



## **BLIP GDPR COMPLIANCE PROGRAM**

This document is Blip's intellectual property, developed specifically to be used as information on the technical actions being carried out.

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DOCUMENT CONTROL

CHANGE HISTORY

Version	Data	Nature of the change
1.0	01/10/2025	Document creation
1.1	07/04/2025	Document update.

DOCUMENT CREATOR AND REVIEWERS

Name	E-mail	Data
Privacy and Data Protection Team	privacy@blip.ai	01/10/2025
Legal Team	legal@blip.ai	02/19/2025
Privacy and Data Protection Team	privacy@blip.ai	07/04/2025

DOCUMENT APPROVERS

Role	Name	E-mail	Data
DPO	Marcelo Lopes	marcelo.lopes@blip.ai	01/17/2025
DPO	Paulo Kimura	paulo.kimura@blip.ai	07/04/2025



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## 1. INTRODUCTION

As an ever-evolving technology company, Blip has been investing heavily in information security and data privacy, having these topics as premises in its strategic plan, as well as in the evolution and development of the Blip product and its main value: smart contacts.

The implementation of the European Union's General Data Protection Regulation (GDPR) reinforced not only the vision of building a product with the best security practices, but also the compliance with the main legislation related to privacy and data protection in the global market.

Currently, our compliance project includes all the necessary steps for Blip to build a mature privacy and data protection governance program. To this end, investments are constantly made in consultancy, training and market tools, which aim to contribute to achieving the goal established in the privacy program. Furthermore, Blip obtained the ISO/IEC 27001:2022 certificate in 2022, with the goal of expanding our security control maturity and consolidating excellence in the levels of standardization and conformity of the information security management system.

The aforementioned projects are managed by the Information Security and Data Privacy Committee, ensuring multidisciplinary themes and direction for all areas, as well as support from Blip's management team. To this end, we count on the support of partners who are references in the data security and privacy market, such as Onetrust and Hogan Lovells. We also have the strong support and partnership of Microsoft in structuring our IT infrastructure with the latest cloud computing technologies.

Always aiming for better communication and transparency, we publish the following links with our policies and other important information:

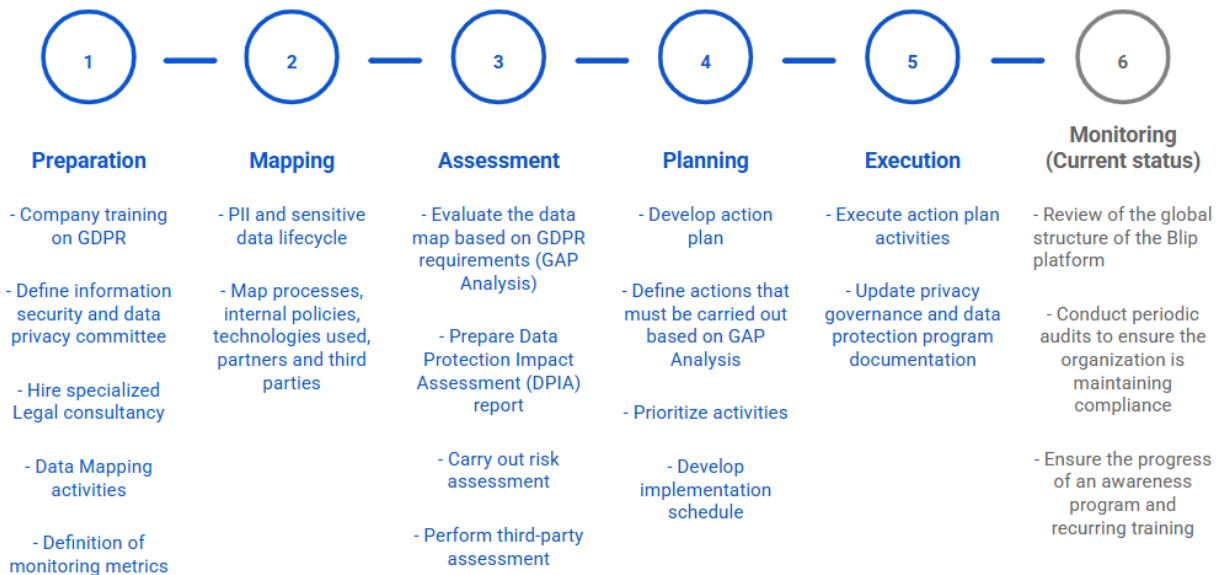
- [Privacy and Security Portal](#)
- [Data Privacy Public Documentation](#)
- [Information Security Public Documentation](#)
- [Cookies Policy](#)
- [Data Privacy Common Questions](#)
- [ISO 27001 Certification](#)
- [Personal Data Processing and Information Security Agreement](#)

With these actions, Blip hopes to continue delivering the best smart contact experience to its customers and partners, in addition to market expectations and the value of best data security and privacy practices.

## 2. OBJECTIVE

The compliance project aims to keep information security and data privacy risks controlled and support the execution of the strategic plan for regulatory compliance with the personal data protection legislation applicable to the business.

