


IMPACT REPORT

PROTECTION OF PERSONAL DATA

Indaiatuba, May 02th, 2023

Revision History

Date	Version	Description	Author
02/05/2023	1.0	Completion of the first version of the report	Tiago P. Remédio

Date	Version	Approver	Signature
02/05/2023	1.0	Data Officer: <i>Tiago P. Remédio</i>	

PERSONAL DATA PROTECTION IMPACT REPORT - RIPD

GOAL

The Personal Data Protection Impact Report aims to describe the personal data processing processes carried out in our activities, which may generate risks to civil liberties and fundamental rights, as well as measures, safeguards and risk mitigation mechanisms.

Reference: Article 5, XVII of Law 13,709/2018 (LGPD).

IDENTIFICATION OF PROCESSING AGENTS AND DATA PROCESSORS

Controller

AXPR VALVE SCIENCE DISTRIBUTION AND INDUSTRIAL MAINTENANCE LTD

Operator

<https://axpr.com.br>

Exact Spotter

One Signal

Guppy

Hubspot

Incumbent

Tiago Remédios

Guilherme Zandoná

Mariana Gomes

E-mail Officer

dpo@axpr.com.br

NEED TO PREPARE THE REPORT

The *Compliance Policy* of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA has among its objectives to ensure that the activities are conducted in accordance with the rules applicable to its activities, under the coordination of the Risk Committee.

In this sense, article 38, *caput*, of Law 13,709/2018, provides for the possibility for the National Agency

for the Protection of Personal Data (ANPD) to determine that the Personal Data Protection *Impact Report* be prepared for data processing operations, which justifies the existence and preparation of this document.

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA, on a daily basis, processes personal data related to an identified or identifiable natural person (article 5, item I, of the LGPD), including the personal data of its employees, service providers, customers and legal representatives of customers, visitors to the Platforms, as well as business partners.

Considering the fundamentals of personal data protection (article 2 of the LGPD), good faith and other principles to be observed in the processing of personal data (article 6 of the LGPD), AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA has different internal control systems, which vary according to the nature of the personal data. to mitigate any risks of failure to protect personal data.

However, despite the high degree of maturity of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA's risk management, it is not possible to guarantee the total elimination of the risks that, in case of materialization, would impact the privacy of the company's personal data.

TREATMENT DESCRIPTION

The *Compliance* of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA aims to prevent the risks to which the information assets are subject from compromising the company's activities and the fulfillment of its institutional mission.

Information assets comprise the means of storage, transmission and processing of information; the equipment needed for this; the systems used to do so and the locations where these means are located.

With specific regard to personal information, the internal control systems implemented at AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA vary according to the type of support (physical or digital), as well as the nature of the information (common or sensitive, when applicable).

DIGITAL DATA

4.1. Nature of the processing

Technical and administrative measures are adopted to protect personal data from unauthorized access and from accidental or unlawful situations of destruction, loss, alteration, communication or dissemination.

Access to databases is controlled and access is limited to only those Officers qualified at the beginning of this Report. Eventually, in the extraordinary absence of the Officers, a password to access the database is assigned to one of the managing partners, and each access is recorded.

There is a continuous search for information security when making use of security systems at AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA and when complying with the provisions contained in the institutional Information Security Policy.

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA has as its principle the minimization of personal data, that is, it seeks to collect only and only those data essential for the provision of its services, seeking to ensure its own rights and the rights of the holders who interact with the services and/or platforms.

Therefore, the following personal data will be collected, nationwide, throughout the chain of services and applications provided by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA:

Registration data: Full Name, RG, CPF, Marital Status, Date of Birth, Address, E-mail, Telephones, Geolocation, Photo, Personal Preferences, Financial Data and Information available in official agencies.

Digital Identification Data: IP Address and Source Logical Port, Device (operating system version), Geolocation, Date and Time Stamps of each action performed, Screens Accessed, Session ID and Cookies.

Sensitive data: employee health.

