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		Issue Date	23/08/2021
Prepared by	Lauanda Salles, Alinne Rosa, Suellen Reis, Rodrigo Garcia, Joaquim Simões	Revision Date	06/08/2025
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1. OBJECTIVE

This policy aims to establish general guidelines for the protection of personal data within Fundação Dom Cabral (FDC) and all its partners in Brazil and abroad. By complying with the directives of this policy, FDC seeks to:

Ensure compliance with applicable personal data protection laws and regulations.

Protect the rights of employees, clients, suppliers, and partners against the risks of personal data breaches.

Provide transparency regarding FDC's procedures for processing personal data.

Promote awareness throughout FDC regarding personal data protection and privacy matters.

This policy applies to FDC, all its partners in Brazil and abroad, and all employees who may have access to any personal data held by or on behalf of the institution.

Any applicable legislation in the different regions where FDC operates shall prevail if, or when, it conflicts with this policy.

2. TERMS AND DEFINITIONS

For the purposes of this policy, the following definitions apply:

2.1.LGPD: Brazilian Law No. 13,709/2018, commonly known as the Brazilian Data Protection Law, which regulates personal data processing operations.

2.2.Personal Data: Any information regarding an identified or identifiable natural person. Examples include name; identification number; location data; online identifier; or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

2.3.Sensitive Personal Data: Any personal data that may lead to discrimination or embarrassment. Examples include data concerning racial or ethnic origin; religious belief; political opinion; affiliation to trade unions or to a religious, philosophical, or political organization; data regarding health or sex life; genetic or biometric data.

2.4.Data Subject: The natural person to whom the specific personal data refer.

2.5.Controller: The party within an institution in charge of making the decisions regarding the processing of personal data. At FDC, the data controller is the Executive Board.

2.6.Processor: The party that processes personal data on behalf of the controller, including but not limited to employees, associate professors, and partners.

2.7.Data Protection Officer (DPO): The person appointed as formally responsible for data protection within an institution.


2.8.Personal Data Processing or Processing: Any operation performed on personal data, whether automated or not, including but not limited to collection; recording; organization; structuring; storage; adaptation or alteration; retrieval; consultation; use; disclosure by transmission, dissemination, or any other means of making such data available; alignment or combination; restriction; erasure; or destruction.

2.9.Consent: Free, informed, and unambiguous manifestation whereby the data subject agrees to the processing of their personal data for a given purpose.

2.10. Anonymization: Process or technique by which personal data are rendered anonymous in such a way that they no longer relate to an identified or identifiable person, either directly or indirectly. Anonymization must be irreversible. Anonymous data are not considered personal data.

2.11. Pseudonymization: Process or technique by which the association of personal data with a person is reduced, so that it no longer directly relates to an individual (for example, not mentioning their name). Pseudonymized data are still considered personal data, since they are not anonymous and the individual can still be identified if additional information, kept separately, is provided.

2.12. Legitimate Interest: The legal basis under which the controller may process personal data without the consent of the data subject, provided that the latter's rights and freedoms are respected and the processing has justifiable purposes.

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3. REFERENCES

Not applicable.

4. DESCRIPTION OF RULES AND GUIDELINES

4.1. Rights of Data Subjects

Data subjects are entitled, at any time and upon request, to:

- Confirm whether FDC processes their personal data.
- Access their personal data processed by FDC.
- Be informed about how their personal data will be processed the moment they are provided.
- Correct their personal data if it is inaccurate, incorrect, or incomplete.
- Request the deletion, blocking, and/or anonymization of their personal data.
- Object to their personal data's processing if the processing is based on legitimate interest.
- Withdraw consent at any time.
- Request the portability of their personal data to another service or product provider.
- Review decisions made solely on the basis of automated processing of personal data.
- File a complaint with FDC or with the applicable Data Protection Authority if they have reason to believe that any of their rights have been violated.

FDC is committed to upholding the rights of data subjects.

4.2. Data Privacy Committee

The Data Privacy Committee is hereby established, whose appointment is defined by the Executive Board.

The Committee is composed of up to six (6) members, including one employee from each of the following areas: Risk and Compliance Office, Marketing, Technology, and Legal. The Committee also includes the DPO and one invited member, the latter being optional. The duties of the Data Privacy Committee are defined in the section below.


4.3. Principles of Personal Data Protection

This section sets forth the principles that must be observed in the collection, handling, storage, disclosure, and processing of personal data by FDC.

4.3.1. Lawfulness, Fairness, and Transparency

FDC processes personal data fairly, transparently, and in compliance with the law, based on the following legal grounds:

- To perform a contract to which the data subject is a party.
- To comply with a legal or regulatory obligation to which FDC is subject.
- To pursue legitimate interests (see definition in Section 3).
- To provide the data subject with information that enables the regular exercise of their rights.
- To conduct studies and research, ensuring the anonymization of personal data whenever possible.
- To fulfill academic purposes, such as registration with the Office of the Registrar for certification.

