


VGPPi – OVERVIEW OF INFORMATION PRIVACY PROCESSES

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1. INTRODUCTION

1.1. Objective

Inform customers and partners of the overview of information privacy processes.

1.2. Responsible

The Privacy Office is responsible for updating this document.

2. STANDARDS

2.1. General Privacy Policy

PPDP001 - PERSONAL DATA PROTECTION POLICY

Data Protection Policy - Establishes the internal guidelines and objectives for the Protection of Personal Data at LG lugar de gente. The policy applies to any personal data processing operation carried out by LG lugar de gente, regardless of the medium or country where the data is located, provided that: (i) the processing operation is carried out in Brazilian national territory; (ii) its purpose is the offer or supply of goods or services or the processing of data of individuals located in the national territory; and (iii) the personal data, which is the object of the processing, has been collected in the national territory.

Protection and privacy of personal data - Defines guidelines to ensure that the privacy and protection of personal data within LG lugar de gente is ensured as required by relevant legislation and regulations, where applicable.

Anonymization and deletion of Personal Data at the end of processing - Defines the rules for deleting Personal Data or delivering it in a form that does not allow the identification or re-identification of the holders of Personal Data, once the original personal data is no longer necessary for the purposes identified at LG lugar de gente.

Collection limit - Limits the collection of Personal Data to the minimum that is relevant, proportionate and necessary for the purposes identified for processing at LG lugar de gente.

Processing limit - Limits the processing of Personal Data in such a way that it is adequate, relevant and necessary for the purposes identified for processing at LG lugar de gente.

Accuracy and quality - Ensures and documents that Personal Data is accurate, complete and up to date, as required for the purposes for which it is processed, through LG lugar de gente's Personal Data lifecycle.

Disciplinary process - Defines guidelines to ensure that any breaches of Information Security and Privacy rules are dealt with fairly and consistently.

Retention - Do not retain Personal Data for longer than is necessary for the purposes for which the Personal Data is processed at LG lugar de gente.

Disposal - LG lugar de gente has documented policies, procedures and/or mechanisms for the proper and correct disposal of Personal Data.

Obligations for Personal Data Holders - Defines rules to provide the client with the means to comply with its obligations towards Personal Data Holders.

2.2. External Privacy Policy

PSIE001 - EXTERNAL PRIVACY POLICY

Publicly establishes the guidelines and practices adopted by LG lugar de gente for the collection, processing, storage, protection and eventual sharing of personal data. The policy covers the processing activities carried out by LG lugar de gente, including decisions related to how data is used, respecting the principles of transparency, security and compliance with current legislation, as well as ensuring that data subjects have mechanisms to exercise their rights under the LGPD.

2.3. Personal Data Protection Responsibility

NPD002 - PERSONAL DATA PROTECTION RESPONSIBILITIES STANDARD

Critical analysis of information security policies - Defines guidelines to ensure that Information Security and Privacy policies and standards are continuously relevant to the organization.

Data Protection and Privacy roles and responsibilities - Defines guidelines to ensure the existence of all roles and responsibilities for the management and operationalization of data protection and information privacy. Defines a contact point to be used by the customer in relation to the processing of personal data.

Segregation of duties - Defines guidelines for segregating conflicting duties and areas of responsibility to reduce opportunities for unauthorized or unintended modification or misuse of the organization's assets.

Terms and conditions of employment - Defines guidelines to ensure that employees and external parties understand their responsibilities and conform to the roles for which they have been selected. It aims to ensure that new hires understand LG lugar de gente's privacy and personal data protection rules, as well as their responsibility regarding Information Security.

Responsibilities and procedures - Establishes responsibilities and procedures for identifying and recording personal data breaches as part of the global information security incident management process. In addition, LG lugar de gente establishes responsibilities and procedures regarding notification to the parties involved in personal data breaches (including the timing of such notifications) and disclosure to the authorities, considering the regulations and/or legislation applied.

2.4. Consent to the Processing of Personal Data

NPD003 - CONSENT STANDARD FOR PROCESSING PERSONAL DATA

Determining when and how consent should be obtained - Documents the processes by which the organization can demonstrate the management of consent obtained from personal data subjects.

Obtaining and recording consent - Establishes the guidelines and requirements for obtaining and recording the data subject's consent for situations in which this is the legal basis used by LG lugar de gente for the processing of personal data, in accordance with documented processes.

Mechanisms for modifying or withdrawing consent - Defines the rules for providing mechanisms for Personal Data subjects to modify or withdraw their consents.

Marketing and advertising use - LG lugar de gente may not use Personal Data processed under a contract for marketing and advertising purposes without establishing that prior consent has been obtained from the appropriate Personal Data subject. The organization cannot provide this consent as a condition for receiving the service.

2.5. Responding to Requests from Data Subjects

NPD004 - STANDARD FOR RESPONDING TO REQUESTS FROM PERSONAL DATA SUBJECTS

Obligations to Personal Data Subjects - Determine and document your regulatory, legal and business obligations to Personal Data Subjects regarding the processing of their Personal Data and provide means to meet these obligations.

Information for Personal Data Subjects - Determines and documents the information to be provided to data subjects regarding the processing of their personal data, and the timing of such provision.

Requests from personal data subjects - Defines procedures for processing and responding to legitimate requests from personal data subjects.

Providing Information to Data Subjects - Defines guidelines for providing data subjects, in a clear and easily accessible manner, with information that identifies them and describes the processing of their personal data.

Mechanisms for denying consent to the processing of Personal Data - Defines the rules for providing mechanisms for data subjects to deny consent to the processing of their personal data.

Access, correction and/or deletion of Personal Data - Defines the guidelines to meet its obligations for data subjects to access, correct and/or delete their personal data.

Obligations of Personal Data controllers to inform third parties - Defines rules to inform third parties processing personal data on behalf of LG lugar de gente of any modification, cancellation or disapproval pertaining to the personal data shared, and to implement appropriate policies and procedures and/or mechanisms to do so.

Providing a copy of the Personal Data processed - Defines the guidelines for providing a copy of the Personal Data that is processed, when requested by the data subject.

2.6. Responsibilities of the Personal Data Controller

NPD005 - DATA CONTROLLER RESPONSIBILITIES STANDARD

It establishes the guidelines and objectives for defining the profile and duties of the LG lugar de gente Personal Data Controller.

2.7. Other Standards

We also have other rules that help us maintain the privacy of our information assets. The standards are based on best security practices and comply with ISO 27701:2019.

- Responsibilities of the CGPDP
- SGSI-SGPI indicators
- SGSI and SGPI Internal Audit
- Organization of Information Security Concept and PDP