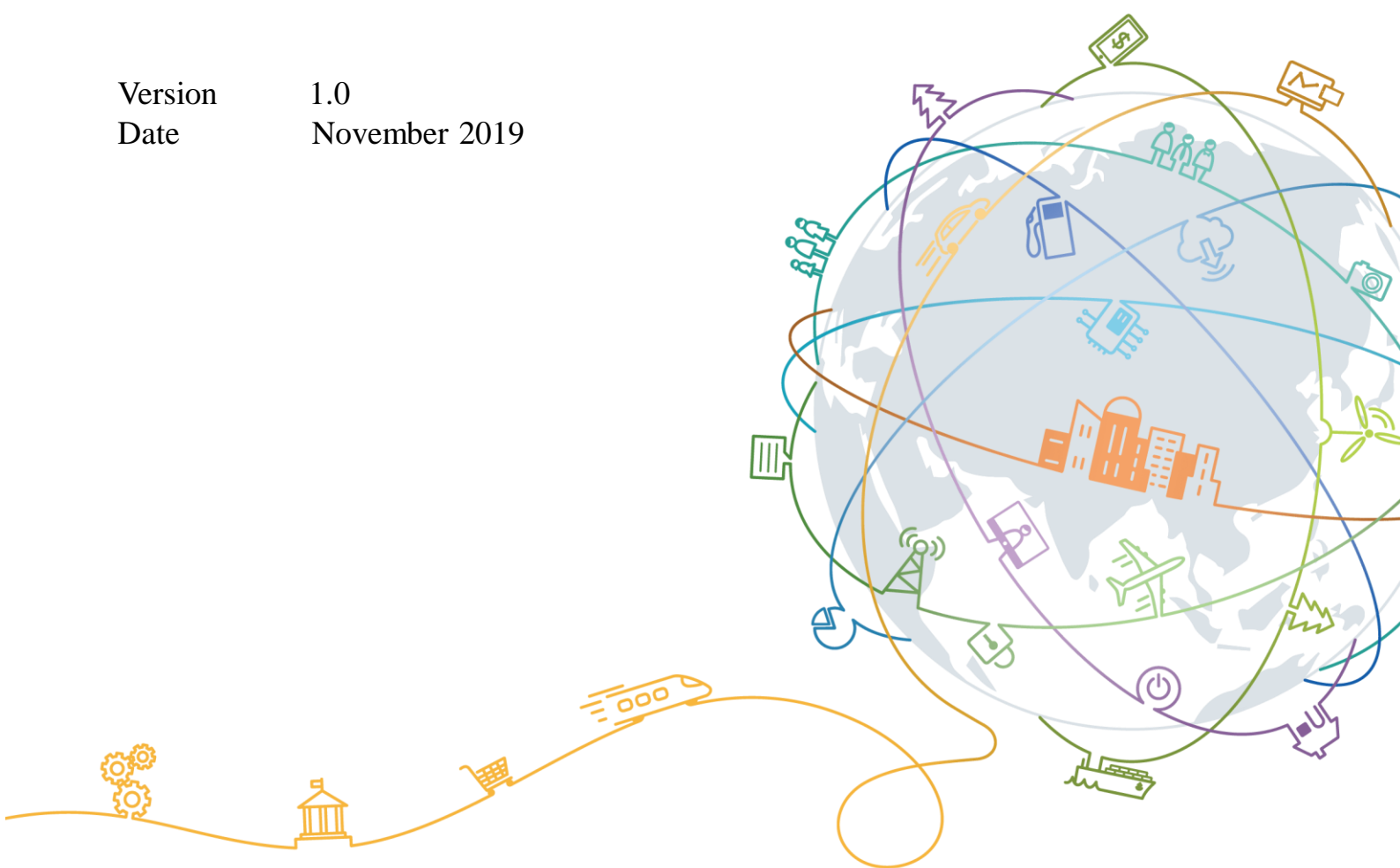


# HUAWEI CLOUD Compliance with Brazil LGPD

Version 1.0  
Date November 2019



HUAWEI TECHNOLOGIES CO., LTD.



**Copyright © Huawei Technologies Co., Ltd. 2019. All rights reserved.**

No part of this document may be reproduced or transmitted in any form or by any means without prior written consent of Huawei Technologies Co., Ltd.

## Trademarks and Permissions



**HUAWEI** and other Huawei trademarks are trademarks of Huawei Technologies Co., Ltd. All other trademarks and trade names mentioned in this document are the property of their respective holders.

## Notice

The purchased products, services and features are stipulated by the contract made between Huawei and the customer. All or part of the products, services and features described in this document may not be within the purchase scope or the usage scope. Unless otherwise specified in the contract, all statements, information, and recommendations in this document are provided "AS IS" without warranties, guarantees or representations of any kind, either express or implied.

