preferences	Your Time Zone preference, Graph Date/Time Format preference
Marketing preferences data	Your marketing preferences such as what information you would like to receive from us and by what method (by email, by mail etc).
Usage Data Data about your usage of our website and related services	Information about how you use our website, products and services including details of your visit and which site you came from to ours, the web pages viewed during your visit, any search terms you entered and the advertisements you clicked on.

## Why and how we collect, keep and use your personal data

### In the Dashboard

We provide your company or institution with measurement equipment and access to the Dashboard so we can send you Alerts, provide you with measurement records and give you current readings of your company's facilities. We need your personal data in the Dashboard so it can operate correctly for your company; whether you are at work or at home.

Your personal data may appear in the dashboard in one of two ways:

1. You may set up a user account or administrator account in the dashboard yourself by providing your identity data and contact data. After you log in to your account and as you use it, the technical data, preferences and activity will be populated and updated.
2. A dashboard administrator, such as your employer or manager, may have entered your identity data and contact data to set up a dashboard account for you. All other classes of personal data (the technical data, preferences and activity) will only be populated after you log in to your account and as you use it.

For as long as your User Account is active your personal data will remain associated with it.

If your User Account is left unused for 90 days it will be locked to protect your personal data; you can unlock your account by contacting your Dashboard Administrator or the Helpdesk.

Your account may be closed by your administrator or by contacting the Helpdesk. Closing an account will prevent your personal data being associated with further activity. However, our records of your Dashboard activity, associated with your identity data and contact data, will be retained and maintained to support our contractual obligations and legal compliance (see above).

Elemental Machines grants access to your Dashboard personal data in the following circumstances:

1. Your Dashboard Administrator has access to your User Account
2. Elemental Machines Helpdesk staff may access your personal data to resolve difficulties e.g. with passwords, dashboard preferences.
3. Elemental Machines technical staff may access your personal data for maintenance and support of the Dashboard e.g. for troubleshooting, running verification testing to assure new releases will operate properly, etc.
4. Where you have an opt-in to receive e-mails advising of updates or general marketing the necessary contact data will be added to these mailing lists.

Elemental Machines uses your personal data to:

1. Send you automated Alerts. This happens when our measurements show an environment in your company has fallen outside limits you or your administrator have previously defined with us.
2. Send you measurement records on request from you

3. Keep a record of changes you make to settings in the dashboard so measurement records meet rigorous standards for record keeping defined by regulatory agencies in e.g. medical, scientific and food industries

### In the Helpdesk

The Helpdesk is provided by Elemental Machines to offer manual help to anyone having difficulty with our automated systems, whether they are with the measuring equipment, Dashboard or marketing activities.

We maintain a complete record of all correspondence with the helpdesk and this correspondence may contain your personal data. The helpdesk draws on this correspondence to resolve difficulties you may have with Elemental Machines products and services, including marketing activities. This may include sharing access to the correspondence with Elemental Machines technical staff.

In addition to using your personal data to help resolve difficulties, Helpdesk correspondence may be anonymized to protect your personal data and analyzed so that Elemental Machines may better understand patterns in user difficulties and then improve our services to you. Since this is anonymized, there is no risk to your personal data.

### For direct marketing

Elemental Machines sends marketing materials to anyone who subscribes with us for this information or who we determine we have a legitimate interest to advertise to. Continuing to receive these materials is purely voluntary.

You may be sent marketing materials because your contact details have been added to our marketing list in any of the following ways:

1. You opted in to receive marketing materials through the Dashboard
2. You requested information on our products and services through a 'Contact us' page on our website, which you may have visited directly or visited through a blog entry or tweet.
3. You requested information in person from a representative of Elemental Machines
4. You have made your professional contact information available for marketing through appropriate platforms (see 'Legitimate Interests' in 'Why we collect personal data' above) and we have determined we have shared professional interests with you.

Marketing materials may be sent to you automatically but you may opt out of this at any time by using the unsubscribe options (at the bottom of marketing e-mails, through your blog or twitter service etc.). If you have any difficulties unsubscribing, or wish to amend or just understand your personal data held by Elemental Machines, please reach out to our Helpdesk for assistance. Subscription to Elemental Machines marketing materials is voluntary and no other service from us is dependent on you receiving this information. After unsubscribing, we keep enough of your personal data to ensure we know not to send you unwanted material in the future.

## For advertising

To keep you up to date with our brand and help you see and find products we believe are relevant to you, we use our legitimate interests to engage in online advertising.

We target banners and adverts to you when you are on other websites and apps using a variety of digital marketing networks and ad exchanges. These adverts use a number of different technologies such as pixels, ad tags, cookies and mobile identifiers as well as specific services offered by some sites and social networks such as Facebook's Custom Audience service.

The banners and ads you see will be based on information we hold about you and/or your previous use of the [www.elementalmachines.io](http://www.elementalmachines.io) website such as your search history and the products and services you have looked at.

## Third parties and your personal data

### Information we share with third parties

We share information with trusted third parties according to the following rules:

- We provide only the information they need
- They may only use your data for the exact purpose we specify
- We work closely with them to ensure your privacy is respected and protected
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous

### Example third party companies we work with

Where necessary we share your data with the following example categories of companies:

- Law enforcement and fraud prevention agencies (including for purchasing, Credit reference agencies), so we can comply with appropriate law, meet our contractual obligations, protect our staff and protect against fraud.
- Professional advisors such as our auditors, regulators, external legal and financial advisors.
- Professional service providers, such as marketing agencies, advertising partners, IT companies and website hosts who help us run our business.
- Direct marketing companies who help us manage our communications with you.
- Companies approved by you, such as social media sites (if you choose to link your accounts to us) or payment providers such as Amazon Pay, V12 Finance and PayPal where you choose to use their payment service.
- Advertising platforms such as Google and Facebook to show you products that might be of interest to you whilst browsing the internet, if you have accepted their cookies to support such services.

