

# **Personal Data Privacy Policy**

# 1. WHO IS THE CONTROLLER OF PERSONAL DATA

Vaz, Buranello, Shingaki & Oioli Advogados will be the controller of your personal data within the scope of the relationship established with you. For the purposes of applicable legislation, the controller is the entity responsible for decisions regarding the processing of personal data.

# 2. WHAT PERSONAL DATA IS PROCESSED

Within the limits permitted by applicable legislation, VBSO may process the personal data described below.

• Identification, qualification, and contact data: Full name; address; date of birth; nationality; identification document data (such as RG, CPF, CNH, OAB, as applicable); email address; phone number;

• Academic and professional data: Company you work for; profession; position and professional background.

In providing legal services, considering the support to clients in various areas and specialties of law, VBSO may have access to and process certain personal data of yours or even personal data of others involved in a particular case (for example, the opposing party in a legal proceeding), depending on the object or reason for the case. Some examples of personal data that VBSO may process in the provision of its services are:

• Registration information: Name, CPF, RG, address, and phone number;

• Financial information: Compensation and general earnings; transaction history and assets; goods and rights; debts;

• Family information: Family structure; relationships;

• Information in processes and contracts: Date of birth, nationality, place of birth, age, marital status, country, address, CNH, voter registration, military enlistment, profession, education, languages, professional registration, PIS/PASEP, CTPS, NIS, NIT.

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

VBSO may collect this information in various ways. This personal data may be collected directly from the Data Subject, obtained from someone related to the Data Subject (for example, the company you are part of), or accessed from publicly accessible sources.

## 3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA

In general, we process your personal data for customer service and the provision of legal services, whether advisory or contentious.

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

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Furthermore, we may process your personal data to maintain our relationship with you through:

• Sending institutional communications, memos, or newsletters on topics of interest to you and event invitations;

• Organizing events, including managing registrations, sending save-the-dates, reminders, and to ensure your easier access and comfort at the event, VBSO may ask if you have any disabilities or mobility restrictions;

• Conducting satisfaction surveys and feedback on our services. Occasionally, VBSO may share your personal data with national or international legal publications so that they may contact you to evaluate and reference our services to such publications.

# 4. WITH WHOM DO WE SHARE YOUR PERSONAL DATA

VBSO may share your personal data with:

• Software providers, cloud hosting services, and other information technology services for managing your relationship with our firm, registration, documentation, and other measures;

• Correspondents, experts, reviewers, partner firms (national and international), auditors, accountants, translators, and financial institutions to assist in the provision of legal services, depending on the case;

- Non-governmental organizations in the case of pro bono work;
- National or international legal publications;

• Regulatory bodies and other authorities, such as the Superintendence of Private Insurance (SUSEP) and the National Telecommunications Agency (ANATEL).

#### 5. TRANSFERS OF YOUR PERSONAL DATA OUTSIDE BRAZIL

VBSO may transfer your personal data to service providers located abroad, including cloud service providers. Additionally, VBSO may share your personal data with other VBSO offices located abroad or with partner firms.

When your personal data is transferred outside Brazil by VBSO, VBSO will take appropriate measures to ensure adequate protection of your personal data in compliance with the requirements of applicable data protection legislation, including through the execution of appropriate data transfer agreements with third parties of your personal data, when necessary.

#### 6. HOW LONG WE WILL RETAIN YOUR PERSONAL DATA

We store and maintain your information: (i) for the time required by law; (ii) until the termination of the personal data processing, as mentioned below; (iii) for the time necessary to preserve VBSO's legitimate interest, as applicable; (iv) for the time necessary to safeguard VBSO's regular exercise of rights in judicial, administrative, or arbitration proceedings. Therefore, we will process your data, for example, during the applicable limitation periods or as long as necessary to comply with a legal or regulatory obligation.

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

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• When the purpose for which the Data Subject's personal data was collected is achieved and/or the personal data collected is no longer necessary or relevant to achieving such purpose;

• When the Data Subject is entitled to request the termination of the processing and deletion of their personal data and does so; and

• When there is a legal requirement to do so.