Considering the authorizing hypotheses in the legislation, the personal data collected will be stored for the minimum period described below:

Registration Data	Term of 05 years after the end of the relationship (articles 12 and 34 of the Consumer Protection Code)
Digital Identification Data	During the period of 06 months (article 15 of the Brazilian Civil Rights Framework for the Internet)
Other	For the duration of the relationship and there is no request for erasure or revocation of consent (Article 9, Item II of the General Law on Personal Data Protection).

For auditing, security, fraud control and rights preservation purposes, a data registration history will remain for a longer period in the event that the law or regulatory standard so establishes or for the preservation of rights.

The Data collected may be stored on servers located in Brazil, as well as in a cloud *computing* environment, which may require the transfer and/or processing of this data outside Brazil.

In the event of processing outside Brazil, AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA values the choice of Operator from countries that ensure an adequate level of data protection, equal to or greater than the protection provided in Brazil.

The administrative measures adopted by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA include:

- (i) signing of responsibility agreements for access to systems, by formal request or by e-mail;
- (ii) registration of accesses granted;
- (iii) access restricted to only three profiles (supervisors);
- (iv) dismemberment of data, so that each department only has access to essential and justifiable data;
- (v) secondment of collaborators dedicated to the response of demands and archiving;
- (vi) drafting of a confidentiality agreement with employees, business partners, service providers and customers;

- (vii) concentration of the database by Department, preventing the replication of information.

DATA PROCESSING

There are several ways of processing personal data at AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA, considering the definition of the LGPD:

- Collected/Received

The data is collected mainly through the provision of the data subject when using the services provided by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENCAO INDUSTRIAL LTDA, either personally or through the legal representation of a legal entity, in addition to receiving data shared by Business Partners, as well as controlled and affiliated companies.

- Stored

The data is kept in the following ways:

- (i) Cloud service, specifically Microsoft 365 and Amazon Web Services;
- (ii) Platforms: Exact Spotter, RD Station, One Signal, Hubspot, Guppy;
- (iii) Files (e.g. Excel spreadsheets, Word files, paper employee files, paper customer files, etc.).

- Used

The data is used in the work processes of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA in various ways, especially for the provision of the company's products and services. Precisely by virtue and the nature of some services, *Due Diligence* and *Know Your Customer* (KYC) procedures are required, which justifies the collection and use of data to proceed with the conferences.

It is also possible to mention the use of information systems developed by the Department of Information Technology or acquired from third parties; data analysis tools; statistical analysis tools.

- Eliminated

Data can be eliminated through actions in information systems and file deletion.

In the case of a database, if there is a request for deletion (through the exercise of the owner's right), the information must be deactivated, respecting the minimum storage period informed in this Report. In this case, the Database Officer must choose archiving (with the creation of a *backup*) or disposal, when the data is deleted, depending on the legal and authorizing hypotheses for keeping the data for a certain period.

A step prior to the deactivation of databases is the evaluation of the use of that data in the activities of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA and the authorizing causes.

Data Source

The forms of data collection at AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA are:

- a) Collection of external information: data files with personal information are sent by Customers and Business Partners essential for the execution and provision of the services of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA and for the *due diligence* and *know your customer* (KYC) procedure;
- b) Information systems;
- c) Receipt of documents and forms, electronically or on paper;
- d) Registration of attendance information, face-to-face or telephone;
- e) Registration of the holder to make use of the products and services made available by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA;
- f) Registration of potential customers who are interested in receiving more information about the products and services of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA;
- g) Public data;
- h) Consultations in credit protection databases, Boards of Trade, Real Estate Registry Offices, DMV, Federal Revenue, other public agencies and national and international regulators.

Data Sharing

The consent of the holder is given upon unequivocal and express acceptance of the Privacy and Data

Protection Policy of each channel with which he/she interacts, when applicable; signing of contractual instruments; Accept it in a separate form and consent form, depending on the time of collection.

