

v·tal

MANUAL

FOR PRIVACY AND
PROTECTION OF PERSONAL
DATA FOR THIRD PARTIES

**We at V.tal are
committed to
protecting the
personal data of our
customers and
employees.**

For this, we need the help and collaboration of our partners, suppliers and other third parties who have access to our data.

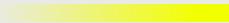
We have prepared this manual for you to embark with us on this mission.

V.tal thanks you for your partnership!

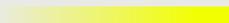
Summary

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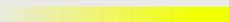
Click on items to access them instantly

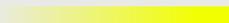
 Executive Summary

 Introduction

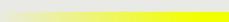
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 05. Data sharing

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Executive Summary



You must process the personal data **only for the purposes set out** in the contract.



You must have **adequate security measures** and apply incident response procedures according to the deadlines defined with V.tal.



You must apply the **flow of response** to requests for rights from the holders defined with V.tal.



You must **return and/or delete** the personal data received as contractually defined.



You should know, if applicable, the **rules and conditions** for carrying out audits by V.tal.



In some cases, you must obtain **prior authorization** from v.tal for the subcontracting of third parties involving the personal data.



You must treat the data received with a level of security **corresponding to the sensitivity of information**, as classified by V.tal.

Introduction

The Brazilian legislation on privacy and protection of personal data establishes a series of obligations that we need to follow. Thinking about these obligations, we have inserted some provisions in our contract that must be observed by you, mainly about::

general rules for data processing.

incident reporting and data security.

flow of requests for rights from holders.

deletion of personal data.

data retention and disposal.

data sharing.

01 General rules for data processing



In most cases, you **will only be able to process personal data for the purposes we set out in our contract.** Stay tuned for that.



Remember that our relationship is governed by Brazilian legislation on the protection of personal data, including the General Data Protection Law (LGPD). We ask that you know all the **rules and obligations applicable to you.**



You will assume **responsibility for any misuse** you make of your personal data, in violation of our contract or applicable law.

02 Incident reporting and data security

To protect data, we need you to adopt **appropriate technical and organizational security measures.** This means not only protecting your systems from vulnerabilities, but also instructing your employees to properly handle personal data on a day-to-day basis.

But we also understand that it is not always possible to protect data from any kind of occurrence. Therefore, when you identify or suspect an incident, you need to:

Trigger your information security incident response plan

Keep the occurrence in **absolute secrecy.**

Communicate to us immediately or within the period defined in our contract, in writing

Not to communicate to any person or authority before we jointly assess the situation

Here are some points that should be evaluated for communication:

	which data and data subjects may have been involved.		what security measures have been taken.
	how the effects of the incident can be mitigated.		what are the risks related to this incident.

03 Data retention and disposal

The data subject to our partnership, depending on the relationship, **cannot be kept forever or for an indefinite period**. Whenever the purpose of the treatment is achieved or your contract with V.tal ends, you need to:

Evaluate whether the data should be returned to V.tal.

Eliminate, totally and irreversibly, the stored data.

Do not worry, as you can continue to store the data if you need it to comply with legal or regulatory obligations, use it anonymously or have another legitimate reason for retention. We only ask that you notify us if you understand that it is necessary to continue storing the information.

04 Audit, due diligence and/or verifications

In order to monitor compliance with privacy and data protection laws, we may carry out third-party evaluation procedures, such as audits, due diligences and/or periodic checks on systems or documents related to the processing of data. Such measures:

They will not impair the normal business activities of the partner.

They will be communicated **in advance**.

On the other hand, you should cooperate with such activities by answering questionnaires, providing information or implementing necessary improvements.

If they reveal any inadequacy, we will need to develop a corrective **action plan and execution schedule** to remedy any irregularities.

Please check your contract to better understand if these measures are foreseen and, if so, what conditions we have set.

05 Data sharing

If you intend to subcontract to a third party and share the personal data applicable to the contract, be aware that **you may need prior authorization from V.tal.**

We may require this to ensure, for example, that the entire personal data processing chain complies with applicable laws.

In general, if there is subcontracting of third parties, the same standards of our contract must be imposed in relation to these third parties. You will always be responsible for maintaining these quality standards and for any sanctions, fines or penalties imposed on the third party.

06 Classification of personal data

It is important to note that all data received by V.tal in the context of the partnership must be treated with the level of security corresponding to the sensitivity of the information. Thus:



Public Data

is released to the general public and can be known and shared with anyone.



Internal Use Data

is released only to internal employees of V.tal or the partner, unless otherwise provided in writing.



Confidential Data

is only released to a limited number of internal V.tal or partner employees.



Highly Confidential Data

is released only to a restricted number of internal employees of V.tal or the partner, previously authorized, and only for senior management positions.

V.tal will always classify the information according to the sensitivity level before sharing it with the partner.

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Communications and questions related to privacy and data protection:

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