

PRIVACY POLICY COMPLAINT PORTAL

Contato Seguro Prevenção de Riscos Empresariais LTDA

The Privacy Policy of the **Complaint Portal** of **Contato Seguro Prevenção de Riscos Empresariais LTDA** (CNPJ: 10.916.727/0001-77) was created to demonstrate the interest and commitment of the digital platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA**, with privacy and security of the data and information collected from its users, as well as to demonstrate transparency regarding the collection and use of such data in the performance of its activities.

The purpose of this document is to clarify the general conditions of treatment (collection, use, storage, etc.) and protection of personal data that are voluntarily made available by **Users** during their registration on the digital platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA**. The processing of such data is in full compliance with the Brazilian law currently in force with regard to the protection of personal data, including, without limitation, **Law No. 12.965**, of April 23, 2014 and **Decree No. 8.771**, May 11, 2016 (“Marco Civil da Internet” [Brazilian Civil Rights Framework for the Internet]), to **Law No. 13.709**, of August 14, 2018 (“General Data Protection Law” or “GDPL”).

Questions that have as their central content the protection of personal data should be directed to lgpd@contatoseguro.com.br, in the care of Mateus Haas, Data Officer.

It is essential that the **User** reads this instrument. This is because, when using the platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA**, you will be **freely, informed, unequivocally, expressly** and **fully** expressing your agreement with this Policy.

1. COVERAGE:

The Privacy Policy of the **Contato Seguro Prevenção de Riscos Empresariais LTDA** platforms will apply, in an unrestricted manner, to all its **Users**. Data will be collected at the time of registration of interest in using the platforms or even in the final registration for use.

Both the collection and maintenance of data are essential for the use of the platforms, given that they unequivocally define who the account holder is, their level of access and hierarchy, and their powers of representation of the Organization of the who stands as a legal representative.

2. INFORMATION THAT MAY BE COLLECTED:

Initially, it is important to note that the provision of data is carried out **voluntarily** by the holder, so considered in view of the manifest interest in the use of the digital platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA** through its registration. That is, the interest in using the platforms is what motivates the data subject to spontaneously provide the information and personal data necessary for the provision of the service.

The **SITES of Contato Seguro Prevenção de Riscos Empresariais LTDA** may collect information actively entered by the Holder at the time of contact or registration, and also information collected automatically when using the Services and the network, such as, for example, browser used, IP with connection date and time, among others.

Therefore, two types of personal data are processed: (a) those provided by the Holder himself; and (b) those collected automatically.

(a) Personal data provided by the user: **SITES of Contato Seguro Prevenção de Riscos Empresariais LTDA** may collect all personal data entered or actively forwarded by the user when contacting, such as full name, email, CPF, date of birth, contact telephone number and data necessary for the execution of specific programs, when filling out forms by the user. Regardless of which data the user actively provides to the **SITES of Contato Seguro Prevenção de Riscos Empresariais LTDA**, we will only use those effectively relevant and necessary to achieve the stated purposes on a case-by-case basis.

(b) Data collected automatically: The **SITES of Contato Seguro Prevenção de Riscos Empresariais LTDA** also collect a series of information automatically, such as: characteristics of the access device, browser, IP (with date and time), IP origin, information about clicks, pages accessed, search terms typed in our portals, among others. They are used for the purpose of improving the Owner's browsing experience on our pages, according to their habits and preferences.

The following personal data may be requested from the **User**: full name, email, date of birth, CPF and contact telephone number.

We do not intentionally collect, store or otherwise process excessive or unnecessary personal data for the purpose for which it was collected, as well as data considered sensitive (those relating to your racial or ethnic origin, religious conviction, political opinion, union membership or organization of a religious, philosophical or political nature, health or sexual orientation, as well as genetic data) and data on children and adolescents. As a result, we ask you to analyze the real need for the provision of certain personal data. If it is our understanding that the data provided is not essential for actions to be taken, we may

delete it, observing the eventual need for authorization by the Controller.

