



# Data Privacy and Data Protection Policy

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## I. Objective

This Data Privacy and Data Protection Policy (“Policy”) represents the commitment of ABCOSTING Produtos e Serviços Ltda. (“MyABCM”) to safeguarding the privacy and security, and its objective is to present the situations in which MyABCM carries out the processing of personal data, its security mechanisms and its compliance with the other requirements set forth in the General Data Protection Law (“LGPD”, in the Portuguese acronym).

In providing its services, MyABCM processes Personal Data with a legitimate and specific purpose, limited to what is necessary to achieve it, in accordance with the general principles established in the LGPD.

Therefore, this Policy will cover the Personal Data processed in the development of the activities of MyABCM and will regulate the Personal Data Processing by its employees, protecting the fundamental rights of freedom and privacy of each individual.

## II. Summary Table

<b>Who are we?</b>	ABCOSTING Produtos e Serviços Ltda, enrolled with the Corporate Taxpayer Registry of the Ministry of Finance (CNPJ/MF) under No. 00.138.349/0001-94, headquartered at Al. Joaquim Eugenio de Lima, 696, 16 <sup>th</sup> floor, suite 161, Jardim Paulista, Zip Code 01.403-000, São Paulo/SP, is the personal data Controller, unless otherwise stated.
<b>Data Processing</b>	We use Personal Data to provide our services, using the Data strictly necessary (i) for our operations and business purposes, and (ii) to provide customized advertisements to our audience, always in compliance with applicable Data Privacy and Protection Laws, according to Item V, below.
<b>Sharing</b>	Personal Data are shared (including internationally) only when necessary for the regular provision of our services and to fulfill business purposes, always in compliance with the applicable Data Privacy and Protection Laws, according to Item XI, below.
<b>Data Security</b>	All technical and organizational mechanisms currently employed to protect Personal Data against misuse and security incidents are used, always in compliance with the applicable Privacy and Data Protection Laws, according to Item X, below.
<b>Cookies</b>	In order to improve the experience on our website, we use cookies, safeguarding the right to oppose them, always in compliance with the applicable Privacy and Data Protection Laws, according to Item VI, below.
<b>Data Subject Rights</b>	Personal Data Subjects have several rights by virtue of the LGPD, including: requesting access, rectification, deletion, objection or other actions, which are fully ensured by MyABCM, unless legally determined otherwise, according to Item VII, below.

## Officer Contact Details

If you have any questions or if you want to exercise certain rights, please contact us via email [compliance@myabcm.com](mailto:compliance@myabcm.com), as detailed in Item XV, below.

### III. Definitions

In order to make the understanding of this Policy easier, the following concepts are defined:

- **Processing Agents:** the Controller and the Processor.
- **Anonymization:** The use of reasonable technical means available at the time of Processing, whereby a data loses the possibility of direct or indirect association with an individual.
- **National Data Protection Authority (“ANPD”, in the Portuguese acronym):** public administration body responsible for ensuring, implementing and overseeing the compliance with the LGPD throughout the national territory.
- **Legal Basis:** one of the 10 (ten) grounds that justify any personal data processing, set forth in Article 7 of the LGPD.
- **Controller:** natural person or legal entity, governed by public or private law, who is responsible for decisions regarding the Personal Data Processing.
- **Anonymized Data:** data relating to a Subject that cannot be identified, taking into account the use of reasonable technical means available at the time of Processing.
- **Personal Data:** any information related to a natural person that allows for their identification or makes them identifiable.
- **Sensitive Personal Data:** Data on racial or ethnic origin, religious belief, political opinion, affiliation to union or religious, philosophical or political organization, data relating to health or sex life, genetic or biometric data, related to a natural person.
- **Officer:** person appointed by the Controller or Processor to act as a communication channel between the Controller, the Data Subjects and the National Data Protection Authority (“ANPD”).
- **General Data Protection Law (“LGPD”, in the Portuguese acronym):** Law No. 13.709/2018, which came into force on September 18, 2020;
- **Processor:** Natural person or legal entity, governed by public or private law, who carries out the Personal Data Processing on behalf of the Controller.
- **Personal Data Subject:** natural person to whom the Personal Data object of the Processing refers (“Subject”).
- **International Data Transfer:** transfer of personal data to a foreign country or international organization of which the country is a member.