In addition, AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA provides in all its contracts the hypotheses of collection, storage, sharing, internationalization, maintenance and disposal of the data involved in the contracting, whose instrument collects the consent of the holder and makes him aware of the processing activities that will be carried out.

In cases where due *diligence and know your customer* (KYC) searches, including Anti-Money Laundering and Anti-Terrorism preventions, point to irregularities and/or suspicions of illegal occurrence, AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA will share the data of the suspected holder with the respective regulatory body, with the Judiciary, Executive and Legislative Branches, as the case may be. In addition, AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA always shares the data of the holder upon judicial authorization/request.

In order to share the data, the Data Controllers carry out the transfer in a secure manner, in order to maintain the integrity and confidentiality of the data transferred, ensuring that only the recipient has access to the data provided.

Security Measures

The security measures adopted are valid for any type of information, whether in digital and/or analog media, defined in our Information Security Policy.

a) File Transfer

For the transfer of electronic files, the following must be used for internal recipients:

- shared folders located on a single server;
- e-mail message;
- properly configured access to folders in the Microsoft 365 environment;
- Messaging solely and exclusively through Microsoft Teams.

For the transfer of electronic files to/from external recipients, the following may be used:

- e-mail attachments, if there is no need for a delivery guarantee;
- Link sharing with editing disabled through the Microsoft 365 environment (OneDrive);
- Removable media (*pendrive*, CD, DVD or external hard drive) may be used for the transfer of corporate files upon justification and with the consent of the Person in Charge and/or the respective immediate superior in the company's hierarchy, especially in case of impossibility of using the technological means described above.

The following are not considered suitable means for the transfer of electronic files: shared folders on workstations (desktops and notebooks), private e-mail, and third-party Internet services linked to private accounts (e.g., Dropbox, Google Drive, and Onedrive).

b) Document Printing

Corporate electronic files with sensitive information should not be printed outside the premises of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENCAO INDUSTRIAL LTDA.

c) Discarding information

The disposal of corporate information recorded in any media must be done in such a way as to prevent its retrieval, always under the guidance of one of the Data Officers.

d) Monitoring

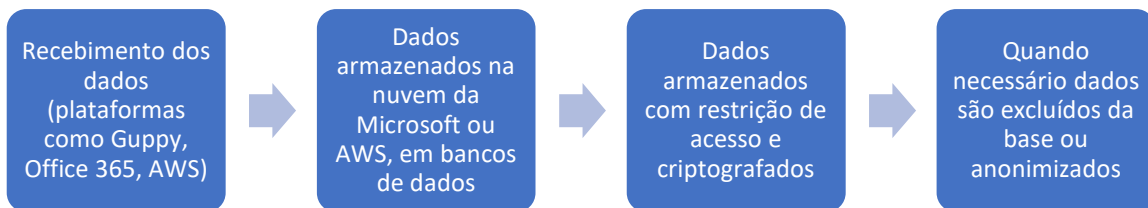
AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA may monitor, for the purposes of audit trails, the access and recordings of files and the transfers and printouts of corporate electronic files.

It is the responsibility of each member of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA to ensure the correct and efficient use of the storage area reserved for it, periodically verifying that:

- only files necessary for the work processes of the unit are stored;
- there are no files that infringe copyright or present other legal risks, such as music, movies, images and books that have not been acquired by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA.

Information security is constantly reviewed and improved with new security measures. One of the approaches currently under discussion is to ensure that data is protected throughout its processing (from collection to disposal). In this process, several systems, technologies and tools are used to allow access control in an integrated way.

Data Flow



Physical Data

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA has data contained in physical documents, stored at the company's headquarters, kept in the form of a dossier, as follows:

- a) Employee Data;
- b) Service Provider Data;
- c) Business Partner Data.

All operations related to physical documents are carried out by authorized persons who make up the Human Resources, Accounting and Legal Departments.

Physical documents are archived for the time defined by the Temporality Table (Annex II). Only authorized persons from each area may request to consult an archived physical document.

