VULTUS	**Main process**	Information Security
	Process title	Personal Data Privacy Governance
	Department / Owner	DPO
	Revision code	005.07

Our Commitment to Privacy and Data Protection

Vultus reaffirms its commitment to privacy, security, and transparency in personal data processing, in accordance with industry best practices, Law No. 13,709/2018 (LGPD), ISO/IEC 27701:2019 and ISO/IEC 27001:2022, and guidelines from Brazil's National Data Protection Authority (ANPD).

Privacy and Data Protection Principles

- Purpose and suitability: data is collected only for legitimate, specific purposes compatible with the contracted services.
- Necessity and proportionality: we process only strictly necessary data, respecting data minimization.
- Transparency: data subjects receive clear information about the use and purposes of processing.
- Security and confidentiality: technical and organizational measures protect data against unauthorized access, loss, alteration, or destruction.
- Accountability: Vultus demonstrates compliance and the effectiveness of its controls.
- Prevention and nondiscrimination: practices to avoid harm and ensure no discrimination in the use of personal data.

Our Role: Controller and Processor

Vultus is the controller of employee, candidate, and business contact data, and the processor of clients' personal data handled when providing services, always under a contract and nondisclosure agreement (NDA) with the client.

Data Subject Rights

Under the LGPD, data subjects may request from Vultus at any time: confirmation of processing; access to, correction, or updating of data; deletion or anonymization, where applicable; portability; withdrawal of consent; and information on sharing and legal bases used. Requests are made through official privacy channels and answered within LGPD deadlines: immediate confirmation in simplified form and a complete statement within 15 days.

Data Processing and Consent

Processing relies on the legal bases provided by the LGPD, including contract performance, compliance with legal obligations, legitimate interests, and consent. When processing requires consent, it is requested freely, with clear information and prominence, and may be withdrawn at any time.

Data Retention and Deletion

Personal data is stored only as long as necessary to fulfill its legal, contractual, or regulatory purposes. It is then securely deleted in accordance with ANPD guidelines and information security best practices.

Data Protection Officer (DPO)

The Data Protection Officer (DPO) is the point of contact between Vultus, data subjects, and ANPD. Privacy questions, requests, or communications may be sent to dpo@vultuscyber.com.br, compliance@vultuscyber.com.br, gilson.batista@vultuscyber.com.br, or (11) 9.5617-7032.

Reporting Channel

Anyone may confidentially report suspected privacy or information security violations, with protection against retaliation, by emailing denuncias@vultuscyber.com.br. More information at www.vultuscyber.com.br.

ANPD Relations and Regulatory Compliance

Vultus complies with ANPD guidance and determinations, responding transparently and without undue delay to requests. In the event of security incidents posing significant risk to data subjects, we notify ANPD and the affected individuals within regulatory deadlines. Processing activities are reviewed periodically and, when necessary, supported by Personal Data Protection Impact Assessments (RIPD).

Revision History

Revision	Date	Revised content
016.01	Feb 25, 2022	Creation of the Public Personal Data Privacy Governance Policy.
016.02	Oct 24, 2022	Review of version 1.0, updating section 8 (Approvals).
016.03	Sep 29, 2023	Review of version 1.0, updating section 8 (Approvals).
016.04	Oct 9, 2024	Review of the logo, organization name, font, revision, and section 10 (Approvals).
016.05	Nov 25, 2024	Review of section 7 (Penalties).
016.06	Jul 15, 2025	Approval review, updating Legal leadership.
005.06	Oct 29, 2025	General policy review, filename, and version naming.
005.07	Oct 24, 2026	Roles as controller and processor, data subject response deadlines, and incident notifications. Added the reporting channel. Standardized layout, owners, and publication (Drive and Vultus Sites). Corrected the reporting channel (denuncias@) and standardized the VULTUS Cybersecurity name (October 29, 2026).

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Approvals

Owner	Date	Signature
Executive Leadership	Oct 30, 2026	Alexandre Brum
DPO and Enterprise Risk	Oct 30, 2026	Gilson Batista