iMobile

Formata Tracker

Country Annex — Brazil

Vendor statement of facts relevant to local requirements

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About this document

This annex supplements the documentation of Formata Tracker version 1.0 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 Tracker 1.0
Deployment	Server software installed on the customer's infrastructure
Customer content on vendor servers	No
Interface languages	Interface, default dictionaries, program messages and notification texts: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). Data entered by users (issue titles, wiki pages, names) is not translated.

2.1. Personal data the product can process

- User accounts: login, name, roles, password hash, active flag
- Employee data: department, position, daily working hours, team and access-group membership, Gitea login (for smart commits)
- Work data: issue reporters and assignees, watchers, logged-time records (who, when, how much, comment), step ticks
- Text entered by users: issue descriptions, comments, wiki pages, attachments; these may contain any information
- Issue change history and wiki page versions with the author and time, notifications
- Platform log records: sign-ins, opening and saving of forms, script errors, access denials
- Data from Gitea events: names of commit and pull-request authors, repository page addresses

2.2. Where data is stored

All data is stored in the PostgreSQL database on the customer's server, in the tracker schema. Attachments are stored in a directory on the server disk (the `CRM_UPLOAD_DIR` parameter). The licence state is kept in a file in the server's service directory. The user's browser keeps the access token (until the tab is closed), the selected language and a cache of the shell files.

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2.3. Data sent to the vendor

- Licence check: the installation token, product identifier, machine identifier and version number are sent to the vendor's account server; at activation also the licence owner's e-mail address and the licence key. Issues, wiki pages, attachments and user data are not sent to the vendor

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.** 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. There is no multi-factor authentication. Tracker access control: tracker roles (tracker administrator, project manager), project roles (viewer, reporter, developer, manager) granted to an employee, an access group or a team, private and internal projects, wiki-space roles, dashboard permissions. Permissions are checked by database functions on every read and write, including attachment downloads and query-string execution.
- **Logging.** The change history of every issue (the `trk_history` table): fields with old and new values, status transitions, labels, sprint, estimates and dates, comments, links, attachments, steps, logged time, with the author and time; the full text for titles, descriptions and comments. Wiki page versions (the `trk_page_versions` table) with the author, time and comment. A log of Gitea events. The platform action log (the `sys_audit` table): sign-in attempts, opening and saving of forms, script runs and errors, access denials. The program sets no retention period.
- **Export and deletion.** Export: the issue list for a query string and logged time as CSV; wiki pages, branches and spaces as HTML, Markdown and Word; a full export with PostgreSQL tools (`pg_dump` of the tracker schema). Deletion: issues, comments, own time records, wiki pages and spaces, templates, dashboards in the forms according to permissions; user accounts are deactivated; all data by dropping the tracker schema 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);

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- 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 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; the query string and its hints work from the keyboard, some operations (dragging board cards and steps) are designed for a mouse.

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: Interface, default dictionaries, program messages and notification texts: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). Data entered by users (issue titles, wiki pages, names) is not translated.

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	1.0	First issue

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