Copies of physical documents, authenticated and sent to the destination areas, are classified as restricted, and it is up to the recipient to reclassify them as confidential, if applicable. Restricted documents can only be viewed by their owner.

If a physical document is classified as confidential, its envelope is sent sealed to the recipient, who is responsible for the proper treatment of the information. These documents are stored by the end areas of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA.

Scope of Treatment

The scope represents the scenario of data processing within AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA, emphasizing that the treatment is the same for physical and digital documents.

Types of Data

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA collects and receives data sharing from people from its subsidiaries, affiliates and group members, as well as customers and business partners. They include the following information:

- Registration data: Full Name, RG, CPF, Marital Status, Date of Birth, Address, E-mail, Telephones, Geolocation, Photo, Personal Preferences, Financial Data and Information available in official agencies.

Digital Identification Data: IP Address and Source Logical Port, Device (operating system version), Geolocation, Date and Time Stamps of each action performed, Screens Accessed, Session ID and Cookies.

Sensitive data: employee health.

This data is stored in a database and copied to other environments on a daily basis to meet the needs of the units of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA, as mentioned in this Report.

Data volume

There are several databases that hold personal data at AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA. One of the most relevant is the one stored in the cloud, on AWS servers, whose volume is approximately 100Mb, containing the information mentioned above.

Frequency of data processing

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA receives daily updates of registration data from individuals, in addition to receiving data shipments shared by its subsidiaries and affiliates, including Customers and Partner Companies.

Data Retention

The Operator can define the retention and disposal time for each database, respecting the minimum period of the Periodicity Table and the Minimum Storage Table, both included in this Document. This information relates to the entire database and not specifically to the personal data contained therein, without prejudice to the retention of the data for the period provided for by law.

Data subjects affected by data processing

Any natural person, including a legal entity, customer or user of services of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA or its subsidiaries, affiliates and Partner Companies, may be affected by data processing.

Context of Treatment

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA processes personal data in accordance with legitimate and specific purposes in a manner compatible with its purpose, always linked to the provision of its services in a satisfactory, high quality, personalized and integral manner.

Methods of control by the Data Subject

The Data Subject may access his/her personal data through requests for information through the channel provided by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENCAO INDUSTRIAL LTDA. As for the change of data, this must also be done through the channels, and it can also be done through the Platform of the group company of which the holder is a customer.

Processing of data involving children, adolescents or other vulnerable groups

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA does not treat children, adolescents and vulnerable groups, but they may be visitors to the Platforms, and, consequently, may have their personal data collected by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA. However, for access to the data, legal representation requirements must be observed, in the case of civilly incapacitated persons.

Previous Experiences

AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA already demonstrates caution with the information it collects and handles, considering not only the importance of this data for the proper provision of services, but also the confidential nature of most of them. The obligations provided for in the LGPD, the Brazilian Civil Rights Framework for the Internet, the Consumer Protection Code – when applicable – and other legislation, are carefully observed by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA.

Advancements in technology and security

The following data protection tool is being evaluated:

- Microsoft – allows you to configure policies to classify, label, and protect data based on its level of sensitivity. Ranking can be fully automatic, coordinated by users, or recommendation-based. You can also define who can access data and what people can do with it – for example, it allows you to view and edit files, but not forward and print them. Data is protected whether it's stored on-premises or in the cloud.
- Amazon Web Services – allows you to configure policies to classify, label, and protect data based on its level of sensitivity. The servers have access restriction and encryption. The data is backed up daily.

Purpose of the processing

The purpose of the data processing by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA is related to the controller's compliance with a legal or regulatory obligation; contract enforcement; regular exercise of rights in judicial, administrative or arbitration proceedings;

meet the legitimate interests of the controller; to provide its services and offer its products.

Among the services offered by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA, is to expand our relationship, inform about news, features, content, news and other events that we consider relevant. Enrich the experience with us and promote our products and services.

