

July 2023

## **Data Security in the GLO CMS (Community Management System)**

The protection of client's data is of critical importance to GLOvent Solutions. Handling sensitive client data is part of our core business and our right to exist would be threatened if we did not handle client data with the utmost care.

We have received and dealt with client data since the start of the company in 2006. We have since handled information of multiple clients, which, to date, included more than 600 communities, representing more than 130,000 database members. We are proud to say that to date we have not lost any of our client's data and are not aware of any technical leakages.

More information about GLOvent's general Privacy Policy as well as Terms of Use can be viewed on our website at: <https://www.glovent.net/disclaimers-privacy>

## **POPIA (Protection of Personal Information):**

The South African Protection of Personal Information Act, No 4 of 2013 promotes the protection of personal information by public and private bodies.

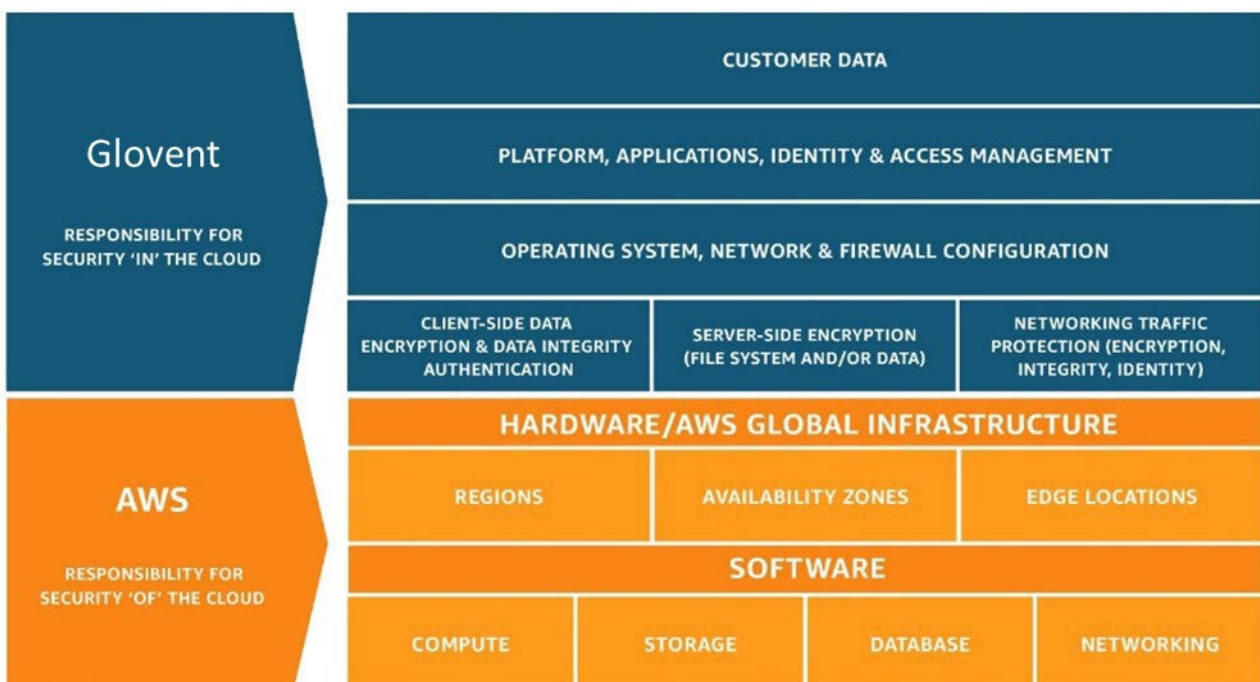
The Protection of Personal Information (POPI) Act has been signed into law in South Africa on 19 November 2013 and published in the Government Gazette Notice 37067 on 26 November 2013. Certain sections of the Protection of Personal Information Act (POPI) have already commenced (under proclamation No. R. 25, 2014), but it is only a few limited sections. The majority of POPI (especially the sections that create compliance requirements) commenced on 1 July 2020 with compliance required by 1 July 2021.

