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Questionnaire

External Parties Data Protection

Hello!

This is a default questionnaire for evaluating **ALAS Technology - CPF.CNPJ** Company on the processing, manipulation or storage of information based on the LGPD and GDPR.

Regards,

Carlos Gomes – CTO
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Questionnaire

No.	Question	Response
1	What kind of security certifications do you currently hold?	We have an ISO/IEC 27001 certification processing with British Standards Institution.
2	What information will you be processing, handling or storing on behalf of clients?	Only the numbers of CPFs/CNPJs checked, as well as data from the registration of the holder representing the clients in Brazil.
3	What are the purposes of the data processing activities?	Automate systems with complete data and from secure sources, increasing database integrity and improving KYC policies.
4	What types of personal data would be processed?	We do not process the information directly. Client is responsible for processing the information returned in the desired packages to be hired.
5	Would you be processing data on European citizens?	No. We only work with data from Brazilian citizens.
6	Will data be transferred electronically to you from client?	Only the CPF number of the Brazilian citizen is received in our API to return data according to the contracted package.
7	Who within your organisation will have access to client data?	No member of our team has access to our customers' data, as they are encrypted by password, including the report of queries made.
8	Which other parties would be involved in data processing activities?	We work with data providers authorized by the Brazilian government and laws. We cannot list them for free competition and contractual privacy.
9	How will the data be transferred to third parties?	We work with direct connection to suppliers via encrypted VPN. The connection between our clients and API is made under SSL protocol, maintaining security and privacy in all transactions. In addition, we work with CDN CloudFlare Business to prevent any type of attacks or vulnerabilities.
10	What kind of security measures are in place to preserve data confidentiality and integrity?	As already mentioned, own VPN, API over SSL, encryption of all sensitive customer data in the database, being possible to decrypt only with the password when logging into the control panel.

11	What controls are in place to keep clientes systems and data separate from other clients data?	The main one is to encrypt each customer's data with their own passwords. That is, in the event of a leak, you would need to have the password for each customer to unveil the recorded data.
12	Where are the systems that will be holding clients information physically located?	Currently located at DigitalOcean in New York.
13	Do you own/manage this physical environment?	No. All services are cloud-based, without colocation.
14	Is information stored on any device which can be removed from your physical premises?	No. There is only the extraction of backups from the datacenter itself, encrypted, rigid and guaranteed by contract and security certificates.
15	Do you have any data stored offsite (e.g. backups)?	No. The backup is done internally by the datacenter.
16	What controls do you have in place to prevent unauthorised access to your employees workstations?	Instances are managed by digital certificate and monitored by versioning so that there is no unauthorized access. Only the company's CEO has direct key access. The maintenance of our code is done only at our headquarters, where it has an authorized IP for it.
17	How often do you scan your systems for vulnerabilities?	As these are systems in instances, all of our software and technologies are constantly updated, automatically. Our team of developers is composed of seniors who are trained and experienced, attentive to the market and constantly changing technologies.
18	How often do you patch/ update your software with security updates?	Whenever there is an update, the instances are processed. In case of emergency updates with risk of instability or unavailability, we open maintenance windows that can be checked on the status.cpfcnpj.com.br website.
19	Please provide a link to your responsible disclosure policy? <i>E.g. Bug bounty program</i>	We do not provide bug rewards. However, we provide the subject to report bugs in the contact form.

20	Will any parts of the data processing take place outside the European Economic Area?	<p>Only data processing takes place between secure connections between Brazil and the USA. Data providers are concentrated in Brazil. Our servers are concentrated in the USA.</p> <p>We have no direct links or traffic with the European Union.</p> <p>However, it is important to emphasize that we use CloudFlare CDN, in which possible external connections may exist, since it fits the best route.</p>
21	What kind of data protection legislation do you follow?	<p>We have followed the strict LGPD since the beginning of 2020.</p> <p>We have been evaluated by accredited professionals and are in effect, described on our website: https://www.cpfcnpj.com.br/lgpd.html</p>
22	How would you help clients respond to data subject rights requests?	<p>In case of violation of the rights of our customers and also of the owners consulted on our platform, we will provide all necessary reports to the competent entities in a timely manner so that the entire investigation process of the requested occurs in the best way. We ensure all practices and policies of use in our contracts, where we constantly emphasize LGPD.</p>
23	What have you done internally to improve your data protection practises?	<ol style="list-style-type: none"> 1. We encrypt all customer data with the possibility of release only with your own password; 2. We restrict access to servers only to update our systems, where the request is made to the chief programmer and approved by our superiors after a complete review of code; 3. We insert notifications of registration of cookies on our main website so that the user has knowledge. 4. We updated our contracts with the requirements and adjustments based on LGPD. 5. We insert the institutional page where it displays information about the law and steps adopted in the company.

24	How long will clients information be retained?	The registration of our clients is permanently saved in our database, as well as the number of CPFs consulted for possible requests or complaints from the holders, as well as material evidence in case of legal actions.
25	What will trigger the deletion of clients data?	Only by court order in which it excludes ALAS TECHNOLOGY from future liabilities or losses.

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