

PRIVACY POLICY

The Mentoring 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").

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.

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, such as name, phone, email and more
- * Matching-criteria related information, such as specific skills for development
- * Open-ended question - 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 Sun Life for managing the mentoring program, which includes:

- * Enabling use of the Platform through the ability to match and communicate among Users
- * Mentoring 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 Mentoring 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. What Information MentorEase Discloses and When

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

3.1 Third-Parties that require some information disclosure

As required by Sun Life, 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.

3.2 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

3.3. 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 Sun Life who will notify the Users about the change of ownership.

4. Software Security

MentorEase is compliant to 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.

5. Compliance

5.1. 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 Mentoring Program you must be over 18 years old.

5.2. Personal Information Protection and Electronic Documents Act (PIPEDA)

MentorEase complies with PIPEDA privacy protections.

6. Contact

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

SFTTrain@sunlife.com