iMobile

# MoneyCounter

## Country Annex — Brazil

Vendor statement of facts relevant to local requirements

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# About this document

This annex supplements the documentation of MoneyCounter version 2.0.0.0 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 | MoneyCounter 2.0.0.0 |
| Deployment | Desktop software installed on the customer's computers |
| Customer content on vendor servers | No |
| Interface languages | 16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only. |

## 2.1. Personal data the product can process

- The e-mail address entered to activate the Pro edition: kept on the computer in an encrypted file and sent to the vendor's account server. Not requested without activation.
- A machine fingerprint (SHA-256 hash of the Windows MachineGuid, the computer name and the system volume serial number): sent to the account server after activation and tied to the e-mail address in the signed terms string.
- Free-text comments to counts typed by the user: kept only in the local database.

## 2.2. Where data is stored

All data stays on the user's computer, in the Windows user profile: the database `%APPDATA%\MoneyCounter\moneycounter.ste` (SQLite: currencies, denominations, history of counts with logs), the activation file `%APPDATA%\MoneyCounter\license.dat`, and settings in the registry key `HKCU\Software\MoneyCounter` (language, selected currency, history column layout). No count data is stored on vendor servers.

## 2.3. Data sent to the vendor

- Activation code request: e-mail address, product identifier, interface language code (HTTPS, account server `accounts.new-imobile.com`)
- Activation: e-mail address, code from the e-mail, product identifier
- Edition check — right after activation and in the background on every start of an activated program: activation token, product identifier, machine fingerprint

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- Nothing else: no counts, history, telemetry or error reports are sent and there is no update check; a program that has not been activated opens no network connections

# 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.

For the data listed under "Data sent to the vendor", which the vendor receives in order to perform the licence agreement, the vendor is itself a controller (controlador).

## 3.2. What the product provides (Article 46)

- **Access control.** The program has no sign-in, roles or access control of its own. Access to data is determined by the Windows account: each Windows user has a separate database and activation. The Pro edition is confirmed by an e-mail address and a one-time code sent to it.
- **Logging.** The program keeps no security event log, operation log or diagnostic files. Each saved count is stored with its log: lines about quantity changes, clearing and saving with the breakdown by denomination. The user can delete history records; deletions are not recorded.
- **Export and deletion.** Export: File → Back up… saves a copy of the database — a SQLite file readable with standard tools; there is no export to CSV, Excel or PDF and no printing. Deletion: a single history record with the M- button; all user data by deleting the folder `%APPDATA%\MoneyCounter` and the registry key `HKCU\Software\MoneyCounter` (uninstalling the program does not remove them). Activation data on the account server cannot be deleted from the program — contact iMobile for that.
- **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. 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 evaluation has been carried out; operation with screen readers and in high-contrast mode has not been tested. The display and some buttons are non-standard, custom-drawn controls. For Arabic and Persian the main window keeps a left-to-right layout.

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No accessibility conformance report is provided for this version.

## 5. 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: 16 languages: English, Russian, German, Spanish, Chinese, Japanese, Korean, Arabic, Turkish, Persian, Portuguese (Brazil), French, Italian, Polish, Vietnamese, Indonesian. The installer is in English only.

## 6. 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 |
| 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 | 2.0.0.0 | First issue |

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