## 3. PROGRAM PLAN



## 4. INFORMATION SECURITY AND DATA PRIVACY COMMITTEE

Objective: establish and disseminate Blip's Information Security and Data Privacy Program Guidelines.

Activities:

- Advise on the implementation of the Privacy Program actions;
- Set up working groups to address issues and propose specific solutions on data protection and privacy, as well as relevant legislation;
- Promote a culture of privacy and data protection;

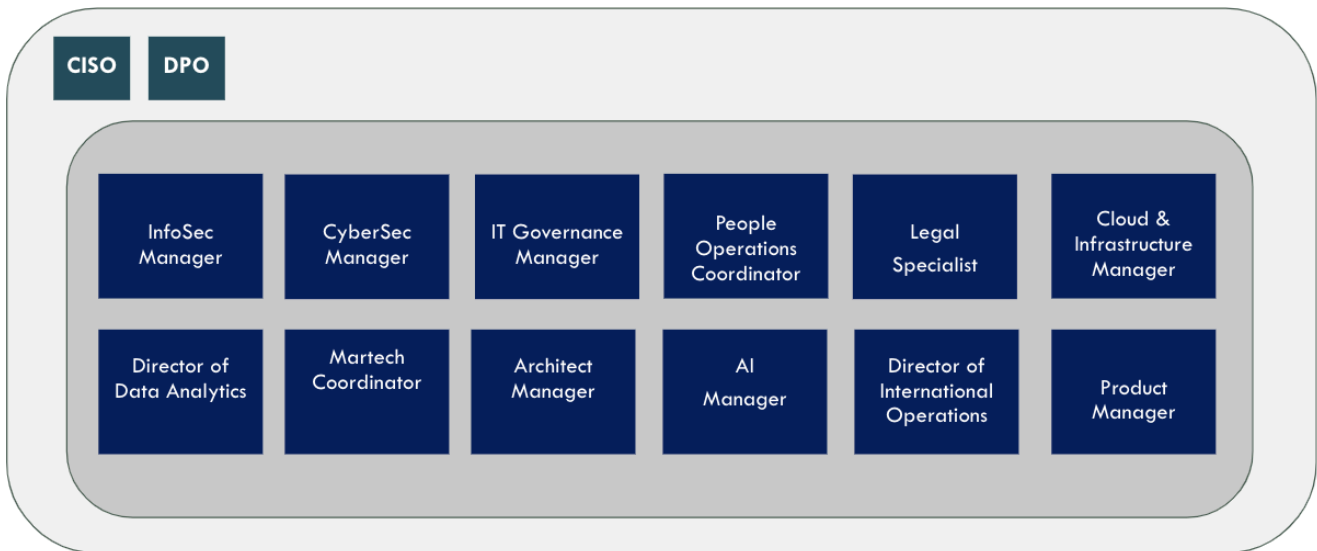


- Monitor investigations and assessments of impacts from security incidents.

### Responsibilities:

- Be a reference to disseminate the culture of privacy as well as guidance regarding legislation within the teams;
- Provide support with respect to Privacy Program initiatives;
- Propose general policies, standards and procedures related to privacy and data protection;
- Support risk management activities;
- Align institutional objectives, organizational culture and information technology with privacy and data protection;
- Be a guardian and act as an action plan manager for compliance with GDPR.

### Committee Structure:



## 5. DATA GOVERNANCE AND PRIVACY PROGRAM

Requirements	Assessment	Status
GDPR Awareness	GDPR awareness for all key stakeholders and all team members has been completed. Knowledge trail developed for ongoing training.	✓
Data Mapping	All information collections were identified, and the questionnaires carried out at each collection were completed and are reviewed annually	✓
Privacy Policy	The Policy was developed, approved and published on the Blip website.	✓
Individual Rights	The Privacy Statement has been created and published on our website.	✓
Legal Bases	The framing of the legal bases was carried out within the data inventory. The review is carried out annually.	✓
Incident and vulnerability management	The Security Incident and Vulnerability Management Standards have been implemented. These artifacts are reviewed annually.	✓
Data Protection Officer (DPO)	Blip has a formal appointment of the Data Protection Officer.	✓
Process data subject requests	The process was established, with flow measured and managed.	✓
Data Protection Impact Assessment (DPIA)	DPIA developed and presented to interested parties.	✓
Structure the privacy by design program	Program developed and presented to interested parties.	✓
Implement the privacy by design program	The concept of Privacy by Design was incorporated and disseminated within our Organization to interested parties.	✓
Contractual and legal adjustments	Contracts adapted to current legislation.	✓
Review of the global structure of the Blip platform	Improved security, transparency and control over personal data processed on the platform	🔄

**Caption:**

✓ In compliance

🔄 In progress



## 6. CONTACT

Data Privacy Officer (DPO): Paulo Kimura

E-mail: [paulo.kimura@blip.ai](mailto:paulo.kimura@blip.ai) | [privacy@blip.ai](mailto:privacy@blip.ai)

Web site: <https://www.blip.ai/en/privacy-portal/>