

FREQUENTLY ASKED QUESTIONS – FAQ

1. What is the General Law on Personal Data Protection - LGPD? To whom does it apply?

The General Law of Personal Data Protection (LGPD - Law No. 13,709/18), is the law that aims to protect Personal Data of natural persons ("Holder"), seeking to ensure transparency and security on how this Personal Data is treated by third parties.

LGPD applies to any person, natural or legal, who performs Personal Data Handling activities (by physical or virtual means) in the Brazilian territory, offers goods or services to Data Subjects located in Brazil or has collected Personal Data in Brazil.

2. What is Personal Data?

Personal Data is information related to a natural person that makes it possible to identify him/her directly or, if associated with other data, to make this identification possible, such as, for example, name, RG/CPF, address, e-mail address, telephone number, profession, IP address and geolocation.

3. What is Personal Data Handling?

According to the LGPD, Handling means any operation carried out with Personal Data, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or information control, modification, communication, transfer, dissemination, or extraction of Personal Data.

It can therefore be said that the mere access to the Personal Data of a Data Subject is enough to configure Handling.

4. Does the Vale Institute of Technology comply with LGPD?

We seek, through the application of technology and innovation, to ensure that the privacy of our users and students is fully met, with a view to achieving maximum transparency in data processing. With the LGPD, we reinforce this idea, committing to comply with all the obligations defined in the LGPD during our Personal Data Handling activities.

We continuously improve the suitability of all our processes, providing adequate security of Personal Data, giving you a transparent view of the Handling, and ensuring that you can exercise your rights as a Data Subject.

5. What is Sensitive Personal Data?

Sensitive Personal Data is the Personal Data that due to its nature requires even greater caution in its treatment, since it may reveal data about creed, race, political opinion, health, among other information linked to a natural person, as provided in Article 5, II of LGPD.

6. Does the Vale Institute of Technology handle sensitive personal data?

During the operations performed, we may collect certain Sensitive Personal Data, always in accordance with the purposes set out in our [Privacy Notice](#).

In compliance with the principle of necessity, we undertake to collect only the data necessary to achieve the stated purpose.

7. What is anonymized data?

Anonymized Data is the data that does not allow the identification of a natural person, since it loses the possibility of direct or indirect association with the Holder, in other words, it is not characterized as Personal Data.

This data may be used by us for statistical purposes.

8. How is Personal Data collected?

We may collect Personal Data when you provide it to us for the purposes of enrolling in our courses and while using the functionalities made available by us, which includes but is not limited to checking attendance and issuing diplomas. In addition, we may collect digital identification data when you visit our website.

9. Where does the Vale Institute of Technology store Personal Data?

Personal Data may be stored on mobile media, electronic devices, or in physical files owned by us.

Furthermore, Personal Data may also be stored on servers installed in Brazil or abroad using cloud computing services.

In any scenario we will undertake the necessary efforts to guarantee the confidentiality and security of Personal Data.

10. What is the National Data Protection Authority - ANPD?

The National Data Protection Authority - ANPD is a federal public administration body linked to the Presidency of the Republic, which, among other duties, is responsible for overseeing the protection of Personal Data, inspecting, and applying administrative sanctions to those who disregard the LGPD, receiving complaints from Data Subjects, and encouraging knowledge about Personal Data protection.

11. Who is the Vale Institute of Technology Personal Data Officer? What does he or she do?

Our Personal Data Officer is the focal point for communications between us, the ANPD and you. In addition to advising our employees on Data Protection regulations, he or she will ensure that requests you make regarding Personal Data are met.

You can contact our Personal Data Officer by e-mail: dpo@itv.org.

12. What are your rights and how can you enforce them?

You have the basic rights of Intimacy, Liberty and Privacy, in addition to the specific rights set forth in the LGPD, according to the legal basis used in handling data and the terms quoted below:

- **Access:** You have the right to know which of your Personal Data we have handled.
- **Confirmation of Existence of Handling:** You have the right to know if we perform any handling activities on your Personal Data.
- **Correction:** You have the right to ask us to correct your Personal Data that is incorrect, inaccurate and/or outdated.
- **Deletion:** You have the right to request the deletion of your Personal Data.
- **Sharing Information:** You have the right to know with whom we share your Personal Data.
- **Restriction:** You have the right to request that we anonymize or block your unnecessary or excessive Personal Data.
- **Opposition to Processing:** You have the right to object to the handling of your Personal Data at any time.
- **Portability:** You have the right to request that your Personal Data undergoing our handling be transferred to another company designated by you.

➤ **Revocation and information on consequences:** You have the right to revoke your consent for the purposes of handling Personal Data linked to it, as well as to be informed of any consequences on the provision of services arising from the revocation request.

You can enforce your rights through our Contact Channels: dpo@itv.org

To enable us to provide all the clarifications and make possible the exercise of your rights, as the case may be, please remember to inform us, in a clear and objective manner: **(i)** your identification as requested **(ii)** what the request is, and **(iii)** the right you would like to enforce.

We remind you that the limitation to handling some of your Personal Data, through the exercise of rights such as requests for blocking, deletion, or revocation of consent, may make it impossible to perform the services provided by us to You. However, do not worry, we will inform you when this is the case, and the decision on whether to proceed with the request is at your discretion.

13. For how long can the Vale Institute of Technology keep my Personal Data?

The retention periods for Personal Data vary according to the reasons we process your data. We keep your Personal Data only for as long as it is necessary to comply with the purposes for which it is processed and with our legal obligations.

These periods may be extended in accordance with specific regulations issued by a regulatory authority, legal obligations arising from law, or for the preservation of rights.

14. Where can I get more information about Privacy and Data Protection?

You can get more information about how we handle and protect your Personal Data by referring to our [Privacy Notice](#).

15. Are there subcontracted companies that will have access to my Personal Data? How does the Vale Institute of Technology monitor or control the legitimacy of this use?

For support in certain activities, we may subcontract with third-party service providers. We refer to these third parties as sub-operators. To ensure compliance in the protection of your Personal Data to which these sub-operators may have access, we have contracts defining their obligations and accountability in case of any irregularities in handling your Personal Data.

We are always monitoring the compliance of these sub-operators and ensure that we only share data that is strictly necessary to achieve a certain purpose and for as long as it takes for this to occur.

16. How does the Vale Institute of Technology protect information?

We have internal policies on Information Security, Privacy and Data Protection, and we conduct periodic training with our employees. Furthermore, our facilities have strict security and access controls, coupled with secure processes throughout our operation.

Do you have any more questions? We can help. Send your questions to our contact channels and we will be happy to answer them!

The Vale Institute of Technology thanks you for your time!