

Privacy Policy

1. Introduction

CIMISA MÁQUINAS POZZER LTDA is committed to protecting the privacy and personal data of its customers, partners, employees, and website visitors. This Privacy Policy has been drafted in accordance with the **Brazilian General Data Protection Law (LGPD - Law No. 13.709/2018)** and aims to clarify how we collect, use, store, and protect your personal data.

Important: CIMISA DOES NOT SELL or trade personal data under any circumstances. All data collected is used exclusively for the purposes described in this policy.

2. Data Collected

CIMISA collects personal data through various forms available on our website and through direct interactions with our clients. Below is a description of the data collected in each situation:

2.1 Contact Form

Data Collected	Mandatory/Optional
Full Name	Mandatory
E-mail	Mandatory
Phone Number	Mandatory
Company/Organization	Optional
Message/Subject	Mandatory

2.2 Quotation Request Form

Data Collected	Mandatory/Optional
Full Name	Mandatory
E-mail	Mandatory
Phone Number	Mandatory
Company/Property	Mandatory

Data Collected	Mandatory/Optional
Full Address	Mandatory
Product of Interest	Mandatory
Desired Technical Specs	Optional

2.3 After-Sales Form

Data Collected	Mandatory/Optional
Full Name	Mandatory
E-mail	Mandatory
Phone Number	Mandatory
Equipment Serial Number	Mandatory
Purchase Date	Mandatory
Problem/Request Description	Mandatory
Attached Photos or Documents	Optional

2.4 “Work With Us” Form

Data Collected	Mandatory/Optional
Full Name	Mandatory
CPF (Brazilian Tax ID)	Mandatory
E-mail	Mandatory
Phone Number	Mandatory
Full Address	Mandatory
Resume (PDF)	Mandatory
Area of Interest	Mandatory
Professional Experience	Optional

Sensitive Data: Submitted résumés may contain sensitive data such as health information, racial or ethnic origin. Such data is given special protection and is used exclusively for recruitment and selection purposes.

3. Purposes of Processing

The personal data collected by CIMISA is used for the following purposes:

- **Contact Form:** responding to inquiries, providing product/service information, maintaining commercial communication.
- **Quotation Form:** preparing personalized commercial proposals, conducting credit analysis when necessary, monitoring sales processes, maintaining commercial history.
- **After-Sales Form:** providing technical support, managing warranties and technical assistance, improving products and services, maintaining service history.
- **“Work With Us” Form:** conducting recruitment processes, evaluating candidate profiles, maintaining a talent pool, communicating recruitment results.

4. Legal Bases

The processing of personal data by CIMISA is based on the following legal grounds provided under the LGPD:

Purpose	Legal Basis (Art. 7 LGPD)
Customer service and technical support	Contract performance (item V)
Preparation of quotations	Legitimate interest (item IX)
Marketing and commercial communication	Consent (item I) or Legitimate interest (item IX)
Recruitment processes	Consent (item I)
Compliance with legal obligations	Legal obligation (item II)

Sensitive Data Consent: For sensitive data contained in résumés, processing is based on the **specific consent for recruitment purposes** (Art. 11, II, "a" LGPD).

5. Data Sharing

CIMISA may share personal data under the following circumstances:

- **Service Providers:** hosting and IT infrastructure, logistics and transportation companies, maintenance and technical support providers, legal/accounting/technical consultants.
- **Competent Authorities:** when required by law or court order, for security investigations, or as requested by regulatory bodies.

All third parties handling personal data must:

- Sign confidentiality agreements,
- Commit to complying with the LGPD,
- Implement adequate security measures,
- Use the data strictly for contracted purposes.

6. Security Measures

CIMISA implements **technical and administrative safeguards** to protect personal data:

- **Technical Measures:** data encryption (in transit and at rest), SSL/TLS certificates, secure backup systems, firewalls and intrusion detection systems, user-profile-based access control, continuous monitoring.
- **Administrative Measures:** staff training, internal security policies, physical access control, incident response procedures, regular security audits.

Incident Notification: In case of a data breach that may pose risks to data subjects' rights and freedoms, CIMISA will:

- Notify the ANPD (Brazilian National Data Protection Authority) within 72 hours,
- Notify affected data subjects when applicable,
- Take immediate mitigation actions.

7. Data Retention

Personal data will be retained only as long as necessary to fulfill the purposes for which it was collected, as shown below:

Data Type	Retention Period	Justification
General contact data	5 years after last contact	Commercial relationship & legal obligations

Data Type	Retention Period	Justification
Customer data	10 years after contract end	Warranty, technical support, fiscal obligations
Candidate résumés	2 years after submission	Talent pool for future opportunities
After-sales data	10 years after service	Technical history & warranty
Access logs	6 months	Security & incident investigation

After retention periods expire, data will be securely and irreversibly deleted, unless legal obligations require longer retention.

8. Data Subject Rights

Under the LGPD, you have the following rights:

1. Confirmation of processing activities
2. Access to your data (copy of processed data)
3. Rectification of inaccurate/incomplete data
4. Anonymization, blocking, or deletion of unnecessary or unlawful data
5. Data portability
6. Deletion of personal data when applicable
7. Information on data sharing (third parties)
8. Withdrawal of consent at any time

How to exercise your rights: Contact us via contato@cimisa.com.br with the subject line "**LGPD Request**", providing: full name, contact e-mail, right you wish to exercise, and documents proving your identity.

Response timelines: acknowledgment within 72 hours; full response within 15 days (up to 90 days in complex cases, with justification).

9. Cookies & Tracking Technologies

Our website uses cookies and similar technologies to improve user experience.

- **Essential Cookies:** site functionality (session-based)
- **Performance Cookies:** usage analytics and improvements (2 years)
- **Functionality Cookies:** user personalization (1 year)

Cookie management can be done via browser settings (Chrome, Firefox, Safari, Edge). Disabling essential cookies may affect site functionality.

10. Data Protection Officer (DPO)

For matters related to data protection, contact us at:

E-mail: contato@cimisa.com.br

Subject: "LGPD - Data Protection Officer"

Business hours: Monday to Friday, 8:00 AM to 5:00 PM

Responsibilities: act as communication channel with data subjects and ANPD, provide staff guidance, monitor compliance with this policy, ensure LGPD adherence.

11. Policy Updates

This Privacy Policy may be updated to reflect: changes in data processing practices, applicable legislation, new website features, or improvements in security processes.

- Significant changes will be communicated via: highlighted notice on our website, and/or e-mail to registered customers (when applicable).
- Continued use of our services after updates constitutes acceptance of the revised policy.

CIMISA MÁQUINAS POZZER LTDA

CNPJ: 90.779.299/0001-17 | Tapejara/RS

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