



Privacy Policy of **smarters**

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Policy Objectives

1. Providing information, to facilitate the understanding, defining, determining, and guiding the guidelines for the PROCESSING of PERSONAL DATA at SMARTERS
2. Ensure the privacy and protection of PERSONAL DATA in compliance with the LGPD
3. Indicate the hypothesis of compliance regarding SMARTERS' procedures relating to the protection of PERSONAL DATA and ISO 27001
4. Training and engaging all the members of SMARTERS TEAM on PROCESSING of third person PERSONAL DATA
5. Empower all the members of SMARTERS TEAM about the PROCESSING of their own PERSONAL DATA in the company
6. Documenting the best governance practices adopted by SMARTERS



ISO/IEC 27002:2013 extension ISO/IEC 27701:2019 - Item 8.4.2 Compliance with the LGPD -The policy shall be available at all times to ensure compliance with rules and good practices regarding the protection of PERSONAL DATA.

WHY

Why: SMARTERS recognizes, promotes, and disseminates the importance of the DATA SUBJECTS' privacy and the positive impact of the PROCESSING of PERSONAL DATA, when appropriate.



How:: SMARTERS and SMARTERS TEAM shall always act in accordance with the best practices, including safety best practices, and always in compliance with the law and the principles of protection of the DATA SUBJECTS' rights.



Value: Responsible PROCESSING of PERSONAL DATA.



Applicability: the POLICY is applied to SMARTERS TEAM, including its partners, and to any third parties acting on behalf of SMARTERS.



Law and policies: the POLICY is directly related to all laws, rules, and regulations applicable to the matter and to other related SMARTERS' policies, and it is supplemented thereby, where applicable.



ISO/IEC 27002:2013 extension ISO/IEC 27701:2019 - Item 6.2. Compliance with the LGPD - Provide guidance from the company's management and support for privacy and protection of PERSONAL DATA, in accordance with the business requirements and relevant laws and regulations.

Definitions

All terms defined below shall have the same definition in plural or singular form. In addition, some terms that are defined by law will have the legal definition and the smarters definition - or simplified definition, so that everyone really understands them!

POLICY = this document, with the objectives and guidelines presented, reviewed from time to time and published for the SMARTERS TEAM

SMARTERS = RESPONSABLE DE TRATAMIENTO que puede ser CONTROLADOR u OPERADOR e instruye el EQUIPO SMARTERS a través de la POLÍTICA

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PERSONAL DATA = information related to an identified or identifiable individual



any information about someone, such as name, individual tax payers' register (CPF) number, address. Information about companies is not considered

SPECIAL PERSONAL DATA = P&3SO/"L D"T" related to race or ethnic origin, religious beliefs, political opinions, affiliation to unions or organizations of a religious, philosophical or political nature, data concerning health, seY life, genetics and biometric data, when linLed to an natural person



any information about someone that could lead to discrimination, even if in a positive way

CONSENT = freely given, informed, and unambiguous indication through which the DATA SUBJECT agrees to the PROCESSING of his/her PERSONAL DATA for a specific purpose



clear and informed "authorization" from the DATA SUBJECT for us to process his/her PERSONAL DATA"

DATA SUBJECT = natural person to whom the PERSONAL DATA refer, and whose PERSONAL DATA are subject to PROCESSING



owner of that name, CPF, address...

PROCESSING = tany operation carried out with PERSONAL DATA, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, erasure, evaluation or control of information, modification, communication, transfer, dissemination or eYtraction



absolutely anything and everything SMARTERS and SMARTERS TEAM. do with PERSONAL DATA - including erasure

CONTROLLER = natural or legal person, public or private responsible for decisions regarding the PROCESSING



company that establishes the rules on the PROCESSING

PROCESSOR = natural or legal person, public or private who performs the PROCESSING on behalf of the CONTROLLER



company that carries out the PROCESSING for or on behalf of the CONTROLLER

SUB-PROCESSOR = company contracted by the P3OC&SSO3 to assist in the PROCESSING for or on behalf of the CONTROLLER

PROCESSING AGENT = jointly or individually, the CONTROLLER, the PROCESSOR, and the SUBPROCESSOR

DPO = natural person designated by the CONTROLLER and P3OC&SSO3 to act as a contact point between the CONTROLLER, the DATA SUBJECTS, and ANPD



person chosen by SMARTERS to act on tasks related to protection of PERSONAL DATA, with the obligations described in the POLICY. Also known as Data Protection Officer