The information in this document is subject to change without notice. Every effort has been made in the preparation of this document to ensure accuracy of the contents, but all statements, information, and recommendations in this document do not constitute a warranty of any kind, express or implied.

## Huawei Technologies Co., Ltd.

Address: Huawei Industrial Base  
Bantian, Longgang  
Shenzhen 518129  
People's Republic of China

Website: Huawei – <https://www.huawei.com/en/>  
HUAWEI CLOUD – <https://intl.huaweicloud.com/en-us/>

Email: support@huawei.com

# Contents

## 1. Introduction

- 1.1. Scope of Application
- 1.2. Purpose of Publication
- 1.3. Basic Definition

## 2. HUAWEI CLOUD Privacy Protection Strategy

- 2.1. HUAWEI CLOUD Privacy Commitment
- 2.2. HUAWEI CLOUD Basic Privacy Protection Principles
- 2.3. Privacy Protection Responsibilities
- 2.4. HUAWEI CLOUD Privacy Protection Related Certification

## 3. How HUAWEI CLOUD Meets Brazil LGPD Requirements

- 3.1. Brazil LGPD Overview
- 3.2. LGPD Basic Principles and HUAWEI CLOUD Related Practices
  - 3.2.1. Purpose, Suitability and Necessity
  - 3.2.2. Free Access
  - 3.2.3. Data Quality
  - 3.2.4. Transparency
  - 3.2.5. Security
  - 3.2.6. Prevention
  - 3.2.7. Non-discrimination
  - 3.2.8. Accountability

## 4. Conclusion

## 5. Version History

# 1. Introduction

## 1.1. Scope of Application

The information provided in this document applies to HUAWEI CLOUD and all its products and services.

## 1.2. Purpose of Publication

This document is intended to help customers understand how HUAWEI CLOUD's business-related activities comply with Brazilian General Data Protection Act (in Portuguese, LGPD, Lei Geral de Proteção de Dados, hereinafter referred to as LGPD) requirements, and HUAWEI CLOUD's measures to protect personal data security. In addition, it helps customers understand the different roles and considerations of customers and HUAWEI CLOUD in cloud service mode.

## 1.3. Basic Definition

- **Personal data** – Information regarding an identified or identifiable natural person.
- **Content data** – Data stored or processed during the use of HUAWEI CLOUD services, including but not limited to documents, software, images, and audio and video files.
- **Data subject** – A natural person to whom the personal data that are the object of processing refer to.
- **Controller** – A natural person or legal entity, of public or private law, that has competence to make the decisions regarding the processing of personal data.
- **Processor** – A natural person or legal entity, of public or private law, that processes personal data in the name of the controller.
- **Processing agents** – The controller and the processor.
- **Processing** - Any operation carried out with personal data, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of the information, modification, communication, transfer, dissemination or extraction.



## 2. HUAWEI CLOUD Privacy Protection Strategy

### 2.1. HUAWEI CLOUD Privacy Commitment

HUAWEI CLOUD has placed cyber security and privacy protection as top priorities. HUAWEI CLOUD has fully integrated cyber security and privacy protection into each cloud service and promises to provide customers with stable, reliable, secure, trustworthy, and evolvable services while respecting and protecting customers' privacy.

HUAWEI CLOUD solemnly treats and actively takes the corresponding responsibilities to comply with global privacy protection laws and regulations. HUAWEI CLOUD sets up professional privacy protection teams, develops and optimizes processes, actively develops new technologies, and continuously builds HUAWEI CLOUD privacy protection capabilities to achieve HUAWEI CLOUD's privacy protection objectives: safeguarding strict service boundaries, protecting customers' personal data security, and helping customers implement privacy protection.

### 2.2. HUAWEI CLOUD Basic Privacy Protection Principles

- **Purpose:** Processing done for legitimate, specific and explicit purposes of which the data subject is informed, with no possibility of subsequent processing that is incompatible with these purposes;
- **Suitability:** Compatibility of the processing with the purposes communicated to the data subject, in accordance with the context of the processing;
- **Necessity:** Limitation of the processing to the minimum necessary to achieve its purposes, covering data that are relevant, proportional and non-excessive in relation to the purposes of the data processing;
- **Free access:** Guarantee to the data subjects of facilitated and free of charge consultation about the form and duration of the processing, as well as about the integrity of their personal data;
- **Quality of the data:** Guarantee to the data subjects of the accuracy, clarity, relevancy and updating of the data, in accordance with the need and for achieving the purpose of the processing;
- **Transparency:** Guarantee to the data subjects of clear, precise and easily accessible information about the carrying out of the processing and the respective processing agents, subject to commercial and industrial secrecy;
- **Security:** Use of technical and administrative measures which are able to protect personal data from unauthorized accesses and accidental or unlawful situations of destruction, loss, alteration, communication or dissemination;
- **Prevention:** Adoption of measures to prevent the occurrence of damages due to the processing of personal data;
- **Nondiscrimination:** Impossibility of carrying out the processing for unlawful or abusive discriminatory purposes;
- **Accountability:** Demonstration by the agent of the adoption of measures which are efficient and capable of proving the compliance with the rules of personal data protection, including the efficacy of such measures.