- **Processing:** includes any operation or set of operations carried out with Personal Data by automated or non-automated means, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, removal, assessment, information control, modification, communication, transfer, dissemination and/or extraction.

## IV. Principles for Personal Data Processing

In order to provide instructions for the correct Processing of Personal Data, the LGPD has established some guiding principles that will be mentioned and used in this Policy:

1. **PURPOSE:** The Personal Data Processing must only occur to achieve legitimate purposes, which must be specified and expressly informed to the Subject. **In this case, you should ask:** “Why am I processing this data?”
2. **ADEQUACY:** Compatibility of the Processing with the purposes informed to the Subjects and the activities effectively carried out. **In this case, you should ask:** “Am I processing the data for the same purpose that was previously agreed with the Subject?”
3. **NECESSITY:** The Personal Data Processing must be reduced to the minimum necessary to achieve its purposes. **In this case, you should ask:** “Are all these data really indispensable for my activity?”
4. **FREE ACCESS:** guarantee, given to the Subjects, of easy and free consultation on the form and duration of the Processing of their Personal Data. **In this case, you should ask:** “At MyABCM, can the Personal Data Subject exercise their rights, including having access to their data easily and quickly?”
5. **DATA QUALITY:** the Personal Data processed must be maintained accurately, clearly, appropriately and up-to-date, according to the necessity and for the fulfillment of the purpose of its Processing. **In this case, you should ask:** “Does MyABCM take care to verify and confirm the quality of the Personal Data collected?”
6. **TRANSPARENCY:** Data Subjects must be provided with clear, accurate and easily accessible information about the Processing, subject to trade and industrial secrets. **In this case, you should ask:** “Are the information provided with clarity and transparency to Subjects?”
7. **SECURITY:** use of technical and administrative measures capable of protecting Personal Data from unauthorized access and/or accidental or unlawful situations of destruction, loss, alteration, communication or dissemination. **In this case, you should ask:** “Is MyABCM adopting the appropriate security measures to protect Personal Data?”
8. **PREVENTION:** the need to adopt measures to prevent the occurrence of damage due to the Processing of Personal Data. **In this case, you should ask:** “Are there any measures I can take, for example, to mitigate the risks of data leakage?”
9. **NON-DISCRIMINATION:** do not use Personal Data for unlawful or abusive discriminatory purposes. **In this case, you should ask:** “With the Data Processing, am I, for example, selecting a certain type of person?”

- 10. LIABILITY AND ACCOUNTABILITY:** demonstration of the adoption of effective measures that prove the observance and compliance with the Personal Data protection standards. **In this case, you should ask: “How can MyABCM demonstrate that it has taken effective measures and is in compliance with the law?”**

## V. Types of Processed Data, Method of Collection and Purpose

The following information and personal data may be the object of processing by MyABCM:

### A. Representatives of Clients

- **Data for advertising and lead capture:** name, phone number, email, company for which they work, position held, company website, number of employees, country/region, which is collected by the contact form itself to send newsletters and e-books, and has the purpose of advertising and lead capture;
- **Data for 2<sup>nd</sup> level customer support:** name, email, phone number (optional), company name and distributor office, which is collected by email or specific form, and has the purpose of providing 2<sup>nd</sup> level customer support;
- **Data for IT service:** name, email and distributor office, which is collected by email or specific form, and has the purpose of providing IT service;
- **User data:** tables with usernames and documents used as login, which is collected by email or specific form and has the purpose of allowing access to the MyABCM information systems so that they can perform their duties properly;
- **Data for holding events such as Webinars and Workshops:** name, email, position, company for which the subject work, country and phone number, which is collected by the event registration form and has the purpose of sending advertising emails or even direct approach for demonstration of the MyABCM solution.

### B. Employees

- **Data for hiring:** name, Individual Taxpayer Registry (CPF), identity card number, address, bank details for payment, copies of proof of address and identification document, which is collected at the time of hiring and has the purpose of drawing up the contract.

### C. Representatives of Suppliers

- **Data contained in the description of the contract:** name, nationality, marital status, profession, CPF, identity card number, address, which is collected in the contract to be signed with the supplier/service provider and has the purpose of describing the company’s legal representative and drawing up the contract.

