

## PRIVACY AND DATA PROTECTION POLICY

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**BRUNO BRASIL SOCIEDADE DE ADVOGADOS**, a law firm duly registered with the OAB (Brazilian Bar Association), Bahia State Chapter, under no. 5401/2020, enrolled with the CNPJ under no. 04.545-000 and Av. Tancredo Neves, 939, Edf. Esplanada Tower, sl. 907, Caminho das Árvores, Salvador/BA, CEP 41.820-021, presents this Privacy Policy, which, in a simple and objective manner, seeks to provide greater transparency regarding the collection and use of personal data processed in all our digital platforms.

We ask, please, that you read carefully our Privacy Policy because, besides governing all our relations, it contains important information about the data kept in our site and, in case you do not agree with our terms, do not proceed with your navigation.

In addition, to ensure the accuracy and compliance of our rules, we reserve the right to change this Policy at any time, which is why we recommend that you read it periodically.

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## 1. THE PURPOSE OF THE PRIVACY POLICY

This Privacy Policy aims to establish the guidelines and give knowledge to our website users of which are and how personal data obtained from our platform are treated, as well as give knowledge and publicity regarding the concern with the security and preservation of personal data, storage time and bring other clarifications.

## 2. PROCESSING OF PERSONAL DATA

According to the General Data Protection Law (Law No. 13,709/2018),

considers  
itself:

**Anonymization:** use of reasonable and available technical means at the time of processing, whereby a data loses the possibility of association, directly or indirectly, with an individual; **Consent:** free, informed and unambiguous manifestation by which the data subject agrees to the processing of his personal data for a specific purpose;

**Personal data:** information related to an identified or identifiable natural person;

**Data subject:** natural person to whom personal data subject to processing relate

**Processing:** any operation performed with personal data, such as those regarding collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

## 3. FROM CONSENT

The consent of the data subject shall be requested whenever required by law, subject to the legal exceptions for cases of compliance with a legal or regulatory obligation by the controller; when necessary for the performance of a contract or preliminary procedures related to a contract to which the data subject is a party, at the request of the data subject; and, when necessary to meet the legitimate interests of the controller or a third party, except in the case of overriding fundamental rights and freedoms of the data subject which

require the protection of personal data, among the others provided in Article 7 of Law No. 13,709/2018 (General Data Protection Law).

#### **4. COLLECTION AND PURPOSE OF TREATMENT**

Information such as full name, ID, CPF, address, email, date of birth (not being accepted the registration of minors under 18 years of age) and phone number may be collected from our platform so that we can identify our users and respond to requests made in our service channels and / or to share news, events and newsletters.

Additionally, to ensure a personalized and facilitated experience, text files may be sent from our platform in order to recognize, track and store the user's navigation - the so-called "cookies", which may collect personal data such as IP address, information regarding the operating system, software and hardware attributes, exit pages and URLs, number of clicks, pages viewed, date and time of access, device information, error logs and other similar information. If, however, the user does not want *cookies* to be used, they can disable and/or block them by registering their preference in their own browser (the user is advised to check their browser settings to see how to do this).

Personal data may also be processed in order for BRUNO BRASIL SOCIEDADE DE ADVOGADOS to comply with legal or regulatory obligations to which it is subject, for the exercise of rights in legal, administrative or arbitration proceedings or for other purposes when the data subject expressly and previously consents thereto.

#### **5. OF DATA SHARING**

Except in cases where it is strictly necessary for the execution of activities related to the provision of services requested by our users, we do not share personal data with any person or entity.

#### **6. A RMAZIONE**

The data collected by our platform will be stored in *datacenter* located in Brazil, with all the measures in accordance with the requirements of

protection established by Brazilian legislation, in particular the General Data Protection Law and the Civil Rights Framework of the Internet.

All data collected will only be kept for the period necessary to fulfil their purposes or as long as necessary to comply with legal or regulatory obligations, being subsequently deleted from our databases or anonymized. The user may, in cases in which the treatment of the data derives from consent, request the deletion of their data before the established deadlines, which will be met as soon as possible, unless there is legal authorization to maintain the data.

## **7. PROTECTION OF DATA**

We provide technical and administrative security measures that aim to bring greater protection to the personal data processed on our platform, always seeking to mitigate the risks of unauthorized access and/or accidental or illicit situations that may cause the destruction, loss, alteration, communication or any form of inappropriate or illicit treatment of the data controlled by us.

In the unlikely event of any security incident that could cause significant risk or harm to the data subjects, they will be promptly notified, as will the National Data Protection Authority.

## **8. COOKIES AND ADVERTISING**

To ensure a personalized and facilitated experience for our users, we may make use of sending text files from our platform in order to recognize, track and store user navigation, so-called *cookies*.

Cookies are necessary in order to provide all the basic functionalities for the data subject to browse the platform, however at this point personal data such as IP address, information regarding the operating system, software and hardware attributes, exit pages and URLs, number of clicks, pages viewed, date and time of access, device information, error logs and other similar information may be collected.

If, however, the user does not want *cookies* to be used, he may disable and/or block them by registering such preference in his own

browser (the user is advised to check the browser settings to do so); however, some functionalities and/or services may be partially or totally impaired as a result of such blocking.

## 9. RIGHTS OF OWNERS

The LGPD guarantees the holder of personal data the following rights that may be exercised with the Controller: (i) obtain confirmation of processing; (ii) declaration on the processing of personal data; (iii) revocation of consent; (iv) deletion of data processed with consent; (v) correction and updating of data; (vi) portability of personal data to another service provider; (vii) information on data sharing.

To exercise the rights related to the processing of personal data, the data subject must send an e-mail to [...@...] indicating which right he/she wishes to exercise.

## 10. DOUBTS AND CONTACT

If you have any questions about this or any of our Policies, please feel free to contact us from the email addresses: [...@.....]  
**By continuing to use our services, you confirm that you are over eighteen (18) years of age and have read and fully understood our Privacy Policy.**