

For Questions regarding Data Protection, Data Handling, or other technical concerns contact Craig Boyles, Director of Operations, craig@gcntraining.com

Section A: Privacy Policy

Your privacy is very important to us. Accordingly, we have developed this Policy in order for you to understand how we collect, use, communicate, disclose and make use of personal information. The following outlines our privacy policy.

- Before or at the time of collecting personal information, we will identify the purpose(s) for which the information is being collected.
- We will collect and use personal information solely with the objective of fulfilling those purposes specified by us and for other compatible purposes, unless we obtain the consent of the individual concerned or as required by law.
- We will only retain personal information as long as necessary for the fulfillment of those purposes.
- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, and, never sold or shared with 3rd parties.
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.
- We will make readily available to customers information about our policies and practices relating to the management of personal information.

We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

Section B: Data Security

While we only require/retain basic information needed for record keeping of tutorial progress, we have made every effort to maintain and secure all information stored in our systems.

- SSL Certificated: Dedicated Server, CDN, FTP
- Managed Backup: Daily Differential, Bi-Weekly Full - 3 day retention
- Fully Managed/Updated OS and Anti-Virus Software

Data Elements stored: (provided by Organization if not otherwise noted)

- **First Name**
- **Middle Initial**
- **Last Name**
- **Email Address** (if not provided by Organization, provided by User)
- **User ID** (if not provided by Organization, provided by User)
- **Position**
- **Location**
- **5-digit PIN** (if enabled by Organization, provided by User)

Section C: Data Security Terms

The statements below reference the policies in place in the handling of *Personally Identifiable Information* (PII) for the specific uses in the services provided by Global Compliance Network, Inc. (GCN).

The type of PII stored on GCN is considered *Directory Information*, which includes details such as name, address, phone number and email address – although GCN does not require/request all of these items.

i. Physical Safeguards

All electronic information is stored within devices accessible only to GCN Staff or subcontracting agencies working on the behalf of GCN. The physical locations wherein information is stored remain under the full control of GCN Staff or the subcontracting agencies.

ii. Encryption in Motion (HIPAA Compliant)

All cloud services used for the transmission of PII utilize SSAE 16 audited data centers and use AES 256-bit encryption (SSL/TLS protocols) to comply with HIPAA standards.

iii. Staff Training

All GCN staff are trained in the proper use of transferring and retaining of PII data. Subcontracting agencies are provided only the information needed to conduct their specific capacities, however in the case that increased access is required GCN will ensure or provide the necessary training as needed.

iv. Breach Plan and Notification

If a breach is detected GCN will assess the type, physical or digital, and scope of the breach, and immediately take steps to contain the breach and prevent re-occurrence. When necessary, GCN will submit any evidence to relevant authorities, including but not limited to: IP addresses, security footage, malicious file diagnostics, log files; and inform the organizations affected by the breach.

v. Access Control to only those with Educational Interests

Data and information stored on GCN is not sold in any way. Access is limited to GCN staff, end-users and organization administrators working on behalf of end-users, as part of the GCN service.

vi. Data Return or Destruction upon Contract End or Termination

Due to the nature of our service (recordkeeping in the case of an audit), the data retained within GCN is “destroyed” only at the written request of the contracted organization, at which time a digital backup of the data is provided to the organization for further record keeping. Upon contract end/termination, data will be retained for up to 10 years unless otherwise noted as mentioned above.

vii. Changes to Organization Point of Contact

Should any of the contacts on this document change, email notices will be distributed with updated information.

viii. Ability to Challenge Data Accuracy

The data contained on GCN is provided either by the contracted organization or directly from the end-user during the course of the session, however this data and any logs of the creation of this data (within 6 months) can be requested for accuracy verification. Please contact data@gcntraining.com for such inquiries.

ix. Subcontractor Security Protocols

All subcontracted agencies are operating at or above the standards set by GCN. All data transmitted is done so internally using SSL/TLS protocols and any data stored is under the complete control of GCN or individuals directly working on behalf of GCN. Furthermore, subcontracted agencies are provided only internal ID numbers (non-PII) and limited directory information in order to fulfill the necessary actions in the GCN program.

All other service or contract questions can be directed to Lisa Tyler Kiebler, President, lisa@gcntraining.com