



PRIVACY POLICY

Stilo SaaS Solution Privacy Policy

APPROVED BY:	CEO	CLASSIFICATION:	Public
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Applies To: All cloud and hosted software services operated by Stilo Corporation, including Migrate, OptimizeR, Analyzer, and related support portals.

1. Our Commitment to Privacy

Stilo Corporation (“Stilo”, “we”, “us”, or “our”) is committed to protecting the privacy and personal information of individuals who use our software-as-a-service (SaaS) platforms.

We design and operate our products in alignment with the principles of **ISO 27701 (Privacy Information Management System)** and applicable privacy laws, including:

- Canada’s *Personal Information Protection and Electronic Documents Act (PIPEDA)*
- the *General Data Protection Regulation (GDPR)* in the European Union
- the *California Consumer Privacy Act (CCPA)* in the United States, and other relevant legislation.

We support and are fully committed to achieving compliance with these laws and any contractual privacy obligations agreed between Stilo and its customers, partners, suppliers, and subcontractors.

2. Roles and Responsibilities

Depending on the service provided, Stilo may act as:

- a **Data Processor (PII Processor)** – when we process personal information on behalf of our customers, following their documented instructions; or
- a **Data Controller (PII Controller)** – when we collect personal information directly through our websites, user accounts, or marketing activities.

All roles and responsibilities for handling personal identifiable information (PII) are defined and allocated within our contractual agreements.

Our contracts clearly specify:

- the nature and purpose of the processing,



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APPROVED BY:	CEO	ISSUE DATE:	October 30, 2025
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- the categories of PII involved,
- each party's responsibilities and data protection obligations, and
- notification and cooperation requirements in the event of a privacy incident or data breach.

3. Personal Information We Process

We process limited personal information necessary to deliver our SaaS services, including:

- Account registration details (e.g., name, email, organization, credentials)
- Usage and activity data within the solution
- Customer-submitted content for processing (e.g., XML or document conversions)
- Support correspondence and audit logs

We do **not** sell or use customer data for marketing purposes.

4. Lawful Basis and Purpose

Personal information is processed lawfully and fairly, for specified and legitimate purposes only.

We use your data to:

- provide and maintain our SaaS services;
- support and secure your account;
- comply with contractual and legal obligations; and
- improve our systems and ensure service quality.

5. Security and Data Protection

Stilo applies ISO 27001 and ISO 27701 certified controls across its infrastructure, including:

- encryption of PII in transit and at rest,



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- multi-factor authentication and role-based access control,
- logging and monitoring of all access to PII, and
- annual privacy and security audits.

Access to personal information is limited to authorized personnel with a legitimate business need. All employees, contractors, and partners are required to sign confidentiality or non-disclosure agreements before accessing any PII.

6. International Transfers

Where personal information is transferred across jurisdictions, Stilo ensures adequate safeguards through standard contractual clauses, encryption, and data-transfer assessments consistent with ISO 27701 §8.5.1–8.5.2. Our customers are notified of all subcontractors and hosting locations used for data processing.

7. Data Retention and Deletion

Personal information is retained only as long as required to provide the services or as mandated by law or contract. Upon termination or at customer request, PII is securely deleted or anonymized. Backup restorations of PII are logged, including date, time, and person authorizing the action.

8. Return, Transfer, and Disposal of Customer PII

Upon termination of a subscription, upon the conclusion of a processing engagement, or at the Customer's written instruction, Stilo will securely return, transfer, or dispose of Customer PII processed on the Customer's behalf.

Stilo will, as applicable:

- Return Customer PII in a mutually agreed, secure, and accessible format;



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- Transfer Customer PII to a designated third party using encrypted and authenticated transfer mechanisms;
- Delete or destroy Customer PII from active systems once it is no longer required for the contract or identified processing purposes;
- Ensure Subcontractor Deletion — all authorized subcontractors engaged in the processing of Customer PII will complete corresponding deletion or return actions;
- Limit Backup Retention — immutable system-level backups that may incidentally contain Customer PII are retained only through their standard lifecycle and are not modified to remove individual records;
- Provide Confirmation — upon request, Stilo will provide written confirmation of the completion of return, transfer, or deletion actions.

These commitments are part of Stilo's ISO 27701-aligned Privacy Information Management System and are available to customers on request.

9. Your Rights

Individuals have the right to:

- access, correct, or delete their personal information;
- object to or restrict processing; and
- lodge a complaint with an applicable supervisory authority.

Requests may be sent to privacy@stilo.com or through the contact form on our website.

10. Third-Party and Sub-Processor Obligations

All partners, suppliers, and subcontractors who handle PII on behalf of Stilo are contractually required to:

- comply with applicable privacy laws and ISO 27701 controls;
- maintain confidentiality and implement equivalent technical and organizational measures; and
- cooperate with Stilo in managing privacy risks or responding to privacy incidents.



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11. Changes and Updates

This policy is reviewed annually and updated as necessary to reflect new legal requirements or service changes.

The most recent version will always be available at
<https://docs.stilo.com/saas/Solution-Privacy-Policy.pdf>.

12. Contact Information

Privacy Officer
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Ottawa, ON K1R 7X6, Canada
privacy@stilo.com