

PPPD EXTRACT

Serpro Privacy and Data Protection Policy - PPPD

1.0 SCOPE - PPPD applies to all corporate services in which Serpro acts as a controller and also in those where it operates as an operator. The implementation and maintenance of corporate Privacy and Data Protection (P&PD) practices are aligned with business requirements and in line with the principles established in Article 6 of Law 13,709/2018, all applied to the data processing life cycle within the scope of Serpro.

2.0 SCOPE OF APPLICATION - PPPD applies to Serpro and all interested parties.

3.0 CONCEPTUAL ALIGNMENT - All technical and legal concepts related to P&PD are in line with the conceptual repertoire of Law 13,709/2018.

4.0 PREMISES - PPPD is aligned with other corporate policies. This alignment includes compliance with the rules of temporality, the maintenance of the Information Privacy Management System (SGPI) and its own model of Data Governance and Privacy integrated by the (coordination) structure of the Privacy and Protection of Personal Data Superintendence (SUPPD) and (support and collaboration) of the Strategic Governance, Risk, Control and Information Security Committee (COGRS).

5.0 DETERMINATIONS

- The SGPI is the result of the implementation of the Serpro Governance in Privacy and Personal Data Protection Program (PGPPDP).
- This Policy will be updated periodically and when necessary.
- Sensitive personal data and the personal data of children and adolescents will be processed differently.
- Regardless of the provisions of Article 6 of Law 13,709/2018, the PPPD adds its own principle load.
- Managers will ensure that data will be properly processed and protected from breach.
- The person in charge may designate sub-supervisor for each of the various organizational units.
- Serpro, as an "Operator", will strictly observe the Controller's contractual instructions and respect its policies, acting in a collaborative manner.

6.0 RESPONSIBLE - Compliance with this policy is the responsibility of the Executive Board, under the approval and monitoring of the Board of Directors and with the guidance of the Legal Board that implemented it. The Supervisor is the privacy and data protection governance coordinator.

7.0 FINAL PROVISIONS:

- All contracts will comply with the provisions of the PPPD;
- All corporate stakeholders will be aware of the PPPD and the external publication will be made by this Extract;
- Failure to comply with this policy implies disciplinary failure subject to sanction;
- There are no independent privacy and data protection policies and any details will be submitted to the PPPD;
- It is one of Serpro's strategies to be a reference in P&PD, acting for the benefit of its clients and the federal public administration;
- Other specific corporate privacy policies will align with the PPPD.