## 2.3. Privacy Protection Responsibilities

As a cloud service provider (CSP), HUAWEI CLOUD is responsible for the security of the cloud platform infrastructure. HUAWEI CLOUD ensures that all business related activities comply with the requirements of laws and regulations. HUAWEI CLOUD provides various privacy protection technologies for customers to help customers protect privacy based on business requirements.

Customers have full control over their content data. They shall correctly and comprehensively identify personal data on the cloud, select appropriate services, and develop security and personal data protection policies to protect personal data. At the same time, customers can use HUAWEI CLOUD's various privacy protection services to enhance the protection of personal data.

The following figure is the HUAWEI CLOUD's Responsibility Sharing Model. This model helps customers better understand the responsibility of HUAWEI CLOUD in the field of privacy protection and the key points that customers need to pay attention to.

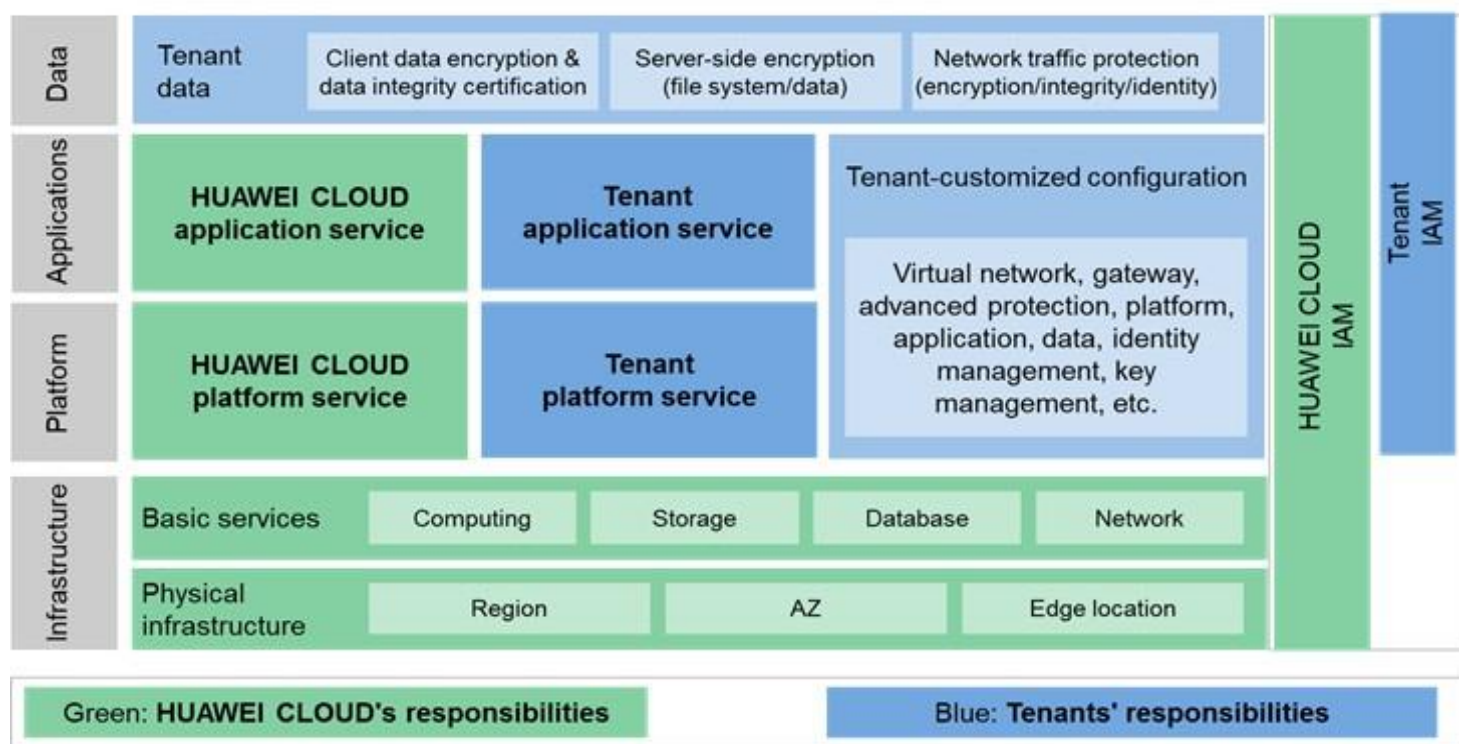


Figure 1: Responsibility Sharing Model

## 2.4. HUAWEI CLOUD Privacy Protection Related Certification

HUAWEI CLOUD complies with all local applicable privacy laws and regulations. HUAWEI CLOUD has a professional legal team, which closely monitors the update of laws and regulations, continuously tracks and analyzes global laws and regulations, and ensures compliance with laws and regulations.

