

Privacy Policy of IX.br

NÚCLEO DE INFORMAÇÃO E COORDENAÇÃO DO PONTO BR – NIC.br, a non-profit civil association, registered with CNPJ nº 05.506.560/0001-36, promotes and creates the necessary infrastructure for interconnection of autonomous systems in Brazilian metropolitan regions that present great interest of Internet Exchange Points (IXP), as provided in article 5, item V, of the NIC.br Statute regarding the development of projects aimed improving the quality of Internet in Brazil and disseminating its use, with special attention to its technical and infrastructure aspects.

This Privacy Policy (“Policy”) has as one of its main values to respect and offer the best personal data protection practices to IX.br participants (“Platform”). For this, clear and transparent information is made available on the processing of personal data carried out in the context of the Platform.

IX.br creates the necessary infrastructure (Internet Exchange Point - IXP) for the direct interconnection between the networks ("Autonomous Systems" - ASs) which compose the Internet in Brazil. IX.br's operations are aimed at metropolitan regions in the country that have interest in the exchange of Internet traffic. An IX.br location is an interconnection in the metropolitan area of Network Interconnection Points (PIXes), commercial and academic, under a centralized management.

For more details on the activity of IX.br, access the link <https://www.ix.br/sobre>.

1. What do I need to know to understand this Policy?

To make it easier to read, we present below some useful definitions and interpretations:

Definition	Meaning
Personal data or data	Data and information obtained by digital or non-digital means capable of identifying or making identifiable individuals, including data that can be

	combined with other information to identify an individual and/or that relates to an individual's identity, characteristics or behavior.
Holder	Individual (natural person) to whom the personal data refers.
Treatment	Any and all operations carried out with personal data, including the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction, as provided for in Law No. 13.709/18.

2. What kind of data are collected by the Platform and for what purposes are processed?

The Platform collects the following data:

Activities	Collected Data	Goals
meu.ix.br platform registration form	Legal entity identification data: business name, CNPJ number, participating company address, ASN, business telephone and NOC contact telephone	To identify and individualize the organization, fill in the IX.br Contract and send any communications to it (ex.: billing contact).

	<p>Identification data of the person responsible for the company (Natural Person): name, telephone number and e-mail.</p> <p>Company administrative contact details (Natural Person): name, telephone and e-mail.</p> <p>Peering contact details (Natural Person): name, telephone and e-mail.</p> <p>Transit commercial contact details (Natural Person): name, telephone and e-mail.</p>	<p>Identification of the person in charge of the participating company and direct contact with the representative of the participating company to solve technical problems and make billing contact.</p>
NIC.br contact	<p>By email, when:</p> <p>Legal entity identification data: business name and e-mail.</p> <p>Natural Person identification data: name and email.</p> <p>By correspondence, when:</p>	

	<p>Legal entity identification data: business name, e-mail, telephone and sender's full address.</p> <p>Individual identification data: full name, email, telephone and full address of the sender.</p> <p>Via INOC-DBA, when: Legal entity identification data: business name or</p>	
Access Records	Under the terms of the Marco Civil da Internet (Law nº 12.965/14), access records represent the set of information referring to the date and time of use of a given internet application from a given IP address.	Access registration: legal obligation provided in Marco Civil da Internet

In general, the data collected belong to legal entities, in other words, institutional information of the IX.br Participants. However, NIC.br needs to collect some personal data that identifies an individual in order to: (i) sign the IX.br Contract (electronic contract); (ii) identification of IX.br user; (iii) direct contact with user to resolve technical problems; (iv) billing; (v) dissemination of NIC.br projects, initiatives, events and courses, by sending e-mails; and (vi) display of data on the portal “meu.ix.br” to other participants who are connected to the same IXP.

If you would like more detailed information about the purposes mentioned above, you can contact us via email protecaodedados@nic.br.

3. Is any of the collected data published on the Platform?

Yes. The other participants registered on meu.ix.br, partners and service providers linked to NIC.br have access (in the logged area of the Platform) to a list that contains some personal data, in order to enable collaboration contacts between the participants, to promote solutions to technical problems and make the project transparent. The published data are as follows:

- a) name of the Participating organization.
- b) telephone number to contact the Participant.
- c) Participant's email; and
- d) Participant's partial address.

Partner companies that act as PIX (Network Interconnection Points) have their data published on the IX Portal (<https://ix.br/adesao/>), which is available for anyone to access (outside the logged area of the platform), so any AS can contact the PIX of the region that wishes to join the PPTmetro traffic exchange and negotiate with it how this physical connection will take place. In this case, the full address of the company will be disclosed, not just the partial address as it happens before.

It is the company's responsibility to provide the contact details mentioned above, and NIC.br is exempt from liability if the company chooses to indicate data about an individual.

4. How are personal data collected?

Personal data are collected through the form available at <https://meu.ix.br/painel> or, eventually, through e-mail in the context of negotiating the contract to adhere to the Platform or comply with the rights indicated in item 6 of this Policy.

5. With whom can IX.br share personal data?

The data collected by the Platform is not or will not, under any circumstances, be shared for advertising purposes. There is not, and never has been, the share of this data with third parties for these purposes.