The processing of the personal data above may be grounded on the legal bases (i) of compliance with a legal obligation; (ii) of execution of contract or preliminary contract-related procedures; (iii) upon the provision of consent by the subject; and (iv) of the legitimate interests of the controller or third parties, except for other data processing cases.

## VI. Use of Cookies and Similar Technologies

MyABCM collects user location data in its virtual environment (<https://www.myabcm.com/pt-br/>) through Google Analytics. Furthermore, data are collected in the virtual environment through cookies.

### A. What are Cookies?

Cookies are small text files stored on each device to ensure the security of the virtual environment, help improve the functionality or adapt information to provide visitors with more relevant pages, and their authorization, collection consent and preferences regarding the use of cookies must be granted by website visitors.

### B. Which Cookies does our Website use and what are they for?

DESCRIPTION OF COOKIE	PURPOSE OF COOKIE	RETENTION PERIOD
Google Analytics	Analytical	Permanent
Google Ads	Marketing	Permanent
IPmeta	Analytical	Permanent

The cookies used by MyABCM have different purposes, such as: **(i) Analytical Cookies:** to collect data so that it is possible to issue statistical reports on the preferences of website users; **(ii) Marketing Cookies:** to target marketing ads according to their preferences, for more assertive communication.

All browsers allow the visitor to accept, refuse or delete cookies, namely by selecting the appropriate settings in the respective browser.

It should be noted that, by disabling cookies, some services may not work correctly, affecting the navigation on our website partially or totally.

## VII. Responsibility of each person

Every person has a level of responsibility related to how they carry out the Personal Data Processing in the performance of their activities, including MyABCM employees, suppliers, clients and partners - each of them being responsible for fulfilling and enforcing this Policy, in full compliance with the LGPD. Among the responsibilities of each person, it is worth highlighting:

### A. Top Management

The commitment of the Partners and Administrators (“Top Management”) is essential for the awareness and acculturation of all MyABCM employees.

Therefore, top management will be directly responsible for MyABCM complying with the legislation, as well as with applicable data protection laws, demonstrating the commitment to ethical and honest behavior, with the purpose of reinforcing the importance of the matter and supporting all the actions needed for the implementation of an effective data protection and privacy program.

### B. Personal Data Processing Officer

The Officer will act with full autonomy and will be responsible for monitoring and ensuring that MyABCM has an effective data privacy and protection program, as set forth in the LGPD. They will act as a communication channel between the company, the Data Subjects and the ANPD and report all issues related to the matter to Top Management.

The following are their main duties:

- Map, develop and create processes, flows, procedures and protocols related to the data protection and privacy sector, and manage the process of MyABCM's compliance with the LGPD;
- Receive requests, complaints and communications from Personal Data Subjects, provide explanations and take the appropriate measures so that their rights are respected;
- Receive communications and notifications from the ANPD and any other body or agency related to Personal Data Protection, provide the necessary explanations by presenting documents, and adopt measures;
- Guide MyABCM's employees, workers, partners and contractors on the practices related to personal data protection to be taken;
- Corroborate personal data protection impact reports periodically and whenever requested by the ANPD;
- Maintain and manage the record of personal data processing operations carried out, especially when based on legitimate interest;
- Instruct the Top Management on the decision-making process regarding personal data privacy and protection, and notify about any processes and protocols adopted that represent risks to personal data privacy and protection, assisting in the development of solutions and methods to mitigate such risks;
- Instruct and assist the Top Management and the press office in the event of an information security incident;
- Instruct the sectors on the choice of service providers and business partners for the office in order to ensure that they properly comply with the LGPD;
- Propose and coordinate periodic refresher training about the LGPD for employees, service providers and office partners;
- Monitor and oversee the application and effectiveness of the Data Protection compliance program, as well as new regulations and/or guidelines to be published by the ANPD.