ANPD = Brazilian Data Protection Authority, responsible for ensuring, implementing, and supervising compliance with the LGPD in Brazil

LGPD = Law 13,709/18, the Brazilian General Data Protection Law; and, in this POLICY, all other rules and regulations on the matter

COMMITTEE = Data Protection Committee, a multidisciplinary group composed of SMARTERS partners, employees, and service providers, with varied duties, trained in the best practices and regulations for constant improvement of procedures with PERSONAL DATA, and which assists the DPO in his/her duties

ROPA = acronym for the Record Of Processing Activities, which is constantly updated, used at SMARTERS to map PROCESSING activities, its projects, apps, and "PIs that process PERSONAL DATA"

PERSONAL DATA BREACH = any confirmed adverse event related to any breach in the safety of PERSONAL DATA, such as unauthorized, accidental, or unlawful access that results in the destruction, loss, alteration, leaL, or inappropriate or unlawful PROCESSING that may cause rik to the DATA SUBJECTS rights and freedoms



any safety issue related to PERSONAL DATA that causes risks or injury to the DATA SUBJECT's rights

ISO 27001 = information safety standard defined by OIN that, when fully complied with, can generate a certification

Principles of LGPD

Purpose: reexecution of the PROCESSING for legitimate, specific and explicit purposes, informed to the DATA SUBJECT, which may not be later PROCESSED in a manner incompatible with such purposes



SMARTERS TEAM will never carry out any PROCESSING without a legitimate purpose.

Purpose limitation: compatibility of the PROCESSING with the purposes informed to the DATA SUBJECT, according to the context of the PROCESSING.



SMARTERS TEAM will not carry out PROCESSING with a purpose other than that informed to the DATA SUBJECT and if the CONSENT is for a specific purpose, another CONSENT will be collected for other purposes.

Data minimization: limitation of the PROCESSING to the minimum necessary to achieve its purposes, with the use of pertinent and proportional PERSONAL DATA that are not excessive in relation to the purposes of the PROCESSING of PERSONAL DATA.



SMARTERS TEAM will always carry out the minimum PROCESSING necessary for the fulfillment of the purpose.

Free Access: guarantee to the DATA SUBJECTS of easy and free consultation regarding the form and duration of the PROCESSING, as well as regarding the entirety of their PERSONAL DATA.



SMARTERS S.T&3S assists the DATA SUBJECTS, through the DPO and the COMMITTEE, by the email privacy@smarters.ai

Accuracy: guarantee to the DATA SUBJECTS that the PERSONAL DATA are accurate, clear, relevant and up-to-date, according to the necessity and for the purpose of the PROCESSING thereof.



SMARTERS will use efforts to ensure that the PERSONAL DATA processed are correct, adequate and up-to-date.

Transparency: guarantee to the DATA SUBJECTS of clear, accurate, and easily accessible information on the conduct of the PROCESSING and the respective PROCESSING AGENTS, observing trade and industry secrets.



SMARTERS TEAM will carry out a transparent PROCESSING and the provision of information to the DATA SUBJECTS may take different forms depending on the event, always with the aim of improving the DATA SUBJECT's experience and guaranteeing the objective and clear delivery of information. Examples are privacy policies, instruments of consent, and contractual clauses.

Security: use of technical and administrative measures able to protect the PERSONAL DATA from unauthorized access and accidental or illicit events of destruction, loss, alteration, communication, or disclosure.



SMARTERS TEAM will adopt proportional and appropriate safety measures for the PROCESSING, such as the use of passwords or encryption, whenever necessary.

Prevention: adoption of measures to prevent damage due to the PROCESSING of PERSONAL DATA.



SMARTERS TEAM will carry out the PROCESSING adopting a high level of caution with the safety of PERSONAL DATA to prevent any damage to DATA SUBJECTS and their rights.

Non discrimination: impossibility of carrying out the PROCESSING for illegal or abusive discrimination purposes.



SMARTERS TEAM will not, under no circumstances, carry out the PROCESSING with the aim of discriminating against the DATA SUBJECT.

Liability and Accountability: demonstration, by the PROCESSING AGENT, of the adoption of effective measures able to prove the observance of and compliance with PERSONAL DATA protection standards, including the efficacy of these measures.



The member of SMARTERS TEAM who carry out the PROCESSING will be responsible therefor and for complying with the POLICY in the fulfillment of their duties

Internal organization

The governance program on the protection of PERSONAL DATA will be implemented, reviewed, and maintained by the DPO, assisted by the COMMITTEE.



