

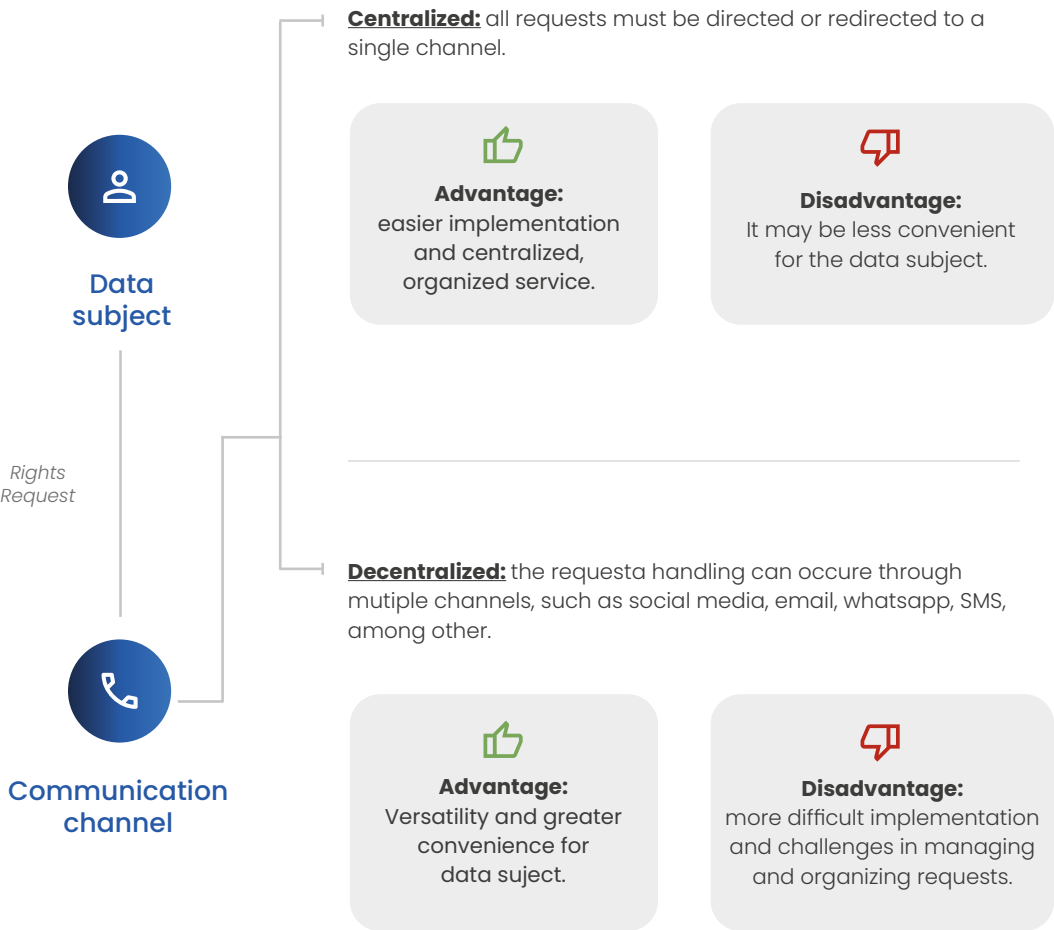
DATA SUBJECT RIGHTS HANDLING PROCEDURE

how to respond to data subjects' requests?

This flow aims to structure the process of communicating with data subjects in cases of rights requests, ensuring efficiency and compliance with the General Data Protection Law (Law No. 13,709/2028 – LGPD).