3. LEGAL GROUNDS AND PURPOSE FOR THE PROCESSING OF PERSONAL DATA

The personal data that will be collected by the platforms of the **Complaint Portal of Contato Seguro Prevenção de Riscos Empresariais LTDA** will have the following legal bases:

- a. Holder's consent;
- b. Necessity for the execution of the contract and the provision of the service;
- c. Compliance with legal or regulatory obligations;
- d. When the collection and processing of data is to ensure and preserve the legitimate interests of **Contato Seguro Prevenção de Riscos Empresariais LTDA**, as well as to preserve the interests of third parties for which, in some way, it has responsibility.

The data collected has a specific purpose for the registration of a complaint and/or report by the **User** on the platform, confirming the identity of the **User**, ensuring communication between the **User** and the companies reported and requesting commercial and/or support contact for **Contato Seguro Prevenção de Riscos Empresariais LTDA**.

4. RIGHTS OF THE USER HOLDER OF PERSONAL DATA

In the manner and within the limits of applicable legislation, you, as the holder of personal data, may contact us to exercise your rights, in order to request:

- a) confirmation of processing of your personal data;
- b) access to your data;
- c) the correction of your incomplete, inaccurate or outdated data;
- d) the anonymization, blocking or elimination of your data that is unnecessary, excessive, or treated in violation of the provisions of applicable legislation;
- e) the portability of your data to another service or product provider, subject to commercial and industrial secrets;
- f) the elimination of your personal data, except in the cases provided for in the applicable legislation, for the exercise of rights relating to **Contato Seguro Prevenção de Riscos Empresariais LTDA** and for the fulfillment of legal requirements;
- g) information from public and private entities with which **Contato Seguro Prevenção de Riscos Empresariais LTDA** shared your data;
- h) information about the possibility of you not providing consent and about the consequences of

your refusal;

- i) the revocation of your consent, when you have provided it to us, safeguarding the public interest that may justify the continuity of the treatment or the existence of another legal basis that authorizes it; and
- j) opposition to any processing of personal data based on one of the cases in which your consent is waived, provided that the provisions of the applicable legislation have not been complied with and the public interest that may justify the continuity of the treatment has been safeguarded.

Your removal request can be made in two ways:

- a) Through the complaint protocol: the user must access the protocol consultation area, through the complaint protocol, and follow the instructions of the "personal data removal" function.
- b) By means of direct contact with Contato Seguro: the user must send an email to the address lgpd@contatoseguro.com.br and request the removal of their personal data in a given complaint. In order to certify the authenticity of the request, the user must send a document that proves his/her identity (passport, RG [ID], CNH [driver's license], or CPF [individual taxpayer's number]), name of the company on which the complaint was filed and date of creation of the complaint. Contato Seguro's specialists will validate the veracity of the request.

5. HOW THE STORAGE AND PROCESSING OF PERSONAL DATA IS PERFORMED:

Contato Seguro Prevenção de Riscos Empresariais LTDA adopts security, technical and administrative measures to keep all stored data safe, through internal guidelines, confidentiality clauses and strict access control.

Access to data is only granted in accordance with the real need for use, with levels of access duly controlled in the structure of **Contato Seguro Prevenção de Riscos Empresariais LTDA**.

Specifically considering the data collected through our digital platform, they are stored, processed and protected using the best hosting and processing practices.

Despite all the efforts and procedures used by **Contato Seguro Prevenção de Riscos Empresariais LTDA**, the **Holder** must be aware that no Internet security system is guaranteed against unwanted intrusions, and the commitment of **Contato Seguro Prevenção de Riscos Empresariais LTDA** is limited to the adoption of recommended protective measures in accordance with the current state of the art.

6. INTERNATIONAL TRANSFER OF PERSONAL DATA:

The platforms of the **Complaints Portal** of **Contato Seguro Prevenção de Riscos Empresariais LTDA** do not carry out the international transfer of your data to other countries or international organizations. All storage and processing take place on servers located in Brazil.

