

BalaBoss

Protection of Sensitive Information

1.1.1 Canadian Perspective – PIPEDA Protection of Personal Information

Personal data protection is governed by "PIPEDA" *Personal Information Protection and Electronic Documents Act* (Canada) R.S.O. 2000, c.5.

BalaBoss enforces PIPEDA policies as follows:

- BalaBoss only collects, uses, and discloses client data in compliance with the consent of the client, to which such client data relates, and all applicable legislation, including without limitation, PIPEDA and any applicable laws or regulations in the jurisdiction of the applicable clients.
- BalaBoss employees are not allowed to access client information with the exception of troubleshooting technical issues.
- All employees have signed PIPEDA compliant non-disclosure agreements.

1.1.2 U.S. Patriot Act Implication to Hosting Locations

The Patriot Act precludes the use of any U.S. based facility for clients in Canada.

- Canadian hosting partners are not located in the U.S., nor are their subsidiary companies of U.S. parent companies. This protects data from the implications of the U.S. Patriot Act.

1.2 Secure Disposal of Servers and Information

Upon decommission of servers and workstations, disks are erased to DoD 5220.22-M standards (<http://www.dtic.mil/whs/directives/corres/html/522022m.htm>).

Operating System	Tool	Reference
Linux (shared and dedicated service model)	Secure Hard disk Eraser	http://www.linux-kurser.dk/secure_harddisk_eraser.html
Windows workstations (developer and support)	Zdelete	http://www.zdelete.com/eraser.htm

These applications both perform a three (3) pass erase, as recommended by the DoD standard.

Staff Security

All employees are required to sign an agreement to confirm that they have read and understood the company policies and procedures.

Development group is physically separated from other groups such as support, testing and administration staff.

All employees and contractors with access to client data are required to pass criminal background and credit checks.

Developer's Relationship with BalaBoss

All developers are full time employees of BalaBoss's development partner.

Developers all must sign a comprehensive non-disclosure agreement.

All developers must pass criminal background and credit checks.

No third party contractors are used.

No development work is outsourced.

All development work takes place in a single location – the BalaBoss development offices at 111 Peter Street, Toronto Ontario, M5V 2H1 Canada.