



DATA SECURITY AND PRIVACY

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Scala Data Centers



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1. OBJECTIVE

To provide guidelines for the processing of Holders' Personal Data by Scala Data Centers, which includes: 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 of collected data, in addition to recording their activities. Personal Data is collected in accordance with the relationship between Scala Data Centers and the Holder, and in accordance with Applicable Law.

2. COVERAGE

This document is applicable to the natural person that is the holder of the personal data collected by Scala Data Centers due to the relationship between Scala Data Centers and such Holder.

3. DEFINITIONS

For a better understanding and interpretation of the terms of this Policy, the following definitions shall apply, whether used in singular or plural:

Data: means the set of Anonymized Data and Personal Data.

Anonymized Data: means information that, individually or together with other Anonymized Data, prevents the identification of a person, considering the use of reasonable technical processes available at the time of its processing.

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

Person in charge or Data Protection Officer (DPO): means the person appointed by Scala Data Centers that is responsible for acting as a point of contact between Scala Data Centers, the Holder and the National Data Protection Authority (ANPD) and who is named at the end of this Policy.

Applicable Law: means the laws, decrees, ordinances, resolutions, and all regulations governing the relationship between Scala Data Centers and the Holder with regard to the protection of personal data.

Holder: means the person holding the personal data provided to Scala Data Centers, in accordance with its relationship with the company. Employees, customers, partners, suppliers, consultants, service providers and subcontractors in general can be Holders.

4. REFERENCE DOCUMENTS

ISO 27001:2013

ISO 27701:2019

Brazilian Data Protection Law (LGPD) – Law No. 13,709/18

5. GUIDELINES**5.1. DATA COLLECTION****SUMMARY:**

We collect Personal Data provided by the Holder, directly or indirectly, for contact information, in commercial or professional relationships; information collected to comply with security rules; to enter into contracts, etc. This data may be shared with Scala Data Centers third party associates, provided that such associates are duly authorized and agree to comply with Scala Data Centers' security and privacy guidelines. In any case, Scala Data Centers shall collect Personal Data from the Holder in accordance with the principles and purposes defined in the Applicable Law.

Personal Data shall be collected:

- i. when entered or submitted voluntarily by the Holder;
- ii. from third party associates who have obtained authorization to share them with Scala Data Centers, and solely if required by legal or contractual obligations or other specific purpose, in accordance with Applicable Law.

We note Scala Data Centers is not responsible for the veracity or accuracy of the information and Personal Data provided by the Holder.

5.2. USE OF PERSONAL DATA**SUMMARY:**

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



- i. Identification, authentication, and authorization to access Data Centers or other Scala Data Centers facilities.
- ii. Entering into contracts.
- iii. In the case of commercial or professional contact.
- iv. Registrations for contact purposes, whether by telephone, email, SMS, direct mail, or other means of communication, with prior authorization from the Holder for their use.
- vi. To send newsletters and emails that the Holder agreed to receive.

The use, access and sharing of the Personal Data database created pursuant to the terms of this Security and Privacy Policy shall be done in accordance with, and limited to, the purposes of Scala Data Centers' activities and Applicable Law. Such database may be made available for access and/or consultation by the entities that are part of the Scala Data Centers economic group, provided that the company's security and privacy standards and procedures are complied with.

Internally, Personal Data shall be accessed exclusively by professionals duly authorized by Scala Data Centers, taking into consideration the purpose, suitability, necessity of Scala Data Centers' purposes, including other set forth in Applicable Law, in addition to Scala Data Centers' commitment to security, confidentiality and preservation of privacy, which are paramount values of Scala Data Centers.

5.3. DATA STORAGE

SUMMARY:

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

The Holder may request the exposition, correction, or deletion of their Personal Data by through the channels provided at the end of this Policy. Under these terms, the Holder may:

- i. request the exposition of their Personal Data, to correct or complement incomplete, inaccurate or outdated data.
- ii. request the deletion of their Personal Data collected and recorded by Scala Data Centers, provided that the contract entered into by and between the Holder and Scala Data Centers is no longer in force, and the minimum legal term of the legal obligations to be complied by Scala Data Centers has expired.
- iii. in cases where processing has been operated exclusively based on the Holder's prior consent, the

Holder may revoke their consent, which shall not affect the legality of the treatment and processing of Personal Data carried out before such revocation; or in cases where the processing is carried out on other legal basis, such as compliance with legal or regulatory obligations, by virtue of a contract or in the case of legitimate interests of Scala Data Centers.

Scala Data Centers may, for the purposes of audits and preservation of rights, retain the historical record of the Holder's Personal Data, and Scala Data Centers shall have the option to definitively delete such record pursuant to Applicable Law. Scala Data Centers may also maintain the Anonymized Data and an anonymized version of the Data for statistical and study purposes, even after a deletion request from the Holder thereof, and in this case, the Holder is no longer identified or identifiable under the terms of Applicable Law.

Finally, Scala Data Centers shall retain Personal Data collected exclusively to comply with legal obligations, audit, and preservation of rights purposes, during the term required to meet such obligations, in the strict terms of Applicable Law.

5.4. GENERAL PROVISIONS

Questions about the Holder's Personal Data can be sent by the Holder to the following email:

tratamentodedados@scaladatacenters.com.

Data Protection Officer (DPO) at Scala Data Centers: Isabella Neves Elias Sarmento.

6. RECORDS

| Identification | Classification | Protection | Storage Location | Recovery | Minimum retention time | Disposal (Removal method) |
|----------------|----------------|------------|------------------|----------|------------------------|---------------------------|
| N/A | N/A | N/A | N/A | N/A | N/A | N/A |

7. VERSION CONTROL

| Version | Preparation | | | Critical Review | | | Approval | | |
|---------|-------------|----------------|------------|-----------------|----------------------|------------|------------|--------------------------|------------|
| | Date | Responsible | Department | Date | Responsible | Department | Date | Responsible | Department |
| 4.0 | 05/12/2022 | Márcio Felix | IS | 05/12/2022 | Sibele C Amereno | Legal | 12/05/2022 | Alexandre C. da Silva | IT |
| 5.0 | 20/06/2023 | Márcio Felix | IS | 20/06/2023 | Alexandre C da Silva | IT | 06/20/2023 | Isabella Elias Sarmiento | Compliance |
| 6.0 | 31/08/2023 | Giulia Venneri | - | - | - | - | - | - | - |

| Version | Amendments 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 it to the guidelines of Information Security at Scala. |
| 5.0 | Change of Person in Charge or Data Protection Officer (DPO) from Scala Data Centers. |
| 6.0 | Adequacy of the code according to PR-088-SGI-02 Control of Documented information. |

8. DISTRIBUTION LIST

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| Public |
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