

## **PRIVACY AND PERSONAL DATA PROTECTION POLICY**

### **OF COSTA & LEMOS SOCIEDADE DE ADVOGADOS**

#### **1. Purpose of this Policy**

This Privacy and Personal Data Protection Policy ("Policy") was created to reaffirm COSTA & LEMOS SOCIEDADE DE ADVOGADOS' ("Firm") commitment to protecting the personal data of its clients, suppliers, partners and visitors. The Firm is established at Rua Pio Corrêa, 92, 203-II, Jardim Botânico, Rio de Janeiro/RJ

This Policy describes how we collect, maintain and use your personal data, as well as the rights you have under applicable laws, in particular Law No. 13,709/2018 ("Data Protection General Law" – "LGPD").

We process personal data only as long as it is necessary and appropriate for the purposes on which the collection is based, always observing the legal grounds for the processing. Thus, we process personal data collected for the performance of contracts, compliance with legal or regulatory obligations, for the legitimate exercise of our rights, on account of our legitimate interest, or with your consent.

We recognize that ensuring the protection of your personal data is an ongoing responsibility and therefore we will periodically update this Privacy Policy as we adopt new practices in the treatment and protection of personal data.

If you still have any questions about our Privacy Policy or our treatment of your personal data, our team is ready to help you by e-mailing us at [victor@cflegal.com](mailto:victor@cflegal.com)

#### **2. Who is the controller of the personal data?**

The Firm shall be the controller of your personal data in the context of the relationship established with you. For the purposes of the applicable law, the controller is the person who makes the decisions concerning the processing of personal data.

#### **3. What personal data is processed?**

To the extent permitted by applicable law, the Firm may process the personal data described below:

- Identification, qualification and contact data: full name; address; date of birth; nationality; identification document(s) data (such as RG, CPF, CNH, OAB, as applicable), e-mail address; telephone number
- Academic and professional data: company he/she works for; profession; position; education

In rendering legal services, considering the support to clients in the most diverse areas and specialties of Law, the Firm may have access to and handle a large repertoire of your personal data or even personal data of others involved in a certain case (for example, the other party in a lawsuit), depending on the object or reason of the demand. Some examples of personal data that the Firm may handle in providing its services are:

- Registration information: name, CPF, RG, address, e-mail and telephone number
- Financial information: remuneration; transaction history; credits; sales; assets; debt certificate; loans
- Family information: family structure; relationships
- Information contained in processes: date of birth, nationality, place of birth, age, marital status, country, address, CNH, electoral title, military enlistment, profession, education, languages, professional registration, PIS/PASEP, CTPS, NIS, NIT, CEI

The above personal data is treated only in certain cases and when necessary to achieve the purposes mentioned in this Policy, especially for the provision of legal services.

The Firm may collect this information in several ways. This personal data may be collected directly from the data subject, it may be obtained from someone related to the data subject (for example, the company of which the data subject is a partner), through the Firm's website ([www.clflegal.com](http://www.clflegal.com)) or it may be accessed from publicly available sources.

The Firm's website does not store cookies.

#### **4. For what purposes do we process your personal data?**

In general, we process your personal data for client service and the provision of legal services in an advisory or litigation capacity, including, but not limited to:

- Drafting, reviewing or negotiating contracts
- Conducting or participating in audit and compliance programs

- Representation in legal, administrative or arbitration proceedings, which includes analysis and preparation of pleadings, follow-up on progress, among other actions
- Analysis of new products, structures, cases or any situations presented by clients to prepare answers to consultations, memoranda, and legal opinions
- Preparation of documents required under Brazilian law
- Intermediation of the client's relationship with authorities and governmental bodies
- Conducting meetings, videoconferences, or conference calls to discuss general issues
- Obtaining necessary licenses, authorizations, and permits

We may also process your personal data for the purposes of formalizing the contract with the Firm, billing and collection if you are an individual client or a representative of a corporate client.

In addition, we may process your personal data to maintain our relationship with you by sending e-mails with informative content, which occurs through the third-party platform MailChimp, for which you may, at any time, request unsubscription in the footer of forwarded messages, interrupting their reception.

## **5. With whom do we share your personal data?**

The Firm may share your personal data with:

- Providers of software, cloud hosting services and other information technology for purposes of managing your relationship with our office, registration, communication, documentation and other arrangements
- Correspondents, experts, legal opinions, partner firms (national and international), auditors, accountants, translators and financial institutions to assist in the provision of legal services, depending on demand
- Competent regulatory bodies, judicial, administrative or governmental authorities

## **6. Transfer of your personal data outside Brazil**

The Firm may transfer your personal data to service providers located abroad, including cloud service providers. In addition, the Firm may share your personal data with partners and employees of the Firm located abroad or with foreign partner firms.

When your personal data is transferred outside of Brazil by the Firm, we will take appropriate steps to ensure adequate protection of your personal data in compliance with the requirements of applicable data protection law, including entering into appropriate data transfer agreements with third parties, where necessary.

## **7. How long will we retain your personal data?**

We store and maintain your information: (i) for as long as required by law; (ii) until the termination of the processing of personal data as mentioned below; (iii) for as long as necessary to safeguard the Firm's regular exercise of its rights in judicial, administrative or arbitration proceedings.

Termination of personal data processing will occur in the following cases:

- When the purpose for which the personal data were collected is achieved and/or the personal data collected are no longer necessary or pertinent to the achievement of such purpose
- When the data subject is within his/her right to request the termination of the processing and the deletion of his/her personal data and does so
- When there is a legal determination to this effect

In these cases of termination of personal data processing, except in the cases established by the applicable legislation or by this Privacy Policy, the personal data will be deleted.

## **8. What are your rights in relation to your personal data?**

You have the following rights in relation to your data: (i) confirmation of treatment; (ii) access to data; (iii) correction of incomplete, inaccurate or outdated data; (iv) anonymization, blocking or deletion of unnecessary, excessive data or data treated in non-compliance with the provisions of the LGPD; (v) portability; (vi) deletion of personal data treated with your consent; (vii) information about sharing; (viii) information about the possibility of not providing consent and the consequences of refusal; (ix) revocation of your consent, if we have requested it from you; and (x) right to petition the National Data Protection Authority (ANPD).

There are circumstances that may restrict the exercise of some rights provided by law, such as, for example, when the provision of the information may reveal a business secret of the Firm or to comply with a legal/regulatory obligation or to enable the Firm's defense in any judicial, administrative or arbitration proceeding.

You may exercise such rights by contacting the DPO through the e-mail: victor@clflegal.com

### **9. Data Protection and Security**

We are committed to the security of your personal data and take reasonable precautions to maintain that protection. The Firm employs industry-standard technical, physical, and managerial security systems and procedures to protect your data.

Please be advised that we do not perform automated processing of personal data.

### **10. Changes to this Privacy Policy**

The Firm is always working to improve its services, always prioritizing transparency, privacy and the protection of your personal data. Therefore, this Privacy Policy may be updated. You can always request the latest version of this document by e-mail: victor@clflegal.com

This Privacy Policy came into effect on August 1, 2019 and underwent its last revision on October 27, 2021.