



Privacy Policy

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The Commercial Vehicle Solutions Network (CVSN)'s Compass 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.

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, mailing address, organization, job title, job level, tenure, education background, demographic information (optional), and social media profile links (optional)
- * 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 web analytics tools currently in use, including Google Analytics.



2. What is the Information Used For

2.1 Basic usage of the software

MentorEase uses the information on behalf of CVSN for managing the Compass program, which includes:

- * Enabling use of the Platform through the ability to match and communicate among Users
- * Compass program managers 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

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 Compass 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 CVSN and does not sell information to any third-parties.

3.1 Third-Parties that require some information disclosure

As required by CVSN, 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 MentorEase is acquired by another company

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 CVSN who will notify the Users about the change of ownership.



4. Software Security

MentorEase is compliant with 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, protections against the Open Web Application Security Project (OWASP) Top Ten vulnerabilities, exclusive data residency on US servers, disk encryption, firewalls, intrusion detection and others. Your data will be retained for the duration of your participation in the Compass program and for a reasonable period thereafter, or as required by law. You may request deletion of your account and data at any time by contacting CVSN.

5. Compliance

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

The Compass program and platform are intended for use by adults only and are not directed at children under 18. We do not knowingly collect personal information from children under 18. To participate in the Compass program you must be over 18 years old.

5.2. Personal Information Protection and Electronic Documents Act (PIPEDA), California Consumer Privacy Act (CCPA/CPRA) and Equivalents per Each State

MentorEase complies with the Canadian PIPEDA, California's CCPA/CPRA and every other USA state equivalent privacy protections (for example, Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA)).

5.3. General Data Protection Regulation (GDPR)

MentorEase complies with the GDPR requirements for EU users. MentorEase is the Data Processor while CVSN is the Data Owner.

6. Data Subject Rights

Depending on your location and applicable privacy laws (such as the GDPR, UK GDPR, PIPEDA, CCPA/CPRA, or other equivalent legislation), you may have the following rights regarding your personal information:

6.1. Right of Access

You have the right to request confirmation of whether we process your personal information and to obtain a copy of the personal



information we hold about you, along with details about how and why we use it.

6.2. Right to Rectification

You have the right to request that we correct any inaccurate or incomplete personal information we hold about you.

6.3. Right to Erasure (“Right to be Forgotten”)

You have the right to request that we delete your personal information in certain circumstances (for example, when the information is no longer necessary for the purposes for which it was collected, or when you withdraw consent and there is no other legal basis for processing).

6.4. Right to Restriction of Processing

You have the right to request that we restrict the processing of your personal information in certain situations (for example, while we verify the accuracy of the information or assess a notice of objection).

6.5. Right to Data Portability

Where technically feasible, you have the right to receive your personal information in a structured, commonly used, and machine-readable format, and to request that we transmit it to another organization.

6.6. Right to Object

You have the right to object to the processing of your personal information in certain circumstances, including processing based on legitimate interests or for direct marketing purposes.

6.7. Rights Related to Automated Decision-Making and Profiling

You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal or similarly significant effects concerning you, except in specific circumstances permitted by law.

6.8. Right to Withdraw Consent

Where we rely on your consent to process personal information, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing that took place before the withdrawal.

6.9. Right to Lodge a Complaint

You have the right to lodge a complaint with a supervisory authority or data protection regulator in your jurisdiction if you believe our processing of your personal information violates applicable law.



How to Exercise Your Rights

To exercise any of the rights listed above, please contact us using the details provided in the “Contact” section of this Privacy Policy.

We may need to verify your identity before processing your request. We will respond to your request within the timeframes required by applicable law (typically within 30 days, or as otherwise specified by local legislation).

Please note that these rights are not absolute and may be subject to limitations or exemptions under applicable law (for example, where disclosure would adversely affect the rights and freedoms of others, or where we are legally required to retain certain information).

7. Data Breach Notification

We take the security of personal information seriously and have implemented appropriate technical and organizational measures to protect it against unauthorized or unlawful processing, accidental loss, destruction, or damage.

7.1. What is a Data Breach?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal information transmitted, stored, or otherwise processed by us.

7.2. Our Response to a Data Breach

In the event of a personal data breach, we will:

- * Promptly investigate the incident to determine its nature, scope, and impact
- * Take immediate steps to contain the breach and mitigate any harm
- * Assess the risk to affected individuals
- * Notify the relevant supervisory authority or regulatory body where required by applicable law
- * Notify affected individuals without undue delay when the breach is likely to result in a high risk to their rights and freedoms (or as otherwise required by law)
- * Document the breach, our response, and any remedial actions taken

7.3. Notification to Authorities

Where required under applicable law (for example, under the GDPR, PIPEDA, or other relevant legislation), we will notify the competent supervisory authority or privacy regulator of a personal data breach within the legally mandated timeframe (typically within 72 hours of



becoming aware of the breach under the GDPR, or as soon as feasible under other laws).

7.4. Notification to Affected Individuals

When a breach is likely to result in a high risk to the rights and freedoms of individuals, or when required by applicable law, we will notify affected individuals without undue delay.

Such notification will typically include:

- * A description of the nature of the breach
- * The categories and approximate number of individuals and records concerned
- * The likely consequences of the breach
- * The measures taken or proposed to address the breach and mitigate its possible adverse effects
- * Contact details for further information

7.5. How We Will Contact You

We may notify you by email, written notice, or other appropriate means using the contact information we hold for you. In some cases, we may also provide public notice if it is not possible to contact affected individuals individually.

7.6. Your Responsibilities

If you believe your personal information has been compromised or you become aware of a potential security incident involving our systems or services, please contact us immediately using the details provided in the "Contact" section of this Privacy Policy.

8. Contact

For any questions about this Privacy Policy please contact CVSN at compass@cvsn.org, info@cvsn.org or MentorEase at:

Giant Step Inc. (MentorEase is a trademark of Giant Step)
Gil Katz, Director of Operations
406 Spadina Avenue, Toronto
M5T 2G7 Ontario, Canada
gil@mentorease.com
+1.416.596.0800