



## PRIVACY POLICY

The Women in Localization (W.L.) Mentorship Program is managed using a web application (Platform) called MentorEase that has been customized especially for this program. MentorEase is a web-based mentoring software product of Giant Step Inc. ("MentorEase" or "we"). The software may be used on a web browser or using a mobile app downloaded from the Apple App Store, Google Play Store or similar ("App").

MentorEase is dedicated to maintaining high standards of confidentiality and privacy regarding the Personal Information received from Mentors, Mentees and Program Managers, in accordance with the obligations under the Personal Information Protection and Electronic Documents Act (PIPEDA) and other related privacy legislation including the EU General Data Protection Regulation (GDPR).

### 1. What Information MentorEase Collects

This Privacy Policy covers all of the ways MentorEase collects information.

#### 1.1 Information required to register to use the software:

\* Profile-related contact information - Name, Phone, Email, LinkedIn Profile, Gender, Current job title, Country and City.

\* Matching-criteria related information, such as specific skills for development and interests.

\* Open-ended questions - participants explain what they are looking to learn

#### 1.2. Automatically collected information

While using the Platform information may be collected through cookies, activity logs, and other means that are either needed to operate the software or used to provide administrative support. Such information may include your IP address, any activity on the site and any data available through Google Analytics or similar web activity tracking tools.

### 2. What is the Information Used For

#### 2.1 Basic usage of the software

MentorEase uses the information on behalf of W.L. for managing the mentorship program, which includes:

\* Enabling use of the Platform through the ability to match and communicate among Users



\* Mentorship program manager/s viewing all User data to ensure matches are made properly and communicating with Users to resolve any issues (typos, etc.).

\* Automatically sending emails through the system between Users, Users and administrators, support requests and program updates.

\* Inviting Users to participate in online surveys, possible webinars, offline events or other program-related activities.

\* Analysis of User activity to assess the status of the program

\* Collecting testimonials with permission for marketing the program

\* Analysis of all activity to improve the overall software and marketing the software with permissions

\* Training purposes

\* Legal requirements

and any other purposes detailed in this Privacy Policy

## 2.2 Cookies

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. MentorEase uses cookies to help MentorEase identify and track visitors, their usage of the Mentorship Program Platform, and their access preferences. Platform visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Platform, with the drawback that certain features may not function properly without the aid of cookies.

## 3. How do we store your data?

The Women in Localization (W.L.) Mentorship Program is managed using a web application (Platform) called MentorEase that has been customized for W.L. especially for this program. MentorEase is a product of a company called Giant Step Inc. located in Toronto, Ontario, Canada. Personal information provided by program participants will be stored in server facilities provided by Microsoft located in the East US datacenter in Virginia, USA.

We also follow the ISO 27001 web security standards to protect your data. Your data is kept from the time you enter it until W.L. asks to remove it from the server. You can also request to remove it at any time and it will be removed within 14 business days. Your data will be provided to you and then deleted from the server and backup copies in a way that it cannot be

Generally, MentorEase keeps mentoring account data for seven years or less as required by clients, although it could be longer if required. Once this time period has expired, we will delete your data as needed as follows:

\* **Server-stored Data** - data on our Microsoft Azure Cloud hosting account is stored in virtual machines, each client with their own virtual machine. When deleting a virtual machine it is removed and overwritten before the drive is used by other customers. Azure's Data Management procedures are detailed at <https://www.microsoft.com/en/trust-center/privacy/data-management>

*"Microsoft is governed by strict standards and removes cloud customer data from systems under our control, overwriting storage resources before reuse, and purging or destroying decommissioned hardware."*

\* **Electronic Media** - such as physical disks, tape cartridge, CDs, printer ribbons, flash drives, printer and copier hard-drives, shall be disposed of by one of the methods:

\* **Overwriting Magnetic Media** - Erasing/Overwriting uses a program to write binary data sector by sector onto the media that requires sanitization (ensure data cannot be undeleted). A minimum of three (3) overwrites is required; additional overwriting is recommended depending upon the sensitivity of the data to be erased. The products listed below are free and able to over-write Microsoft and Unix operating systems.

