



**PRIVACY AND DATA  
PROTECTION POLICY**

**PRIVACY AND  
PERSONAL DATA  
PROTECTION  
PROGRAM**

## Objective

The purpose of this Privacy and Personal Data Protection Policy is to establish Montreal's guidelines and responsibilities that ensure and reinforce the Organization's commitment to compliance with personal data protection legislation. This document is in line with the national legislation in force, especially Law 13709/2018 - General Data Protection Law (GDPL).

## Concepts

- National Data Protection Authority (NDPA): public administration body responsible for ensuring, implementing and monitoring compliance with this Law throughout the national territory.
- Biometrics: a measurable physical characteristic or personal trait used to recognize or verify an individual's identity.
- Personal Data Protection Committee: a Montreal committee made up of elected representatives and responsible for representing Montreal vis-à-vis data subjects and the ANPD, as well as providing general guidance on the processing of personal data.
- Purpose: The reason or motivation for processing personal data.
- Legitimate Interest: Processing of personal data carried out by the Controller, due to an interest of its own, of other companies or of society, respecting the individual rights and freedoms of the Data Subject.
- GDPL: General Data Protection Law (Law No. 13,709 of August 14, 2018).
- Personal data: Information relating to an identified or identifiable natural person.
- Sensitive personal data: personal data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or religious, philosophical or political organization, data relating to health or sex life, genetic or biometric data, when linked to a natural person.
- Anonymized data: data relating to the data subject that cannot be identified, taking into account the use of reasonable technical means available at the time of processing.
- Database: a structured set of personal data held in one or more locations, on an electronic or physical medium.
- Data subject: natural person to whom the personal data being processed refers.

Classification of the information: Public

- Processing: any operation carried out with personal data, such as those relating to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction
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- Anonymization: the use of reasonable technical means, available at the time of processing, by which a piece of data loses the possibility of direct or indirect association with an individual.
- Consent: free, informed and unequivocal expression by which the data subject agrees to the processing of their personal data for a specific purpose.
- Blocking: temporary suspension of any processing operation, by keeping the personal data or the database.
- Deletion: deletion of data or a set of data stored in a database, regardless of the procedure used.
- Shared use of data: communication, dissemination, international transfer, interconnection of personal data or shared processing of personal databases by public bodies and entities in compliance with their legal powers, or between these and private entities, reciprocally, with specific authorization, for one or more processing modalities permitted by these public entities, or between private entities.
- Opposition: The data subject's right not to want their data processed.
- Controller: a natural or legal person, whether governed by public or private law, who is responsible for decisions regarding the processing of personal data.
- Operator: natural or legal person, governed by public or private law, who carries out the processing of personal data on behalf of the controller.
- Controller: a person appointed by the controller and operator to act as a communication channel between the controller, the holders of personal data and the National Data Protection Authority (NDPA).
- Processing agents: the controller and the operator.
- Purpose: processing carried out for legitimate, specific and explicit purposes and informed to the data subject, without the possibility of further processing incompatible with those purposes.
- Adequacy: compatibility of the processing with the purposes informed to the data subject, in accordance with the context of the processing.

Classification of the information: Public

- **Necessity:** limitation of processing to the minimum necessary for the fulfillment of its purposes, covering data that is relevant, proportionate and not excessive in relation to the purposes of the data processing.
- **Free access:** guaranteeing data subjects easy and free consultation on the form and duration of processing, as well as on the completeness of their personal data.
- **Data quality:** guarantee to data subjects that their data is accurate, clear, relevant and up-to-date, in accordance with the need for it and for the fulfillment of the purposes for which it is processed.
- **Transparency:** guaranteeing data subjects clear, precise and easily accessible information about the processing and the respective processing agents, with due regard for commercial and industrial secrets
- **Security:** use of technical and administrative measures to protect personal data from unauthorized access and accidental or unlawful destruction, loss, alteration, communication or dissemination.
- **Prevention:** adoption of measures to prevent the occurrence of damage as a result of the processing of personal data.
- **Non-discrimination:** the impossibility of processing for unlawful or abusive discriminatory purposes.
- **Responsibility and accountability:** demonstration by the agent of the adoption of effective measures capable of proving compliance with personal data protection rules, including the effectiveness of these measures.

## Collection

Montreal Informática has a solid presence in the Brazilian market and guarantees sustained growth through solid management, ethical action, respect for diversity and preservation of the environment. It acts as a controller and operator and collects your personal data in compliance with the General Data Protection Act, No. 13,709/2018. The services carried out by Montreal follow the recommendations, best practices and information security management standards of the market contemplated in the standards of the ISO/IEC 27000 family.

## Purpose

Under the terms of the General Data Protection Law (Law No. 13,709/18), Montreal processes your personal data for specific purposes and in accordance with the legal bases provided for in the respective Law, such as:

- Execution of the contracts signed with its clients or to meet the legitimate interests of Montreal and its clients or third parties.