7. PERSONAL DATA RETENTION TIME:

We store and maintain your information: (i) for the time required by law; (ii) until the end of the processing of personal data, as mentioned below; (iii) for the time necessary to preserve the legitimate interest of **Contato Seguro Prevenção de Riscos Empresariais LTDA**, as the case may be; (iv) for the time necessary to protect the regular exercise of the rights of **Contato Seguro Prevenção de Riscos Empresariais LTDA** in judicial, administrative or arbitration proceedings. Thus, we will process your data, for example, during the applicable statute of limitations or while necessary to comply with a legal or regulatory obligation.

The end of the processing of personal data will occur in the following cases:

- a) When the purpose for which the Holder's personal data were collected is achieved and/or the personal data collected is no longer necessary or relevant to the scope of that purpose;
- b) When the Holder withdraws his consent or is in his right to request the end of the processing and the deletion of his personal data and he does so; and
- c) When there is a legal determination in this regard.

Observing the principle of necessity, some data forwarded through the Sites of **Contato Seguro Prevenção de Riscos Empresariais LTDA** may be excluded from our records through routine record keeping. We are under no obligation to store personal data indefinitely and disclaim any liability arising out of or related to the destruction of this personal data.

8. COMMUNICATION POLICY:

It is not our policy to send unsolicited emails or emails that are not directly related to the activity performed by us.

9. CONNECTIONS TO OTHER SITES:

It is possible that the digital platform allows the connection with other sites whose function is to facilitate the end use of the user, although without direct and necessary relationship with **Contato Seguro Prevenção de Riscos Empresariais LTDA**.

Such connections, however, are not carried out by systems owned by **Contato Seguro Prevenção de Riscos Empresariais LTDA**, that is, they are external systems over which **Contato Seguro Prevenção de Riscos Empresariais LTDA** has no control, including over what specifically concerns information protection and security.

To the extent that the linked sites are not part of **Contato Seguro Prevenção de Riscos Empresariais LTDA**, we do not control, recommend or endorse these sites and their content, products, services, policies and their privacy practices; We do not have access to your personal data collected and processed by them and to their advertising policies, cookies and terms of use. Therefore, we recommend that you carefully read these documents from third-party websites.

10. ACCEPTANCE OF THE TERMS:

As initially noted, the terms of this privacy policy must be read carefully.

Access and interaction with our digital platform will be understood as agreement and full acceptance of all the terms set out and clarified here.

1. Consent

It is from your consent that we process your personal data. Consent is the free, informed and unequivocal expression by which you authorize **Contato Seguro Prevenção de Riscos Empresariais LTDA** to process your data.

Thus, in line with the General Data Protection Law, your data will only be collected, processed and stored with prior and express consent.

Your consent will be obtained in a specific way for each purpose described above, evidencing the commitment of transparency and good faith of **Contato Seguro Prevenção de Riscos Empresariais LTDA** towards its users/clients, following the relevant legislative regulations.

By using the platforms of the **Complaints Portal** of **Contato Seguro Prevenção de Riscos Empresariais LTDA** and providing your personal data, you are aware and consenting to the provisions of this Privacy Policy, in addition to knowing your rights and how to exercise them.

At any time and at no cost, you may request the withdrawal of your consent.

It is important to note that the revocation of consent for the processing of data may imply the impossibility of the adequate performance of some functionality of the sites of **Contato Seguro Prevenção de Riscos Empresariais LTDA** that depend on the operation. Such consequences will be informed in advance.

2. What are your rights?

Contato Seguro Prevenção de Riscos Empresariais LTDA assures its users/clients their rights as holders provided for in article 18 of the General Data Protection Law. That way, you can, free of charge and at any time:

- a) Confirm the existence of data processing, in a simplified way or in a clear and complete format;
- b) Access your data, being able to request them in a legible copy in printed form or by electronic, safe and suitable means;
- c) Correct your data, when requesting the edition, correction or update of these;
- d) Limit your data when unnecessary, excessive or treated in breach of legislation through anonymization, blocking or elimination;
- e) Request the portability of your data, through a report of registration data that **Contato Seguro Prevenção de Riscos Empresariais LTDA** deals with about you;
- f) Delete your data processed from your consent, except in cases provided for by law;
- g) Revoke your consent, disallowing the processing of your data;
- h) Inform yourself about the possibility of not providing your consent and about the consequences of denial.