### C. Data Privacy and Protection Committee ("CPPD")

The Data Privacy and Protection Committee ("CPPD", in the Portuguese acronym) is a permanent, multidisciplinary advisory body that will support the Officer in the performance of data privacy and protection routines, coordinating and overseeing the process of MyABCM's compliance with the LGPD. MyABCM's CPPD will include the Officer and representatives from the following sectors: **Business Management, Operational Management and Financial Management**, whose main duties are as follows:

- Propose policies and suggest actions to raise awareness of all internal agents involved with the company's personal data processing;
- Discuss and participate in the preparation and updating of standards, policies, reports and documents related to the company's personal data processing;
- Manage the activities related to the company's personal data processing;
- Oversee the governance program that is being implemented and supervise the processes that involve the office's personal data processing;
- Request information from the company sectors, as well as request investigations when information security incidents are suspected;
- Clear any doubts from employees and third parties and advise on matters related to the LGPD;
- Manage incidents and crises related to the Personal Data processed by the company;
- Create a response plan upon the identification of incidents and crises, including information security incidents within the personal data processed, and establish protocols to contain damage in such situations;
- Create methods for recovery from incidents and crises;
- Define actions to mitigate risks in case of incidents and crises;



- Prepare incident and crisis reports, and review applicable procedures;
- Adopt corrective measures and the regulatory and procedural adjustments needed to prevent situations of vulnerability to the security of the Personal Data Processed.

#### D. Employees and Partners

Everyone has the duty to maintain the privacy and protect the Personal Data, and they must have as a principle and undertake to carry out their activities with the best security practices, ensuring the compliance with legal duties regarding Data Processing, as well as the full exercise of the rights of the Subjects.

Therefore, all employees and partners have a fundamental role in ensuring that the Personal Data Processing occurs in a legitimate, secure and legal way.

### VIII. Legal Bases for Personal Data Processing

MyABCM will process Personal Data only in accordance with the legal bases set forth in the LGPD, and the Officer must be consulted whenever there are doubts about the best Legal Basis to be used to justify the respective Processing. Among all the Legal Bases, we highlight the main ones used by MyABCM:

- **Consent:** when the Data Subject expressly and unequivocally expresses their will for a certain activity of Personal Data Processing to be carried out;
- **Compliance with Legal or Regulatory Obligation:** when the Processing is necessary for the compliance with a legal or regulatory obligation;
- **Execution of a Contract or Preliminary Procedures with the Subject:** when necessary for the provision of a service, a product or functionality directly requested by the Subject, even before the effective contracting;
- **In Judicial, Administrative or Arbitral Proceedings:** when the Processing is necessary for the defense of MyABCM's interests in a dispute;
- **Legitimate Interest:** when necessary to meet the legitimate interests of the Controller or third parties, except when the fundamental rights and freedoms of the Subject that require the Personal Data protection prevail.

### IX. Data sharing

MyABCM must carry out any and all modes of personal data sharing in accordance with the requirements of the LGPD, complying with the legal provisions and procedures necessary for the legitimate sharing.

MyABCM may share the Personal Data of its employees with accounting and Human Resources service providers, as well as software and system providers, for the purposes of registration and documentation management, as well as other necessary measures.

MyABCM does not internationally transfer Personal Data.

## X. Personal Data Security

MyABCM will adopt, under the terms of the LGPD, security, technical and administrative measures capable of protecting Personal Data from unauthorized access and from accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate or unlawful Processing, implementing, if necessary, additional security measures that comply with technical standards set forth by the ANPD in the future.

The access to all Personal Data provided will be limited to qualified agents who are duly authorized to process them, in strict accordance with the purposes mentioned in this Policy. Even after the end of their Processing, MyABCM undertakes to notify the ANPD and the Subject on the occurrence of any security incident that may cause relevant risk or damage to the Subjects.

## XI. Storage and Disposal of Personal Data

MyABCM will store the personal data throughout the period of Processing, and discard/anonymize them afterwards (except for the data kept as determined by law), according to the Policy of Retention and Disposal of Personal Data, in full compliance with article 16 of the LGPD.

MyABCM, through its Officer, will periodically analyze the database maintained, as well as the justifications presented by the sectors, in order to avoid situations in which the Personal Data are processed excessively, unnecessarily, or in violation of the law.

Personal data are stored by MyABCM as follows:

### A. Data of Clients:

- Digital file (Vtiger CRM database).

### B. Data of Employees:

- HQ users have their data stored in the Active Directory database (domain controller), and replicated to Azure (AD and Exchange) and Vtiger databases.
- MyABCM distributor users have their data stored in Azure (AD and Exchange) and Vtiger databases.
- Personal data related to contracts are managed by the financial sector and stored in official storage.
- File server: departmental and personal data storage with control and access by the team (departmental folders) or by the employee (personal storage).
- OneDrive: personal storage provided by the Microsoft 365 service;
- SharePoint: corporate storage provided by the Microsoft 365 service.

