



Record of Personal Data Processing Activities (ROPA)

Kicol Tecnologia e Serviços LTDA

Document:	Record of Personal Data Processing Activities (ROPA)
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Approved by:	Eduardo Macedo — Director / Technical Lead
Classification:	Internal use

CNPJ: 64.973.433/0001-06

Rua Alcindo Guanabara, 17, Sala 1313, Centro, Rio de Janeiro - RJ, 20031-130

1. Purpose

This document records the personal data processing activities carried out by Kicol Tecnologia e Serviços LTDA, in compliance with Article 37 of Brazil's General Data Protection Law (LGPD — Law No. 13,709/2018).

2. Controller / Processor Information

Field	Information
Company name	Kicol Tecnologia e Serviços LTDA
CNPJ	64.973.433/0001-06
Address	Rua Alcindo Guanabara, 17, Sala 1313, Centro, Rio de Janeiro - RJ, 20031-130
DPO	Eduardo Mello de Macedo
DPO contact	privacidade@kicol.com.br
Primary role	Data processor (processes data on behalf of contracting clients)

3. Record of Processing Activities

3.1 Software development for clients

Field	Description
Activity	Development of custom web applications that process personal data
Legal basis (LGPD)	Art. 7, V — Contract performance
Data subject categories	End users of developed applications (e.g., employee buyers in Gol Lovers)
Personal data processed	Name, email, phone, tax ID (CPF/CNPJ), delivery address
Purpose	Order processing and management, user registration in applications
Sharing	Platforms integrated with the system (NuvemShop, Bling) per project scope
Storage	Cloud servers (Hostinger), MySQL databases
International transfer	None

Retention period	During the client contract term. After termination, data deleted within 30 days
Security measures	Encryption in transit (HTTPS/TLS), restricted access via SSH, 2FA, daily backup

3.2 Vendor and partner management

Field	Description
Activity	Registration and management of partner vendors in developed systems
Legal basis (LGPD)	Art. 7, V — Contract performance
Data subject categories	Legal representatives and contacts of partner vendors
Personal data processed	Representative name, email, phone, tax ID (CPF), banking details
Purpose	Vendor registration, financial transfer and commission management
Sharing	Only with the contracting client (e.g., GOL Airlines) per scope
Storage	Cloud servers (Hostinger), MySQL databases
International transfer	None
Retention period	During the contract term. After termination, data deleted within 30 days
Security measures	Encryption in transit (HTTPS/TLS), restricted access via SSH, 2FA, daily backup

3.3 Contract and commercial management

Field	Description
Activity	Management of contracts, proposals and terms with clients and partners
Legal basis (LGPD)	Art. 7, V — Contract performance
Data subject categories	Legal representatives of clients and commercial partners
Personal data processed	Name, tax ID (CPF), email, phone, address
Purpose	Formalization and management of contracts and commercial partnerships

Sharing	No third-party sharing
Storage	Encrypted password manager (Bitwarden) and encrypted local storage (FileVault)
International transfer	None
Retention period	During the contract term and for the applicable legal period after termination
Security measures	Disk encryption (FileVault), access restricted to technical lead

3.4 Corporate communication

Field	Description
Activity	Email and messaging communication with clients, partners and vendors
Legal basis (LGPD)	Art. 7, IX — Legitimate interest
Data subject categories	Clients, partners and vendors
Personal data processed	Name, email, phone
Purpose	Operational communication about projects, support and commercial relations
Sharing	No third-party sharing
Storage	Gmail (Google), WhatsApp
International transfer	Google (global servers) with standard contractual clauses
Retention period	While active commercial relationship exists
Security measures	2FA active on Google account, end-to-end encryption (WhatsApp)

3.5 Financial and accounting management

Field	Description
Activity	Invoice issuance, financial control and accounting obligations
Legal basis (LGPD)	Art. 7, II — Legal obligation
Data subject categories	Clients and commercial partners
Personal data processed	Name/company name, tax ID (CPF/CNPJ), address, banking details

Purpose	Compliance with tax, fiscal and accounting obligations
Sharing	Accountant and invoice systems (per legal obligation)
Storage	Accounting system and encrypted local storage (FileVault)
International transfer	None
Retention period	Per applicable tax legislation (minimum 5 years)
Security measures	Disk encryption (FileVault), access restricted to technical lead

4. Review and Updates

This record is reviewed semi-annually or whenever there are changes to the company's personal data processing activities, new projects, vendor changes or changes in applicable legislation.

Version	Date	Description	Owner
1.0	03/03/2026	Initial version	Eduardo Macedo

5. Approval

This document has been approved by the management of Kicol Tecnologia e Serviços LTDA.

Eduardo Macedo

Director / Technical Lead

Kicol Tecnologia e Serviços LTDA

March 3, 2026