Classification of the information: Public

- Carrying out selection processes to recruit employees, trainees and third parties;
- Organizing events and meetings with representatives of public and private organizations; - Strengthening the brand and attracting potential clients;
- Managing registration and communications with the ANPD;
- Complying with legal and regulatory obligations in order to carry out activities;
- Acting in legal proceedings in which Montreal has active or passive legitimacy;
- Interacting with clients who are interested in our services and areas of activity.

For any other purpose, for which the consent of the data subject must be collected, processing will be subject to the rights, free, informed and unequivocal manifestation of the data subject.

## Rights of personal data subjects

The holders of personal data, under the terms of the applicable legislation, have the following rights:

- a. Right of access;
- b. Right to rectification;
- c. Right to object to processing;
- d. Right to portability of personal data;
- e. Right to lodge a complaint with the competent authorities; and
- f. Right to withdraw consent.

## Consent

Consent consists of an explicit, freely given, specific, informed and clear indication of the personal data subject's authorization for processing, by means of a statement or a clear affirmative action. The consent of the data subject may be withdrawn at any time by means of a clear and specific statement. Exceptions to the manifestation of consent may only occur in full compliance with the obligations and principles laid down in the General Data Protection Law, while safeguarding the rights of the personal data subject.

## International transfer MONTREAL

Montreal is based in Brazil, but uses some services from suppliers that are hosted in other countries. Personal data is protected by the privacy laws in force in the locations of these providers. The Organization does not contract any supplier that may have a low level of protection for personal data.

The personal data that is sent may be stored on servers that are hosted in countries such as the United States, in accordance with the Privacy Policy of these partners. To find out which partners we currently have contracted services with, please contact us.

## Processing of personal data

Montreal's processing of HOLDERS' personal data is entirely governed by the General Personal Data Protection Act (GPDP) and is based on transparency, respect for privacy, informational self-determination and the maintenance of best practices related to the management and security of personal data. As a data controller under the terms of the legislation, you can process, collect, store and share data in compliance with the law, your personal data and registration information. As an operator, processing varies according to each contract, taking into account that the relevant communication and compliance steps are dealt with.

## Personal data protection at Montreal

All senior management and Montreal's Personal Data Protection Committee are committed to complying with all current national legislation relating to personal data, and to protecting the rights and freedoms of the people whose personal data is processed. To this end, in addition to this Policy, Montreal maintains a structured Personal Data Protection and Privacy Program. The Privacy and Data Protection Program is supported by other specific compliance and information security policies and procedures.

## Personal data security

Montreal has ISO27001 certification - Information Security, cyber security and privacy protection to support Data Management and ensure data integrity, confidentiality and availability. The Organization invests heavily in state-of-the-art technology and infrastructure.

The Organization has implemented the necessary technical and organizational measures to ensure the adequate security of the Personal Data under its responsibility. Therefore, all employees are responsible for ensuring that personal data is kept securely and legally.

## Contacting the Personal Data Protection Committee and the DPO

Our Personal Data Protection Committee can be contacted by e-mail: [comite.lgpd@montreal.com.br](mailto:comite.lgpd@montreal.com.br) for clarifications and questions about this Privacy and Personal Data Protection Policy. The DPO can be contacted directly at [dpo@montreal.com.br](mailto:dpo@montreal.com.br).

## Incidents involving personal data

Montreal evaluates and responds promptly to the occurrence of incidents that may compromise the personal data under its responsibility. If Montreal becomes aware of any incident involving the personal data under its responsibility, it will take the appropriate measures in accordance with the General Data Protection Act to avoid damage to data subjects, in accordance with its incident response process.

## Disposal of personal data

Montreal evaluates and responds promptly to the occurrence of incidents that may compromise the personal data under its responsibility. If Montreal becomes aware of any incident involving the personal data under its responsibility, it will take the appropriate measures in accordance with the General Data Protection Act to avoid harm to data subjects, in accordance with its incident response process.

Personal data processed by Montreal must not be kept for longer than is necessary for the specific purposes, observing the national legislation in force for the purposes of auditing, accountability and compliance with legal or regulatory obligations. The retention period will be based on the following criteria:

- a. Specific legislation with a fixed period for data retention;
- b. Montreal's internal policies;
- c. Existence of judicial, administrative or arbitration proceedings;
- d. Requests for information from government authorities.

Once the periods of storage of personal data have expired, they are removed from our databases or anonymized, except in cases where there is the possibility or need for storage due to legal or regulatory obligation.

For a better understanding, see our incident management policy.

## How to manage your cookie preferences

You can review your cookie permissions at any time and can enable or disable them, with the exception of necessary cookies. Currently, when you access our website for the first time, you are asked whether or not you agree to the installation of cookies.

To do this, we use an information banner system that alerts you and gives you the option to manage cookies. For a better understanding, please consult our cookie policy.

## Change Control

Montreal reserves the right to make changes or updates to this Privacy and Data Protection Policy at any time, and these changes will be duly updated on our Platforms. We suggest that you check them regularly to be aware of any changes.