Registration data are shared with third parties only in the following hypothesis:

- **Publication on the Platform:** Some data will be published in the logged area of the Platform, pursuant to item 3 of this Policy.
- **Partners:** We count on the help of our partner National Education and Research Network (RNP) to support the activities of IX.br.
- **To comply with the law, safeguard and protect rights:** IX.br reserves the right to access, read, preserve and disclose any personal data it believes to be necessary to comply with a legal obligation or a court order or a competent authority; enforce this Policy, contracts entered into between the parties and other agreements; or protect the rights, property and safety of NIC.br, its employees, users and others, always in accordance with the applicable legislation.

6. What are the rights of the personal data holder?

IX.br assures personal data holders the rights related to privacy and protection of their personal data provided for in the General Law for the Protection of Personal Data, which are as follows:

Rights	Reason
Confirmation of the treatment of your personal data	This right allows you to request and receive confirmation on the existence of treatment of your personal data by IX.br.
Access to personal data	This right allows you to request and receive a copy of the personal data processed by IX.br.
Correction of incomplete, inaccurate or outdated personal data.	This right allows you to request correction and/or rectification of personal data, if you identify that some of them are incorrect,

	directly on the meu.ix.br platform. If you have any questions about this point, please contact us at protecaodedados@nic.br .
Anonymization, blocking or deletion of unnecessary, excessive or incorrectly treated personal data.	This right allows you to request the anonymization, blocking or deletion of your personal data from the Platform's database. Your data may be anonymized, blocked or deleted from NIC.br's servers when requested or when these are no longer necessary or relevant for the performance of IXP'S activities, unless there is any other reason for its maintenance, as a possible need retention of data for the fulfillment of a legal obligation or to safeguard the rights of NIC.br or third parties.
Personal data portability	This right allows you or third parties appointed by you to gain access to personal data processed by the Platform in a structured and interoperable format, provided that this does not violate intellectual property rights or business secrets, in accordance with regulations to be established by the Autoridade Nacional de Proteção de Dados. (ANPD) (Data Protection National Authority)
Do not provide or revoke consent at any time	In cases where data processing is carried out on the basis of your consent, you will have the right to provide it freely, specifically in detail or simply not to provide it. Likewise, after consenting, you also have the right to revoke it, which will

	not affect the legality of any treatment previously carried out.
Oppose to certain data processing	You also have the right to object to certain data processing purposes, in whole or in part. In some cases, NIC.br can demonstrate that it has legitimate or collective reasons for processing personal data, which may overlap with individual opposition to the processing, if, for example, they are strictly essential for the performance of activities, for compliance with legal or regulatory obligations, or even to safeguard the rights of NIC.br or third parties.

For your security, whenever you submit a request to exercise your rights, NIC.br may request some additional information and/or documents so that you can prove your identity, seeking to prevent fraud. We do this in order to guarantee the privacy of holders.

In some cases, NIC.br may have legitimate reasons to fail to respond to a request to exercise rights, to fulfill a legitimate interest in the retention of personal data, to comply with legal or regulatory obligations, or to enable NIC.br's defense or third parties in disputes of any nature.

Furthermore, NIC.br is committed to respond to all requests within a reasonable period of time and always in accordance with applicable legislation.

You can ask questions related to or exercise these rights at any time, through the e-mail “protecaodedados@nic.br”.

7. How long will Personal Data be stored?

NIC.br has a Retention and Disposal Policy (Política de Retenção e Descarte) that has specific rules on the period of data storage, defining the necessary period of data storage considering its nature, need and purpose.

Personal data are deleted after reaching the purpose for which they were originally collected, unless there is a need to maintain this information in our database, such as, for example, to comply with legal and contractual obligations, among others, provided that this exception is supported by a legal basis of legitimate treatment, under the terms of LGPD.

Questions about retention and disposal period can be resolved through the email “protecaodedados@nic.br”.

8. What security measures are taken to protect personal data?

We implement the following technical measures to protect your personal data:

- We use all security mechanisms offered by MySQL and PostgreSQL, depending on specific module of the system;
- Members of IX.br Team have limited access to the database, in which they will only have access when strictly necessary, thus, members have profiles with different access from each other;
- Dual backend access authentication, generated via SSH keys.
- IX.br team members use strong authentication to access the servers.

Despite the best security practices adopted by IX.br, unfortunately, security incidents depend on multiple factors, including those external to IX.br. Therefore, if you identify or become aware of anything that compromises the security of your personal data or that of third parties, please inform the NIC.br Committee in Charge through the e-mail “protecaodedados@nic.br”.

9. Is there an international data transfer?

Yes. Data that are published in a logged area on the Platform that may be accessed by international participants of IX.br, who may be located in other countries.

However, it is important to highlight that personal data collected in the activities are stored on servers that are located in the national territory.

10. How to talk with the person in charge of NIC.br?

If you have any questions or want to make comments or suggestions related to this Policy, please contact us through the email “protecaodedados@nic.br”.

11. Updates and changes to Privacy Policy

As IX.br is always seeking to improve the IX.br Platform and the IXP initiative, this Privacy Policy may be updated. Therefore, we recommend that user periodically visit this page to learn about the changes.