



PRIVACY POLICY

LACAGIS ASSESSORIA EMPRESARIAL E SERVIÇOS DE ENGENHARIA LTDA (“LACAGIS”), a private legal entity, registered under CNPJ nº 00371.841/0001-05, headquartered at Rua Lord Cockrane, 616 conj. 1209, São Paulo – SP, is an organization aware of the need for privacy and protection of personal data. Serving this privacy policy to regulate which personally identifiable information we can collect, store, save and treat, how we can use this information, as well as other important points regarding your privacy.

In this way, we express our commitment to the treatment of your personal data in a responsible and ethical manner, in accordance with our values and, mainly, in accordance with the provisions of Law No. and other current and applicable laws.

By using this site, you consent to the collection, storage, safekeeping, treatment, use and disclosure of your personal information as described in this Privacy Policy.

It is important to point out that, when we need to collect personal data required by law, or enter into or perform a contract with you and you decide not to provide the data, it will not be possible to enter into the contract; or, if this relates to an existing service already contracted, we may have to suspend or cancel it, and if so, we will notify you as soon as possible. Where providing data is optional and you choose not to share personal data, features that use the data, such as personalization, for example, will not work for you.

This Privacy Policy informs and clarifies the following aspects:

What data we collect:

The personal data that may be provided by the Holder include, but are not limited to, the name; email address; Mailing address; Country of Residence; phone number; your marital status and the existence of dependents; employment and education details; Bank information; financial and tax; details of any claim; details of how you use our services and other similar information.

The personal data that may be provided by the Holder may also include sensitive personal data, that is, those that refer to racial or ethnic origin, religious conviction, political opinion,

affiliation to a union or organization of a religious, philosophical or political nature, data referring to health or sexual orientation, genetic or biometric data, when linked to a natural person, as established by art. 5, II of the LGPD.

The types of personal data and special categories of personal data we collect may vary depending on the nature of the services provided to you or our customers, or how you use our website. In some rare circumstances, we may also collect other special categories of personal data about you, either because you provide this data to us or because we are obliged to collect it due to certain legal requirements imposed on us.

We also automatically obtain data from the Owner through the use of 'Cookies' and other similar technologies, in order to guarantee the best user experience.

Technologies with potential use by LACAGIS Assessoria Empresarial include, but are not limited to: browser cookies; web beacons; tracking pixels; Internet Protocol (IP); browser type; Internet Service Provider (ISP); reference/exit page; operational systems; and date/time stamp.

When using our website, the data collected is exclusively for the registration mentioned in the form. After completion, the data will be stored by LACAGIS Assessoria Empresarial, in a secure way, only for the purpose of keeping a history of activities carried out and internal analysis of statistics and trends, with no possibility of transmission to third parties.

How we collect your personal data:

We collect and process personal data to provide services. We may collect personal data in the following ways, but not limited to:

- In the course of providing services to you or our customer;
- Through provision by the holder himself, or because they are publicly available;
- Through provision by our customers and, where it occurs, we take the necessary measures to ensure that the customer complies with privacy and data protection laws and regulations; and,
- Through your interaction with our website, for the registration mentioned in the form and in order to provide you with information that we believe may be of interest to you.

How we use and process your personal data:

When we are offering our services, we will use your personal data to provide services to you or our customer. In this scope, we may use your personal data in the course of communication related to the services and their progress. Such communication may be with you, our client, other collaborators of **LACAGIS Assessoria Empresarial**, our service providers or competent authorities.

Also, we may use your personal data when there are applicable legal requirements; requests and communications from competent authorities; customer account opening and other administrative purposes; financial accounting and billing; customer relationship purposes and protection of our rights and those of our customers.

Finally, data may be collected through our website, for better website management; adapt the content of our website; and manage and respond to any request you submit through our website.

Data sharing:

In the provision of our services, we may share the Holder's information with the following recipients: (i) our service providers; (ii) partners involved in commercial relationships, for the development of activities, as well as for advertising purposes; and (iii) public administration, in case of legal or judicial obligation, for the protection of rights, fulfillment of duties, guarantee of security to customers, investigation of fraud and/or responses to public inquiries.

