

Attestation Letter - GDPR Adequacy Activities

Pipefy retained **Opice Blum, Bruno, Vainzof Advogados** to provide legal services regarding broadly adequacies with the **General Data Protection Regulation European Union 2016/679 ("GDPR")**.

We have drawn up a work schedule starting on April 14, 2021, ending on July 13, 2021. This Attestation Letter describes the activities undertaken during this period.

I. GDPR Compliance Project

The GDPR Compliance Project scope consisted of 3 phases:

- Phase 1 - Diagnosis
- Phase 2 – Document elaboration/ validation
- Phase 3 – Attestation Letter

Each phase comprised a series of activities which are detailed below with their respective status and completion date.

PHASE 1 – Diagnosis			
Activity	Status	Completion Date	
Kick off meeting	Completed	04.13.2021	
Preliminary Action Plan: a. Review of the data mapping processing activities b. 1 st Meeting with personnel (HR, IT, Finance, Purchase) c. 2 nd Meeting with personnel (Sales, Marketing, Customer Success)	Completed	05.18.2021	
Analysis of the lawful basis for processing	Completed	05.18.2021	
Assessment of the mapped activities	Completed	05.18.2021	
PHASE 2 – Drafting Documents			
Action plan for the assessment of the mapped activities	Completed	06.14.2021	
Identification of supervisory authorities in Europe and the UK	Completed	06.14.2021	
Privacy notice adequacies for the GDPR	Completed	06.14.2021	

	Assessment of the need for drafting a DPIA appointment in Europe and the UK	Completed	06.14.2021
	Assessment of the need for drafting DPIAs	Completed	06.14.2021
	EDPO final check of the (1) Identification of supervisory authorities (2) Assessment of the need for drafting a DPIA	Completed	07.08.2021
PHASE 3 – Final			
	Opice Blum sends the attestation letter to Pipefy	Completed	07.13.2021

II. DPO as a Service

Pipefy retained Opice Blum to act as Data Protection Officer to meet the requirements outlined in articles 37 to 39 of the GDPR in addition to the scope retained by Pipefy for the Brazilian LGPD DPOaaS.