

Declaration of Compliance with the General Data Protection Law (Lei Geral de Proteção de Dados - LGPD)

November 2024

Introduction:

At InvGate, securing customer data is, and always has been, a top priority. We know the data you manage through our software is key to your business, and that is why we are committed to keeping it private and safe. To that end, we comply with industry best practices related to cloud security standards and certifications.

As part of this commitment, we adhere to the Brazilian General Data Protection Law (Lei Geral de Proteção de Dados - LGPD), which strengthens the rights of individuals in Brazil over their personal data and sets out obligations for organizations processing this data.

As Data Processors, we take care of data in the following ways:

1. Data Protection Principles:

We adhere to the following principles when processing personal data under LGPD:

- **Lawfulness, Purpose, and Necessity:** Personal data is processed lawfully for specified and legitimate purposes and to the extent necessary for those purposes.
- **Transparency:** We ensure clear and transparent communication with data subjects about how their data is processed.
- **Data Quality:** Personal data is accurate, up-to-date, and relevant to the purposes for which it is processed.
- **Security:** We implement appropriate technical and organizational measures to safeguard personal data.
- **Prevention:** We take measures to prevent damage to the data subjects by processing personal data securely and responsibly.
- **Non-Discrimination:** Personal data is processed in a way that does not lead to discriminatory outcomes.
- **Accountability:** We are responsible for compliance with LGPD and can demonstrate adherence to its principles.

2. **Data Subject Rights:**

Under LGPD, we ensure data subjects can exercise their rights, including:

- Accessing, correcting, and updating their personal data.
- Anonymizing, blocking, or deleting unnecessary or excessive data.
- Obtaining information on shared data and entities with whom data is shared.
- Objecting to the processing of their personal data in certain cases.
- Revoking consent at any time.

3. **Lawful Basis for Processing:**

Personal data is processed based on one or more lawful bases under LGPD, including:

- Consent from the data subject.
- Compliance with legal or regulatory obligations.
- Execution of contracts or preliminary steps related to contracts.
- Protection of life, health, or legitimate interests.

4. **Data Security Measures:**

We ensure data security through measures such as:

- Encryption and pseudonymization of personal data.
- Procedures to ensure ongoing data integrity, confidentiality, and availability.
- Regular evaluation and testing of security measures to mitigate risks.

5. **Incident Response and Notification:**

In the event of a personal data breach, we will:

- Notify the Brazil National Data Protection Authority (ANPD) and affected data subjects in accordance with LGPD requirements.
- Take immediate action to contain and mitigate any risks associated with the breach.

6. **Data Processing Agreements:**

We maintain Data Processing Agreements with all third parties that process personal data on our behalf, ensuring their compliance with LGPD requirements.

7. **International Data Transfers:**

For personal data transfers outside of Brazil, we apply appropriate safeguards, such as international agreements or specific clauses ensuring data protection compliance.

8. Data Protection Officer:

We have appointed a Data Protection Officer (DPO) responsible for overseeing our data protection strategy and LGPD compliance.

Contact Information:

For any questions or concerns regarding this LGPD Compliance Declaration or our data protection practices, please contact our Data Protection Officer, Liliana Gary, at lgpd@invgate.com

By adhering to the principles and practices outlined in this declaration, InvGate demonstrates its commitment to LGPD compliance and the protection of personal data.