

PRIVACY *Policy*

The Law Firm **ARRUDA ALVIM, ARAGÃO, LINS & SATO ADVOGADOS** takes your privacy and data protection seriously. This Policy explains how we treat your personal data, which rights you have, and how you can exercise them.

Why does AAALS treat your personal data?

AAALS renders legal services to its clients and makes this website and additional related pages available to the general public to share legal content, broadcast the Firm's events and materials.

The Firm is committed to your privacy and safety, and invests its resources in the development of technological solutions capable of delivering high quality services, in addition to safekeeping your privacy and protecting your personal data.

To perform its activities, the Firm must treat all personal data for the purposes arising from the agreements executed with its clients, as well as with the Firm's collaborators.

The Firm takes compliance with the law on the protection of privacy seriously. This Policy describes how your personal data are collected, used, shared, and stored.

If you continue to have questions after reading this Policy, get in touch with the Firm using the communication channels indicated at the end of this document.

This Policy is applicable to the Firm's digital platforms and to its operations as a whole, including all forms of personal data treatment it performs.

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1. TYPES OF PERSONAL DATA AND PURPOSES OF TREATMENT

The types of Personal Data collected, and the form AAALS collects them depend on **how you relate to AAALS and why**. Aiming total transparency, you will find below the ends for which the Firm treats personal data:

Purpose of Treatment	Type of personal data used
To register navigation accesses to AAALS' digital platforms	/ Navigation data: IP number, date, time, content accessed, and access duration.
To generate analytics on the use of the Website	/ Navigation data: analysis and essential cookies.
Website's Confidence Channel	/ Registration data: name, e-mail, phone number – if the user so wishes.
Service Rendering	/ Several: Registration data, contact data, financial data, authentication data, among other necessary data to properly render our services, according to the applicable legal ethical principles and professional secrecy.
Recruitment Process	/ Registration data: Name, id No., taxpayer registration No., telephone number, address, e-mail address. / Professional data: academic background and professional experience.

SERVICES IMPROVEMENT

To increasingly improve the Firm's practices and internal procedures, we may use data related to your contact with us, especially to your online interactions by means of our digital platforms. This procedure may be used with purposes of identifying patterns of use, to correct mistakes of bugs and inconsistencies and, in general, to allow the improvement of our services in your benefit.

Whenever possible, for these purposes we will use only anonymized data (data that do not allow the identification of any individualized person), or pseudonymized data (data that, on themselves, cannot identify one individualized person, except when the data are combined with others, that may allow the identification).

COOKIES AND DATA COLLECTION

We may use cookies and such other technology that may allow us to collect data when you access and use our digital platforms. To know more about how we use such technology, see below.

1.1. COOKIES

What is a Cookie?

Cookies are small text files stored in your browser or device. They allow us to recognize your preferences to, for example, adapt the site and your navigation to your specific needs.

In other words, some information may be kept in the text file and, when you visit the digital platform again, the site recognizes your browser.

Furthermore, cookies generally have an expiration date. For instance, some are automatically excluded when you close your browser (these are called session cookies), while others may be stored for a longer period of time in the computer, or even be excluded manually (these are called persistent cookies).

Why do we use Cookies?

AAALS uses cookies to measure the performance of the site and to analyze how our services are being accessed and, consequently, improve your experience as a user.

How to remove or block Cookies?

If you want to know which cookies are installed in your device, or if you wish to exclude or restrict them, use your browser configuration. You will find more information about how to proceed in the links below. To find information on other browsers, visit the browser developer's website.

- Firefox
- Chrome
- Safari
- Internet Explorer

Remember the use of cookies allows us to offer a better experience in our website. If you block cookies, it is probable that certain functions and pages may not function properly.

2. SHARING PERSONAL DATA

We have partnerships with several other organizations to enable our activities. Below you will find some situations in which we may share personal data:

Our suppliers and partners. We have suppliers and partners who enable our operation and our service providing. Some of them may treat the personal data we collect, as, for example, companies that license the right of use of the digital platform which support AAALS's operations, or companies that render services to host data, among others. We carefully evaluate our suppliers and impose to them certain safety contractual obligations and personal data protection, with purposes of minimizing risks.

Public authorities. We are subject to certain legal or regulatory obligations which determine the supply of personal data to determined authorities. In the event AAALS perceives a specific order as abusive or excessive, we will defend the right to privacy and the protection of your personal data.

3. INTERNATIONAL TRANSFER

AAALS may transfer the personal data collected in Brazil to other countries. These transfers may take place in the context of our relations with clients located outside of Brazil or with service providers and technology suppliers headquartered abroad.

When we use third parties' services, we search for suppliers and partners who are in conformity, or undergoing a conformity procedure, with the privacy and data protection applicable laws, and keep a level of compatibility similar or even more rigorous than the one set forth by Brazilian applicable law.

