ShareGate:

Sharegate Security and Compliance Overview

Sharegate Desktop is a product made by Montreal-based software development firm Groupe Sharegate Inc., a subsidiary of Groupe GSOFT Inc.

Since our first line of code was written in 2009, our team has grown from 5 to 130. With each new addition, our culture has taken on a life of its own. We’re really good at what we do, because we love what we do. Our software is designed with the same simplicity and happiness-driven attitude. With over 10,000 clients across 90 countries, we have grown to be the leader in SharePoint & Office 365 management around the world.

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ShareGate:

Company Identification

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Groupe Sharegate Inc. (Sharegate Group Inc.)</th>
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<tr>
<td>Trading name (doing business as)</td>
<td>Sharegate</td>
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<tr>
<td>Type/Category</td>
<td>Desktop Software</td>
</tr>
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<td>Legal Entity Type</td>
<td>Business incorporated under the laws of Québec, Canada (Private Corporation)</td>
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<tr>
<td>Registered Company Address</td>
<td>1751 rue Richardson, suite 1050 Montréal, Québec, Canada H3K 1G6</td>
</tr>
<tr>
<td>Telephone Number</td>
<td>1-855-980-8423</td>
</tr>
<tr>
<td>Company Registration Number (NEQ - Québec Enterprise Number)</td>
<td>1168363837</td>
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<td>Business Start Date (Year Founded)</td>
<td>June 27th, 2012</td>
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<tr>
<td>Number of employees</td>
<td>130</td>
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<tr>
<td>Shareholder (Ownership)</td>
<td>Groupe GSOFT Inc.</td>
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<tr>
<td>Directors</td>
<td>Simon De Baene, Sébastien Leduc, Guillaume Roy</td>
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<td>Officers (Management)</td>
<td>Simon De Baene (president), Sébastien Leduc (VP), Guillaume Roy (VP)</td>
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ShareGate:

Description of the product

Sharegate Desktop: Security, Reporting and Migration for Microsoft SharePoint and Office 365.
Website: sharegate.com

Description

- Sharegate Desktop is an On-Premises desktop application, meaning that it works within your environment and runs on your hardware. Sharegate Desktop can be used offline.
- We grant licenses for Sharegate Desktop for a specific period of time (12, 24 or 36 months). We do not offer a perpetual license. This license provides you with an access to a number of seats (1-5-25 seats). A seat is defined as a specific user on a specific workstation. For example, if you buy a one-seat license, you'll be able to activate Sharegate for one user on one computer only. However, the license can be transferred from one workstation user session to another (see this how to guide on our blog).
- The End User License, Maintenance and Support Agreement for Sharegate Desktop is available at https://sharegate.com/terms

Features

- Migration: Sharegate Desktop is built to migrate Microsoft SharePoint and Office 365’s content. Migrate entire site collections or the exact content or structure you want to move: sites, libraries, lists, work flows, Nintex work flows & forms, documents, and much more.
- Reporting: We've simplified reporting & administrative tasks by providing more than 30 built-in reports to help you complete the complex and repetitive work IT admins and power users must do every day.
- Security: Get a complete overview of your security by drilling down through your environments and instantly understand who has access to what. Validate and manage permissions on the spot, whether you're using SharePoint, Office 365, or both in a hybrid scenario.
- Content Management: Sharegate simplifies your Microsoft Office 365 and SharePoint management process by allowing you to easily clean and edit your content.

Updates

We make available patches, fixes, updates and/or enhancements for Sharegate Desktop regularly to ensure optimal performance and security. Updates may be automatic, unless you chose to deactivate automatic updates. Release notes are available here
Support

- Email-based technical support (support@sharegate.com) and telephone technical support (1-888-444-3168) are available as-needed during normal business hours (9AM to 5PM Eastern Time UTC/GMT -5 hours).
- We do not provide on-site technical support.

Information accessed by us

Sharegate Desktop programatically accesses the documents and data stored in your Microsoft SharePoint and Office 365 ("User Data") to perform its functions. Since it is an on-premise desktop application, our company does not have access to your User Data. ShareGate Desktop uses APIs from Microsoft SharePoint, Google Drive and Box.com. It also uses your local hard drive to perform the migration and if you use the Insane Mode, will use a provided storage account in Microsoft Azure. Therefore, your User Data is not stored and collected during the migration process.

In the context of providing support services, our support team does not have access to your User Data nor the machine hosting Sharegate Desktop but may require you to provide Diagnostic Data (see definition below) to investigate what prevents the normal functioning of the application.

Security and protection of information

Any confidential information received by our company is stored and processed in a manner consistent with industry security standards.

Transmission of information

Your User Data does not transit within our company servers during such process. For On-Premises migration, the migrated data is streamed in process memory to where Sharegate Desktop is installed to be transmitted to its final destination.

In the context of providing support services, when you activate the diagnostic mode in Sharegate Desktop, you may transmit to us, if you chose to, the migration report, the Sharegate Desktop error log, the copy manifest, the telemetric information captured during
the migration and the capture of Sharegate Desktop HTTP/HTTPS traffic stream ("Diagnostic Data"). Note that the Diagnostic Data may contain User Data and authentication information.