HUAWEI CLOUD's capabilities and achievements in privacy protection and personal data security have been widely recognized by third-party certifications around the globe. Up to now, HUAWEI CLOUD has obtained certifications<sup>1</sup> from more than 10 organizations in and outside China, including:

- **ISO 29151**

ISO 29151 is an international practical guide to the protection of personal identity information. The adoption of ISO 29151 confirms HUAWEI CLOUD's implementation of internationally recognized management measures for the entire lifecycle of personal data processing.

- **ISO 27701**

ISO 27701 specifies requirements for the establishment, implementation, maintenance and continuous improvement of a privacy-specific management system. The adoption of ISO 27701 demonstrates that HUAWEI CLOUD operates a sound system for personal data protection.

- **ISO 27018**

ISO 27018 is an international code of conduct that focuses on the protection of personal data in the cloud. The adoption of ISO 27018 indicates that HUAWEI CLOUD has met the requirements of an internationally complete personal data protection and management system.

- **BS 10012**

BS10012 is the personal information data management system standard issued by BSI. The BS10012 certification indicates that HUAWEI CLOUD offers a complete personal data protection system to ensure personal data security.

- **ISO 27001**

ISO 27001 is a widely used international standard that specifies requirements for information security management systems. This standard provides a method of periodic risk evaluation for assessing systems that manage company and customer information.

- **ISO 27017**

ISO 27017 is an international certification for cloud computing information security. The adoption of ISO 27017 indicates that HUAWEI CLOUD has achieved internationally recognized best practices in information security management.

<sup>1</sup> <https://intl.huaweicloud.com/en-us/securecenter/safetycompliance.html>



- **SOC (audit)**

The SOC audit report is an independent audit report issued by a third-party audit institution based on the relevant guidelines developed by the American Institute of Certified Public Accountants (AICPA) for the system and internal control of outsourced service providers. At present, HUAWEI CLOUD has passed the audit of SOC2 Type 1 Privacy Principle in terms of privacy, which proves that HUAWEI CLOUD has reasonable control measures in terms of cloud management and technology.

- **ISO 20000**

ISO 20000 is an international recognized information technology service management system (SMS) standard. It specifies requirements for the service provider to plan, establish, implement, operate, monitor, review, maintain and improve an SMS to make sure CSPs can provide effective IT services to meet the requirements of customers and businesses.

- **ISO 22301**

ISO 22301 is an internationally recognized business continuity management system standard that helps organizations avoid potential incidents by identifying, analyzing, and alerting risks, and develops a comprehensive Business Continuity Plan (BCP) to effectively respond to disruptions so that entities can recover rapidly, keep core business running, and minimize loss and recovery costs.

- **CSA STAR Gold Certification**

CSA STAR certification was developed by the Cloud Security Alliance (CSA) and the British Standards Institution (BSI), an authoritative standard development and preparation body as well as a worldwide certification service provider. This certification aims to increase trust and transparency in the cloud computing industry and enables cloud computing service providers to demonstrate their service maturity.

- **PCI DSS Certification**

Payment Card Industry Data Security Standard (PCI DSS) is the global card industry security standard, jointly established by five major international payment brands: JCB, American Express, Discover, MasterCard and Visa. It is the most authoritative and strict financial institution certification in the world..

- **International Common Criteria (CC) EAL3+ Certification**

Common Criteria (CC) certification is a highly recognized international standard for information technology products and system security. HUAWEI CLOUD FusionSphere passed CC EAL 3+ certification, indicating that the HUAWEI CLOUD software platform is highly recognized worldwide.

- **MTCS Level 3 (Singapore)**

The Multi-Tier Cloud Security (MTCS) specification is a standard developed by the Singapore Information Technology Standards Committee. This standard requires cloud service providers (CSPs) to adopt sound risk management and security practices in cloud computing. HUAWEI CLOUD Singapore has obtained the highest level of MTCS security rating (Level 3).



- **Certification for the Capability of Protecting Cloud Service User Data (China)**

This certification evaluates a CSP's ability to protect cloud data. Evaluation covers pre-event prevention, in-event protection, and post-event tracking.

