

Security Questionnaire

Responses from SolerWorks

Parties	The reviewing enterprise and SolerWorks LTDA
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Standard responses. Account-specific versions are issued with the audit dossier.

Requested by	Standard release. The version for your account ships with the audit dossier
Completed by	Enzo Fonseca Soler, Sócio-Administrador
Date	September 2026
Client track	All client tracks

Organization and governance

NO.	QUESTION	ANSWER	EVIDENCE
1.1	Who is the contracting entity?	SolerWorks LTDA, a Brazilian limited liability company registered in São Paulo (CNPJ 60.678.861/0001-55). It signs the data processing agreement in its own name, as processor.	Governance page, solerworks.com/governance . Data processing agreement
1.2	Who is responsible for data protection?	A named privacy contact: Enzo Fonseca Soler, Sócio-Administrador, privacy@solerworks.com . No data protection officer is appointed. The privacy contact is named in each data processing agreement.	Data processing agreement. Governance page
1.3	Which legal framework covers work done from Brazil?	The GDPR and the Brazilian LGPD. Transfers rely on the European Commission's adequacy decision for Brazil, with the Standard Contractual Clauses incorporated as a fallback.	EU–Brazil adequacy framework, solerworks.com/adequacy-framework

Access control

NO.	QUESTION	ANSWER	EVIDENCE
2.1	How do engineers reach client systems?	Only through the virtual desktop, VPN or managed device the client designates, with credentials the client issues. SolerWorks holds no account or administrative right in the client environment.	Data processing agreement, security measures annex
2.2	Who issues and revokes credentials and enforces multi-factor authentication?	The client, under its own identity provider and policy. One credential set per named engineer. No shared logins or sessions. SolerWorks requests revocation the day a role ends.	Authorized personnel register. Deletion and deprovisioning certificate

NO.	QUESTION	ANSWER	EVIDENCE
2.3	Does the delivery partner have access?	No. The delivery partner holds no credentials in the client environment and receives no client personal data.	Data processing agreement. Sub-processor declaration, trust center

Devices and endpoints

NO.	QUESTION	ANSWER	EVIDENCE
3.1	Who provides the workspace?	The client provisions and manages it to its own standard: a corporate device, a virtual desktop or a secure VPN tenancy.	Data processing agreement, security measures annex
3.2	What baseline applies to the physical endpoint?	Before credentials are issued, each engineer attests to full-disk encryption, automatic screen lock, a supported and patched operating system, and endpoint protection. SolerWorks keeps the attestation.	Signed endpoint attestation. Engineer onboarding records
3.3	Does SolerWorks manage or monitor endpoints?	No. SolerWorks runs no device management or monitoring tooling. Monitoring inside the client environment stays with the client.	Data processing agreement, security measures annex

Data handling

NO.	QUESTION	ANSWER	EVIDENCE
4.1	Where is client personal data stored?	Only in the client's own environment. SolerWorks does not host, store, back up or transmit it.	Data processing agreement. Record of processing activities
4.2	Can engineers copy or export data?	No. Copying, downloading, exporting, printing, screenshots and forwarding are prohibited by each engineer's undertaking. No local copies, caches or databases are kept on devices in Brazil.	Engineer security and privacy undertaking

NO.	QUESTION	ANSWER	EVIDENCE
4.3	What happens when a role or an engagement ends?	SolerWorks runs a seven-step offboarding checklist. The client revokes access, and a signed certificate confirms that nothing was retained.	Deletion and deprovisioning certificate

Personnel

NO.	QUESTION	ANSWER	EVIDENCE
5.1	Who engages the engineers?	SolerWorks contracts each engineer in Brazil in its own name. They act on its instructions as persons authorised to process under Article 29 GDPR, and are not sub-processors.	Data processing agreement. Individual engineer agreements
5.2	What does each engineer sign before access?	A security and privacy undertaking covering confidentiality, the client-contained perimeter, immediate incident reporting, and return and deletion. It is signed before the client issues credentials.	Engineer security and privacy undertaking, English and Portuguese
5.3	How are engineers vetted and recorded?	SolerWorks verifies identity, right to work and professional background before assignment, and completes security and privacy onboarding before access. A live register records name, role, systems and access dates.	Authorized personnel register. Engineer onboarding records

Incident response

NO.	QUESTION	ANSWER	EVIDENCE
6.1	How is an incident reported internally?	Every engineer is bound to report any actual or suspected incident to SolerWorks immediately.	Engineer security and privacy undertaking
6.2	When is the client notified?	Without undue delay after SolerWorks becomes aware, on one structured form, with updates as the facts develop, so the client can meet its own 72-hour regulatory deadline.	Security incident notification form. Data processing agreement

NO.	QUESTION	ANSWER	EVIDENCE
6.3	Does SolerWorks detect incidents inside the client environment?	No. Detection and logging inside the environment rely on the client's own tooling. SolerWorks provides the reporting chain and the record.	Data processing agreement, security measures annex

Sub-processors

NO.	QUESTION	ANSWER	EVIDENCE
7.1	Which sub-processors are engaged?	None. SolerWorks uses no hosting, storage, analytics or AI provider for client personal data. Engineers are its own authorised personnel, not sub-processors.	Sub-processor declaration, trust center
7.2	What is the delivery partner's role?	A commercial contractor that directs the work. It is outside the processing chain.	Data processing agreement
7.3	How could this change?	Only with the client's prior written consent. Any sub-processor would carry the same obligations.	Data processing agreement

Business continuity

NO.	QUESTION	ANSWER	EVIDENCE
8.1	What does delivery depend on?	The client's own environment. SolerWorks hosts no system in the delivery path, so its availability does not affect the uptime of client systems.	Data processing agreement, security measures annex
8.2	How does SolerWorks stay reachable?	Separate mailboxes for privacy, legal and general contact: privacy@solerworks.com , legal@solerworks.com and contact@solerworks.com .	Governance page, solerworks.com/governance