



## PRIVACY POLICY

### General Statement

The Massachusetts Medical Society (MMS) 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") located in Toronto, Ontario, Canada. 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"). Information participants provide will be stored in Microsoft server facilities located in the United States of America, and secured using multiple web security procedures and in compliance with all applicable laws.

MentorEase and MMS are dedicated to maintaining high standards of confidentiality and privacy regarding the Personal Information received from all users of the Platform in accordance with all applicable privacy legislation.

Information entered into the online mentoring platform will be viewable by the program administrator(s); however, all information will be held confidential and used solely to administer the program, except to the extent the program administrator(s) or others have a legal or other obligation to share it. Any reporting of demographics or input by program participants will be in aggregate form only.

### 1. Information Collected

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

MMS and MentorEase collect information to determine program eligibility, to match mentors and mentees, and to facilitate communication and program review.

Some of that information may be shared with a potential mentoring partner:

- \* Profile-related contact information, such as name, phone, email and more
- \* Matching-criteria related information, such as employment information, skills, and topics of interest
- \* Responses to open-ended questions –in which participants might 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 user's IP address, any activity on the site and any data available through Google Analytics or similar web activity tracking tools.

## **2. Uses of the Information**

### **2.1 Basic usage of the software**

MentorEase and MMS use the information to administer and manage the mentoring program, including matching mentors and mentees and facilitating communication and program reviews. Specifically, information will be used for:

- \* Matching and communication among users through the Platform;
- \* Reporting, in the aggregate only, of demographic and other data;
- \* 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;
- \* Analyzing User activity to assess the status of the program;
- \* Collecting testimonials with permission for marketing the program;
- \* Analyzing all activity to improve the overall software and marketing the software with permissions;
- \* Adhering to any applicable 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 and MMS Disclose and When

All information will be held confidential and used solely to administer the program, except to the extent the program administrator(s) or others have a legal or other obligation to share it. Any reporting of demographics or input by program participants will be in aggregate form only.

#### 3.1 Third-Parties that require some information disclosure

Administration of the program may require that the software be integrated with Third-Party services like SurveyMonkey, MailChimp, Google Analytics, LinkedIn or others ("Third Party Services") for specific use cases and added functionality. In that event, some information (such as name and email address) will be shared with those Third Party Services. Those third parties are not subject to the control of MMS or MentorEase, and have their own separate privacy policies describing the information they collect and how they use it.

#### 3.2 Compelled Disclosure

MentorEase and MMS may disclose information if required by:

- \* Government agencies and/or law enforcement
- \* Applicable law, regulation or court order
- \* Resolution of a case of misuse of the software to harm human or property rights
- \* Proceedings in a legal case or investigation

#### 3.3. Sale of MentorEase

If Giant Step, Inc. plans 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 Giant Step, Inc. (MentorEase) does today. In such an event, MentorEase will notify MMS of the sale, and MMS may notify the Users about the change in 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 user data only as long as MMS requires and as required by law.

## **5. Compliance**

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

COPPA does not apply to MentorEase, as a user must be over 18 years old to participate in the Program. 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.

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

MentorEase complies with PIPEDA privacy protections.

### **5.3 Health Insurance Portability and Protection Act (HIPAA)**

MentorEase is not HIPAA-compliant. Please do not include any protected health information of a patient in the platform.

## **6. Contact**

For any questions about this Privacy Policy please contact

MentorEase at:

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