- **Trusted Cloud Service (TRUCS) (China)**

Trusted Cloud Service (TRUCS) is one of the most authoritative public domain assessments in China. This assessment confirms that HUAWEI CLOUD complies with the most detailed standard for cloud service data and service assurance in China.

- **Classified Cybersecurity Protection (China)**

Classified Cybersecurity Protection issued by China's Ministry of Public Security is used to guide organizations in China through cybersecurity development. Today, it has become the general security standard widely adopted by various industries throughout China. HUAWEI CLOUD has passed the registration and assessment of Classified Cybersecurity Protection Class 3. In addition, key HUAWEI CLOUD regions and nodes have passed the registration and assessment of Classified Cybersecurity Protection Class 4.

- **Gold O&M (TRUCS)**

The Gold O&M certification is designed to assess the O&M capability of cloud service providers who have passed TRUCS certification. This certification confirms that HUAWEI CLOUD services operate a sound O&M management system that satisfies the cloud service O&M assurance requirements specified in Chinese certification standards..

- **Cloud Service Security Certification - Cyberspace Administration of China (CAC)**

This certification is a third-party security review conducted by the Cyberspace Administration of China according to the Security Capability Requirements of Cloud Computing Service. HUAWEI CLOUD e-Government Cloud Service Platform has passed the security review (enhanced level), indicating that Huawei e-Government cloud platform was recognized for its security and controllability by China's top cybersecurity management organization.

- **ITSS Cloud Computing Service Capability Evaluation by the Ministry of Industry and Information Technology (MIIT)**

ITSS cloud computing service capability evaluation is based on Chinese standards such as the General Requirements for Cloud Computing and Cloud Service Operations. It is the first hierarchical evaluation mechanism in China's cloud service/cloud computing domain. Huawei private and public clouds have obtained cloud computing service capability level-1 (top level) compliance certificates.

HUAWEI CLOUD actively focuses on the release of authoritative privacy certification mechanisms in the industry, and continuously raises higher requirements, optimizes its privacy protection system, and increases and updates security and privacy certifications. In addition, HUAWEI CLOUD works closely with privacy protection associations to explore cutting-edge privacy protection information and technologies to build its sustainable, secure privacy protection environment.



## 3. How HUAWEI CLOUD Meets Brazil LGPD Requirements

### 3.1. Brazil LGPD Overview

Brazil's General Data Protection Act (LGPD)<sup>2</sup> is a comprehensive law on the protection of personal data that regulates the processing of such data by natural persons and other legal entities governed by public or private law, including through digital media. The LGPD is intended to protect the fundamental rights of freedom and privacy and free personality of the natural person. The LGPD is applicable to any individual, group, or institution that processes data in Brazil, provides goods or services to individuals in Brazil, and collects personal data in Brazil. The law was formally signed on August 14, 2018 and will take effect on August 15, 2020.

### 3.2. LGPD Basic Principles and HUAWEI CLOUD Related Practices

Providing quality service to customers has always been the goal of HUAWEI CLOUD. Based on an in-depth analysis of Brazil's LGPD compliance requirements, HUAWEI CLOUD combines the understanding of customer business needs during the process of serving customers, and integrates HUAWEI CLOUD's advanced practices and technical capabilities to provide a variety of services that satisfy privacy protection requirements. This white paper will help customers understand the services provided by HUAWEI CLOUD in privacy protection compliance according to the core principles of LGPD.

HUAWEI CLOUD deeply understands the importance of customer content data in business. HUAWEI CLOUD adheres to a neutral attitude and maintains strict service boundaries, ensuring that data is owned and used only by customers and creates value for customers. In the process of using HUAWEI CLOUD, customers have full control over their content data:

#### **Customers can determine where content data is stored.**

HUAWEI CLOUD currently has data centers in multiple regions around the world, including Asia, Europe, and the Americas. The data centers in each region are physically isolated. If a customer requires a specific geographical location, they can choose different regions of HUAWEI CLOUD according to their needs. For example, if a customer in Brazil chooses a geographical site in Brazil, the customer's content data will be stored in the Brazil-based data center. HUAWEI CLOUD will not transfer customer content data to other regions without the customer's explicit consent, or unless other legal obligations are presented.

If there is a need to transfer customer content data containing personal data across borders and the customer requires HUAWEI CLOUD's assistance, they can contact and authorize HUAWEI CLOUD, who will then transfer the data according to the customer's authorization.

<sup>2</sup> [http://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2018/lei/L13709.htm](http://www.planalto.gov.br/ccivil_03/_ato2015-2018/2018/lei/L13709.htm)

**Customers can determine the content data protection policy.**

By using different HUAWEI CLOUD services, customers can decide on a range of security-related factors, including whether their data is encrypted, what access policies are adopted, and whether logs are audited and how.

