



# Privacy Notice

## PUC-Rio

GRAND CHANCELLOR: Dom Orani João Tempesta, O. Cist.

RECTOR: Prof. Father Anderson Antonio Pedroso, S.J.

VICE-RECTOR: Prof. Father André Luís de Araújo, S.J.

VICE-RECTOR FOR ACADEMIC AFFAIRS: Prof. Marley Maria Bernardes Rebuzzi Vellasco

VICE-RECTOR FOR ADMINISTRATIVE AFFAIRS: Prof. Ricardo Tanscheit

VICE-RECTOR FOR COMMUNITY AFFAIRS: Prof. Renato Callado

VICE-RECTOR FOR DEVELOPMENT AFFAIRS: Prof. Marcelo Gattass

VICE-RECTOR FOR EXTENSION AND PEDAGOGICAL STRATEGY: Prof. Jackeline Farbiarz

VICE-RECTOR FOR INFRASTRUCTURE AND SERVICES: Prof. Luiz Fernando Martha

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# 1. Introduction

This Privacy Notice describes PUC-Rio's policies and practices regarding the collection and use of personal data. PUC-Rio recognizes that the right to the protection of personal data and the right to privacy must be continuously safeguarded, and therefore, this privacy notice will be regularly updated to meet specific needs. This document summarizes the most relevant concepts for data protection and privacy as provided in the General Data Protection Law (LGPD), Law No. 13,709/18. 2

## 2. Main Concepts of LGPD

### 2.1 Personal Data

For the purposes of LGPD, the following is considered (Article 5):

- Personal data: data related to an identified or identifiable natural person. Examples of personal data include: name, address, email, identity, CPF (Brazilian individual taxpayer registry), location data (collected by GPS), connection records (cookies).
- Sensitive personal data: personal data about racial or ethnic origin, religious belief, political opinion, membership in a trade union or religious, philosophical, or political organization, data related to health or sexual life, genetic or biometric data, when linked to a natural person.

### 2.2 Data Processing

LGPD applies to any processing operation carried out by a natural person or by a legal entity, whether public or private, regardless of the means, the country of its headquarters, or the country where the data are located (Article 3).

The processing of personal data and sensitive personal data includes the following activities, among others:

- Collection, classification, storage;
- Access, reproduction, modification, deletion;
- Termination;
- Sharing.

The processing of personal data may be carried out, among other hypotheses (Article 7):

- Through the provision of consent by the data subject.
- For the fulfillment of a legal or regulatory obligation by the controller.
- For the execution of contracts.

### 2.3 Subjects

LGPD considers the following roles or actors (Article 5):

- Data subject: natural person to whom personal data that is the subject of processing refers.

- Controller: natural or legal person, whether public or private, responsible for decisions regarding the processing of personal data.
- Processor: natural or legal person, whether public or private, who processes personal data on behalf of the controller.
- Data Protection Officer: person appointed by the controller and processor to act as a communication channel between the controller, data subjects, and the National Data Protection Authority.

### 3. Policy for the Protection of Personal Data at PUC-Rio

#### 3.1 Controller and Processor

The Catholic Faculties are the Controller and Processor, unless a contract or agreement defines other responsibilities.

#### 3.2 Data Protection Officer

PUC-Rio has appointed a data protection officer to handle requests and respond to inquiries and doubts from data subjects about the privacy and protection policies of PUC-Rio. The data protection officer of PUC-Rio is Caitlin Sampaio Mulholland, and her contact is [encarregado-igpd@puc-rio.br](mailto:encarregado-igpd@puc-rio.br)

#### 3.3 How PUC-Rio Collects and Processes Personal Data

PUC-Rio collects personal data about its students, professors, employees, suppliers, and other individuals with whom it has a relationship that requires and depends on the processing of personal data. PUC-Rio collects the personal and sensitive data summarized in Table 1, depending on the type of relationship with the institution. This collection is covered by specific contractual clauses and consent terms.

**Table 1 - Personal data collected**

<b>Relationship with PUC-Rio</b>	<b>Personal data and sensitive personal data</b>
Student	Identification data, academic data, Data necessary to fulfill legal, regulatory, and contractual obligations
Employee	Identification data, data necessary for benefits and rights, data necessary to fulfill legal or regulatory obligations
Third-Party Employee	Identification data, data necessary for benefits and rights, data necessary to fulfill legal or regulatory obligations
Supplier	Identification data, data necessary to fulfill legal, financial, or regulatory obligations
Candidate in the selection process	Identification data, data necessary for the selection process, data necessary for benefits and rights
Financial Responsible for the student	Data necessary to fulfill financial obligations
Employee's Family Member	Identification data, data necessary for payment of benefits and rights, data necessary to fulfill legal or regulatory obligations

PUC-Rio collects personal data through the processes summarized in Table 2, depending on the type of relationship with the institution.