3. How can you exercise your rights as a holder?

To exercise your rights as a holder, there are two possible ways:

- a) Through the complaint protocol: the user must access the protocol consultation area, through the complaint protocol, and follow the instructions of the "personal data removal" function.
- b) By means of direct contact with Contato Seguro: the user must send an email to the address lgpd@contatoseguro.com.br and request the removal of their personal data in a given complaint. In order to certify the authenticity of the request, the user must send a document that proves his/her identity (passport, RG, CNH, or CPF), name of the company on which the complaint was filed and date of creation of the complaint. Contato Seguro's specialists will validate the veracity of the request.

4. How and for how long will your data be stored?

Your personal data collected by **Contato Seguro Prevenção de Riscos Empresariais LTDA** will be used and stored for the time necessary for the provision of the service or for the purposes listed in this Privacy Policy to be achieved, considering the rights of data subjects and controllers.

In general, your data will be kept as long as the contractual relationship between you and **Contato Seguro Prevenção de Riscos Empresariais LTDA** lasts. At the end of the period of storage of personal data, they will be deleted from our databases or anonymized, except for the cases legally provided for in article 16 general data protection law, namely:

- I – compliance with a legal or regulatory obligation by the controller;
- II – study by a research body, guaranteeing, whenever possible, the anonymization of personal data;
- III – transfer to a third party, provided that the data processing requirements set forth in this Law are complied with; or
- IV – exclusive use of the controller, its access by a third party being prohibited, and provided that the data is anonymized.

That is, personal information about you that is essential for the fulfillment of legal, judicial and administrative determinations and/or for the exercise of the right of defense in judicial and administrative proceedings will be kept, despite the exclusion of other data.

The storage of data collected by **Contato Seguro Prevenção de Riscos Empresariais LTDA** reflects our commitment to the security and privacy of your data. We employ technical protection measures and solutions capable of guaranteeing the confidentiality, integrity and inviolability of your data. In addition, we also have risk-appropriate security measures and access control to stored information.

5. What do we do to keep your data safe?

To keep your personal information safe, we use physical, electronic and managerial tools aimed at protecting your privacy.

We apply these tools taking into account the nature of the personal data collected, the context and purpose of the treatment and the risks that any violations generate for the rights and freedoms of the holder of collected and processed data.

Among the measures we have adopted, we highlight the following:

- a) Only authorized persons have access to your personal data;
- b) Access to your personal data is made only after a commitment to confidentiality;
- c) Your personal data is stored in a safe and suitable environment.

Contato Seguro Prevenção de Riscos Empresariais LTDA is committed to adopting the best postures to avoid security incidents. However, it is necessary to point out that no virtual page is entirely safe and risk-free. It is possible that, despite all our security protocols, problems that are solely the fault of third parties occur, such as cyberattacks by hackers, or also as a result of the negligence or recklessness of the user/customer himself.

In the event of security incidents that may generate relevant risk or damage for you or any of our users/clients, we will communicate to those affected and the National Data Protection Authority about what happened, in line with the provisions of the General Data Protection Law.

6. Who can your data be shared with?

In order to preserve your privacy, **Contato Seguro Prevenção de Riscos Empresariais LTDA** will not share your personal data with any unauthorized third party.

Your data is shared with only one contracted third-party provider: AWS Brasil - Comercial Ltda, registered with the CNPJ under No. 03.628.331/0001-69, which is the company responsible for maintaining the data centers where the Contato Seguro website and systems are hosted.

They receive your data only to the extent necessary for the provision of the contracted services and our contracts are guided by the data protection rules of the Brazilian legal system.

