IndCloud ERP IndCloud CRM

PERSONAL DATA PROTECTION

Privacy Policy
Indcloud ERP and Indcloud CRM

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This Policy explains how **RAPHAEL DE ARAUJO SILVA ME (Grubtech)**, CNPJ 30.444.499/0001-97, headquartered at Rua Costa Barros, 698, Conj. 3, Vila Alpina, São Paulo/SP, Brazil, ZIP 03210-000 ("Grubtech") processes personal data on the grubtech.com.br website and in the Indcloud ERP and Indcloud CRM systems, in accordance with the Brazilian General Data Protection Law (LGPD, Law 13,709/2018). This English version is a translation; in case of discrepancy, the Portuguese version prevails.

1 Grubtech's two roles

1.1 Grubtech is the controller of the data it decides to collect itself: from website visitors, from people who request contact or a proposal, and from the representatives and Users of client companies (for registration, contract, billing, support and notices about the systems).

1.2 Grubtech is the processor of the data that client companies enter into the systems (their customers, suppliers, employees, contacts and buyers, and the conversations recorded in the CRM). In this case, the client company is the controller and decides about the data; Grubtech only processes it to provide the service, according to the Terms of Use and the client's instructions.

1.3 If your data was entered by a Grubtech client company, please contact that company first. Requests about this data that reach Grubtech will be forwarded to it.

1.4 G ERP has its own Privacy Policy, published at grubtech.com.br/politicas.aspx.

2 Data processed by Grubtech as controller

2.1 We process the following data, for the purposes indicated:

- **a.** identification and contact (name, position, company, CNPJ or CPF, e-mail, phone and address): registration, contract, billing, support and notices about the systems;
- **b.** system access data (user, date and time, screens accessed and technical data about the connection and browser): security, access control, support and improvement of the systems;
- **c.** support messages (tickets, e-mail and WhatsApp): support and service history;
- **d.** public company data (such as from the Brazilian Federal Revenue Service and Sintegra): verification of registrations;
- **e.** website browsing data (cookies, section 8): website operation and, with your consent, statistics and marketing;
- **f.** commercial contact: news and offers about Grubtech products, always with the option to unsubscribe.

2.2 We rely on these legal bases of the LGPD (art. 7):

- **a.** performance of a contract, for registration, billing, support and provision of the service;
- **b.** compliance with a legal obligation, for tax and accounting documents and records required by law;
- **c.** legitimate interest, for security, improvement of the systems and communications to clients, always respecting your rights;

d. consent, when required, such as for marketing to people who are not yet clients and for non-essential cookies.

3 Data that client companies enter into the systems

3.1 This data is used only for the systems to work: registering, selling, issuing tax documents, billing, production, reports and the other functions used by the client. It is never sold or used for Grubtech's marketing.

3.2 Grubtech's team only accesses this data for support, bug fixing and updates, under confidentiality.

3.3 Digital certificates and access keys to banks and government agencies provided by the client are stored securely and used only for the function the client has enabled.

4 Who data is shared with

4.1 Grubtech does not sell personal data. It shares only what each service needs with:

a. Google Cloud: hosting of the systems, database and backups;

b. tax document issuance and transmission services (such as TecnoSpeed/PlugNotas and ManagerSaaS) and the tax authorities (SEFAZ, city governments and the Brazilian Federal Revenue Service);

c. company registration lookup services (such as CNPJá, ReceitaWS and BrasilAPI);

d. banks and payment institutions, when the client uses bank slips, remittance files and statements in the ERP;

e. e-mail providers, for sending tax documents, bank slips and notices and, in the CRM, for the e-mail account the client connects;

f. WhatsApp (Meta), for messages sent and received through the CRM;

g. Twilio, for phone calls and SMS made through the CRM;

h. artificial intelligence services (Google and OpenAI), only when the User uses an AI feature of the systems, such as automatic document reading in the ERP and the AI features of the CRM;

i. search, maps and company contact lookup services (such as Google, Serper and Hunter.io), when the User uses the CRM's company and contact search;

j. Google reCAPTCHA, to protect the website's forms against bots;

k. Google Analytics and Google Ads, for website visit statistics and ads, with your consent in the cookie notice;

l. authorities, when required by law, court order or administrative order, and for Grubtech's defense in legal proceedings;

m. another company, in the event of a merger, acquisition or change of control of Grubtech, with notice to clients.

