

Formata

Country Annex — Brazil

Vendor statement of facts relevant to local requirements

Document ID	IM.FORMATA.BR.A1
Document version	1.0
Date of issue	2026-10-06
Applies to	Formata 1.6.0
Language	English
Publisher	iMobile

Contents

- 1. Purpose and status 3
- 2. Product facts 3
 - 2.1. Personal data the product can process 3
 - 2.2. Where data is stored 3
 - 2.3. Data sent to the vendor 3
- 3. Data protection — LGPD 4
 - 3.1. Roles 4
 - 3.2. What the product provides (Article 46) 4
 - 3.3. What remains with the customer 4
- 4. Use of artificial intelligence 5
- 5. Fiscal documents 5
- 6. Accessibility 5
- 7. Language 5
- 8. Documents usually requested and where to find them 5

About this document

This annex supplements the documentation of Formata version 1.6.0 for customers in Brazil. It sets out the facts about the product that matter under the local rules named below and shows which obligations stay with the customer.

The annex is a statement by the vendor about its product. It is not legal advice, not a certificate of conformity and not a substitute for the customer's own assessment.

1. Purpose and status

No certification, homologation or registration by Brazilian authorities is claimed for the product or for the vendor in this document.

2. Product facts

Item	Fact
Product and version	Formata 1.6.0
Deployment	Server software installed on the customer's infrastructure
Customer content on vendor servers	No
Interface languages	Shell: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). CRM form labels are kept in a translation dictionary in the same languages; some strings produced by queries and scripts are shown in Russian only.

2.1. Personal data the product can process

- User accounts: login, name, roles, department, password hash, active flag
- Customer contact persons and leads: last name, first name, position, company, email address, phone, notes
- Organisational structure data: positions, assignments, managers, delegations
- Correspondence: messages of connected mailboxes with attachments, messages of the internal messenger
- Details of counterparties in warehouse documents
- Log records: who signed in and when, who opened and saved forms, who changed field values
- Any other information the customer enters in note fields, attachments and its own forms

2.2. Where data is stored

All data is stored in the PostgreSQL database on the customer's server. Attachments are stored in a directory on the server disk (by default `uploads` in the service working directory); mail attachments are stored in the database. The user's browser keeps the access token (until the tab is closed), the queue of unsaved actions made while offline and a cache of the shell files.

2.3. Data sent to the vendor

None.

3. Data protection — LGPD

Law No. 13,709/2018 (Lei Geral de Proteção de Dados Pessoais, LGPD) applies to the personal data the customer processes with the product. The supervisory authority is the Autoridade Nacional de Proteção de Dados (ANPD).

3.1. Roles

For personal data processed in the product on the customer's own equipment, the customer is the controller (controlador). The vendor has no access to that data and is not a processor (operador) for it.

3.2. What the product provides (Article 46)

- **Access control.** Sign-in with a login and password; the server issues a random token that the browser sends in the `Authorization: Bearer` header. After five failed attempts within 15 minutes sign-in for that login is blocked for 10 minutes (configurable). The password of a domain account can be checked by an external identity provider over OpenID Connect. There is no multi-factor authentication. Access control: user roles, a role-to-forms matrix, permissions on individual form controls and table fields, record visibility by owner and organisational structure, sharing of a single record, roles on named queries. External systems use API keys with scopes and a request-rate limit.
- **Logging.** The `sys_audit` database table: sign-in attempts (successful, failed, locked), opening and saving of forms, script runs and errors, access denials, form publication, report exports. The `sys_record_history` table: the old and new value of every changed field for tables placed under observation (by default warehouse documents, their lines, products, warehouses and counterparties). Separate logs are kept for integration API calls, scheduler job runs, background tasks, slow queries and configuration transfers. Service messages go to the system journal (journald). The program sets no retention period for the action log.
- **Export and deletion.** Export: results of named queries and data components as CSV (by a button in the forms that provide one and by a request to the server), records as JSON through the integration API, a full export with standard PostgreSQL tools (`pg_dump`). Deletion: individual records in forms, through the API or by the administrator's SQL queries; attachments are marked deleted and the file is erased once nothing references it; all data by dropping the database and removing the attachment directory. The program has no ready-made procedure for anonymising or erasing all information about one person.
- **Encryption.** See the section on cryptography below.

3.3. What remains with the customer

- the legal basis for processing (Articles 7 and 11) and transparency towards data subjects;
- appointing the person in charge of data processing (encarregado, Article 41);
- answering data-subject requests (Article 18) with the export and deletion functions above;
- reporting security incidents to the ANPD and to data subjects (Article 48; ANPD Resolution CD/ANPD No. 15/2024);
- for installations on the customer's equipment, the choice of where that equipment is located.

4. Use of artificial intelligence

The product uses large language models as follows. Lead scoring. If the administrator has configured a key for an external artificial-intelligence service, a scheduler job sends that service the fields of unscored leads every 15 minutes (title, company, contact person, e-mail address, telephone, source, budget) and stores the returned score in the lead record. If no key is configured, the score is computed on the customer's server by built-in rules and nothing is sent to an external service.

Content sent to a model provider outside Brazil that contains personal data is an international transfer under the LGPD. The output of these functions is to be reviewed by a person before it is relied on.

5. Fiscal documents

The product keeps business records. Brazilian electronic fiscal documents and bookkeeping (NF-e, NFC-e, NFS-e, SPED) require software integrated with the tax authorities' systems. No such integration and no Brazilian fiscal functions are claimed for this version.

6. Accessibility

Law No. 13,146/2015 (Lei Brasileira de Inclusão) requires accessible websites of companies established in Brazil and of public bodies; public buyers refer to the eMAG model and to WCAG.

Status of the product: No accessibility assessment (WCAG or similar) has been carried out. The interface runs in a browser, scales with browser zoom and supports right-to-left layout for Arabic and Persian; some operations (dragging cards on the board, working in the designer) are designed for a mouse.

No accessibility conformance report is provided for this version.

7. Language

This package is supplied in English. Offers to consumers must give information in Portuguese (Consumer Defence Code, Article 31), and public tenders under Law No. 14,133/2021 normally require documentation in Portuguese. Portuguese-language documentation is not part of this package.

Interface languages of the product: Shell: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). CRM form labels are kept in a translation dictionary in the same languages; some strings produced by queries and scripts are shown in Russian only.

8. Documents usually requested and where to find them

Usually requested	Where it is
Product description, functional specification	Product Description and Functional Specification
Installation and operating instructions	Installation and Administration Guide
User manual	User Guide
Maintenance and support description	Software Lifecycle, Maintenance and Support. Service levels: contract
List of third-party and open-source components	Delivery Specification and Third-Party Components
Security and data-protection description	Security and Data Protection Statement

Usually requested	Where it is
Data processing terms, international-transfer clauses (LGPD)	Contract; needed only where the vendor processes customer data
Documentation in Portuguese	Not part of this package
Licence agreement, warranties, prices	Contract

Document history

Document version	Date	Product version	Change
1.0	2026-10-06	1.6.0	First issue