STAKEHOLDERS CONSULTED

For the preparation of this Report, all areas of the company were consulted. As of April 1, 2020, LGPD compliance assessments were carried out, according to a methodological standard developed by *Compliance*, based on the best compliance management practices.

NECESSITY AND PROPORTIONALITY

The processing of data is limited to the minimum necessary for the achievement of the purposes informed to the data subject.

Where necessary, it covers data that is relevant, proportionate and not excessive in relation to the purposes of the data processing.

The processing is carried out only when it is indispensable and for the purpose of complying with legal and regulatory obligations, researching and disseminating market statistics, offering and improving products and services.

In order to ensure that AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA processes personal data in accordance with the LGPD and respects the criteria established by the company, every server or outsourced worker must follow the Manuals and Policies of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA. In addition, information systems have *logs* and access controls.

RISKS TO THE PROTECTION OF PERSONAL DATA

Risks can be divided into financial, operational and strategic risks – and have different dimensions of impact – such as financial, reputational and business impact.

Operational risks, specifically, contemplate the possibility of losses resulting from external events or failure, deficiency or inadequacy of internal processes, people or systems.

Among the types of operational risk, the risks to the protection of data and information stored by AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA, especially personal data, stand out. This type of risk can be described as a potential event that impacts the personal data subject and AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA. In the document Risk Management for the Protection of Personal Data (Annex I), the risk management methodology is addressed.

Categories of risks

Due to the introduction of the theme of personal data protection, the operational risk management methodology of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENCAO INDUSTRIAL LTDA seeks to identify and measure the risks specific to this subject. In the survey of operational risks to the protection of personal data, potential events are analyzed in the following categories:

1. Unauthorized access	Access to personal data without the prior express, unequivocal and informed consent of the data subject, except for legal exceptions.
2. Unauthorized modification	Modification of personal data without the consent of the data subject.
3. Loss	Destruction or loss of personal data.
4. Theft / Appropriation	Misappropriation or misuse of personal data. Possibility of fraud and intentional data leakage.
5. Unauthorized removal	Removal of personal data without the owner's authorization.
6. Excessive Collecting	Extraction of more data than is necessary to carry out the work, or what is provided for by law or has been authorized by the user.
7. Insufficient information on the purpose of the processing	The stated purpose for the use of personal information is unsatisfactory, not specific, or may give rise to different

	interpretations.
8. Processing without the consent of the data subject	Processing of personal data without the prior express, unequivocal and informed permission of the data subject, except for legal exceptions.
9. Failure to consider the rights of the personal data subject	Limit and/or make it impossible to exercise the rights of the holders.
10. Sharing or distributing personal data with third parties without the consent of the personal data subject	Sharing of personal data with other private entities without the proper permission of the data subject.
11. Prolonged retention of personal data without need	Keep the personal data of the holder beyond what was necessary or what was consented/authorized. It violates the principle of necessity.
12. Improper linking or association, directly or indirectly, of personal data to the data subject	Error when linking data of the true holder to another. It violates the principle of data quality.
13. Processing failure or error	Imperfect or erroneous processing of the data.
14. Re-identification of pseudonymized data	Unsatisfactory anonymization of sensitive personal data, making it possible to interfere with who the person in question is. It violates the right to anonymization.

Identification of risks

The following are non-exhaustive initial examples of identified risks, according to the operational risk management methodology for the protection of personal data:

- intentional and/or extraordinary leakage of personal data;
- intentionally and/or mistakenly altering personal data;
- improper permission to access personal data;
- theft of confidential information;
- unauthorized disclosure of personal data contained in documents and files;
- invasion of systems for the collection of personal data;
- Hacking into the server and/or computer of employees.

Risk treatment measures

The application of the methodology for identifying and assessing risks allows them to be classified according to prioritization criteria. Thus, after the validation of the treatment, the necessary actions to mitigate the risks are formalized by the Data Officers.

Thus, several mitigation plans are underway with the aim of reducing the probability of occurrence and/or the impacts of the mapped risks. The conduct of these plans has organizational support, in terms of resources, and support from senior management.

