



# Privacy Policy and Data Protection

## (Brazilian LGPD)

Version: REV003  
Last update: 07/17/2025

## Summary

I. OBJECTIVE .....	3
II. SUMMARY TABLE .....	3
III. DEFINITIONS .....	3
IV. PRINCIPLES OF DATA PROCESSING.....	4
V. DATA PROCESSED AND PURPOSES.....	4
VI. USE OF COOKIES .....	4
VII. RESPONSIBILITIES .....	4
VIII. LEGAL BASIS .....	4
IX. DATA SHARING.....	4
X. INFORMATION SECURITY .....	5
XI. STORAGE AND DISPOSAL.....	5
XII. RIGHTS OF THE HOLDERS .....	5
XIII. DATA PROCESSING AND GOVERNANCE .....	5
XIV. POLICY VIOLATIONS .....	5
XV. DATA PROCESSING OFFICER (DPO).....	5
XVI. UPDATES AND VALIDITY .....	5

## I. OBJECTIVE

This Policy expresses MyABCM's commitment to the protection of personal data, in accordance with the Brazilian General Data Protection Law (LGPD – Law No. 13,709/2018), presenting how we collect, use, share, store and protect personal data processed in our activities.

## II. SUMMARY TABLE

- **Who we are:** ABCOSTING Products and Services Ltda., CNPJ 00.138.349/0001-94, headquartered in São Paulo/SP.
- **Purpose of processing:** provision of services, communication with customers, technical support, management of employees and suppliers, among others.
- **Sharing:** data may be shared with service providers (including international providers), as detailed in this Policy.
- **International transfer:** some data may be processed outside of Brazil, especially when using solutions such as Microsoft 365, Salesforce CRM, and Jira.
- **Information security:** we use technical and administrative measures to protect personal data.
- **Cookies:** we use cookies to improve navigation and personalize content, with the possibility of user management.
- **Data subject rights:** we guarantee the full exercise of the rights provided for in the LGPD.

## III. DEFINITIONS

- **Processing agents:** are the Controller and the Operator.
- **Anonymization:** use of reasonable technical means available at the time of Processing, through which data loses the possibility of direct or indirect association with an individual.
- **National Data Protection Authority (“ANPD”):** public administration body responsible for overseeing, implementing, and monitoring compliance with the LGPD throughout the national territory.
- **Legal basis:** one of the 10 (ten) grounds that justify any processing of personal data provided in article 7 of the LGPD.
- **Controller:** a natural or legal person, under public or private law, responsible for decisions regarding the Processing of Personal Data.
- **Anonymized data:** data relating to the Holder that cannot be identified, considering the use of reasonable and available technical means at the time of its Processing.
- **Personal data:** any information relating to a natural person that allows their identification or makes them identifiable.
- **Sensitive personal data:** data linked to a natural person regarding racial or ethnic origin, religious belief, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data.
- **Person in charge:** person appointed by the Controller or Operator to act as a communication channel between the Controller, Data Subjects and the ANPD.
- **LGPD:** Law No. 13,709/2018, which came into force on September 18, 2020.
- **Operator:** natural or legal person, under public or private law, that carries out the Processing of Personal Data on behalf of the Controller.
- **Holder of Personal Data:** natural person to whom the Personal Data subject to Processing refers.

- **International data transfer:** transfer of personal data to a foreign country or international organization of which the country is a member.
- **Treatment:** includes any operation or set of operations carried out with Personal Data, whether by automated means or not, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation, information control, modification, communication, transfer, dissemination and/or extraction.

## IV. PRINCIPLES OF DATA PROCESSING

We respect the principles of the LGPD, such as: Purpose, Adequacy, Necessity, Free Access, Data Quality, Transparency, Security, Prevention, Non-Discrimination and Accountability.

## V. DATA PROCESSED AND PURPOSES

We collect and process data from:

- **Customers:** for advertising, customer service, system access, events, and technical support. Includes data such as company name, contact name, and email address. This data is stored in Salesforce CRM and also brought into Jira for managing and tracking technical support requests.
- **Employees:** for admission, payroll and access to systems.
- **Suppliers:** for contract formalization and relationship management.

## VI. USE OF COOKIES

We use cookies for analytical and marketing purposes, including Google Analytics and Ads. Consent is requested when accessing our website, with the ability to manage preferences through your browser.

## VII. RESPONSIBILITIES

- **Senior Management:** ensures compliance with the LGPD and supports the privacy program.
- **Person in Charge (DPO):** acts as a channel between the company, the holders and the ANPD.
- **Privacy Committee:** supports the Data Protection Officer in data governance.
- **Employees and partners:** must follow this Policy and adopt good security practices.

## VIII. LEGAL BASIS

The main legal bases used include consent, contract execution, legal obligation, legitimate interest and regular exercise of rights in proceedings.

## IX. DATA SHARING

We share data with:

- IT service providers (such as Microsoft 365, Salesforce CRM, and Jira);
  - Accountants and HR;
  - Partner companies, within the limits of the stated purpose.
- Note:** because we use cloud services such as Microsoft 365, Salesforce CRM, and Jira, **data is transferred internationally**, complying with LGPD requirements.

## X. INFORMATION SECURITY

We adopt security measures based on market best practices and ANPD guidelines. Significant incidents are reported to the ANPD and the data subjects.

## XI. STORAGE AND DISPOSAL

Data is stored in:

- **Clients:** Salesforce CRM and Jira (for technical support).
- **Collaborators and distributors:** Active Directory, Azure AD, Exchange, OneDrive, SharePoint.
- **Suppliers:** servers and internal systems.