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g) To ensure credit protection.

In cases where the processing of personal data does not fall under the above legal grounds, FDC shall request the data subject's consent, ensuring that it is provided in a specific, free, informed, and unambiguous manner.

Data subjects may manage and/or revoke their consent at any time through the website: <https://privacidade.fdc.org.br/>

All collected consents are stored in order to allow for verification, if requested.

In certain circumstances, FDC may process sensitive personal data. In such cases, more robust security standards shall be adopted.

FDC processes sensitive personal data without the data subject's consent only when it is indispensable for:

- a) Compliance with legal or regulatory obligations.
- h) Regular exercise of rights in contracts and judicial, administrative, or arbitral proceedings.
- b) Compliance with obligations and the exercise of rights in matters of employment, social security, and social protection.
- c) Protection of the life or physical safety of the data subject, including medical data for preventive and occupational purposes.
- d) Promotion or maintenance of equal opportunities among people of different racial or ethnic backgrounds.
- e) Fraud prevention and ensuring the security of the data subject in identification and authentication processes for electronic systems.
- f) Studies and research, ensuring the anonymization of personal data whenever possible.

4.3.2. Limitation and Adequacy of Purpose


FDC has the duty to process personal data in a manner that is compatible with the original purpose for which the data were collected and may not use them for any other purpose.

4.3.3. Data Minimization

FDC must limit the collection and processing of personal data to the minimum necessary to achieve the purpose of a given processing activity. In other words, it must collect data that is relevant, proportional, and not excessive in relation to the purposes of the processing.

It is important to always ensure that the data are relevant, aligned with the purpose of the processing, and clearly communicated to the data subject.

The sharing of personal data with another area or a third-party company must also comply with this principle.

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4.3.4. Accuracy (Data Quality)

FDC must adopt reasonable measures to ensure that any personal data in its possession is kept accurate and up to date in relation to the purposes for which it was collected.

4.3.5. Data Retention and Storage Limitation

FDC must be aware of its processing activities, established retention periods, and periodic review processes, and must not retain personal data for longer than necessary to fulfill the purposes of each processing operation.

4.3.6. Integrity and Confidentiality

FDC must ensure that appropriate technical and administrative measures are applied to personal data to protect it against unauthorized or unlawful processing, as well as against accidental loss, destruction, or damage. All employees with access to personal data are bound by confidentiality obligations.

4.3.7. Accountability

FDC is responsible for, and must be able to demonstrate, compliance with this policy by ensuring the implementation of measures that include, but are not limited to:

- Ensuring that data subjects are able to exercise their rights as recognized by law and by this policy.
- Maintaining records of the personal data processing activities it conducts and, where applicable, records of the recipients with whom the data are shared.
- Maintaining records of personal data incidents and breaches.
- Ensuring that third parties acting as personal data processors on behalf of FDC are complying with this policy as well as with applicable laws and regulations.

4.4. Controller–Processor Relationship


As a general rule, each FDC partner is the controller of personal data within its own institution. In certain circumstances, a partner may act as a processor on behalf of FDC, or FDC may act as a processor on behalf of a partner. In such cases, the party acting as the processor is required to follow the instructions of the party acting as the controller.

4.5. Data Protection Audits

FDC must ensure that periodic reviews are conducted to confirm that privacy initiatives, systems, measures, processes, safeguards, and other activities (including the management of personal data protection) are implemented, maintained, and in compliance with applicable laws and regulations.

4.6. International Transfer of Personal Data

When personal data are processed in countries other than the one where they were collected, the laws and regulations applicable to international data transfers in each country must be observed. FDC must ensure that agreements governing the international transfer of personal data are in place and kept up to date.

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4.7. Third-Party Service Providers

Third-party service providers that process personal data under the instructions of FDC are subject to the obligations imposed on processors in accordance with applicable personal data protection laws. FDC must ensure that service agreements include appropriate privacy clauses. The processor is authorized to process personal data only to fulfill the contractual purpose.

4.8. Data Breach Management

All incidents and potential data breaches must be reported to the DPO. All employees must be aware of their personal responsibility to escalate possible issues and to report any actual or suspected data breaches as soon as they are identified.

Data breaches include, but are not limited to, the loss, deletion, theft, or unauthorized access of personal data controlled or processed by FDC.

4.9. General Provisions

The Risk and Compliance Office is responsible for clarifying any questions related to this policy, establishing the necessary procedures for its implementation, and communicating and verifying the rules set forth in this policy.

All FDC employees and partners are responsible for complying with the guidelines established in this document.

The DPO can be contacted to perform their duties at dpo@fdc.org.br.

