

DATA PROTECTION AND PRIVACY FREQUENTLY ASKED QUESTIONS (FAQ).

iTalentPro Group of Companies ('iTalent') treats data confidentiality and the privacy its clients' information and records very seriously and is committed to ensuring personal privacy is protected while meeting its obligations to relevant stakeholders such as Customers, approved statutory bodies and third parties. It complies with all relevant Data Privacy laws, regulations and/or policy when it collects, processes, uses and retains such personal information about any third party, which is necessary to use the Service provision.

What data does iTalent collect?

iTalent collects data regarding clients' staff, programs and policies that comply with federal and state laws, regulations, and requirements. iTalent's Standard Operating Procedures provide a guideline for the data collected for processing and to be retained within the system, the frequency of collection, and the source of the mandate (state, or other requirement) that necessitates the data collection.

How does iTalent use data?

iTalent uses data to analyze, process and generate reports used by HR personnel and management for the effective and efficient human capital management. Such reports, evaluations, and studies are designed to ensure compliance with federal/state reporting requirements, and iTalent's teams to provide technical assistance and support, and ensure the effective and judicious use of the resources.

How does iTalent securely connect workloads on the cloud-based server?

iTalent uses one of the most secure connectivity options available, for its system cloud hosting service that is via the use of a VPN connection (IPSec and OpenVPN), Secure Sockets Layer (SSL) that sends information through cryptographic protocols that provide communications security between the server and iTalent's system. In order to ensure that the connection is more secure, penetration (for external system connections) and vulnerability tests are done by the Product team every six (6) months.

iTalent is certified by ISO 27001:2013, a world class Information Security Certification as we acknowledge that protection of Client and iTalent's data and assets is vital to the success of our business. To this end, we have established an Information Security Management System that



operates in all the processes required to identify the information we need to protect and how we must protect it.

How does iTalent protect confidential data?

iTalent implements technical and security-related protections to ensure that confidential data are only accessible to authorized persons. For example:

- i. All the staff in iTalent are bound by a Non-Disclosure Agreement (NDA) to ensure that no company information is leaked to outsiders and unauthorized persons.
- ii. All clients provide consent for the use of data through agreeing to terms of the Service Agreement and acknowledgement of Privacy Policy which sets out the terms on which iTalent processes any personal data collected from the client, or that the client has provided, which is necessary to manage and administer the Services provided.
- iii. All confidential data are stored on secure servers behind stringent multi-level firewall protections and monitored by sophisticated intrusion detection software.
- iv. Data are only accessible to persons with the requisite system service authorization approvals and access is limited to only those concerned with the processing of the data. This authorization is given to teams servicing a particular client, for instance, certain members from the Product team and Client Servicing team will be assigned to a particular client. Only they shall have access to this client account.
- v. iTalent does not permit the use of the system outside working hours and office premises unless for the purposes related to the business.
- vi. iTalent has systems, policies and procedures set to ensure data protection, these policies and procedures are certified under ISO 27001:2013 as valid and verified Information Security Management Systems.

Does iTalent provide client's data to the government?

No. iTalent does not provide any client information data to the government.

Does iTalent retain ownership of all confidential data?



No. iTalent uses, processes and retains the confidential data for the contractual period of service provision only. Upon completion of the contractual period, all data that is collected from the client or generated as a result of using the system will be returned to the client. Any other information relating to the client will be erased or destroyed accordingly.