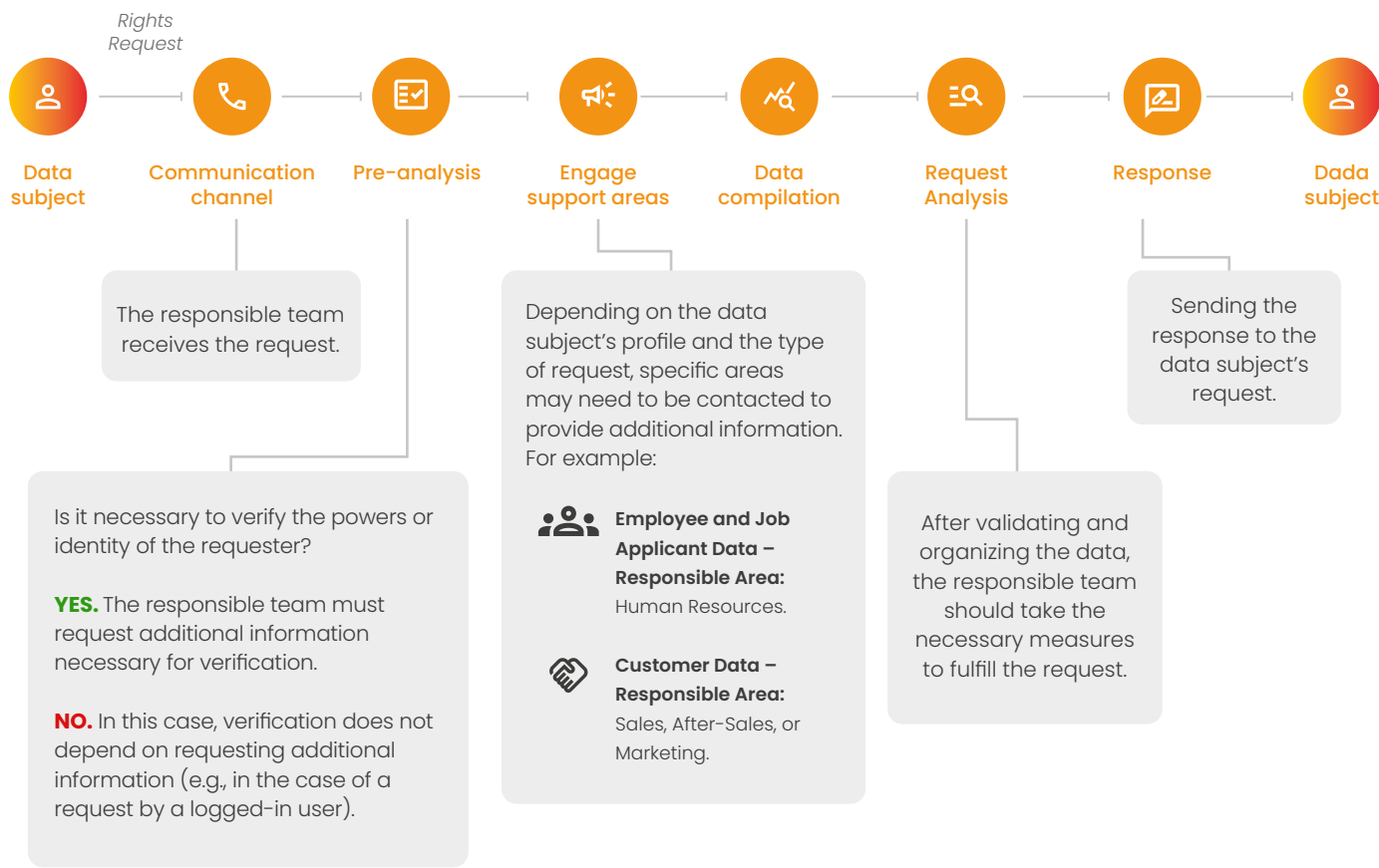
DEFINING THE APPROPRIATE CHANNEL

Initially, it is important to establish which communication channels will be responsible for receiving requests from data subjects.



DEFINING THE HANDLING FLOW

After defining the communication channels, the internal flow for handling requests should be organized, taking into account the main steps outlined below.



Note 1: Relevant suppliers or partners

It is possible that, in certain contexts, the data subject's personal data may have been shared with suppliers, business partners, or other third parties. In such cases, it is important, especially for requests for data deletion and rectification, that these third parties are contacted to replicate the same measures.

Note 2: Data processing agents

According to the LGPD, the controller is responsible for responding to data subject requests. Therefore, if a processor receives a request, they must take the necessary steps to forward that request to the responsible controller—ideally, the contract between the controller and the processor will establish how this flow should occur.

Note 3: Response timeframe

In general, the LGPD only specifies the deadline for responding to the right of access request, which is 15 days (in full format). Other deadlines may still be regulated by the ANPD. Specific legislation may provide for different deadlines depending on the relationship between the processing agents and the data subjects—for example, in consumer relations, Article 43, §3 of the Consumer Protection Code (Law No. 8,078/1990) provides 5 business days for responding to data rectification requests.