Customers should consider how to manage and protect personal data security and prevent personal data breach. If a breach does occur, customers should notify National Authority for Protection of Data (ANPD) without undue delay according to the corresponding laws and regulations.

**3.2.1. Purpose, Suitability and Necessity**

**Purpose:** processing done for legitimate, specific and explicit purposes of which the data subject is informed, with no possibility of subsequent processing that is incompatible with these purposes.

**Suitability:** compatibility of the processing with the purposes communicated to the data subject.

**Necessity:** limitation of the processing to the minimum necessary to achieve its purposes, covering data that are relevant, proportional and non-excessive in relation to the purposes of the data processing.

***Customer Considerations:***

Customers have full control over their content data, act as data controllers, and decide whether to use HUAWEI CLOUD services to collect or use personal data and for what purpose. Customers should ensure that personal data collection is based on legal, specific, and clear purposes, inform the data subject, and obtain the consent of the data subject. Customers should also ensure that data is processed for the purposes of which the data subject is informed. Customers should inform their parents or legal guardians and obtain their explicit consent when collecting and processing personal data of children and adolescents. Customers should develop a corresponding control process and use the related services provided by HUAWEI CLOUD or self-developed capabilities, to ensure that personal data is processed only for appropriate purposes and within the scope of the data subject's consent. In addition, customers should implement the principles of notification to data subjects as per privacy protection regulations. For example, through HUAWEI CLOUD's Convergent Video Cloud Service (CVCS)<sup>3</sup>, customers can use the interface provided by HUAWEI CLOUD for signing and querying privacy statements to embed a function of agreeing or revoking privacy statements and recording related operation records, and to inform their users of the personal data processing policy. For cloud services related to personal data processing, customers can take corresponding privacy protection measures based on information relating to the types, processing, and storage modes of personal data provided by HUAWEI CLOUD in the product documentation.

<sup>3</sup> <https://intl.huaweicloud.com/en-us/product/cvcs.html>



Through the database security service (DBSS) <sup>4</sup> provided by HUAWEI CLOUD, customers can quickly identify personal data from within the massive amounts of data they own, and analyze whether the personal data that has been collected is necessary for business purposes, and whether the purpose of data collection has been notified to the data subject. If there are any instances of non-compliance, corrective measures can be taken in time to avoid illegal risks.

***HUAWEI CLOUD Considerations:***

After obtaining the customer's consent to collect personal data necessary to provide the service, HUAWEI CLOUD will only process the customer's personal data within the scope specified in the *Privacy Statement*. HUAWEI CLOUD's products and services are primarily intended for adults. The collection and use of personal data of children and adolescents will obtain the explicit consent of their parents or guardians. In the HUAWEI CLOUD product design phase, HUAWEI CLOUD will sort out all the personal data categories involved and conduct a Privacy Impact Assessment (PIA). The PIA includes HUAWEI CLOUD's processes of processing personal data and corresponding measures of personal data protection to ensure that the personal data collected by HUAWEI CLOUD products does not exceed that is required to achieve the purposes. In the operation and maintenance process, HUAWEI CLOUD will set different access rights to personal data based on staff roles, ensuring that staff can only access or use personal data necessary for their work.

HUAWEI CLOUD will not use or disclose customer content data unless authorized by the customer, or in compliance with local applicable laws and regulations or binding orders of government agencies.

**3.2.2. Free Access**

Guarantee to the data subjects of facilitated and free of charge consultation about the form and duration of the processing, as well as about the integrity of their personal data.

***Customer Considerations:***

Customers have full control over their content data. If customer content data in HUAWEI CLOUD contains personal data, customers should establish a relevant mechanism and use the functions provided by HUAWEI CLOUD products and services or self-developed capabilities, to respond to the data subjects' request for personal data access and correction.

For content data stored in HUAWEI CLOUD, customers should directly respond to the data subjects' requests to exercise their right to access and correct their personal data. Customers can use HUAWEI CLOUD's various privacy protection services, such as the Log Tank Service (LTS) <sup>5</sup>, to keep records of the operation of personal data, and to protect their users' right to be informed.

<sup>4</sup> <https://intl.huaweicloud.com/en-us/product/dbss.html>

<sup>5</sup> <https://intl.huaweicloud.com/en-us/product/lts.html>

### ***HUAWEI CLOUD Considerations:***

HUAWEI CLOUD allows customers to exercise their right to access and correct their personal data. HUAWEI CLOUD provides a dedicated channel to receive customer requests, and is equipped with a professional team to respond to customer requests for personal data and privacy protection. Upon receiving a request from a customer, the problem is handled and processing is completed within a specified time, with the result then given back to the customer. For more details related to request channels, please refer to HUAWEI CLOUD's *Privacy Statement*.