Data Protection Officer (DPO)

Is appointed by the board, through minutes of the shareholders' meeting.

His/her name and contact email shall always be publicly disclosed, as well as any substitutes whenever there is a change in position.

The contact email relating to PERSONAL DATA for DATA SUBJECTS, whether of SMARTERS TEAM or not, privacy@smarters.ai y dpo.ext@smarters.ai

His/her duties are:

1. Creating a strategic and comprehensive privacy program that defines, maintains, develops, and implements policies and processes for effective privacy practices, minimizing risks and ensuring the confidentiality of PERSONAL DATA.
2. Creating and implementing a communication plan on the protection of PERSONAL DATA at SMARTERS and ensuring interaction between the company's areas to promote a culture of PERSONAL DATA protection.
3. Coordinating the COMMITTEE for routine or emergency resolutions, creating and maintaining periodic monitoring to establish a culture of PERSONAL DATA protection.
4. Ensuring that the ROPA, SMARTERS' privacy policies and procedures are updated.
5. Carrying out, supervising, and maintaining procedures to track, investigate, evaluate, analyze, mitigate, correct, and document possible breaches and episodes of privacy risk of PERSONAL DATA such as PERSONAL DATA BREACH.
6. Taking a leadership role to ensure SMARTERS properly collects and maintains CONSENTS and provides notices in accordance with legal requirements.
7. Supervising, developing, and offering training and awareness on privacy and protection of PERSONAL DATA to SMARTERS TEAM, and sanctioning any intentional breaches proportionally and jointly with the COMMITTEE and HR.
8. Receiving communications from ANPD, taking the required measures, and managing all required breach notification processes.
9. Accepting complaints, communications, and reports from DATA SUBJECTS, responding to them, making active contact with information when necessary, providing clarifications, and adopting measures.
10. Establish guidelines for interactions with CONTROLLERS and PROCESSORS with whom SMARTERS shares or processes, in any way, PERSONAL DATA.
11. Preparing impact reports and PERSONAL DATA BREACH reports when necessary.

Internal organization



Committee

👤 It is autonomous as to its guidelines and its internal organization, such as its structure, frequency of meetings, and prioritization.

👉 Also created at the initiative of the board, by minute of the partners' meeting, to assist the DPO in his/ her activities.

👥 Its composition may be changed at any time, depending on the needs of SMARTERS or the COMMITTEE members, without the need to change the POLICY, but with the obligation to disclose the changes made..

Members: **Pietro Buquera Bujaldon**, SMARTERS' CEO (pietro@smarters.ai) + **César Gnechi**, SMARTERS' CTO (cesar@smarters.ai) + **Milla Cerqueira**, DPO (dpo.ext@smarters.ai) + **Felipe Aguiar**, software engineer hired by SMARTERS (felipe@smarters.ai) + **Bianca Isabelle Lourenço**, lawyer at SMARTERS (bia@smarters.ai) + **Ana Peng**, HR director (anapeng@smarters.ai)

The following are matters that may be deliberated by the COMMITTEE (among others that may be relevant):

1. The privacy program to be implemented by the DPO and any initiatives that help to create a culture of privacy and protection of PERSONAL DATA at SMARTERS.
2. Requests, complaints, communications, and reports from DATA SUBJECTS or the need to contact them to inform about their PERSONAL DATA.
3. Notifications, requests, or the need to contact ANPD to notify it regarding any breaches or provide information.
4. PERSONAL DATA BREACH, prevention procedures and possible tracking, investigation, evaluation, analysis, mitigation, correction, and documentation of breaches.
5. Update of SMARTERS' policies and procedures on PERSONAL DATA, application of training to SMARTERS TEAM and possible internal sanctions for intentional breaches.
6. **Approval of impact reports and PERSONAL DATA BREACH reports prepared by the DPO.**



Training awareness and engagement



SMARTERS will promote periodical training sessions for SMARTERS TEAM and inform in advance which of them are mandatory, ensuring everyone's participation.



All rules and instructions on the matter shall be treated in a simplified and accessible manner to generate the engagement of SMARTERS TEAM and promote the culture of privacy in the company.



The COMMITTEE and the DPO will always be available to clarify doubts and support SMARTERS TEAM about the PROCESSING of PERSONAL DATA of customers, suppliers, and any third parties, as well as their own PERSONAL DATA processed by SMARTERS.



The DPO and the COMMITTEE will participate in projects, new business development, and internal meetings or meetings with customers whenever requested by someone from SMARTERS TEAM who deems it necessary to assess issues related to privacy or protection of PERSONAL DATA.