However, our partners have their own Privacy Policy, which may differ from this one. We recommend reading these documents, which you can access here:

AWS Brasil Privacy Policy: <https://aws.amazon.com/pt/compliance/brazil-data-privacy/>

In addition, there are also other hypotheses in which your data may be shared, which are:

- I – Legal determination, request, requisition or court order, with competent judicial, administrative or governmental authorities;
- II – Case of corporate transactions, such as merger, acquisition and incorporation, automatically;
- III – Protection of the rights of **Contato Seguro Prevenção de Riscos Empresariais LTDA** in any type of conflict, including those of a judicial nature;

7. International data transfer

AWS Brasil has *data centers* in Brazil, so all data processing by **Contato Seguro Prevenção de Riscos Empresariais LTDA** will be carried out within the national territory.

8. Cookies or navigation data

Cookies are text files sent by platforms to your computer and stored there, which contain information related to website navigation. In short, Cookies are used to improve the user experience. See below the cookies we use and their due purposes:

Types of Cookies	What they do?	Species
Performance	These cookies help us to understand how visitors interact with pages on the websites, providing information about the areas visited, the time spent on the website and any problems found, such as error messages.	_ga _gat _gid

You may, at any time and at no cost, check and/or change your browser's permissions. Just do it directly in the browser settings, in the Cookies management area. You can access tutorials on the topic directly from the links below:

- Mozilla Firefox: <https://support.mozilla.org/pt-BR/kb/ative-e-desative-os-cookies-que-os-sites-usam>

- Google Chrome:

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=ptBR>

- Safari:

<https://support.apple.com/pt-br/guide/safari/sfri11471/mac>

- Microsoft Edge:

<https://support.microsoft.com/pt-br/windows/excluir-e-gerenciar-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

9. Amendment of this Privacy Policy

The current version of the Privacy Policy was formulated and last updated on **08/22/2022**.

We reserve the right to modify this Privacy Policy at any time, mainly due to the adequacy of any changes made on our websites of **Contato Seguro Prevenção de Riscos Empresariais LTDA** or in the legislative scope. We recommend that you review it frequently.

Any changes will take effect as of their publication on our website and we will always notify you of the changes.

By using our services and providing your personal data after such modifications, you consent to them.

10. Responsibility

Contato Seguro Prevenção de Riscos Empresariais LTDA provides for the liability of agents who work in the data processing processes, in accordance with articles 42 to 45 of the General Data Protection Law.

We undertake to keep this Privacy Policy updated, observing its provisions and ensuring compliance. In addition, we are also committed to seeking technical and organizational conditions capable of protecting the entire data processing process.

If the National Data Protection Authority requires the adoption of measures in relation to the processing of data carried out by **Contato Seguro Prevenção de Riscos Empresariais LTDA**, we undertake to follow them.

10.1 Disclaimer

As mentioned in Topic 6, although we adopt high security standards in order to avoid incidents, there is no virtual page that is entirely risk-free. In this sense, **Contato Seguro Prevenção de Riscos Empresariais LTDA** is not responsible for:

I – Any consequences arising from the negligence, recklessness or malpractice of users in relation to their individual data. We guarantee and are only responsible for the security of the data processing processes and the fulfillment of the purposes described in this instrument;

We emphasize that the responsibility regarding the confidentiality of the access data lies with the user.

II – Malicious actions by third parties, such as hacker attacks, unless proven culpable or deliberate conduct by **Contato Seguro Prevenção de Riscos Empresariais LTDA**;

We emphasize that in the event of security incidents that may generate relevant risk or damage to you or any of our users/customers, we will communicate to those affected and the National Data Protection

Authority about what happened and we will comply with the necessary measures.

III – Inaccuracy of the information entered by the user/client in the records necessary for the use of the services of **Contato Seguro Prevenção de Riscos Empresariais LTDA**; any consequences arising from false information or entered in bad faith are the sole responsibility of the user/customer.

11. Data Protection Officer

Contato Seguro Prevenção de Riscos Empresariais LTDA provides the following means for you to contact us to exercise your proprietary rights.

If you have questions about this Privacy Policy or the personal data we process, you can contact our Personal Data Protection Officer, through the following channels:

Mateus

Haas

lgpd@contatoseguro.com.br