Regarding customer content data, if customers have any questions about the access requirements of their data subjects when using the HUAWEI CLOUD products, they should contact the HUAWEI CLOUD customer service team. For details, please refer to HUAWEI CLOUD official website.

#### **3.2.3. Data Quality**

Guarantee to the data subjects of the accuracy, clarity, relevancy and updating of the data, in accordance with the need and for achieving the purpose of the processing.

#### ***Customer Considerations:***

Customers have full control over their content data. If customer content data in HUAWEI CLOUD contains personal data, customers can select the data integrity protection function provided by HUAWEI CLOUD products or services or self-developed capabilities. Customers can develop security and privacy protection policies to ensure the accuracy of personal data, such as using the access control service to set minimum permissions for personal data and assign permissions as needed, and using encryption technology to ensure integrity during data storage and transmission. Customers can guarantee the accuracy of their content data through various data security and privacy protection functions provided by HUAWEI CLOUD. For example, in the data storage phase, HUAWEI CLOUD provides data encryption (server encryption) in multiple services such as cloud hard disk, object storage, image service, and relational database, and uses high-intensity algorithms to encrypt stored data. The server encryption function integrates the Data Encryption Workshop (DEW) <sup>6</sup>. Customers can use DEW to centrally manage the key lifecycle and ensure the integrity of the data storage process. In the data usage phase, customers can adopt the Identity and Access Management (IAM) <sup>7</sup> provided by HUAWEI CLOUD to take measures such as user management, identity authentication and fine-grained cloud resource access control to prevent unauthorized modifications to content data. During the data transmission phase, customers can ensure the integrity of the data transmission process through various encryption transmission mechanisms provided by HUAWEI CLOUD.

<sup>6</sup><https://intl.huaweicloud.com/en-us/product/dew.html>

<sup>7</sup><https://intl.huaweicloud.com/en-us/product/iam.html>

For example, when a customer provides a website service through the Internet, HUAWEI CLOUD's certificate management service can be used to implement trusted authentication of the website and secure transmission based on the encryption protocol. For customer service hybrid cloud deployment and global deployment scenarios, customers can use Virtual Private Network (VPN)<sup>8</sup>, Direct Connect (DC)<sup>9</sup>, Cloud Connect (CC)<sup>10</sup> and other services provided by HUAWEI CLOUD.

***HUAWEI CLOUD Considerations:***

For customer personal data, HUAWEI CLOUD has taken various measures to ensure accuracy. For example, HUAWEI CLOUD checks the validity of data when customers input personal data, and enhances the standardization and accuracy of data input. HUAWEI CLOUD also requires the entry of a verification code obtained through the email address or mobile phone number provided by the customer, in order to confirm the customer identity and verify the accuracy of the relevant contact information.

For customer content data, HUAWEI CLOUD provides customers with a variety of data security and privacy protection functions to help customers ensure the accuracy of their content data.

**3.2.4. Transparency**

Guarantee to the data subjects of clear, precise and easily accessible information about the carrying out of the processing and the respective processing agents, subject to commercial and industrial secrecy.

***Customer Considerations:***

HUAWEI CLOUD customers shall be responsible for the transparency of their personal data processing, including how personal data is collected and processed. During this process, if the HUAWEI CLOUD service is involved, the customer can utilize the documents provided by the HUAWEI CLOUD official website, the trust center public information, or the HUAWEI CLOUD customer service team. Customers can also access the *Privacy Statement* through the HUAWEI CLOUD official website homepage, or learn about HUAWEI CLOUD's efforts and achievements in personal data protection through the various channels provided by HUAWEI CLOUD. For example, white papers or the various certifications that have been published in the trust center each illustrate HUAWEI CLOUD's personal data protection related information in different dimensions.

***HUAWEI CLOUD Considerations:***

Through the *Privacy Statement*, HUAWEI CLOUD clearly informs customers about the purpose and method of personal data collection, in addition to other personal data processing matters.

For more information about the personal data protection functions or features of HUAWEI CLOUD, customers can visit the HUAWEI CLOUD official website or contact the HUAWEI CLOUD customer service team.

<sup>8</sup> <https://intl.huaweicloud.com/en-us/product/vpn.html>

<sup>9</sup> <https://intl.huaweicloud.com/en-us/product/dc.html>

<sup>10</sup> <https://intl.huaweicloud.com/en-us/product/cc.html>



### 3.2.5. Security

Use of technical and administrative measures which are able to protect personal data from unauthorized accesses and accidental or unlawful situations of destruction, loss, alteration, communication or dissemination.