Both the Insane Mode O365 and the diagnostic mode rely on the Azure storage and all communications are encrypted by default. Since the User Data and the Diagnostic Data transit through your network, as long as the Microsoft SharePoint sites you are connecting to use "encrypted SSL/TLS connection" (HTTPS), the data received by or sent from Sharegate Desktop will be encrypted.

Employee

All of our employees commit themselves to confidentiality and have signed an employment contract which includes confidentiality obligations. Prior to hiring, all new employees are subject to a background check, which includes a verification with the Canadian Police Information Centre and the Royal Canadian Mounted Police for any national criminal records. Logical access is given on a need to know, least privilege basis, as per our access control policy. Access is controlled using the role-based access control model.

Disaster recovery plan

As explained earlier, we do not access your User Data; we only have access to the Diagnostic Data that you have provided in the context of using our support services. In case of a disaster, we do have a plan to recover the Diagnostic Data.

Sharegate Desktop Development

Sharegate Desktop is developed by our employees using agile methodologies. Continuous on the job training, including secure coding techniques, and coaching is provided to all developers. We do not have any outsourced development.

Extensive automated unit, integration and systems testing is executed on each increment to the codebase. Before any public release, extensive regression testing is performed to ensure that the software continues to adhere to design specifications. Our process for reviewing, testing and deploying code includes peer code reviews, automated and manual testing and repeatable build and release process. Testing includes security testing.

The test data is custom built for Sharegate Desktop and is segregated in our local development network. Test and development environments are separated from the live production environment. *No User Data is used for development purposes.*
Audit and certification

Given the nature of our business and the large number of clients, we do not provide audit rights. However, the company is taking all necessary measures to ensure that it will be in compliance with ISO 27001 and ISO 27002 standards within a reasonable timeframe.

Compliance with privacy laws

We take our obligations under data protection laws very seriously. We comply with applicable Canadian private sector data protection laws such as the Personal Information Protection and Electronic Documents Act (PIPEDA) and substantially similar provincial laws pertaining to the collection, use and disclosure of personal information.

Sharegate is also taking all necessary measures to ensure that it is GDPR compliant. Please click here to review our Data Processing Addendum, under which Sharegate formalizes its commitment to comply with GDPR. Among others, such contractual commitments guarantee that:

- Sharegate will be transparent and will never use your personal information other than as instructed by you.
- Sharegate will maintain appropriate technical and organizational security measures to protect your personal information.
- Sharegate will assist you when you have requests regarding your personal information processed in the context of our services.

Where applicable, this Data Processing Addendum is automatically incorporated by reference to the End User License, Maintenance and Support Agreement. You can also find our Data Processing Record by clicking here, where is described how Sharegate will be processing the personal information you share with us.

For further information, please visit https://sharegate.com/privacy-policy.

Sharing of personal information with third parties

We do not disclose User Data to third parties. However, when acting as data processor, we may use third parties to process the Diagnostic Data (which may contain personal information) in connection with the delivery or the improvement of the products and support services. We ensure that such third parties have reasonable data practices for maintaining the confidentiality and security of such information. All such third parties are Privacy Shield certified entities - the European Commission has recognized the Privacy Shield Framework.
adopted by the United States as providing adequate protection for the purpose of GDPR requirements. Please see the “Third Parties” section below.

Third Parties

Third parties that we may use, when acting as data processor, to process the Diagnostic Data (which may contain personal information) in connection with the delivery or the improvement of the products and support services.

<table>
<thead>
<tr>
<th>Third parties</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Microsoft Azure</td>
<td>Azure is our cloud computing platform where Sharegate’s internal database is hosted.</td>
</tr>
<tr>
<td>Zendesk</td>
<td>Zendesk is a customer service software and support ticketing system.</td>
</tr>
<tr>
<td>Slack</td>
<td>Slack is our internal team communication tool.</td>
</tr>
<tr>
<td>JIRA</td>
<td>JIRA is our bug and issue tracker.</td>
</tr>
<tr>
<td>Box</td>
<td>Box is our cloud content management and file sharing tool for support services.</td>
</tr>
</tbody>
</table>

Bankruptcy, offenses, litigation

There is no pending litigation against our business.

No bankruptcy order has been made for, or is being applied for, our business or any of its directors or shareholders. No composition or arrangement has been entered in for the benefit of our creditors nor has such arrangement been requested.

We tolerate no form of and do not engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law. Our business has not been found guilty of any offense in relation to an act of bribery or corruption.
Our business has not been found guilty of any offense in relation to competition legislation, trade sanctions or export controls.

Our business has not been found guilty of any offense in relation to financial crimes including fraud and money laundering.

Compliance with labor laws and human right laws

All of our employees are located in Quebec, Canada. We act in compliance with Quebec labor laws, which include among others, requirements with respect to working time and minimum wage.

We take responsibility for the health and safety of our employees and provide a healthy and safe working environment. Our business has not been found guilty of any offense in relation to health and safety related legislations.

We abide by the highest standards of international human rights and humanitarian law (including no slavery, no child labor, no human trafficking, no forced or compulsory labor, etc.). We ensure that there is no form of discrimination in the recruitment, compensation, promotion, access to training, termination and retirement of our employees and that our employees are treated with dignity and respect. Our business has not been found guilty of any offense in relation to human rights legislations.