

# AvanTax Filing Services

by ELM Computer Systems Inc.

## Data Protection & Security Policies Summary

v. 1.4 – October 4, 2023

In the event of a discrepancy between this document (Data Protection & Security Policies – Summary) and the Terms of Service (<https://www.WeFileTaxSlips.com/Terms.pdf>), the provisions outlined in the Terms of Service shall prevail.

### Client Data

- Client data must be encrypted in transit and at rest.
- Client data must be stored on encrypted storage.
- Client data must not exist outside of the data folder(s) assigned to the client.
- Backups of Client data will be done in accordance with ELM’s backup policy.
- Backups of Client data must not exist outside of the data folder(s) assigned to the client.
- Backups of Client data must be retained for the shortest time possible to complete contracted work.

### Data Security

- ELM will implement and adhere to security best practices in all aspects of product development, deployment, and operations.
- Security is incorporated into all software and services and is regularly tested.
- ELM conducts ongoing security vulnerability testing and regular security audits to ensure continued compliance with its strict security standards.
- Terms of Service: Item “3. Confidentiality” provides details on Data Security

### Data Retention

- Upon completion of processing, ELM will:
  - Compress Client data & reports into a compressed (7z or ZIP) file and place it in Client’s secure portal.
  - Inform Client that the data has been made available for download and request that Client confirm receipt of data.

- Unless otherwise requested in writing by Client, ELM shall delete its copy of Client data after 60 days or on receiving Client confirmation of receipt of data (which will be understood as a request to delete the data), whichever comes first.
- Backups containing Client data will be deleted in accordance with our internal backup policy
- If Client requires additional work to be performed (for example, to file amendments or additional slips) Client will upload the necessary data files to Client's secure portal. When the additional work is completed, the aforementioned data retention policies will be followed.

### Security Incident Response

- In the event of a security incident ELM will:
  - take immediate, appropriate and reasonable action to contain the incident.
  - promptly notify Client of the incident;
  - assist Client by taking any actions that Client and ELM agree are necessary;
  - take any other appropriate and reasonable actions to ensure that such Incident or potential Incident will not recur.