SMARTERS TEAM members shall be always invited to participate and ask questions about the subject to clarify and develop the culture in a participatory and collaborative manner.



SMARTERS TEAM is and will always be instructed to prioritize privacy by design, i.e., application of the principles and guidelines on privacy and protection of PERSONAL DATA in the design of products and services developed



SMARTERS TEAM will have the necessary knowledge about SMARTERS' personal data breach response plan and will have free access to the COMMITTEE and the DPO to report any suspected breach or incident.



Data Subject's rights and obligations

→ Every member of SMARTERS TEAM shall respect the DATA SUBJECT's rights when carrying out any PROCESSING of PERSONAL DATA of others

←...and all of SMARTERS TEAM members shall have their rights respected as DATA SUBJECTS of their PERSONAL DATA

! Por lo tanto, ¡todos los derechos descritos en este documento también son **obligations y guidelines!**



The DATA SUBJECT has the right to:

1. Freedom and privacy
2. Be informed, clearly (about: their rights, the purpose, form, and duration of the PROCESSING, who is the CONTROLLER and what is his/her contact information and responsibilities, who is the PROCESSOR, if any, and his/her responsibilities, if their PERSONAL DATA are shared, with whom and the purpose of sharing it, what is CONSENT, what are the consequences of providing it and not providing it, what criteria and procedures are used for making automated decisions, if any)
3. Confirm the existence of PROCESSING
4. Access their own PERSONAL DATA
5. Correct or request the correction of incomplete, inaccurate, or outdated data
6. Request the anonymization, blocking, or erasure of their PERSONAL DATA processed in non-compliance with the LGPD
7. Receive their PERSONAL DATA to be transferred to another supplier
8. Withdraw their CONSENT
9. Request the erasure of PERSONAL DATA which CONSENT has been withdrawn
10. Oppose any PROCESSING that is not in accordance with the LGPD
11. Not be discriminated based on their PERSONAL DATA
12. Not having their PERSONAL DATA used for unlawful or abusive purposes
13. Request a review of decisions made solely by automated PROCESSING s whenever they affect their interest
14. Be notified of any PERSONAL DATA BREACH that may cause risk or material damage
15. File lawsuit or administrative act to ANPD or consumer protection bodies if they understand that their rights have been violated

It must be requested to the DPO or to the COMMITTEE by the email privacy@smarters.ai

✗ it is not possible to make requests on behalf of third person without specific power of attorney

✗ it is not possible to delete data necessary for the performance of any agreements in effect or negotiated to comply with a legal or regulatory obligation

✗ the withdraw of the CONSENT may preclude continuity of the service that motivates the PROCESSING

🔴 the DPO can and will require confirmation of some PERSONAL DATA or another way of confirming the identity of the DATA SUBJECT before transmitting any information to ensure the safety of the data

🔴 the DATA SUBJECT is responsible for the veracity of the PERSONAL DATA, and the inaccuracy thereof may generate civil (fines) and criminal consequences

🔴 the DATA SUBJECT is also responsible for redressing any damage caused intentionally or by fault, by action or omission, to SMARTERS, to the SMARTERS TEAM, and to any other DATA SUBJECT



Smarters' role

SMARTERS will be the **CONTROLLER** whenever fundamental decisions regarding the PROCESSING and the PERSONAL DATA are its responsibility

Ej.: PERSONAL DATA of SMARTERS TEAM members, processed to maintain the employment relationship, PERSONAL DATA of partners' employees for communication purposes

SMARTERS will be the **PROCESSOR** whenever fundamental decisions about the PROCESSING and PERSONAL DATA are made by the customer that contracted SMARTERS to carry out the PROCESSING on its behalf

Ej.: PERSONAL DATA of conversational agents' users that are processed to provide information on projects to customers

In carrying out any PROCESSING, SMARTERS will take all necessary initiatives to:

