

Public Call No. 2/2025

# ARTIFICIAL INTELLIGENCE AND DATA PROTECTION REGULATORY SANDBOX

The Brazilian Data Protection Authority (ANPD) published, on June 27, 2025, the [Public Call for Participation in the Experimental Regulatory Environment Pilot \(Sandbox\) on Artificial Intelligence and Data Protection](#) ("Regulatory Sandbox").

The Sandbox aims to provide an experimental environment in which the ANPD can oversee the development and testing of AI projects that involve experimenting with innovative techniques, technologies, and business models. For this edition, the ANPD intends to place greater emphasis on projects concerning algorithmic transparency.

## WHAT IS A REGULATORY SANDBOX?

An **experimental regulatory environment**, created and overseen by the competent authority (in this case, the ANPD), where companies or innovative projects can **operate under more flexible rules for a limited time period** in order to **test products, services, or business models** that do not yet fully fit within the existing legislation.



### REASONS TO PARTICIPATE

- Cooperation relationship with the ANPD
- Testing without risk of sanctions
- Controlled interruption in case of issues
- Time and compliance cost savings
- Continuous technical guidance from the ANPD

### PARTICIPATION REQUIREMENTS

- Be a public or private legal entity with headquarters or legal representation in Brazil
- Have the ability to develop the project in compliance with the obligations established by the ANPD
- Have the technical and economic capacity to develop the project, with own technical and financial resources
- Not be prohibited from participating in public calls or entering into contracts with the Public Administration

## DUTIES OF THE PARTICIPANTS



If approved, the participant must submit, within a future deadline to be defined by the Sandbox committee, the following information:

- Procedures and measures required** for the start of the project testing, necessarily including an **indicative operational schedule**
- Mechanisms**, even if simplified, that will be used to **receive and respond to requests or inquiries from data subjects**
- Transparency measures** planned to comply with the **information and communication** rules set by the Sandbox committee
- Simplified analysis of the main risks** related to the processing of personal data in the development of the project, **including those related to security incidents**
- Justified indication of the **information** contained in the required documentation that should be **protected as trade or industrial secrets**
- Operation **discontinuation plan**

### DISCONTINUATION PLAN

The discontinuation plan is the document that details how the participant will terminate its activities within the Sandbox, ensuring compliance with all obligations established in the Public Call. The discontinuation plan shall:

- describe the actions and procedures to be adopted at the time of termination
- present a communication strategy to promptly inform stakeholders about the end of the testing phase
- list potential obstacles and risks that may affect the execution of the plan itself
- explain the mechanisms that will be applied to eliminate or mitigate those obstacles and risks

## TIMELINE

15/jul



Clarification webinar

10/aug



Deadline for submissions

02/oct



Announcement of selected participants

## HOW TO APPLY?

Interested parties must send an email to [sandbox@anpd.gov.br](mailto:sandbox@anpd.gov.br) with the subject line "Inscrição – SANDBOX REGULATÓRIO DE IA E PROTEÇÃO DE DADOS" and include the following documents:

- Completed **application form** (Annex II of the Public Call)
- Articles of incorporation/bylaws of the private legal entity**, along with **documentation of the legal representative**
- Proof of registration and current status with the CNPJ** (Brazilian National Registry of Legal Entities)
- Negative bankruptcy certificate** issued by the competent Court of Justice
- Statement of awareness and agreement with the terms of the Public Call**, and of technical and economic capacity (as per the model in Annex III of the Public Call)
- AI projects portfolio** demonstrating the participant's prior experience