In the case of an international transfer of Data, we undertake to observe, in the transmission, one of the following hypotheses: (i) that the recipient of the data is located in a country that provides a degree of Data protection adequate to that provided for by Brazilian legislation; (ii) the controller offers and proves guarantees of compliance with the principles, rights of the holder and the data protection regime provided for in the Brazilian data protection legislation through specific contractual clauses for a given transfer, standard contractual clauses, global corporate rules, regularly issued seals, certificates and codes of conduct; (iii) when the transfer is necessary for international judicial cooperation between public intelligence and investigative bodies, in accordance with the instruments of international law; (iv) when the transfer is necessary to protect the life or physical safety of the Holder or third parties; (v) when the competent body authorizes the transfer; and (vi) when the Holder has provided his consent for the transfer, under the terms of this Privacy Policy, and in the form of art. 33 of the LGPD.

Data security:

We process and store the Holder's data provided or collected in a safe way, since we adopt practices and security measures of a technical, administrative and organizational nature, all suitable for its full protection, according to criteria defined by market standards and applicable legislation, aiming at the protection of data against accidental or illegal situations of alteration, loss, destruction, communication or any inappropriate or illegal way of processing personal data.

We are committed to the principles set out in the **LGPD**, in particular the following:

- Confidentiality: so that access to information and personal data is obtained only by previously authorized persons and when strictly necessary;
- Availability: so that authorized persons have access to personal data whenever necessary;
- Integrity: we value the accuracy and completeness of information and personal data and their respective processing and treatment methods, in addition to transparency in dealing with all those involved in the operation; and,
- Security: to curb accidental or illegal situations such as invasion, destruction, loss and dissemination of personal data.

In addition, we use the following physical, electronic and managerial measures to ensure that your personal data remains secure, accurate and up to date. Are they:

- Training of all responsible staff so that they are aware of our privacy and data protection obligations when dealing with personal data;
- Administrative and technical controls in order to restrict access to personal data, subject to the need for prior knowledge;
- Physical security measures, such as controlling access to our facilities; and,
- Technological security measures, including firewalls, encryption and antivirus software.

Although we use appropriate security measures and comply with national legislation on data protection, once we receive your personal data, the transmission of data over the internet, including via email, is never completely secure. Although we make efforts to protect your personal data, we cannot guarantee the complete security of data transmitted to or by us.

Therefore, aiming at the proper protection and treatment of your personal data in accordance with the LGPD, in addition to other applicable laws, we are committed to:

- Adopt security, technical and administrative measures to protect personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate or unlawful data processing;
- Keep a record of the processing of personal data carried out, especially when based on legitimate interest;
- Communicate, within a reasonable period of time, the National Data Protection Authority and the Holder of the occurrence of a security incident that may entail significant risk or damage to the Holders;
- Use in the processing of personal data systems that are constituted in order to meet the security requirements, the standards of good practices and governance and the general principles provided for in the LGPD;
- Eliminate personal data after the end of its treatment, within the scope and within the technical limits of the activities, being authorized the anonymization of data and conservation for the purposes foreseen by law; and,
- Comply with the guidelines, rules and regulations issued by the National Data Protection Authority (ANPD).

How long do we keep your personal data:

We will keep your personal data on our systems for the greater of the periods set out below: (i) as long as necessary for the relevant activity or services; (ii) any retention period required by law; (iii) the end of the period in which disputes or investigations in relation to the Services may arise; (iv) while your consent is valid, in the applicable cases; (v) pursuant to current legislation.

Liability and compensation for damages:

We guarantee that in the event that the controller or operator, in the exercise of the activity of processing personal data, causes pecuniary, moral, individual or collective damage to you or a customer, violating national legislation for the protection of personal data, the damage will be repaired in the form of art. 42 and following of the LGPD.

What are your rights:

We list below the rights you have in relation to the collection and processing of your personal data, which can be exercised at any time, free of charge, through a request registered by you to our DPO/In charge. Are they:

- Obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;
- Ask us to update the personal data we hold about you or to correct data that you feel is incorrect or incomplete;
- Withdraw the consent granted for the processing of your personal data, as well as request its deletion, insofar as such processing is based on consent;
- Request the portability of the personal data we hold about you to another supplier of products or services, provided that commercial and industrial secrets are respected, as well as applicable confidentiality;
- Obtain information about who we share your data with;
- Request that your personal data that you understand as unnecessary, excessive or treated in violation of the LGPD, be anonymized, blocked or deleted; and,
- Request the review of decisions taken solely on the basis of automated processing of personal data.

Contact for suggestions, questions or complaints:

If you are not satisfied with the way we treat your personal data, if you want to confirm that LACAGIS is processing your personal data, or if you have any other question or request related to your privacy, you can forward your complaint or request to the company's email: luis.alves@lacagis.com