4.2 Each supplier receives only the data it needs and follows its own privacy and security rules.

5 Where data is stored

5.1 The systems and the data are stored on Google Cloud servers in the United States. Backups are kept in another region, also in the United States, separate from the system. Some suppliers listed in section 4, such as artificial intelligence, WhatsApp and telephony, also process data outside Brazil.

5.2 This international transfer is carried out under art. 33 of the LGPD and the regulations of the Brazilian National Data Protection Authority (ANPD), with the contractual and security safeguards offered by the provider.

6 How data is protected

6.1 Measures in place include:

- **a.** encrypted communication (HTTPS) between the browser and the systems, and an encrypted connection to the database;
- **b.** data stored encrypted by the cloud provider;
- **c.** access with personal username and password, with per-User permissions and the option to sign out all sessions;
- **d.** servers protected by a firewall, with only what is necessary exposed to the internet, and kept up to date;
- **e.** daily backups, kept in a separate project, locked against deletion and checked every week, according to the Backup Policy;
- **f.** team access restricted to those who need it, under confidentiality.

6.2 No system is immune to risk. Security incidents are handled according to the Incident Response Policy. When there is a relevant risk or damage, Grubtech notifies the client company and, where applicable, the data subjects and the ANPD.

7 How long data is kept

7.1 Data that client companies enter into the systems: for as long as the contract lasts. After termination, the database is deleted within 90 days. Backups remain locked and expire on their own within 90 days (daily) and 12 months (monthly).

7.2 Registration, contract and billing data of client companies: for the period required by tax and accounting laws and for as long as needed to defend rights.

7.3 System access logs: for the period required by the Brazilian Internet Civil Framework (Law 12,965/2014).

7.4 Data of people who request contact or a proposal and do not become clients: up to 24 months after the last contact, or earlier if you ask.

7.5 Data used for commercial contact: until you ask to unsubscribe.

8 Cookies

8.1 The systems use only cookies necessary for their operation (session, login and security) and to remember usage preferences. They do not use marketing cookies.

8.2 The website uses necessary cookies and, only with your consent in the cookie notice, statistics and marketing cookies. You can delete or block cookies in your browser settings; blocking necessary cookies may prevent the use of the website or the systems.

9 Your rights

9.1 As a data subject, you may request, free of charge and at any time (art. 18 of the LGPD):

- **a.** confirmation that we process your data and access to it;
- **b.** correction of incomplete, inaccurate or outdated data;
- **c.** anonymization, blocking or deletion of unnecessary or excessive data, or data processed unlawfully;
- **d.** data portability;
- **e.** deletion of data processed based on your consent, except when the law requires it to be kept;
- **f.** information about who we share your data with;
- **g.** withdrawal of consent and information about the consequences of not consenting;
- **h.** objection to processing carried out in breach of the LGPD;
- **i.** review of decisions made solely by automated processing that affect your interests (art. 20 of the LGPD).

9.2 Requests are made through the channels in section 10. We may ask for proof of identity. We respond within 15 days.

9.3 You may also file a complaint with the Brazilian National Data Protection Authority (ANPD), at gov.br/anpd.

10 Data Protection Officer

10.1 Grubtech's data protection officer is Raphael de Araujo Silva, reachable by e-mail at indcloud@grubtech.com.br or by WhatsApp at +55 11 97466-4832.

11 Changes to this Policy

11.1 This Policy may be updated. The current version is available at grubtech.com.br/politicas.aspx, with the date at the top. Relevant changes are notified to client companies by e-mail or by a notice in the systems.

Contact: indcloud@grubtech.com.br · WhatsApp +55 11 97466-4832 · Policies: grubtech.com.br/politicas.aspx