We carry out periodic review of the database and disposal/anonymization in accordance with our Retention Policy.

## XII. RIGHTS OF THE HOLDERS

We guarantee all rights provided for in the LGPD, including:

1. Confirmation of the existence of treatment
2. Data access
3. Data correction
4. Anonymization, blocking or deletion
5. Exclusion (subject to legal obligations)
6. Information on use and sharing
7. Revocation of consent
8. Data portability
9. Opposition to treatment
10. Review of automated decisions (where applicable)

## XIII. DATA PROCESSING AND GOVERNANCE

- **Treatment activity record:** updated every 6 months for each area.
- **Impact assessment (RIPD):** whenever there are privacy risks, such as in the case of sensitive data or legal basis of legitimate interest.
- **Privacy by Design:** every new project is evaluated for privacy.
- **Incident Response:** governed by our Contingency Plan.
- **Support for holders:** received within 48 hours, response within 15 days.


## XIV. POLICY VIOLATIONS


Any violation will be investigated and may result in corrective and disciplinary action. Employees and partners must immediately report any suspicions to the Supervisor.

## XV. DATA PROCESSING OFFICER (DPO)

**Alberto Sanseverino**

 alberto.sanseverino@myabcm.com

 +55 (11) 3254-1926

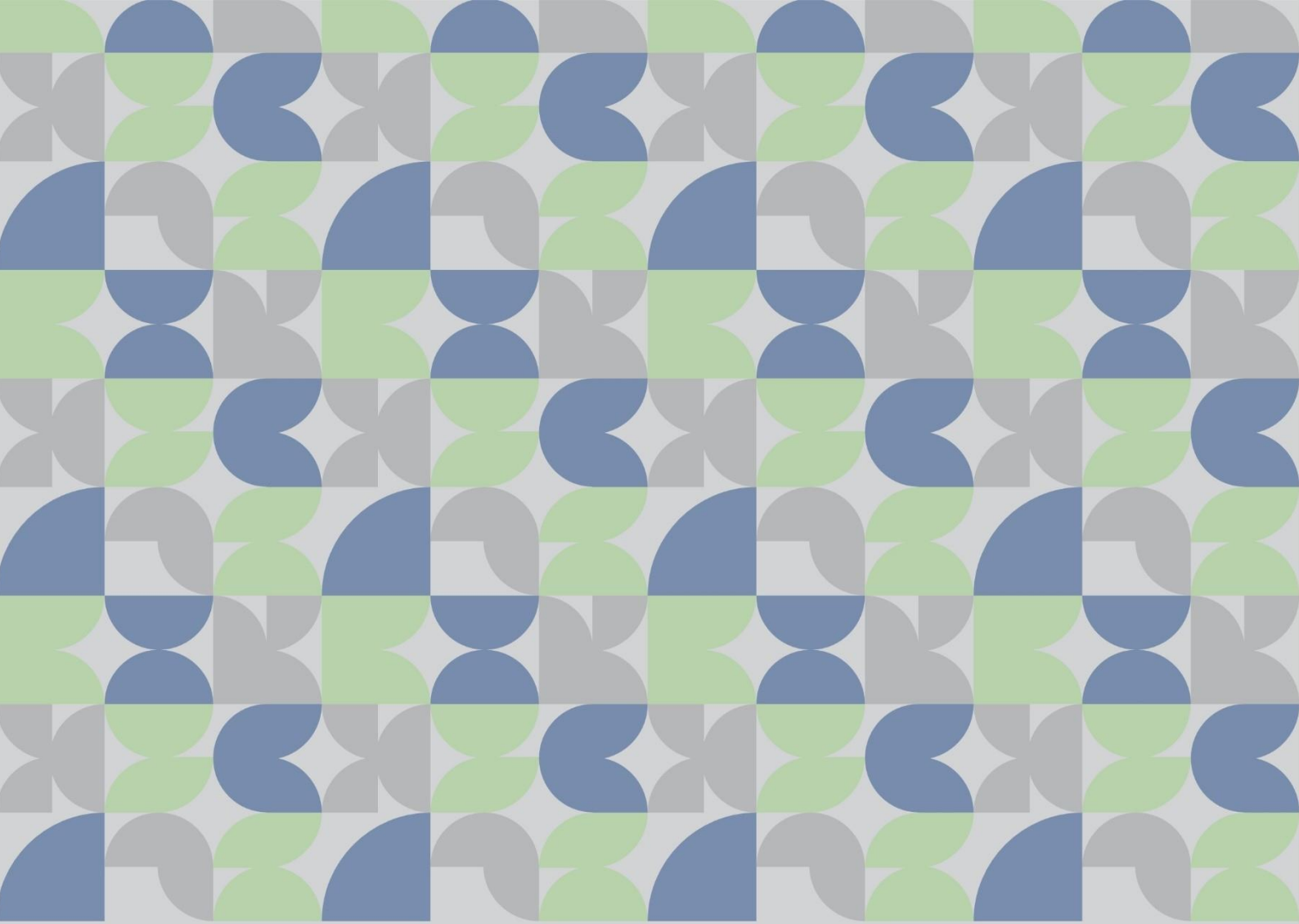
 Alameda Joaquim Eugenio de Lima, 696, 16th floor, Suite 161 – São Paulo/SP - Brazil

## XVI. UPDATES AND VALIDITY

This Policy may be updated at any time. The current version will be published on our official channels.

## VERSION HISTORY

- **V01:** 2021
- **V02:** 02/28/2024
- **V03:** 07/17/2025



ask the right questions