Classification	Value
Low	5
Moderate	10
High	15

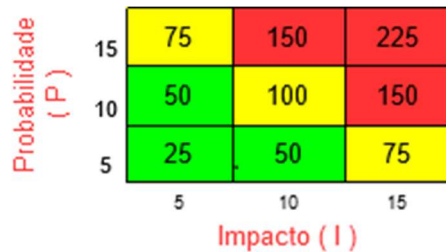
For better verification of risks, a Probability x Impact Matrix is estimated, which is elaborated by multiplying the probability value with the impact value, resulting in the table below:

RISK	RISK RELATED TO THE PROCESSING OF PERSONAL DATA	P	I	LEVEL OF RISK (P x I)
R01	Unauthorized access.	5	15	75
R02	Unauthorized modification.	5	15	75
R03	Loss.	10	15	150
R04	Theft.	5	15	75
R05	Unauthorized removal.	5	15	75
R06	Excessive collection.	15	10	150
R07	Insufficient information on the purpose of the processing.	10	15	150
R08	Processing without the consent of the data subject.	5	15	75
R09	Failure to consider the rights of the personal data subject.	5	15	75
R10	Sharing or distributing personal data with third parties without the consent of the data subject.	5	15	75
R11	Prolonged retention of personal data without need.	10	5	50
R12	Undue linking/association, direct or indirect, of personal data to the data subject.	5	15	75
R13	Processing failure/error.	5	15	75
R14	Re-identification of pseudonymized data.	5	15	75

P – Probability: chance of something happening, regardless of whether defined, measured or determined objectively or subjectively, qualitatively or quantitatively, or if described using general or mathematical terms (ISO/IEC 31000:2009, item 2.19);

I – Impact: result of an event that affects the objectives (ISO/IEC 31000:2009, item 2.18).

Risk Level: The magnitude of a risk or combination of risks, expressed in terms of the combination of consequences and their probabilities (ISO/IEC 31000:2009, paragraph 2.23).



- green, is understood as low;
- yellow, represents moderate risk; and
- red, indicates high risk.

The Risk framed in the region according to the Matrix below:

MEASURES TO ADDRESS RISKS

Risk	Measure(s)	Effect on Risk	Residual Risk			Approved measure(s)
			P	I	Level (P x I)	
R03 Loss.	1. Logical Access Control 2. Secure Development 3. Network Security 4. Physical and Environmental Protection	Reduce	5	10	50	Yes
R06 Excessive collection	1. Limitation of collection	Reduce	5	10	50	Yes
R07 Insufficient information on the purpose of the processing.	1. Seek the specific consent of the data subject, justifying the purposes and purposes 2. Purpose-specific definition of the minimum amount of data required	Reduce	5	10	50	Yes

P – Probability;

I – Impact.

¹ Effect resulting from the treatment of risk with the application of the measures described in the table. The following options can be selected: Reduce, Avoid, Share, and Accept.

² Residual risk is the risk that still remains even after measures to treat the risk have been applied.

³ Measure approved by the controller of personal data (yes or no).

COMPLIANCE WITH THE GENERAL LAW ON THE PROTECTION OF PERSONAL DATA

The LGPD provides for the processing of personal data by an individual or legal entity under public or private law, and the need arises for AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA to review its processes in order to verify the current stage of compliance with said standard.

FINAL THOUGHTS

This document demonstrates, in general terms, how personal data is collected, processed, used, shared, as well as the measures adopted to address the risks that may affect the civil liberties and fundamental rights of the data subjects. In addition, information was presented that denotes the current stage of compliance of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA with the LGPD.

This Report will be reviewed and updated every six months or whenever AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA implements any type of change that affects the processing of personal data. AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA is concerned with continuously assessing the risks of personal data processing that arise as a result of the dynamism of transformations in the technological, regulatory, political and institutional scenarios.