1. Keep PERSONAL DATA accurate and ensure the safety thereof by the DPO and the COMMITTEE
2. Prevent loss, damage, counterfeit, leakage, and unauthorized external access
3. Manage PERSONAL DATA and comply with information security regulations
4. Specify the purpose of the PROCESSING
5. Collect, store, and use PERSONAL DATA appropriately and only as required by its business
6. Follow the principles determined in LGPD and in this POLICY
7. Declare the legal basis on which that PROCESSING is based
8. Comply with specific requirements on SPECIAL PERSONAL DATA and PERSONAL DATA of children and adolescents
9. Not to cause, in any way, financial loss or damage, including to the image of the DATA SUBJECT
10. Respect the appropriate and necessary time and, upon completion of the purpose and without any legal or contractual obligation to keep them, delete or anonymize the PERSONAL DATA
11. Avoid technical incidents and those caused by human action or omission
12. Grant confidential treatment to PERSONAL DATA, whenever possible, and provide PROCESSING suitable for the purpose
13. Store PERSONAL DATA in a secure environment, regardless of whether it is electronic or physical
14. Respect the principles of the LGPD, such as respect for privacy, freedom of expression, economic and technological development, free enterprise, consumer protection, and human rights
15. Process PERSONAL DATA only to the extent of the CONSENT collected when this is the legal basis

Data sharing

(with partners, processors and sub-processors)



If SMARTERS shares with other companies any PERSONAL DATA of which it is the CONTROLLER (e.g., of SMARTERS team members) or PROCESSOR (e.g., of users of project conversational agents), SMARTERS shall:

1. Cherish on the selection of third parties capable of properly managing PERSONAL DATA and complying with all laws and regulations with the same quality standard and commitment of SMARTERS
2. Establish contractual clauses aiming at the safe sharing of PERSONAL DATA with its partners



The SMARTERS TEAM member **responsible** for this sharing shall:

1. Check the good standing of the partner or supplier
2. Ensure that it has signed with SMARTERS a PERSONAL DATA transfer agreement or a commercial contract that delimits the responsibility of each one regarding the PROCESSING
3. Check if the purpose of the sharing is legitimate and if the DATA SUBJECT can obtain information about the sharing whenever it wishes
4. Inform the DPO about the partnership or contract



PERSONAL DATA **may** only be shared with third parties if:

1. There is a specific CONSENT from the DATA SUBJECT
2. The PERSONAL DATA are duly anonymized
3. It is necessary to comply with agreements, including the SMARTERS TEAM employment contract
4. It is required in arbitration or lawsuits
5. It is necessary for carrying out an audit
6. It is required by law and regulation or by a public entity, such as a court or the police
7. It is necessary for protection of health management, life, or physical safety of DATA SUBJECT



ISO/IEC 27002:2013 extension ISO/IEC 27701:2019 - Item 8.5.5 Compliance with the LGPD - Ensure that PERSONAL DATA will not be disclosed for other purposes; and ISO/IEC 27002:2013 extension ISO/IEC 27701:2019 - Item 8.5.3 Compliance with the - Ensure that the PROCESSING of data has a level of protection and traceability.

International data transfer

? Is the sending, transfer, communication, dissemination, or interconnection of PERSONAL DATA to PROCESSING AGENTS located in third country

↳ e.g.: SMARTERS conversational agents that interact with the Brazilian public, collecting data, and sending them to a customer or partner located in another country

 The SMARTERS TEAM member responsible for the transfer shall inform the DPO so that he/she classify it under one of the applicable legal basis.



The transfer shall be:

1. To countries with the same degree of protection as Brazil
2. Based on specific contractual clauses
3. Based on standard contractual clause
4. Based on global corporate standards
5. For the protection of the life or safety of the DATA SUBJECT
6. Authorized by the ANPD
7. With specific CONSENT
8. For the performance of an agreement
9. To comply with a law or regulation
10. For the exercise of rights in lawsuits

✗ Events in which SMARTERS transfers, stores, and processes PERSONAL DATA with service providers located in other countries (e.g., email, cloud storage, and provision of application) shall not be deemed an international transfer of PERSONAL DATA.

✓ SMARTERS will seek qualified partners that can offer the same level of safety that PERSONAL DATA receives in Brazil



Consent to process data

 SMARTERS shall have on conversational agents available for its own use (e.g.: Pedro, Barbs), initiatives scheduled for standard collection and withdraw of CONSENT.

