

ANPD PUBLISHES INFORMATION SECURITY GUIDE FOR SMALL DATA PROCESSING AGENTS



On October 4, 2021, the Brazilian Data Protection Authority (ANPD) published a guide on information security measures for small data processing agents, with a checklist to enable these measures.

* Small data processing agents cover microenterprises, small businesses and startups. However, ANPD is drafting a specific resolution that will provide more information about who can be considered a small data processing agent.

Administrative measures



Information Security Policy

Set of rules that enable the planning, implementation and control of actions related to information security in an organization, such as use of passwords, data sharing, software updates, use of antivirus, etc. Although it is not mandatory, it is a good practice recommended by ANPD.



Awareness and Training

It is recommended that employees be made aware of their **obligations and responsibilities** related to the processing of personal data and the legal obligations existing in the Brazilian General Law for the Protection of Personal Data (LGPD) and in rules and guidelines issued by ANPD.



Contract management

It is recommended to use **non-disclosure agreements (NDA)** with employees, as well as an information security clause in contracts with third parties to ensure adequate personal data protection

Technical Measures



Access control

Adoption of measures to ensure that personal data is only accessed by authorized people.



Security of stored personal data

Personal data must not be stored for an indiscriminate period. Therefore, personal data destruction registration clauses are recommended.



Communications security

It is suggested that network traffic be managed by a firewall that detects and blocks threats and by anti-virus and anti-spam services.

The adoption of security measures is a compliance with the security principle provided for by the LGPD and will be considered in the application of administrative sanctions by ANPD, in accordance with article 52, §1, VII and IX of the LGPD.

The guide does not have a binding normative effect and must be understood as a guide to good practices, which can be updated and improved whenever necessary.