Privacy Overview

Iron horse Risk Management Corporation (On the Move Safety) and its business affiliates are committed to protecting the accuracy, security and privacy of the personal information collected from its customers, suppliers and employees. To this end, Iron horse Risk Management has developed policies and procedures relating to privacy protection.

Employees across Iron horse Risk Management are held accountable for complying with these privacy policies. Any questions or concerns regarding Iron horse Risk Management’s policies can be directed to Iron horse Risk Management’s Privacy Officer, whose contact information is provided below.

Purpose

This Privacy Policy outlines and emphasizes Iron horse Risk Management’s commitment to protecting and maintaining the privacy of its customers, employees, and other relevant individuals when collecting, using and disclosing Personal Information.

Definitions

“Personal Information” is information about an identifiable individual. Such information may include any factual or subjective, recorded or unrecorded, information about an identifiable individual, including name, address and telephone number; e-mail addresses; income information; ethnic origin; age; opinions; evaluations; comments; financial information and purchasing habits. In the case of a customer, such information includes, but is not limited to, the customer’s home e-mail address, home address, home telephone number and credit card information.

Accountability

Iron horse Risk Management is responsible for protecting any Personal Information under its control. Iron horse Risk Management’s Corporate Human Resources Director has been designated as the Privacy Officer of Iron horse Risk Management and will be responsible for ensuring that Iron horse Risk Management’s privacy procedures, as well as any applicable privacy legislation, is followed. You can reach the Privacy Officer at admin@onthemovesafety.com or (780) 232-6882.

Purpose of Collecting Personal Information

Iron horse Risk Management collects, uses and discloses personal information only for specific purposes which relate to effectively managing its workforce, providing products and services to its customers or as required by law. The information kept in Iron horse Risk Management’s records is used only for those legitimate purposes.
Personal information may be collected and maintained by Iron horse Risk Management for the following purposes:

- processing of warranty claims
- billing and after sales follow-up
- basic communications
- to advise of future products or services
- to meet any legal requirements
- to provide products and requested services
- to allow Iron horse Risk Management Finance to process applications for credit
- to allow Iron horse Risk Management’s third-party service providers to assist in the operation of Iron horse Risk Management’s business by providing such services as: marketing, collecting overdue accounts, delivering products and processing credit card payments and charges; and to assist us in establishing, managing and terminating an employment relationship.

Although these are the typical purposes, this is not an exhaustive list. Prior to the collection of any personal information, Iron horse Risk Management will obtain consent, subject to the exceptions within applicable legislation.

Methods of Collecting Personal Information

Iron horse Risk Management may collect personal information in a variety of ways, the most common of which are as follows:

- registrations on its website
- business cards, surveys, market research and other business intelligence sources such as credit agencies conversations, whether by phone or in person; and in the ordinary course of business or through employment relationships.

Computer and Internet Information

Iron horse Risk Management may collect information about your computer hardware and software. This information may include: your IP address, browser type, operating system, domain name, access times and referring website addresses. In addition, Iron horse Risk Management collects information about
the specific pages that are viewed within its internet server and applications. Iron horse Risk Management uses this information for system administration, web server load balancing and for its internal security audit log. Conversely, Iron horse Risk Management does not link your IP address to any personal information provided to Iron horse Risk Management by you through Iron horse Risk Management’s website. However, it may be used to identify the duration of a visitor’s session and to gather broad, aggregate demographic information.

In addition, in some of Iron horse Risk Management’s web applications it uses “cookies”. Cookies are pieces of information that may be placed on your computer by the website for the purpose of facilitating or enhancing your communication and interaction with that site. Cookies help Iron horse Risk Management deliver personalized content and are an integral part of some of its web applications. Iron horse Risk Management may also use cookies to obtain statistics on the use of its websites and applications. You may stop or restrict the placement of cookies on your computer, or flush them from your browser, by adjusting your web browser preferences. However, the rejection of certain cookies may interfere with the functionality of the website. Iron horse Risk Management does not use cookies to retrieve information from your computer for purposes that are unrelated to the service being offered over the applicable website or your interaction with that website.

Collection, Use and Disclosure of Personal Information

Iron horse Risk Management will collect, use and disclose only the Personal Information that is needed for authorized purposes, as described above.

Where consent to the collection of information is required by law, it will be obtained in accordance with the applicable legislation. Consent will be explicit or implied and could be obtained either verbally or in writing, depending on the nature of the information in question.

Personal Information will be disclosed consistent with the purposes for which it was collected and only on a need-to-know basis. Personal Information about an individual is not disclosed to third parties unrelated to Iron horse Risk Management without the individual’s consent, unless authorized or required by law.

If consent is required to collect, use or disclose Personal Information, individuals have the right to withdraw consent at any time. However, there may be consequences to such withdrawal. If an individual withdraws his or her consent, Iron horse Risk Management will inform the individual of the likely consequences of such action. An individual may not withdraw consent if withdrawing the consent would frustrate the performance of a legal obligation.
An individual may request an explanation of the specific purpose of the collection, use or disclosure of his or her Personal Information. Such an explanation will, in any event, be provided where required by law.

Protection of Personal Information

Iron horse Risk Management is committed to protecting your personal information against loss, theft and unauthorized access, disclosure, use or modification by instituting security safeguards consistent with the sensitivity, amount, format, nature and storage of the information.

Personal Information provided to Iron horse Risk Management in electronic form is stored in secure computer servers with limited access and located in controlled facilities. It should be noted that e-mails sent to Iron horse Risk Management are not a secure means of communication unless messages are encrypted.

Paper files are maintained in secure locations with various levels of restricted access based on the sensitivity of the information. Files with sensitive information are kept in locked file cabinets, behind locked doors.

Retention of Personal Information

Personal Information will be retained only as long as necessary, permitted or required by law to fulfill the purpose for which it was collected or a related business or legal purpose. Documents containing Personal Information that are not retained will be destroyed in a secure manner, such as shredding or through a document destruction service or erased from software/hardware.

Accuracy of Personal Information

Iron horse Risk Management will take appropriate measures to ensure that all personal Information it collects and holds will be accurate, complete and continuously updated. Right to Access and Correct your Personal Information:

Depending on applicable legislation, individuals may have the right to access any of their Personal Information held by Iron horse Risk Management and to request correction or rectification of the information in accordance with the following terms and conditions:

1. Requests to access information should be directed in writing to Iron horse Risk Management’s Privacy Officer at admin@onthemovesafety.com
2. Requests must contain sufficient information to prove the identity of the requester and to identify the information that is being requested.

3. Iron horse Risk Management will reply to requests to access information as quickly as possible and no later than 30 days after the request is received or as necessary to comply with applicable legislation concerning timelines for providing responses to such requests.

4. Iron horse Risk Management may ask the individual to pay reasonable costs of providing the requested information. A written estimate of these costs will be provided to the individual before the requested information is provided.

5. If the request to access, correct or rectify information is refused, the individual will be informed, in writing, of the reasons for refusal and the legislative basis for the refusal. Contact information of a Iron horse Risk Management representative that can answer questions about the refusal will be provided.

Complaints

If an individual has a complaint regarding Iron horse Risk Management’s compliance with this Policy or with any privacy-related legislation or statutory requirements, the individual may file a written complaint to Iron horse Risk Management, admin@onthemovesafety.com. All complaints received will be investigated in a fair, impartial and confidential manner.

For any further information regarding this Policy, or any of Iron horse Risk Management’s other privacy policies or practices, please contact the Privacy Officer at the address provided above.