 SMARTERS shall be responsible for collecting, maintaining, and keeping the CONSENT only when it is the CONTROLLER



When SMARTERS is the CONTROLLER due to the collection of PERSONAL DATA in conversational flows of agents for internal use

1. SMARTERS will have available standard initiatives coded for collection and withdraw of CONSENT, when necessary.
2. SMARTERS will be responsible for collecting, maintenance, and safekeeping the CONSENT.
3. The intentions of ending the conversation and withdrawing the CONSENT will be constantly updated and will follow the opt-out macro-flow indicated in this POLICY and its updates.
4. The conversational flows will have NLP intentions programmed to clarify basic doubts of the DATA SUBJECTS, also as described in the opt-out macro-flow



When SMARTERS is the PROCESSOR due to the collection of PERSONAL DATA in conversational flows from licensed agents

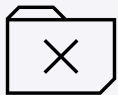
1. The CONTROLLER is responsible for instructing SMARTERS on the collection and withdraw of the CONSENT.
2. The initiatives for the collection of CONSENT must be instructed by the CONTROLLER, by providing a privacy instrument or policy or, also, by intention in the conversational flow that contains, at least, its scope, extent, and term, if determined.
3. The initiatives for withdraw of the CONSENT, its form, extent, and impacts shall be instructed by the CONTROLLER and, if there is no instruction, the flows with initiatives standardized by SMARTERS shall apply, in compliance with the LGPD and excluding any responsibility of SMARTERS regarding the adequacy of the standardized content.

Personal data erasing



The PERSONAL DATA will be stored by SMARTERS only for the period required for fulfillment of its purposes.

1. The PERSONAL DATA will be stored by SMARTERS only for the period required for fulfillment of its purposes
2. Upon identification of term of the purpose of that PROCESSING, the SMARTERS TEAM member responsible for that PERSONAL DATA shall eliminate it
3. If the purpose is linked to any legal or regulatory obligation, SMARTERS shall keep the PERSONAL DATA in accordance with the period indicated in the law or regulation
4. If SMARTERS chooses not to delete the PERSONAL DATA, or due to technical impossibility, the PERSONAL DATA shall be duly anonymized for the retainment thereof to be possible



DATA SUBJECTS may request the erasing:

1. Only of their PERSONAL DATA, or that related to children or adolescents for whom they are legally responsible, or presenting a power of attorney from the DATA SUBJECT
2. At any time, as long as SMARTERS does not have to store them to comply with a legal or regulatory obligation
3. Through the communication channels with the DPO and the COMMITTEE
4. By withdrawing the CONSENT if CONSENT is the legal basis that legitimizes the PROCESSING

 If the DATA SUBJECT requests the erasure of PERSONAL DATA necessary for performance of an agreement or offer of a product or service, SMARTERS shall inform about the impossibility of proceeding with that performance since the data is erased

 Upon receipt of the erasure request by the DATA SUBJECT, SMARTERS TEAM member who receives it shall inform the DPO to assessment of the impacts of that erasure or request by the DATA SUBJECT.

Personal data breach

? Is the confirmed adverse event of breach in the safety of PERSONAL DATA

↳ e.g.: Unauthorized access, destruction, loss, alteration, leakage, and anything that may represent a risk to the rights of the DATA SUBJECT

Technical incident relates to electronic, hardware, or software problem

E.g.: firewall breach, virus

Incident due to human action or omission relates to the action taken or not taken by an individual.

E.g.: PERSONAL DATA of agents' users that are processed to provide information on projects to customers

▶ If there is an PERSONAL DATA BREACH

1. The SMARTERS Personal Data Breach Response Plan shall be followed
2. All SMARTERS TEAM members shall immediately inform the DPO and the COMMITTEE when discovering or suspecting an PERSONAL DATA BREACH with:
 - a. The nature (e.g., internet hacking, theft or loss of equipment, viruses, unauthorized dispersion)
 - b. The PERSONAL DATA affected
 - c. The date, time, place, and duration of the PERSONAL DATA BREACH
 - d. Individuals involved in or who are aware of the event
3. The SMARTERS TEAM member who identifies the PERSONAL DATA BREACH or who is aware thereof shall assist the DPO and the COMMITTEE in identifying the possible risks, and may not disclose, communicate, or inform what happened without the proper authorization of the DPO or the COMMITTEE, under penalty of disobedience
4. If the DPO and the COMMITTEE identify damage or risk of relevant damage to DATA SUBJECT'S rights, the PERSONAL DATA BREACH must be informed to the ANPD within 2 business days, pursuant to the Personal Data Breach Response Plan
5. SMARTERS and all SMARTERS TEAM members are expected to cooperate with any investigation that takes place on the matter
6. If SMARTERS is the PROCESSOR of the PERSONAL DATA involved in the PERSONAL DATA BREACH, the CONTROLLER shall be immediately notified to guide preventive actions and in order to reverse the incident.





Changes in the Policy

SMARTERS, SMARTERS TEAM and their activities are constantly being improved, as is this POLICY. Therefore, its most current version will always be available in digital media and should be consulted regularly.