All personal data of employees processed are deleted according to the deadlines set out in the MyABCM Retention Policy.

### C. Data of Service Providers and Suppliers:

- File server: departmental and personal data storage with control and access by the team (departmental folders) or by the user (personal storage);
- OneDrive: personal storage provided by the Microsoft 365 service;
- SharePoint: corporate storage provided by the Microsoft 365 service.

## XII. Rights of Personal Data Subjects

The LGPD has established several rights for the Subjects, who may exercise such rights upon request. The Officer will provide this service. In general, Subjects are entitled to obtain:

1. **Confirmation of the Existence of Processing:** the Subject may inquire if any of their Personal Data is being processed by MyABCM.
2. **Access:** the Subject may request information about the existence of their Personal Data in the database and, if any, may request access to them, including the origin of the data, the criteria used and the purpose of the Processing.
3. **Correction:** the Subject may request the correction of their information when they are incomplete, inaccurate or outdated.
4. **Anonymization, Blocking or Removal:** the Subject may request the anonymization, blocking (for certain purposes) or even the removal of their Personal Data.
5. **Deletion of Personal Data:** the Subject may request the deletion of their Personal Data, in compliance with legal and regulatory obligations.
6. **Information:** the Subject may request information about the Processing of their Personal Data.
7. **Information on the Possibility of not Providing Consent:** the Subject may inquire about the consequences if they do not consent to the Processing of their Personal Data.
8. **Revocation of Consent:** the Subject may, at any time, request the revocation of the consent previously provided.
9. **Objection:** the Subject may object to the Processing carried out based on one of the cases of waiver of consent.

## XIII. Personal Data Processing Activities

### A. Record of Activities

Any Data Processing operation will be recorded and documented, especially when based on legitimate interest, through the Record of Personal Data Processing Activities, with each sector being responsible for filling out each entry, and the Officer being responsible for supervising.

The Records must be updated every 6 (six) months by the sectors, which will be responsible for the completion and veracity of the information recorded.

### B. Impact Assessments and Personal Data Protection Impact Report (“RIPD”)

The Officer will objectively review the legal bases indicated by the sectors, in order to assess the activities that impact the rights and freedoms of the Subject and the potential risks that they may cause to their privacy.

Personal Data Protection Impact Reports (“RIPD”, in the Portuguese acronym) must be prepared whenever there is a risk of violating the rights of the Data Subject in a given activity, especially in cases where the Processing activities are legally based on legitimate interest or involve sensitive Personal Data.

### C. Compliance of New Projects (PRIVACY BY DESIGN)

MyABCM will assess the risks of each new activity or project regarding data privacy and protection, and depending on the level of risk, the new project/activity: (i) will proceed freely; or (ii) will need approval from Top Management to proceed, taking into account the Officer’s opinion.

