

PRIVACY POLICY

This privacy policy ("<u>Privacy Policy</u>") was prepared based on Law No. 13.709, of August 14th, 2018 ("<u>General Data Protection Law</u>" or "<u>LGPD</u>"), and describes how Chediak e Cristofaro Advogados ("<u>Chediak Advogados</u>") processes and protects personal data within the scope of the provision of its services, observing the right to privacy, other guiding principles of the LGPD, and the best practices related to data protection.

For the purposes of this Privacy Policy, we consider "Users" any people who access the *website*, and "<u>Data Subjects</u>" any people whose personal data we have access to, during the provision of our services, by any means and in any capacity, such as clients and business partners, as well as collaborators, employees, associates, interns, and candidates.

When hiring our services, using our *website*, applying for a job vacancy, or subscribing for any events promoted by, or in partnership with Chediak Advogados, the Data Subject freely and expressly assumes their awareness of and agreement with this Privacy Policy. This policy also applies to the processing of the personal data of collaborators, employees, associates, and interns.

1. Collection and Use of Personal Data

Chediak Advogados may collect the personal data of Data Subjects, such as: Name, email, company, position, address, city, State, CEP (Zip Code), country, telephone, and other information from identified or identifiable individuals, as described in this Privacy Policy ("Personal Data"). From time to time, we may ask the updating of their Personal Data.

Personal Data are collected by Chediak Advogados mainly by means of: (i) receipt and/or access to physical or digital documents containing Personal Data for the provision of Services; (ii) submission by the Personal Data Subject through face-to-face or virtual meetings with partners, associates or employees of Chediak Advogados; (iii) submission by the Personal Data Subject through subscription in events promoted or sponsored by Chediak Advogados; (iv) submission by the Personal Data Subject through the subscription to our *website*; and (v) submission by the Personal Data Subject in their application to or hiring by Chediak Advogados.

In addition to collecting data through the free, explicit, and specific consent of the Data Subjects, we may collect Personal Data (a) to fulfill a contract or for preliminary procedures related to a contract to which the Data Subject is a party, at their request; (b) for the regular exercise of rights in legal, administrative or arbitration proceedings; (c) when required by law or regulation; (d) in the face of a legitimate interest in this regard; (e) for other purposes, allowed by the LGPD.

The following table describes the main hypotheses in which we process the Personal Data of Data Subjects:

Hypothesis of Collection	Use of Personal Data
Submission of Personal Data by email or other types of mail, addressed to Chediak Advogados and/or its members.	To fulfill a specific request by the User or for the provision of services by Chediak Advogados.
User Subscription to our Website.	Mailing List Subscription for later sending of institutional materials.
Candidate for job vacancies at Chediak Advogados.	Assessment of the candidate and contact for interviews.
Student and internship fairs.	Assessment of the student and offering of professional opportunities.
Business partnership with Chediak Advogados or in parallel projects, such as <i>pro bono</i> work.	Information exchange and benchmarking.
Participation in events promoted by, or with the participation of Chediak Advogados.	Sending of information about our areas of work and <i>mailing list</i> subscription for later sending of institutional materials.

In the context of our legal services, in addition to collecting Personal Data of a Data Subject for the provision of services hired by them, we may use Personal Data to provide relevant legal content to clients, potential clients, and third parties, such as (i) information about our areas of work; (ii) news in which Chediak Advogados or its members appeared in the media; (iii) institutional communications, bulletins, memos, invitations to events promoted by, or with the participation of Chediak Advogados, and other materials produced for our clients and partners; and (iv) client satisfaction surveys, always in a reasonable and non-invasive manner to Data Subjects.



2. Security and Storage Measures

Chediak Advogados implements the best market practices to store and protect the information it collects. We adopt security, technical, and administrative measures as well as tools chosen from among the best available on the market. As an example of a measure is the encryption of certain information, which scrambles the data submitted through technologies such as Secure Socket Layer (SSL) and Transport Layer Security (TLS).