# 7. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You have the following rights regarding your data: (i) confirmation of processing; (ii) access; (iii) correction of incomplete, inaccurate, or outdated data; (iv) anonymization, blocking, or deletion; (v) portability; (vi) deletion; (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 as provided by law, such as when the provision of information may reveal some business secret of VBSO or due to compliance with a legal/regulatory obligation or to allow VBSO's defense in a judicial or administrative proceeding.

You may exercise these rights by contacting the Data Protection Officer via email: segurancainfo@vbso.com.br.

# 8. DATA PROTECTION AND SECURITY

We are committed to the security of your personal data and take reasonable precautions to maintain this protection. VBSO employs security systems and technical, physical, and managerial procedures commonly adopted in the market to protect your data.

## 9. COLLECTION AND USE OF COOKIES

This section describes how cookies and tracking technologies are used on our websites to enable features and functionalities, analyze usage, and enhance your browsing experience. Below are details about the types of cookies and tracking technologies we use, the types of information we collect through these technologies, and your specific rights regarding this processing.

By using our websites, you acknowledge the use of cookies under the conditions described here. You should have seen a pop-up in the lower corner of the page alerting you to the use of this tool during your first visit to our site. Although this notice will not appear on subsequent visits, you can manage the use of cookies through our website by following the instructions below.

If you do not agree with the use of these cookies, you can disable them at any time by adjusting your browser settings. Browsers differ, so consult your browser's settings menu for instructions on how to change your cookie preferences. If you choose not to accept cookies, our websites may not function correctly, and some features may be unavailable.

A cookie is a small text file stored by your browser when you visit a website. Almost all websites use cookie technology. Cookies can store certain information, such as your IP address, information about the content you view, information you provide so that you do not have to re-enter it each time you visit our site, and

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# vbso advogados

your preferences and settings. Cookies also help us deliver personalized content, speed up your navigation on our website, and allow us to learn more about your visit and use of online services.

Four types of cookies may be used on our websites: strictly necessary cookies, performance cookies, functional cookies, and marketing cookies.

• Strictly necessary cookies: These are essential to enable you to navigate our websites and use their features. These are temporary cookies that last only while your browser is open and are used for technical purposes, such as allowing better navigation on our site. Without these cookies, your navigation on our website may be significantly affected. When you close your browser, the cookie automatically disappears.

• Performance cookies: These are stored on your computer for longer periods and are used for other purposes, such as tracking the number of unique visitors to our site and information like the number of page views, how long a user spends on a page, and other relevant statistics. The information collected is aggregated and, therefore, anonymized. These cookies are used solely to improve the site's performance and, with it, the user experience.

• Functional cookies: These allow the site to store information you have already entered (such as usernames, language options, and location) to offer enhanced and more personalized functions. Functional cookies are also used to enable features requested by you, such as playing videos. These cookies collect anonymous information and cannot track your movements on other websites.

• Analytics: We use the web analytics services of Google Analytics, which use cookies to collect information such as your IP address or other identifiers, browser information, and the content you view to analyze how visitors use our website. The information generated by the cookies about your site usage will be transmitted to and stored by these service providers on servers in Brazil, the United States, and the United Kingdom. These service providers will use this information to evaluate your use of our website, compiling reports on website activity for website operators and providing other services related to website activity and internet usage. The service providers will not associate your IP address with any other data held by them. You may refuse the use of these cookies by selecting the appropriate settings on your browser, as explained above. However, please note that if you do this, you may not be able to use the full functionality of our websites.

• Marketing cookies: These cookies are intended to display relevant content and information according to your preferences. These cookies may also measure the effectiveness of our marketing communications and track the performance of our campaigns. We may share this information with third parties.

We will retain your information collected through cookies and tracking technologies for as long as necessary to fulfill the purposes mentioned in this section.

# **10. HOW TO CONTACT VBSO IN CASE OF DOUBTS**

If you have any questions about this Privacy Policy, please contact VBSO's Data Protection Officer via email: segurancainfo@vbso.com.br.