**Table 2 - Main processes involving the processing of personal data**

<b>Relationship with PUC-Rio</b>	<b>Main Processes</b>
Student	Admission and enrollment; graduation; academic, administrative, and financial management in general; granting of scholarships
Employee	Hiring; dismissal; retirement; career management; benefits management
Third-Party Employee	Management of the service provision contract
Supplier	Management of the service provision contract
Candidate in the selection process	Selection process
Financial Responsible for the student	Financial management of the student's service provision contract
Employee's Family Member	Benefits management for the employee

In particular, access to personal data is protected as described in Table 3.

**Table 3 - Protection of access to personal data**

<b>Type of data</b>	<b>Type of access</b>
Generic personal data (name, address, etc.)	Authentication by ID and password
Academic personal data	Authentication by ID and password; access to critical academic personal data only through a computer connected to the secure PUC-Rio network
Sensitive personal data	Authentication by ID and password; access to critical sensitive personal data only through a computer connected to the secure PUC-Rio network

The termination of the processing of personal data will occur according to the temporality defined in specific regulations published by the competent authorities or in internal processes of academic, administrative, and financial management. The sharing of data follows the criteria described in Table 4.

**Table 4 - Sharing of personal data**

<b>Relationship with PUC-Rio</b>	<b>Reason</b>	<b>Organization</b>
Student	Fulfillment of legal or regulatory obligation	Federal public administration: MEC, INEP, CAPES, CNPq, among others
	Fulfillment of contractual obligation	Contracted companies
	Application and receipt of scholarships	FAPERJ, CNPq, CAPES, among others
	Exchange	Higher education institutions abroad
	Monitoring of alumni	Alumni Association
Employee or Intern	Fulfillment of legal or regulatory obligation	Federal public administration: MTPS, MEC, Ministry of Economy, among others.
	Benefits treatment	Private pension, health plans, among others
	Fulfillment of contractual obligation	Contracted companies
Third-Party Employee	Fulfillment of legal or regulatory obligation	Federal public administration: MTPS, Ministry of Economy, among others.
Supplier	Fulfillment of legal or regulatory obligation	Federal public administration: MTPS, Ministry of Economy, among others

### **3.4 How PUC-Rio Ensures Data Security**

PUC-Rio maintains physical, technical, and administrative safeguards to ensure the protection of personal data. PUC-Rio continuously updates and tests the adopted security technology. PUC-Rio restricts access to personal data to its employees, Professor, and suppliers who need access to personal data to fulfill their activities, committing to safeguarding its integrity and security. Additionally, PUC-Rio trains its employees on the importance of confidentiality and the maintenance of privacy and data security.

### **3.5 How PUC-Rio Handles Data Storage and Retention**

The personal data processed by PUC-Rio is stored on its local servers. PUC-Rio retains data during its relationship with employees, students, professors, and others for a period of time specified by educational legislation or the deadline set by the regulatory bodies overseeing PUC-Rio's activities. For more information on where and for how long personal data is stored, and for more information on the rights of erasure and portability, please contact PUC-Rio's data protection officer at [encarregado-igpd@puc-rio.br](mailto:encarregado-igpd@puc-rio.br)

## **4. Use of PUC-Rio Website**

PUC-Rio maintains several websites on its Internet domain ("puc-rio.br") to publicize its activities. The processing of personal data performed by PUC-Rio's websites follows the guidelines outlined in Section 3.

In particular, the policies adopted by PUC-Rio's websites are:

- Security: access to restricted applications is controlled by access credentials (login and password). In some cases, access is only allowed through computers connected to PUC-Rio's secure network. The user should not share their access credentials with third parties and must ensure the protection of their password, following the guidelines of the RDC.
- Collection and storage: personal data is collected only for the time necessary to fulfill specific purposes, such as legal or contractual obligations. Users will be informed in advance about which data will be collected and for what purpose, and it is at their discretion to provide them or not.
- Data sharing: personal data will not be shared, except in the case of a legal obligation or when expressly authorized by the user.

## **5. Rights of Data Subjects**

LGPD recognizes certain rights to data subjects, as outlined in Article 18 of LGPD, among other articles.

If a data subject wishes to confirm that PUC-Rio is processing their personal data or to access the personal data processed by PUC-Rio, they need to contact the Data Protection Officer at [encarregado-lgpd@puc-rio.br](mailto:encarregado-lgpd@puc-rio.br)

The data subject can also request information about the purpose of the processing, the categories of personal data processed, with whom PUC-Rio shares personal data, and how long they will be stored, among other things.

The data subject has the right to correct their personal data record maintained by PUC-Rio if it is incorrect.

The data subject can request that PUC-Rio erase this data or pause it.