In relation to the above requirement, GLOvent Solutions has been certified as POPI Act Ready by IACT-Africa in accordance with the Protection of Personal Information (POPI) Act No.4 of 2013 Compliance Preparation Project. The certificate is attached in Annexure A.

## Technical Measures Implemented to protect Client Data:

GLOvent takes appropriate measures to prevent and minimize risks of unauthorised access. GLOvent will not disclose any personal information to a person/company who is not directly involved in the delivery of our products/services or without the customer's permission unless compelled by law/in terms of a court order to do so, or in the public interest or necessary to protect the rights and ensure the integrity and operation of its business and systems.

GLOvent Systems and Data are hosted on AWS (Amazon Web Services). By using AWS Services, GLOvent subscribes to the Shared Responsibility Model:



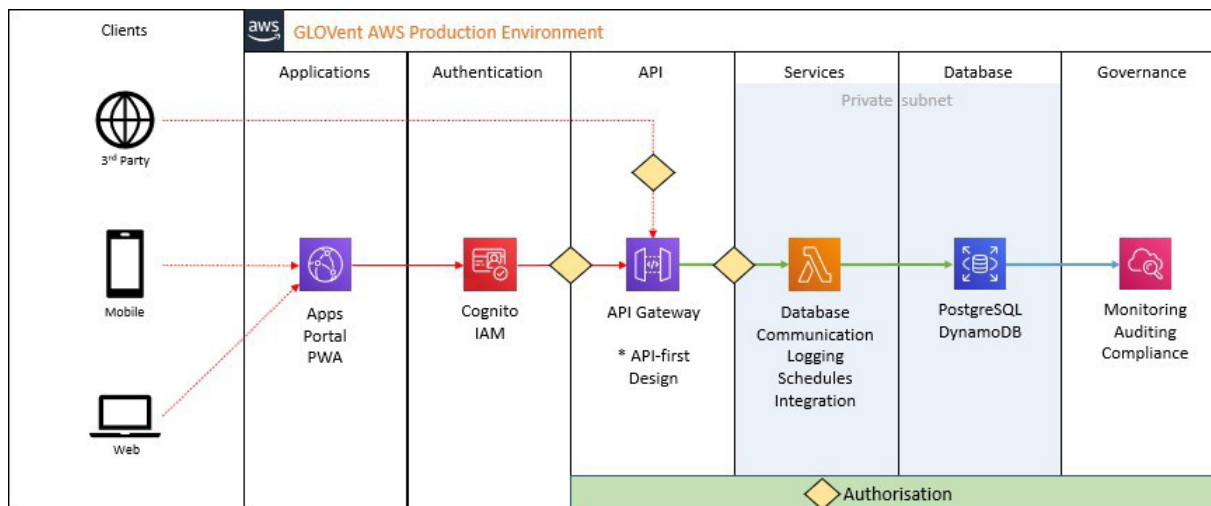
GLOvent uses a combination of IaaS (Infrastructure as a Service) and AWS Managed Services. When using AWS Managed Services like Amazon RDS for Database Management, AWS takes responsibility for security tasks like database patching, firewall configuration, and disaster recovery. For other services that make use of IaaS, the responsibility lies with GLOvent to perform all the necessary security configuration and management tasks.

All-access to AWS Resources is based on least privilege permissions to ensure only data and tasks required to deliver necessary services can be viewed and executed.

GLOvent has implemented a predominantly serverless architecture using Amazon Cognito to authenticate and authorise Users in the Apps and backend services to ensure limited

access and processing of data. Amazon Cognito supports encryption of data-in-rest and in-transit. Amazon Cognito is HIPAA eligible and PCI DSS, SOC, ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, and ISO 9001 compliant.

Below is a simplified overview of the GLOCMS Production Environment:



SSL (Secure Sockets Layer) is used by GLOvent to establish an encrypted link between our servers and a web browser accessing the GLOvent products. SSL is a connection standard security technology. (See details of our SSL Security Certificate in Annexure B below).

