

DATA SECURITY AND PRIVACY

Code: PL-088-SI-01-04

Classification: Public

Document Type: Plan

Responsible Department: Information Security / Legal

Scala Data Centers



TABLE OF CONTENTS

1. OBJECTIVE.....	3
2. SCOPE	3
3. DEFINITIONS.....	3
4. REFERENCE DOCUMENTS	4
5. GUIDELINES.....	4
5.1. DATA COLLECTION	4
5.2. USE OF PERSONAL DATA	5
5.3. DATA STORAGE.....	5
5.4. GENERAL PROVISIONS	6
6. RECORDS.....	6
7. VERSIONS CONTROL.....	7
8. DISTRIBUTION LIST.....	7



1. OBJECTIVE

Inform the guidelines for the processing of Personal Data of Holders by Scala Data Centers, which includes, for example: the operations of collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of the information, modification, communication, transfer, diffusion or extraction of the data collected, as well as the registration of its activities. Personal Data is collected in accordance with the relationship that Scala Data Centers has with the Holder, and in compliance with the Applicable Legislation.

2. SCOPE

This document is applicable to the natural person who is the holder of personal data that has been collected by Scala Data Centers by reason of the relationship established with that Holder.

3. DEFINITIONS

For a better understanding and interpretation of the terms of this Policy, the following definitions will be adopted, used in the singular or plural, namely:

Data: the set of Anonymized Data and Personal Data.

Anonymized Data: is information that, alone or in combination with other Anonymized Data, prevents the identification of an individual, taking into account the use of reasonable and available technical means at the time of its processing.

Personal Data: is information related to an identified or identifiable natural person. They may include, for example, name, address, email, telephone, IP address and geolocation data.

Person Responsible or Data Protection Officer (DPO): person appointed by Scala Data Centers and responsible for acting as a communication channel between Scala Data Centers, the Holder and the Brazilian Data Protection Authority (ANPD). It is indicated at the end of this Policy.

Applicable Legislation: These are the laws, decrees, ordinances, resolutions and all legal norms that regulate the relationship between Scala Data Centers and the Holder with regard to the protection of personal data.



Holder: is the person holding the personal data provided to Scala Data Centers, in accordance with the relationship to be established with the company. They are clients, partners, suppliers, consultants, service providers and subcontractors in general.

4. REFERENCE DOCUMENTS

ISO 27001:2013

ISO 27701:2019

GENERAL PERSONAL DATA PROTECTION LAW – LAW No. 13.709/18

5. GUIDELINES

5.1. DATA COLLECTION

SUMMARY:

We collect the Personal Data provided by the Holder, directly or indirectly, for contact information, in commercial or professional relationships; information collected to comply with security rules; in the conclusion of contracts, etc. This data may be shared with Scala Data Centers partners, as long as they are duly authorized and committed to Scala Data Centers security and privacy guidelines. In any event, Scala Data Centers will only collect Personal Data from the Holder in accordance with the principles and purposes defined in the Applicable Legislation.

Personal Data will be collected:

- i. when entered or submitted voluntarily by the Holder;
- ii. from partners who have obtained authorization to share them with Scala Data Centers, and only in cases where this is required by legal obligation, contractual or other specific purpose, under the terms of the Applicable Legislation.

We point out that Scala Data Centers is not responsible for the veracity or inaccuracy of the information and Personal Data provided by the Holder.

DATA SECURITY AND PRIVACY

5.2. USE OF PERSONAL DATA

SUMMARY:

The Personal Data collected from the Holders may be used for the following purposes:

- i. Identification, authentication and authorization for access to Data Centers or other Scala Data Center facilities;
- ii. When concluding contracts;
- iii. In the case of commercial or professional contact;
- iv. Registration for purposes of contact by telephone, email, SMS, direct mail or by other means of communication, always with prior authorization from the Holder regarding its use;
- vi. Sending newsletters and emails that the Holder has agreed to receive.

The use, access and sharing of the Personal Data base formed under the terms of this Security and Privacy Policy will be done within the limits and purposes of Scala Data Centers' activities and the Applicable Legislation, and may be supplied and made available for access and/or consultation to the companies comprising Scala Data Centers' economic group, in compliance with all security and privacy rules and procedures of the company.

Internally, Personal Data will only be accessed by professionals duly authorized by Scala Data Centers, respecting the principles of purpose, adequacy, necessity - among others provided for in the Applicable Legislation - for Scala Data Centers' objectives, in addition to the commitment to security, confidentiality and privacy preservation, all of which are core values for Scala Data Centers.

5.3. DATA STORAGE

SUMMARY:

Scala Data Centers implements strict measures to guarantee the integrity and security of the Holders' Personal Data, which are collected and stored in a safe and controlled environment, in accordance with best market practices and always in accordance with the Applicable Legislation.



The Holder may request the display, correction or deletion of their Personal Data, through access to the channels informed at the end of this Policy. In these terms, the Holder may:

- i. request the display of your Personal Data, to correct or complement incomplete, inaccurate or outdated data concerning you;
- ii. request the deletion/exclusion of your Personal Data collected and recorded by Scala Data Centers, provided that the contract between you and Scala Data Centers has ended, and the minimum legal period for purposes of Scala Data Centers' legal obligations has completely elapsed;
- iii. in cases where the handling has been operated exclusively on the basis of the consent of the Holder, the Holder may revoke the consent. This will not affect the legality of the handling and processing of Personal Data performed before the revocation; or in cases where the handling also operates on another legal basis, such as compliance with a legal or regulatory obligation, by virtue of a contract or in case of legitimate interest of Scala Data Centers.

Scala Data Centers may, for purposes of auditing and preservation of rights, keep the registration history of the Holder's Personal Data, allowing Scala Data Centers to delete them definitively, in the cases of the Applicable Legislation. Scala Data Centers may also keep the Anonymized Data and anonymized version of the Data for statistical and study purposes, even after the request for deletion by the Holder. It should be noted that in this case, the Holder is no longer identified or identifiable, under the terms of the Applicable Legislation.

Finally, Scala Data Centers will only keep the Personal Data collected for compliance with legal obligations, auditing and preservation of rights, for the period necessary to fulfill these responsibilities, in the strict terms of the Applicable Legislation.

5.4. GENERAL PROVISIONS

Questions about the Holder's Personal Data can be directed by the Holder to the email: tratamentodedados@scaladatacenters.com.

Person Responsible or Scala Data Centers Data Protection Officer (DPO):
Anna Laura Baraf Svartman.

6. RECORDS



Identification	Classification	Protection	Storage Location	Recovery	Minimum Retention Time	Disposition (Form of disposal)
N/A	N/A	N/A	N/A	N/A	N/A	N/A

7. VERSIONS CONTROL

Version	Preparation			Critical Analysis			Approval		
	Date	Person Responsible	Department	Date	Person Responsible	Department	Date	Person Responsible	Department
4.0	12/05/2022	Márcio Felix	Information Security	12/05/2022	Sibele Costa Amereno	Legal	12/05/2022	Alexandre Correa da Silva	IT

Version	Change Made
4.0	Adjustments to the standard according to the guideline of procedure PR-088-SGI-02-02 Control of Documented Information. General review of the document to adapt to the Information Security guidelines at Scala.

8. DISTRIBUTION LIST

Public