However, no method of transmission over the Internet or electronic storage is 100% secure. Therefore, we do not guarantee the absolute security of the Personal Data, considering malicious third parties' actions.

We store Personal Data until we no longer expect to use it to fulfill the purpose for which it was collected, under the LGPD. To determine the appropriate storage period, we take into account the nature, quantity, and sensitivity of the Personal Data, as well as the purpose, need, and suitability of its storage.

We do not record any face-to-face or virtual meetings with the Data Subjects, except (i) when expressly authorized by the Data Subject in question; (ii) in the cases required by law; or (iii) to defend the interests of our clients, within the limits of the applicable rules.

3. Sharing of Personal Data

We do not share Personal Data with third parties, unless the disclosure is:

- Necessary for the provision of our services;
- Necessary for the provision of services by our correspondents, in the defense of our client's interests;
- Required for compliance with a legal or regulatory obligation;
- Requested or authorized by the Data Subject, for its partners or service providers;
- Due to a court order or request from a competent government authority;
- In any other way, when necessary for the defense of our client's interests.



We do not sell or trade Personal Data. However, we may share them with our agents, contractors or business partners for the exclusive purpose of performing the services offered by Chediak Advogados, hired or requested by the Personal Data Subject.

Chediak Advogados is headquartered in Brazil and the data we collect is governed by Brazilian law. By accessing or using our services, the User of the *website* and our services, Personal Data Subject, agrees to the processing and transfer of such data to Brazil and, eventually, to other countries through the service of third parties, including storage of data in the cloud. The Personal Data of the Users of the *website* and our services, when transferred to other countries, may be subject to local legislation and the relevant rules.

4. Access, changes and deletion of Personal Data

The Personal Data Subject has a set of rights regarding their data that are provided for in the LGPD, among them:

- confirmation of the existence of processing;
- access to the data;
- rectification of incomplete, inaccurate, or outdated data;
- anonymization, blocking or deletion of unnecessary or excessive data or data processed in non-compliance with the provisions of the Law;
- data portability to another service provider, subject to commercial and industrial secrets;
- deletion of personal data processed without their consent;
- information about the public and private entities to which the data was shared;
- information about the possibility of not providing consent;
- revocation of consent.

If the Data Subject wishes to exercise any of their rights, they shall contact us through our website at privacidade@chediak.com.br, stating, at the beginning of the message, the subject DATA PROTECTION, so that their request can be assessed. We emphasize that, in some cases, we will not be able to meet their request, such as in cases where we have to keep their data in our databases to comply with a legal obligation or for the exercise of rights in proceedings.



Whenever possible, in our communications, there will be an option for access by email or contact address so that the Data Subject informs that they no longer wish to receive any materials or emails from Chediak Advogados.

5. Links indicated on the Website

Any *links* made available on our *website* to third-party *websites* are provided for information purposes only. These *websites* operate independently of Chediak Advogados and have their own privacy and personal data collection procedures. Any information provided to them will be used in accordance with their specific privacy policies, if any.

6. Cookies

We do not use cookies on our website.

7. Review of the Privacy Policy

We continually work to improve our services, with the aim to provide more privacy, security, and convenience to our website users, clients, partners, and employees. Therefore, we reserve the right to amend this Privacy Policy at any time, at our sole discretion.

Any significant amendment to the Privacy Policy will be informed by means of a notice on our *website* and/or notified by means of an alert sent to the Data Subjects, at which time they shall renew their consent to the Privacy Policy.

It is the responsibility of the *Website* User to periodically review this Privacy Policy as to ensure that they agree with its content in view of any amendments. By continuing to use our *website*, materials and services, the User indicates that they have read, accept, and agree to the Privacy Policy, as amended.



8. Contact, Complaints and Questions

If the Data Subject has any questions about the processing of their Personal Data, if they believe that their Personal Data has been misused or if they wish to receive any additional information related to this Privacy Policy, please contact us through our website, on the CONTACT tab, informing the subject DATA PROTECTION at the beginning of the message.

This Privacy Policy was updated in February 2022.