

NovaMente Soluções Cognitivas

Document 12 — LGPD & Data Privacy Policy

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Introduction

NovaMente Soluções Cognitivas processes personal data in two distinct capacities: as an employer that collects and manages data about its own employees, and as a software company whose product, MindFlow, processes sensitive personal data on behalf of corporate clients. Both capacities carry significant legal and ethical obligations under the Lei Geral de Proteção de Dados (LGPD), Brazil's data protection law (Law No. 13.709/2018). This document addresses the employee-facing dimension of our data privacy obligations. For information about how NovaMente handles client and end-user data in the context of MindFlow, refer to the product's Data Processing Agreement and Privacy Notice, maintained by the Legal team.

All employees who handle personal data in the course of their work — which includes virtually all employees at NovaMente to some degree — are expected to understand the principles in this document and apply them consistently. Annual training on LGPD compliance is mandatory for all employees.

LGPD Fundamentals

Key Principles

The LGPD establishes a set of principles that must govern all processing of personal data. NovaMente is committed to applying these principles in all contexts where personal data is handled. The core principles are: **Purpose** — data must be collected and processed for legitimate, specific, and explicit purposes; **Adequacy** — processing must be compatible with the declared purpose; **Necessity** — only the minimum data necessary for the purpose should be collected; **Free Access** — data subjects have the right to access their own data; **Quality** — data must be accurate and up to date; **Transparency** — data subjects must be clearly informed about how their data is processed; **Security** — appropriate technical and organizational measures must protect the data; **Prevention** — measures must be taken to prevent damage from data processing; **Non-Discrimination** — processing must not be used for unlawful discriminatory purposes; and **Accountability** — NovaMente must demonstrate compliance with these principles.

Legal Bases for Processing

The LGPD requires that every processing activity be grounded in one of the legal bases defined by the law. The most relevant bases for NovaMente's employee data processing are: consent (where freely given, specific, and informed); contract performance (processing necessary to fulfill employment obligations); legal obligation (processing required by applicable law); and legitimate interest, where the interest is clearly documented and does not override the rights of the data

subject. NovaMente's Legal team maintains a Record of Processing Activities (ROPA) that documents each processing activity, its legal basis, and its retention period.

Employee Data NovaMente Collects

As an employer, NovaMente collects and processes the following categories of employee personal data: identification and contact information (name, CPF, address, phone, email); employment and payroll information (role, salary, bank account details, tax information); benefits enrollment data (health plan dependents, life insurance beneficiaries); attendance and performance data; and where relevant to the employment relationship, health-related data, such as medical certificates provided during sick leave. NovaMente does not collect employee health or wellbeing data through MindFlow in a manner that is individually identifiable — all internal use of the platform is subject to the same anonymization standards applied to client deployments.

How Long Data is Retained

Employee data is retained for the duration of the employment relationship and for the periods required by applicable law following departure. Tax and payroll records are retained for a minimum of five years as required by Brazilian law. Employment contracts and related documents are retained for a minimum of two years following termination. Health and medical records are retained for the period required by the CFM (Federal Council of Medicine) guidelines. Data that is no longer required for any legitimate purpose is deleted or anonymized in accordance with NovaMente's data retention schedule, maintained by the Legal team.

Employee Rights Under the LGPD

All employees have the following rights regarding their personal data processed by NovaMente as an employer: the right to confirm whether their data is being processed; the right to access the data held about them; the right to correct inaccurate or incomplete data; the right to anonymize, block, or delete data that is excessive or processed in violation of the law; the right to data portability; the right to be informed about sharing with third parties; and the right to withdraw consent for processing based on consent, where applicable. Requests to exercise these rights should be submitted to the HR & Culture team or the Legal team. NovaMente will respond to all rights requests within 15 calendar days.

Employee Obligations Regarding Data Privacy

Employees who handle personal data in the course of their work have specific obligations under the LGPD and under NovaMente's internal policies.

Handle data on a need-to-know basis. Employees should access and process only the personal data necessary for their specific work responsibilities. Accessing data out of curiosity, for personal purposes, or on behalf of others who do not have access is prohibited.

Protect data from unauthorized access. Personal data must be stored securely, shared only through approved channels, and never transmitted via unencrypted personal email or unsecured storage services. Full technical requirements are in Document 13 — Information Security Policy.

Report breaches immediately. Any actual or suspected breach of personal data — including accidental loss, unauthorized access, or inadvertent disclosure — must be reported to the Legal team and the Data Protection Officer (DPO) immediately, and no later than within two hours of discovery. The LGPD imposes strict timelines on breach notification to authorities and data subjects; early internal reporting is essential to meeting those obligations.

Complete mandatory training. All employees must complete the annual LGPD compliance training provided by the Legal team. Employees who join mid-year must complete the training within their first 30 days. Completion is tracked and is a mandatory element of the onboarding checklist.

Consult the Legal team when in doubt. Data privacy questions are rarely straightforward. When an employee is unsure whether a particular data practice is compliant, they should consult the Legal team before proceeding. The cost of getting it wrong — to individuals whose data is mishandled, and to NovaMente in reputational and legal terms — is high.

Data Protection Officer

NovaMente has appointed a Data Protection Officer (DPO) as required by the LGPD. The DPO is responsible for overseeing NovaMente's data protection program, advising on compliance matters, serving as the point of contact for data subjects and the national data protection authority (ANPD), and coordinating the response to data breaches and rights requests. The DPO's contact information is available from the Legal team and is published on the internal knowledge base. Employees may contact the DPO directly with data protection questions or concerns.