

Data Policy

v.1 June 2025

Data Policy – HAI v1

VERSION 1	DATE 2025-06-13
VALID UNTIL NA	CLASSIFICATION PUBLIC

SUMMARY

HAI (Hybrid AI) develops hybrid artificial intelligence solutions combining physical models and machine learning algorithms to support industrial and engineering operations. This policy explains transparently how we collect, use, store, and protect personal and operational data processed in our solutions.

This policy applies to all users of our products and services, including websites, SaaS applications, consulting services, and technical partnerships.

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1. PURPOSE AND SCOPE OF APPLICATION

This Policy sets forth the principles, guidelines, and practices adopted by HAI (Hybrid AI) in the processing of personal data and sensitive operational data, in compliance with the Brazilian General Data Protection Law (LGPD – Law No. 13,709/2018), as well as with best practices in data governance and artificial intelligence applicable to its operations and services.

It applies to all data processed within the scope of HAI's business activities, service agreements, technological development projects, and SaaS/MaaS (Software/Model as a Service) operations, encompassing clients, users, employees, suppliers, and partners.

2. LEGAL AND REGULATORY FOUNDATIONS

All data processing activities are carried out in good faith, necessity, transparency, security, and full respect for data subject rights.

Data processing carried out by HAI is fully aligned with:

- The LGPD – Law No. 13,709/2018 (Brazil);
- Sectoral regulations from regulatory bodies and contracting agencies (e.g., ANPD, ANP, BACEN, among others, when applicable);
- Ethical principles and international guidelines on AI governance and best practices in data science.

3. CATEGORIES OF DATA COLLECTED

In the course of its activities, HAI may process the following categories of data:

3.1 Personal Data (identifiable):

- Name, email, job title, company, phone number;
- Professional identification and registration data of client and partner representatives;
- Communication records and technical support logs.

3.2 Operational and Industrial Data (non-personal):

- Raw data from sensors, monitoring systems, automation, and control systems;
- Technical data and parameters from engineering processes;
- Computational simulations, time series, measurements, and process variables;
- Derived data used for modeling, development, and training of AI algorithms.

Note: Whenever feasible, operational data is anonymized, pseudonymized, or aggregated to eliminate any possibility of re-identification.

4. PURPOSES OF DATA PROCESSING

Data is processed exclusively for the following legitimate purposes:

- Delivery of contracted services;
- Development, calibration, validation, and operation of hybrid artificial intelligence models;
- Technical support, maintenance, and customer service;
- Statistical analyses and continuous service improvement;
- Compliance with applicable legal and regulatory obligations;
- Ensuring operational security and fraud and incident prevention.

HAI does not:

- Sell or transfer personal data to third parties for advertising or marketing purposes.

5. LEGAL GROUNDS

Data processing is based, as applicable, on:

- The data subject's consent, when required;
- Contract performance and service provision;
- Compliance with legal and regulatory obligations;
- HAI's legitimate interest, duly documented, balanced, and audited in light of data subject rights.

6. DATA SHARING AND INTERNATIONAL TRANSFERS

HAI may share data with:

- Technical service providers and cloud providers (e.g., AWS, Microsoft Azure, GCP), under contracts containing specific data protection clauses;
- Strategic partners, provided they are contractually bound to equivalent confidentiality and information security commitments;
- Public authorities and regulatory agencies, pursuant to legal or judicial mandates.

In cases of international data transfers, HAI adopts specific contractual safeguards (Standard Contractual Clauses – SCCs) and verifies the adequacy of protection in destination countries.

7. INFORMATION SECURITY

HAI adopts a robust information security architecture, including:

- Segregation of data environments (production, development, testing);
- Access control based on roles and the "need-to-know" principle;
- Identity management and strong authentication;
- Logging and auditing of access and activity logs;
- Periodic vulnerability and compliance testing.

8. AI GOVERNANCE AND MODEL TRAINING ETHICS

HAI adopts an internal AI governance framework focused on:

- Transparency and traceability of training datasets and model training experiments;
- Best practices to avoid data leakage between training and testing datasets;
- Ongoing model validation and inference estimation practices for bias or unwanted model behavior detection and correction;
- Formal assessment of ethical and technical risks prior to deployment of new models;

9. DATA SUBJECT RIGHTS

Data subjects may exercise their rights under Article 18 of the LGPD by contacting: privacy@hybridai.com.br

Requests will be reviewed and fulfilled within the legal timeframes, subject to any legal or regulatory limitations.

10. DATA RETENTION AND DISPOSAL

Data is retained only for the time necessary:

- To perform contracts;
- To comply with legal and regulatory obligations;
- To defend HAI's legitimate interests in any administrative, judicial, or arbitral proceedings.

Upon expiration of applicable retention periods, data is securely deleted or anonymized in accordance with documented procedures.

11. AUDIT AND COMPLIANCE REVIEW

HAI maintains ongoing processes for:

- Internal audit and compliance controls;
- Data protection risk assessments;
- Periodic review and update of this Policy.

This Policy may be updated whenever necessary to reflect legislative or business model changes. The most up-to-date version will always be available on HAI's official portal.

Corporate Data Protection Contact:

HAI - Hybrid AI

CNPJ: 41.459.664/0001-09

privacy@hybridai.com.br

www.hybridai.com.br