4. RIGHTS OF THE PERSONAL DATA OWNER

The personal data are yours and the Brazilian legislation offers several rights related to them. We are committed to the compliance with such rights and, in this section, we will explain which they are and how you can exercise them:

Anonymization, blocking or elimination	<p>You may request (so long as the contractual needs are observed) (a) that your personal data be kept anonymized, so that they may not be related to you and, thus, are no longer personal data; (b) that your personal data be blocked, temporarily suspending the possibility of being treated for certain purposes; and (c) that your personal data be eliminated, in which case we must irreversibly delete all your personal data.</p>
Portability	<p>You may request AAALS to supply you with your personal data in a structured and interoperable format with purposes of transferring them to a third party, so long as this transference does not violate any of AAALS's intellectual property rights or trade secrets.</p>
Information about sharing	<p>You have the right to know which are the public and private entities with which AAALS shares your personal data. Depending on the case, we may limit the information given to you in the event its disclosure violates AAALS's intellectual property rights or trade secrets.</p>
Information about the possibility of denying consent	<p>You have the right to obtain clear and complete information about the possibilities and the consequences of not giving consent, when such is requested by AAALS.</p> <p>Your consent, when necessary, must be free and informed. Thus, anytime we request your consent, you are free to deny it – in such cases, it is possible that some services may not be rendered.</p>

Revoking your consent	<p>In the event you have consented with any purpose of treating your personal data, you may always opt to have it revoked. Nevertheless, this will not affect the legality of any treatment performed before such revocation. If you revoke your consent, it is possible we may be unable to render certain services, but we will inform you when that happens.</p>
Opposition	<p>The law authorizes the treatment of personal data even without your consent, or a contact with us. In such situations, we will only treat your personal data if we have legitimate reasons for it. In the event you do not agree with any purpose of treatment of your personal data, you may file an opposition, requesting its interruption.</p>

To request the exercise of any of the abovementioned rights, please contact us at **[dpo@aalvim.com.br]**.

IMPORTANT WARNINGS ABOUT YOUR RIGHTS

Every time you file a request to exercise your rights, **AAALS may ask for some information and/or additional documents, to ascertain your identity** and avoid fraud. We do that to guarantee the safety and privacy of all parties, so as not to disclose personal data to non-authorized people.

In some cases, **AAALS may have legitimate reasons to refrain from meeting a request for the exercise of a right.** These situations include, for example, cases in which the revelation of a specific information may violate intellectual property rights or trade secrets, both AAALS's or belonging to third parties; as well as cases in which requests for anonymization, blocking

or elimination of data may not be met, due to an obligation imposed to AAALS to retain data, whether to comply with legal and regulatory obligations or to allow the defense of rights belonging to AAALS or third parties, including on disputes of any nature.

Furthermore, **although some requests may not be immediately met**, AAALS commits to replying to all the requests within reasonable time and always in conformity with the applicable law.

In the event you have any questions on these matters or about how you can exercise your rights, feel free to contact us by means of the channels informed in this Policy.

5. PERSONAL DATA STORAGE PERIOD

AAALS's policy of data storage is aligned with the applicable law.

The information is stored solely by the time deemed necessary to comply with the purposes to which they were collected, except if there are other reasons as, for example, to comply with any legal, regulatory or contractual obligations, among others allowed by law.

We proceed with a technical analysis to determine the adequate retention period for each type of data collected, considering their nature, the need for the collection and their purpose, as well as possible needs to retain them for the compliance of obligations and the safekeeping of rights.

6. INFORMATION SECURITY

Our responsibility is to take care of your personal data and use them solely for the purposes described in this Policy.

To safekeep your privacy and to protect your personal data, we adopted advanced technological resources, applied to all data treated by AAALS. Among the safety measures applied are the implementation of entry controls to access systems and data treating environments, cryptography techniques, and the installation of barriers against the improper access to the database, among other information security control.

Furthermore, our digital platforms use safety certificates, which ensure that all information is cryptographed before their transmission, allowing safety exchanges among the platforms.

We work hard to protect your personal data, but unfortunately, we cannot guarantee total security.

Non-authorized entrances and use by third parties with your information, hardware or software failure, which are not under AAALS's control and other external factors may compromise the security of your personal data. Therefore, your co-operation is paramount for the maintenance of a secure environment for all. In the event you identify or become aware of any factor that may compromise the safety of your data related to AAALS, please get in touch by means of the channels appointed below.

7. CONTACT CHANNEL

If you have any questions, doubts, comments, or suggestions related to this Policy and to the way we treat your personal data, get in contact with us by means of the following addresses:

Person in charge: Manuela Rupel

Mail address: R. Hildebrando Cordeiro, 30, Ecoville,
CEP: 80740-350 - Curitiba - PR

Contact e-mail: dpo@aalvim.com.br

8. CHANGES IN THE PRIVACY POLICY

Considering we are always improving our services and the way we operate; this Privacy Policy may undergo updating to reflect the adopted upgrades.

It is our suggestion, thus, that this page be periodically visited, so you may be fully aware of any changes that may have taken place.

Track record of versions:

Last update – January 15th, 2021.