### D. Response to Privacy Incidents

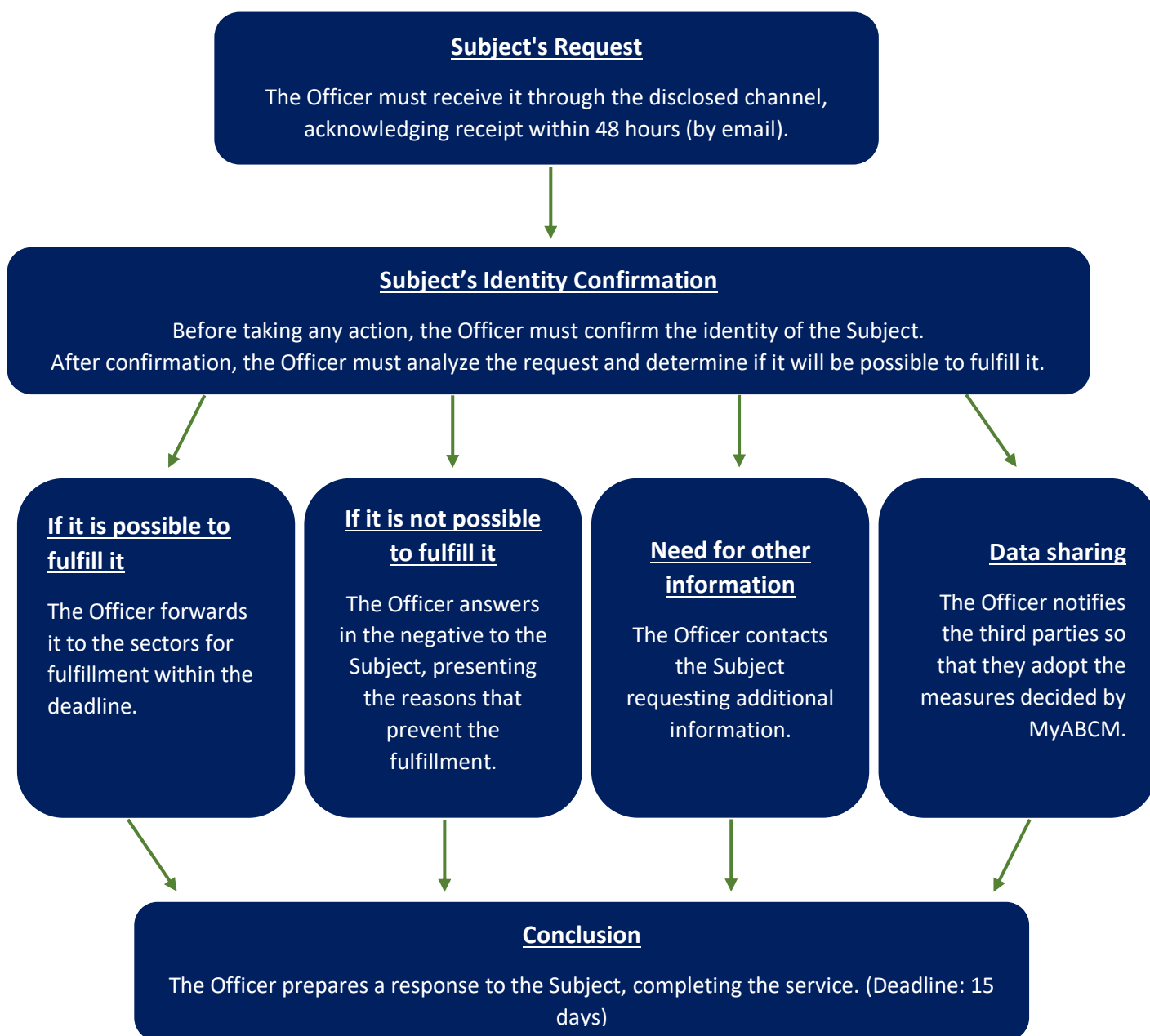
In case of a suspected security incident, that is, any event that may violate the confidentiality, integrity and availability of Personal Data, the procedure of response to personal data security incidents must be followed. This procedure is included in the MyABCM Contingency Plan, as advised by the person in charge and the CPPD.

### E. Fulfillment of the Request of Subjects

The service to the Subject must be provided free of charge, quickly and effectively. To that end, it is determined that the requests shall be answered by email by the Officer appropriately, as follows:

- (i) Upon receiving the request, acknowledge the receipt within a maximum of 48 (forty-eight) hours;
- (ii) Then, the Officer must respond to the Subject within a maximum period of 15 (fifteen) days, counted from the date of receipt of the request.

The following procedure must be observed to protect the right of the Subject:



#### XIV. Policy Violations

In case of violation of this Policy or the legislation, the facts will be investigated using the appropriate methods, and disciplinary or corrective measures will be taken, proportionally to the seriousness of the event, in compliance with labor legislation and subject to the right to full defense and adversary proceedings.

In case any situation that may reveal the occurrence of a violation of this Policy is identified, the Officer must be immediately notified.

## **XV. Officer Information**

If there are any questions and requests regarding Data Privacy and Protection, contact MyABCM's Personal Data Processing Officer, via email, telephone or postal address:

- Alberto Sanseverino – [alberto.sanseverino@myabcm.com](mailto:alberto.sanseverino@myabcm.com)  
Al. Joaquim Eugenio de Lima, 696, 16<sup>th</sup> floor, suite 161, Jardim Paulista,  
Zip code 01.403-000, São Paulo  
Phone: +55 (11) 3254-1926

## **XVI. Update and Duration**

This Policy is effective immediately and may be updated without prior notice and whenever necessary. It will be updated in our internal and external virtual environments.

**Last updated on: 2/28/2024\_V02**