- \* Active@Kill Disk (Department of Defense Standard)
- \* DBAN Hard Drive Secure Wipe
- \* Windows Secure Eraser
- \* Secure Erase or Secure Empty Trash on Mac OS X 10.6.8 or later (3, 5, or 7 pass)

\* **Degaussing** - Degaussing consists of using strong magnets or electric degaussing equipment to magnetically scramble the data on a hard drive into an unrecoverable state

\* **Physical Destruction** - implies complete destruction of media by means of crushing or disassembling the asset and ensuring no data can be extracted or recreated

\* **Physical Print Media** - shall be disposed of by one (or a combination) of the following methods:

\* **Shredding** - Media shall be shredded using cross-cut shredders

\* **Shredding Bins** - Disposal shall be performed using locked bins located on-site using a licensed and bonded information disposal contractor

\* **Incineration** - Materials are physically destroyed using licensed and bonded information disposal contractor

#### **4. What Information MentorEase Discloses and When**

MentorEase only discloses information as permitted by law and agreed with W.L. and does not sell information to any third-parties.

##### **4.1 Third-Parties that require some information disclosure**

As required by W.L., the software may be integrated with Third-Party services like SurveyMonkey, MailChimp, Google Analytics, LinkedIn or others for specific use cases and added functionality.

Please note that this Privacy Policy does NOT apply to content, activity or procedures of any third parties that MentorEase does not own or control. This would include third parties such as SurveyMonkey, MailChimp, Google, LinkedIn or any others ("Third Party Services"). MentorEase cannot provide any privacy level when using those Third-Party Services. We recommend reviewing carefully the privacy policies of any Third-Party Services you select to use.

##### **4.2 Compelled Disclosure**

MentorEase may disclose information if requested by:

- \* Government agencies and/or law enforcement
- \* As required by law, regulation or court order
- \* To resolve a case of misuse of the software to harm human or property rights
- \* To be included in a legal case or investigation if needed

##### **4.3. In case we sell MentorEase**

If we plan to sell the business in the future, that process would require disclosing information to third-parties in relation to the transfer of ownership of the business. In such a case the Users' privacy will stay the same as before, except that the new owner/s will have the same access as we do today. In such an event we will notify W.L. who will notify the Users about the change of ownership.

## 5. Software Security

MentorEase is compliant to ISO 27001 security standards and uses various procedures to safeguard Users data from loss, misuse, unauthorized access, alteration or destruction in storage or transmission. Some of the procedures include encryption, securing the Open Web Application Security Project (OWASP)'s list of the ten most common vulnerabilities to acceptable score, locking data residency to Australian servers, disk encryption, firewalls, intrusion detection and others. MentorEase will keep your data only as long as you ask and required by law.

## 6. Compliance

### 6.1. Children's Online Privacy Protection Rule ("COPPA")

MentorEase is a mentoring software designed to only be used by adults and does not collect any information from children under 18 years of age. As such it does not need to comply to COPPA. To participate in the Mentorship Program you must be over 18 years old.

### 6.2. Personal Information Protection and Electronic Documents Act (PIPEDA)

MentorEase complies with PIPEDA privacy protections.

### 6.3. EU General Data Protection Regulation (GDPR)

MentorEase complies with GDPR.

## 7. What are your data protection rights?

MentorEase would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access** – You have the right to request MentorEase for copies of your personal data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that MentorEase correct any information you believe is inaccurate. You also have the right to request MentorEase to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that MentorEase erase your personal data, under certain conditions.



**The right to restrict processing** – You have the right to request that MentorEase restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to MentorEase's processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that MentorEase transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

## 8. Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

### How do we use cookies?

MentorEase uses cookies in a range of ways to improve your experience on our website, including:

- \* Keeping you signed in
- \* Understanding how you use our website
- \* Log activity for troubleshooting in case there are technical issues

We do not use cookies for advertising, only to support the functionality of the site. MentorEase uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

### How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

## 9. Privacy policies of other websites

The W.L. Mentorship program website may contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

## **10. Changes to our privacy policy**

MentorEase keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on March 5, 2023.

## **11. Contact**

For any questions about this Privacy Policy please contact MentorEase at:

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