APPROVAL

Responsible for the preparation of the Impact Report	Incumbent
Tiago Pereira Remédio	Tiago Pereira Remédio
Date: 02/05/2023	

Controllers Representative
Tiago Pereira Remédio

ANNEX I - METHODOLOGY FOR MANAGING RISKS TO THE PROTECTION OF PERSONAL DATA

The process of identification and assessment of risks in the corporate risk management methodology of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENCAO INDUSTRIAL LTDA is carried out with results analyzed through three main information models:

- i) perception models: risk assessment and control models based on the perception of those responsible for each area of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA, in which the risks associated with each process, and their possible causes, are identified and classified according to possible events. They are classified by the nature of any incidents with a negative impact, such as: fraud, theft, error, system interruption, etc.;
- ii) Confirmation models: models that allow the identification of new risks, visualization of trends, and details of risk behavior over time, based on the systematic recording of both risk events and near-events, regardless of the severity of the loss;
- iii) Recognition models: Models that anticipate the evolution of a given risk exposure and that can be used to identify current risk exposure and future risk trends, using pattern recognition and machine learning techniques.

The self-assessment of risks, in a first approach, is conducted by interviews in which the most relevant risks associated with each sector of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA are identified and classified according to an event-based risk taxonomy. Then, the probability of occurrence is raised, the impacts on the financial, reputational and business dimensions are evaluated, as well as the effectiveness of the controls, and the causes are determined.

The result of the identification and measurement of organizational risks, at the end of this stage, is presented in the form of a risk matrix. Due to its ease of compilation and visualization, this matrix establishes relationships between processes and associated risks in an integrated manner, generating an overview of the degrees of risk exposure. In this way, it allows a broad view of processes, actions and projects, relating them to potential events and subsidizing the implementation of risk mitigation measures by the organization.

Risks can thus be classified into the following scales: "I", highest priority; "II", medium priority; and "III", lower priority, depending on the impact and probability of occurrence.

Based on the data in the risk matrix, those responsible for each sector of AXPR VALVE SCIENCE DISTRIBUIÇÃO E MANUTENÇÃO INDUSTRIAL LTDA must evaluate the appropriate response to each identified risk, in order to adjust risk exposure to acceptable levels. Thus, the treatment action for each risk should be indicated, among those listed below:

- a) mitigate risk: plan response actions aimed at reducing the occurrence and/or impact of risk, for example, by improving controls;
- b) accept risk exposure: the residual risk is at the acceptable level or the risk is known and there will be no treatment due to factors such as cost-effectiveness;
- c) transfer the risk to a third party: transfer of all or part of the risk to another business unit or third party; and
- d) Eliminate the risk: This implies the decision to eliminate the activity that generates the risk.

The methodology of this risk assessment process, a fundamental tool for risk management, has the following advantages: facilitating the understanding of the business and its vulnerabilities, pointing out critical activities with weak or non-existent controls, generating higher quality risk information and bringing flexibility to the assessment process.

ANNEX II – TEMPORALITY TABLE

Registration Data*	Term of 05 years after the end of the relationship between the holder and the Controller, except in the case of suspicious activity, which period may follow the criminal statute of limitations referring to the alleged offense committed.
Digital Identification Data**	During the period of 06 months (article 15 of the Brazilian Civil Rights Framework for the Internet)
Other***	For the duration of the relationship between the data subject and the Controller, and there is no request for erasure or revocation of consent (Article 9, Item II of the General Personal Data Protection Law).
Longer storage times	For auditing, security, fraud control, credit protection and rights preservation purposes, we may keep the registration history of your Data for a longer period in the event that the law or regulatory standard so establishes or for the preservation of rights.

* Full Name, R.G., CPF, Marital Status, Date of Birth, Address, E-mail, Telephones, Geolocation, Photo, Personal Preferences, Financial Data and Information available in official agencies. Health data, as it is sensitive data, is collected and stored only by the Human Resources Department and is kept for the legal term.

** Cookies and browsing data.

Information provided by the Data Subject on a voluntary basis.