### Commercial Measures Implemented to protect Client Data:

Data security (with specific reference to the member’s personal information) is detailed in our standard Terms of Service. It is stated that GLOvent is not allowed to use the database for any other purpose than for the fulfillment of their agreement and is not allowed to make know or disseminate the database or any part thereof to any third party that is not directly involved in the delivery of the contracted products and/or services.

The Service Agreement also specifically notes that all data (including the member database, design elements, etc.) remains the property of the client and that GLOvent is to return this data to the client and destroy any copies thereof if requested.

*\* For more information on GLOvent Solutions and our products and services, please visit our website at [www.glovent.net](http://www.glovent.net). GLOvent can also be contacted at [info@glovent.co.za](mailto:info@glovent.co.za).*

## **Annexure A – POPIA Compliance Project**



This is to certify that

### **GLOVent Solutions**

Has completed the IACT-Africa  
Protection of Personal Information (POPI) Act No.4 of 2013 Compliance Preparation Project and is now

### **POPI Act Readiness Maintained**

The monitoring and maintenance of the compliance framework follows the successful completion of a POPI Act compliance preparation project in July 2022 in which appropriate, reasonable, organisational and technical measures, as required by the Act and in line with GLOVent Solutions' business, were successfully implemented. A satisfactory review of compliance measures by IACT-Africa in August 2023 has included the following:

- Review of internal and external assessments for POPI Act compliance
- Review of POPI Act compliance accountability structures
- Review of POPI Act compliance privacy notice and related policies
- Review of the assessment of risks to personal information and management thereof
- Review of personal information security measures
- Review of a Promotion of Access to Information Act-compliant manual
- Review of contracts and policies in line with POPI Act compliance requirements
- Review of areas in which personal information is stored and processed



A handwritten signature in black ink, appearing to read 'JCB'.

John Cato, Certified Data Protection Officer

[www.iact-africa.com/popi.html](http://www.iact-africa.com/popi.html)

**Issued date: 28 August 2023 – valid for 1 year**


# Annexure B – GLOCMS SSL Check


You are here: [Home](#) > [Projects](#) > [SSL Server Test](#) > [portal.glocms.net](#) > 13.35.125.5


SSL Report: [portal.glocms.net](#) (13.35.125.5)


### Summary


Overall Rating



Certificate 

Protocol Support 

Key Exchange 

Cipher Strength 

0 20 40 60 80 100

Visit our [documentation page](#) for more information, configuration guides, and books. Known issues are documented [here](#).

This site works only in browsers with SNI support.


This server supports TLS 1.3.

Source: <https://www.ssllabs.com/ssltest/analyze.html?>




- ✓ Common name : \*.glocms.net
- ✓ Alternative names (SANs) : \*.glocms.net, glocms.net
- ✓ Valid From Dec 08,2021 to Jan 06,2023
- ✓ Signature Algorithm : sha256WithRSAEncryption
- ✓ Issuer : Amazon






- ✓ Common name : Amazon
- ✓ Location : US
- ✓ Valid From Oct 22,2015 to Oct 19,2025
- ✓ Signature Algorithm : sha256WithRSAEncryption
- ✓ Issuer : Amazon Root CA 1





- ✓ Common name : Amazon Root CA 1
- ✓ Location : Scottsdale Arizona US
- ✓ Valid From May 25,2015 to Dec 31,2037
- ✓ Signature Algorithm : sha256WithRSAEncryption
- ✓ Issuer : Starfield Services Root Certificate Authority - G2





- ✓ Common name : Starfield Services Root Certificate Authority - G2
- ✓ Location : US
- ✓ Valid From Sep 02,2009 to Jun 28,2034
- ✓ Signature Algorithm : sha256WithRSAEncryption
- ✓ Issuer : Starfield Technologies, Inc.

Source: <https://comodosslstore.com/ssltools/ssl-checker.php>