# eNavigate Consulting Inc.

## **Data Security Statement and Privacy Policy**

### **Data Security Statement**

We take our users' security and privacy concerns seriously. Working closely with our Software as a Service provider, we strive to ensure that user data is kept securely, and that we collect only as much personal data as is required to provide our services to users in an efficient and effective manner. Our provider uses some of the most advanced technology for Internet security that is commercially available today. This Security Statement is aimed at being transparent about our security infrastructure and practices, to help reassure you that your data is appropriately protected.

All data associated with our service is stored only in Canada – our SaaS provider is a 100% Canadian service, with all infrastucture and data storage is physically located in Montreal, Quebec, Canada. In addition, all SaaS staff are located in Canada.

Data centers are staffed and surveilled 24/7. Access is secured by security guards, visitors logs, and entry requirements such as passcards and biometric recognition.

When your exercise is completed and all services (Tier 1 and Tier 2) have been fully rendered, all data submitted is deleted from our infrastructure. No data is shared with third parties.

All other communications with our web site and learning platform is sent over SSL/TLS connections. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) technology (the successor technology to SSL) protect communications by using both server authentication and data encryption. This ensures that user data in transit is safe, secure, and available only to intended recipients.

Firewall restricts access to only required ports for the operation of our platform.

Secure VPN, PKI, multifactor authentication, and role-based access is enforced for systems management by authorized engineering staff.

Our servers are proactively monitored for any malicious intrusion attempts.

Backups occur bi-hourly internally, and daily to a centralized backup system for storage in a separate data centre cluster in Canada.

### **Privacy Policy**

When you register with eNavigate Consulting Inc, we collect very basic information including your name, email address, phone number, and current employer. This personal information is private, we will never share it.

With your authorization, we may use some information collected from you to help diagnose technical problems, and improve the quality and types of services delivered.

We will send you strictly service-related announcements when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email.

Based upon the personally identifiable information you provide us, we will send you a welcoming email to verify your email address and registration. We will also communicate with you in response to your inquiries, to provide the services you request, and to manage your account.

Our servers are protected with generally available security technologies, including firewalls and data encryption. Our servers are located in a PCI-DCSS compliant, secure data centre in Montreal, Quebec. The PCI-DCSS security standard was created by the Security Standards Council. These technologies are designed to prevent unauthorized access.

All data collected via our platform is stored only on infrastructure physically located in Canada. Our SaaS provider and eNavigate have no affiliates outside of Canada, and no foreign body has authority to compel the production of information.

Our SaaS provider and eNavigate are compliant with PIPEDA (The Personal Information Protection and Electronic documents Act) which helps companies meet the mandatory provisions of the protection of person information. These provisions include, but are not limited to, the following:

- Consent must be garnered for collection of personal information
- Collection of personal information limited to reasonable purposes
- Limits use and disclosure of personal information
- Limits access to personal information
- Stored personal information must be accurate and complete
- Designates the role of the Privacy Officer
- Policies and procedures for breaches of privacy
- Measures for resolution of complaints
- Special rules for employment relationships

#### Any questions regarding this policy should be addressed to support@enavigate.ca.