5. DUTIES AND RESPONSIBILITIES

5.1. The Executive Board (Controller) is responsible for:

5.1.1. Approving policies related to privacy and personal data protection.

5.1.2. Approving and establishing the governance structure for privacy and data protection matters, including the appointment of the Data Privacy Committee and the DPO.

5.1.3. Keeping records of all personal data processing activities that are performed, especially when based on legitimate interest.

5.1.4. Notifying the applicable Data Protection Authority (in Brazil, the National Data Protection Authority – ANPD) and data subjects of any security incident that may entail significant risk or damage to data subjects.

5.1.5. When required, preparing a personal data protection impact assessment, including for sensitive personal data, related to its processing activities, as described by applicable legislation.

5.2. The Data Protection Officer (DPO) is responsible for:


5.2.1. Acting as a communication channel between controller, data subjects, and the ANPD, performing the following activities:

a) Receiving complaints and communications from data subjects, providing clarifications, and taking appropriate measures.

b) Receiving communications from the national authority and taking appropriate measures.

c) Guiding employees and contractors of the organization regarding the practices to be followed in relation to personal data protection.

d) Performing any other duties assigned by the controller or established in complementary regulations.

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5.2.2. Providing guidance to employees to ensure compliance of procedures involving the processing of personal data.

5.3. The Data Privacy Committee is responsible for:

5.3.1. When necessary, reviewing the privacy initiatives adopted by FDC and proposing improvements to the responsible areas.

5.3.2. Discussing and making technical decisions on new personal data processing activities together with the proposing areas.

5.3.3. Deciding on the technical measures to be applied for high-risk events.

5.3.4. Evaluating and deciding on personal data breach incidents in collaboration with the controller.

5.4. The Governance, Risk, and Compliance Office is responsible for:

5.4.1. Promoting adequate awareness among key stakeholders regarding the importance of personal data protection and internal activities related to privacy initiatives.

5.4.2. Reviewing this policy and its amendments and recommending their approval to the Executive Board.

5.4.3. Proposing to the Executive Board the governance structure for privacy and data protection matters.

5.4.4. Promoting the implementation of privacy initiatives to ensure FDC's compliance with applicable laws and regulations, as well as its internal policies and procedures related to the subject.

5.4.5. Implementing training, awareness, and communication initiatives on the subject for employees and third parties involved in processes related to the collection and processing of personal data.

5.4.6. Preparing and updating the Guiding Documents related to privacy that fall within its competence.

5.4.7. Periodically conducting, in collaboration with the Technology Management team, maturity assessments of FDC's privacy initiatives, identifying improvements and tracking their progress.

5.5. The Legal Advisor is responsible for:

5.5.1. Ensuring that contracts involving the transfer or processing of personal data contain privacy clauses in compliance with applicable laws and regulations.

5.5.2. Providing technical support to the DPO and the controller in the event of personal data breaches.

5.5.3. Providing technical support to FDC in interpreting laws and regulations related to the protection of personal data.

5.5.4. Supporting the DPO in interactions with national data protection authorities.

5.6. Technology Management is responsible for:

5.6.1. Analyzing personal data breaches and leaks, as well as collecting technical evidence and sharing this information with the Data Privacy Committee.


5.6.2. Implementing and monitoring security measures to ensure compliance with legislation in personal data processing.

5.6.3. Preparing and updating policies related to information security.

5.6.4. Defining procedures for the formal documentation and handling of personal data incidents.

5.6.5. Implementing mechanisms to ensure the rights of data subjects.

5.6.6. Providing technical support to internal areas and analyzing new tools and systems focused on personal data protection.

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5.6.7. Periodically conducting, in collaboration with the Risk and Compliance Office, maturity assessments of FDC's privacy initiatives, identifying improvements and tracking their progress.

5.6.8. Providing technical support to the DPO.

5.7. All Employees are responsible for:

5.7.1. Keeping records of all personal data processing activities that they perform, especially when based on legitimate interest.

5.7.2. Maintaining the confidentiality of personal data that they access in the course of their duties.

5.7.3. Consulting the DPO before any new personal data processing activity is implemented, to ensure compliance with applicable legislation.

5.7.4. Acting in accordance with the guidelines set forth in this policy and applicable legislation, guaranteeing the proper processing of personal data.

6. RECORDS

Not applicable.

7. ANNEXES

AN.0007: Data Privacy Committee

AN.0021: Terms of Use – FDC Website

8. REVISION HISTORY

Date	Revision No.	Description	Reviewed by:	Approved by:
08/23/2021	00	Preparation of the entire document	Lauanda Salles Alinne Rosa Rodrigo Garcia Joaquim Simões	Antonio Batista
11/21/2022	01	Update of Duties and Responsibilities and other specific matters	Lauanda Salles Alinne Rosa Suellen Reis Rodrigo Garcia Joaquim Simões	Antonio Batista
08/06/2025	02	Update of the document's layout and code	Not applicable	Not applicable

This document is valid for two years from the date of the last revision.