#### ***Customer Considerations:***

Customers should perform security configuration based on service and personal data protection requirements, such as operating system configuration, network settings, security protection, and database encryption policies, and set proper access control and password policies.

In addition, customers can satisfy various security requirements by utilizing security services provided by HUAWEI CLOUD.

#### ***HUAWEI CLOUD Considerations:***

HUAWEI CLOUD guarantees the security of personal data through a series of technologies and practices. Policies are implemented based on the minimum permissions required by roles through identity authentication and access control technologies, preventing unauthorized manipulation of personal data. Encryption technologies are widely used to encrypt customer personal data, ensuring data security during storage and transmission. In addition, potential security risks are rapidly discovered in order to quickly respond to and address issues through logging and auditing technology. Regarding customer content data, HUAWEI CLOUD utilizes various data security technologies and related management and control measures, including identity authentication and access control, data transmission and storage encryption technologies, and logging, to ensure the security of HUAWEI CLOUD services.



### 3.2.6. Prevention

Adoption of measures to prevent the occurrence of damages due to the processing of personal data.

#### ***Customer Considerations:***

Customers have full control over their content data, and should select appropriate services to develop security and privacy protection policies to protect personal data. Customers can build a secure environment that meets their business needs through the various security services mentioned earlier in this white paper, such as data encryption services, unified identity authentication and log services.

#### ***HUAWEI CLOUD Considerations:***

Regarding customer personal data, HUAWEI CLOUD adheres to company standards for customer support services and privacy compliance, and adopts personal data protection measures to ensure the integrity of customer personal data and prevent data loss or damage.

For customer content data, adhering to the principle of not accessing customer data, HUAWEI CLOUD implements security control measures including encryption, tenant isolation, and access control, in order to prevent possible damage of customer content data during transmission, processing and storage.

### 3.2.7. Non-discrimination

Impossibility of carrying out the processing for unlawful or abusive discriminatory purposes.

#### ***Customer Considerations:***

Customers have full control over their content data, and shall take full responsibility for ensuring that the processing of personal data is not discriminatory, illegal or abusive.

#### ***HUAWEI CLOUD Considerations:***

HUAWEI CLOUD respects the customer's rights and does not discriminate based on their personal data. HUAWEI CLOUD does not automatically process personal data, and as such will not affect the interests of individual customers.

### 3.2.8. Accountability

Demonstration by the agent of the adoption of measures which are efficient and capable of proving the compliance with the rules of personal data protection, including the efficacy of such measures.

#### ***Customer Considerations:***

As customers have full control over the personal data they collect, an effective privacy protection system should be established according to specific business characteristics and compliance requirements. Customers can quickly and easily meet their privacy protection compliance requirements through HUAWEI CLOUD's privacy protection compliance scheme.

#### ***HUAWEI CLOUD Considerations:***

HUAWEI CLOUD has established a privacy protection system to ensure the security of personal data. HUAWEI CLOUD uses strict and systematic management methods to ensure the implementation and continuous improvement of privacy protection policies and processes. HUAWEI CLOUD routinely carries out internal and external auditing activities, and constantly verifies and improves the entire privacy protection system. HUAWEI CLOUD's accreditation in related fields both at home and abroad, as well as through passed audits, confirms that such an emphasis on privacy protection achieves results. Customers can reach out to HUAWEI CLOUD through customer service for further information about certification and reports.



## 4. Conclusion

HUAWEI CLOUD always adheres to HUAWEI's "customer-centric" core values, fully understands the importance of customer personal data security, and respects and protects customer privacy rights. HUAWEI CLOUD has industry-leading security and privacy protection technologies and provides customers with capabilities through cloud services and solutions to help customers cope with increasingly complex and open network environments and increasingly strict privacy protection laws and regulations.

To satisfy the requirements of local privacy protection laws and regulations, HUAWEI CLOUD follows up on the updates of relevant laws and regulations, converting new requirements into internal HUAWEI CLOUD regulations, and optimizing internal processes to ensure that all activities carried out by HUAWEI CLOUD meet the requirements of laws and regulations. HUAWEI CLOUD continuously develops and launches privacy protection related services and solutions to help customers implement privacy protection laws and regulations in each region.

Compliance with privacy protection laws and regulations is a long-term and multi-disciplinary activity. HUAWEI CLOUD is committed to continuously improving capabilities in the future in order to satisfy relevant laws and regulations and to build a secure and trustworthy cloud platform for customers.

This white paper is for reference only and does not have legal effect or constitutes legal advice. Customers should assess their use of cloud services as appropriate and ensure compliance with Brazil's LGPD when using HUAWEI CLOUD.

## 5. Version History

Date	Version	Description
November 2019	1.0	First release