N.B. We do not give, sell, or otherwise transfer your personal data, including your e-mail addresses, to any other party for the purposes of initiating, or enabling others to initiate, electronic mail messages outside the scope of the above categories.

## Aggregated Data

For personal data, aggregated data is data concerning preferences and activities of people that has been stripped of personal information and condensed into summary statistics (e.g. popular web pages in our website and how visitors arrived there). As part of our marketing activity we use Aggregated Data sources from third parties to improve the systems, services and products we provide to you and generally make informed business decisions as set out below:

- Analytics information from providers such as Google
- Advertising network performance such as Facebook and Google AdWords
- Search information providers such as Google

This third-party Aggregated Data often relies on data from third-party cookies in your internet browser. Your control of these cookies is through your browser.

## How long we retain your Personal Data

Elemental Machines provides measurement products and data collection, visualization, and analysis services, as well as the support you need to use our products and services and the marketing, sales and business activities to expand our business. The nature of our business means we do have instances where we need to retain your Personal Data for an ongoing, indefinite period; we have identified these for you with the reasons why in the following sections below.

### For Users of Elemental Machines Insights Dashboard

The Insights Dashboard is your interface with our Alerts and Monitoring service and you will have been given a User account to access it that holds your personal data. You may at any time (by applying to your administrator or our Helpdesk) have your account closed so that you will no longer be sent alerts or associated with further activity. However, we will continue to maintain your account to support existing records of our Monitoring service.

Our Monitoring service is intended to support science and technical companies who need thorough records. In these industries it is a normal for our customers to have to submit records to quality assurance and regulatory bodies to demonstrate they have maintained proper laboratory conditions during, for example, drug studies and clinical trials. For these examples, a necessary part of such monitoring records is to record “secure, computer-generated, time-stamped audit trails to independently record the date and time of operator entries and actions that create, modify, or delete electronic records.” (This example requirement is from the USA’s Food and Drug Administration, 21.CFR.11.B(e)).

Because our customers work under this type of legal requirement, we need to maintain the information in all User accounts even after that account has been closed to external access so we can generate these meticulous records of User activity. We must maintain all our Alerts and Monitoring records to meet these standards because we do not know what data our customers will need to use for this purpose or when; what we do know is that the records must be available for at least ten years after a customer has finally finished using all samples involved in

a study. In summary, Users of Elemental Machines Insights Dashboard must expect the personal data they enter into their account to be maintained by us for an indefinite period of greater than ten years.

#### [For communicating with the Helpdesk](#)

Elemental Machines' Helpdesk is the technical support service for using Elemental Machines Insights Dashboard. It is the platform for discussing and resolving issues with the performance of Elemental Machines' Alerts and Monitoring Service. We must therefore maintain a record of this correspondence for a similar time as we maintain the Alerts and Monitoring data.

#### [For direct marketing](#)

At Elemental Machines, we invest in active marketing, sales and business activities to spread the word about and expand our business. We have described in the section "Why and how we collect, keep and use your personal data" (see above) how we reach out to relevant professionals and how continuing to receive marketing materials is purely voluntary.

We will maintain a record of your personal data in our marketing and sales database so we can reach out to you on an ongoing basis. Should you express a wish not to receive our marketing materials, we prefer to maintain your details in this database, identified as not wishing to receive marketing information, so we can make sure we do not go against your wishes. If you wish us to amend or remove your personal details completely from our marketing database, please contact the Helpdesk and we will be happy to make the changes you request; however, be aware that if we remove you completely from our marketing database we will no longer have a record of your wish not to be contacted. In this case, if your professional contact information becomes available to us again through an appropriate platform we may inadvertently reach out to you again.

#### [Your control over personal data we have about you](#)

You can, at any time, access the personal data you have shared with Elemental Machines Dashboard by logging in to the dashboard and selecting the User Settings. You may edit, amend or delete this data, and changes will be reflected in any new activities we record. Changes will not be applied retrospectively to activity logs, however; please see the explanation above about our duty for legal compliance.

You can, at any time, use the unsubscribe option in any of our marketing e-mails and the change in your marketing preference will be acted on. No part of the Insights Dashboard is affected by your choice to accept or refuse marketing communications.

You can also apply to our Helpdesk to have all your personal data in both our Marketing and Dashboard databases sent to you unchanged, or have details amended or have our record of your personal data deleted. We will honor your request for deletion up to the limit of our duty for legal compliance (see above).

## Contact details

### Contact us

Elemental Machines may be contacted:

By email: [help@elementalmachines.io](mailto:help@elementalmachines.io)

By mail: 185 Alewife Brook Parkway, Suite 401  
Cambridge MA  
02138  
USA.

### Contacting the regulator

If you wish to make a complaint about the way we handle your personal data, we encourage you to contact our Helpdesk as described in 'Contact us' above. If you are unhappy with our response to any requests you have made to us regarding the use of your personal data, Or if you wish to appeal immediately to an independent body, various national regulators have created Authorities for this purpose:

- In the UK, the Information Commissioner's Office by calling 0303 1231113 or contacting them via their website: [www.ico.org.uk](http://www.ico.org.uk)
- In the EU, contact your national Data Protection Authority