

This website is maintained and operated by SCHNEIDER, PUGLIESE, SZTOKFISZ, FIGUEIREDO E CARVALHO ADVOGADOS.

We act as **controllers** of the personal information belonging to our website's users that we collect and use, and therefore we are subject to the provisions of Brazilian law no. 13.709/2018 (General Data Protection Law - LGPD).

We value the integrity of your data, which is why we have complied this privacy policy, containing important information regarding:

- Who may use our website;
- Which types of data we collect and what we do with it;
- Your rights regarding your personal data; and
- How to contact us.

## 1. Data collected and why we collect them

Our website collects and uses certain types of personal information belonging to our users, in accordance with the provisions below.

### 1. Sensitive information

We **do not** collect sensitive information from our users. Sensitive information is defined, as of LGPD article 11, as comprising racial and ethnic origin, religious conviction, political opinion, trade union or religious, philosophical or political organization membership, health and sexual data, and genetic or biometric information, if relating to a natural person.

### 2. Cookies

Cookies are small text files which are stored on your computer by your web browser. They exist basically to identify devices, user activity, and their preferences.

Cookies do not allow any files or information to be extracted from the user's hard drive, nor do they grant access to personal information that was not shared by the user while using the website.

*a. Website cookies*

Website cookies are sent by the website to the user's computer or device and are administered exclusively by the website.

Information collected through this type of cookie are used to improve and personalize user experience. Some cookies may, for instance, be used to remember preferences and choices made by the user, as well as to offer personalized content.

*b. Third-party cookies*

Some of our partners may install cookies on our users' devices.

These cookies, in general, enable our partners to offer personalized content and services to our users, through the extraction of navigation data from the user's session on our website.

Users may find further information on the collection and handling of third-party cookies, as well as a description of their characteristics, on the following address:

JSDELIVR:

<https://www.jsdelivr.com/terms/privacy-policy-jsdelivr-com>

Google Analytics:

<https://developers.google.com/analytics/devguides/collection/gajs/cookie-usage>

Organizations which collect cookies may share the information they obtain with third parties.

*c. Cookie management*

Users may stop the collection of cookies by this website by turning off the corresponding option on their browser settings. Below you can find information on how to do change your cookie settings on the most popular browsers:

Internet Explorer:

<https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

Microsoft Edge:

<https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

Safari:

<https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Google Chrome:

<https://support.google.com/chrome/answer/95647?hl=en>

Mozilla Firefox:

<https://support.mozilla.org/en-US/kb/disable-third-party-cookies>

**Turning off cookies, however, may affect the availability of some tools and features of this website, thus compromising its correct and expected behavior. Another possible consequence is the removal of previously saved user preferences, which could impact user experience.**

### *3. Collection of data not expressly provided for herein*

We may occasionally collect other type of information not expressly provided for in this policy, as long as the user provides express consent, or as may be authorized by law.

In any case, collection of data and deriving handling activities will be informed to website users.

## **2. Third-party data sharing**

We do not share personal information with third parties. However, we may be required by law to share information or in connection with an order issued by a court or another public authority.



### 3. How long we store personal information

Personal data collected by this website will be stored by 12 months.

This period does not exceed the minimum amount of time necessary in compliance with the requirements and legal justification for the use of data.

Additionally, if an extraordinary legal or regulatory requirement should arise, data may be stored for longer periods of time, until the purpose of their collection and handling is complete.

Once data handling is complete, in accordance with the provisions of this section, data will be erased or anonymized.

### 4. Legal provisions concerning personal data handling

A legal provision concerning personal data handling is a provision of law which justifies a specific type of data collection. Each type of personal data collection and handling has an associated legal provision.

We handle our users' personal information:

- When expressly authorized by our users; or
- In connection with a legal or regulatory obligation imposed on the controller.

#### 1. *Consent*

Certain types of data handling on our website depend on the user's informed consent, which must be expressed freely and unequivocally.

Users may revoke their consent at any time, in which case any information which the controller is not legally required will be deleted.

Additionally, users may indicate which types of data handling they authorize. It is possible, however, that some of the website's functions will become unavailable. Consequences arising from turning off a specific type of data handling will be notified to the user beforehand.

#### 2. *Legal or regulatory obligation imposed on the controller*

Certain types of data handling arise from legal or regulatory obligations imposed on the controller, especially those connected with the storage of personal information.

## 5. User rights

LGPD affords the user the following rights:

- Notification about data handling activities;
- Access to data;
- Correction of incomplete, imprecise, or out-of-date information;
- Anonymization, blocking, or deletion of data deemed unnecessary, excessive, or handled in violation of legal requirements;
- Transferability of data to other suppliers of products and services, per written request, in accordance with national authorities' regulations, provided industrial and commercial secrets are preserved;
- Elimination of personal data at the user's request, except in the cases expressly provided for by law;
- Notice of public agencies and organizations with which the controller exchanges and shares information;
- Information regarding the possibility of denying access to personal data and the consequences thereof; and
- Revocation of consent.

It bears mentioning that, under the LGPD, the user does not have an absolute right to eliminate data handled based on legal provisions other than consent, unless it is deemed unnecessary, excessive, or handled in violation of legal requirements.

### 1. *How users may exercise their rights*

To ensure that users seeking to exercise data protection rights are, in fact, their owners, we may request documents or other information to assist us in determining their correct identification, as a manner of protecting ourselves and third parties. This will be done only as absolutely necessary in connection with a request for information presented by a user.

## 6. Personal data handling safety

We have put in place technical and organizational measures which help us ensure the protection of personal data from unauthorized access and from destruction, loss, or modification.

The measures we use take into account the nature of the data, the context and the scope of their handling, the risks to users' rights and freedoms arising from a potential breach, and industry-standard practices.

Among these safety measures we highlight the following:

- User data are stored in a secure environment;
- We limit access to user data stored by us to prevent unauthorized third-party access;
- We use a secure socket layer certificate to encrypt and protect the transmission of data from users' devices to our servers;
- We keep a record of all personnel who use the data we collect in any way.

While we take every precaution to ward off potential data breaches, it is possible that incidents may be caused exclusively by third parties, such as through a hacker or cracker attack, or by user action, who may, for instance, voluntarily transfer data to a third party. Thus, while we are, in general, responsible for the personal data we handle, we do not accept responsibility for exceptional situations such as those described in this paragraph, over which we have no sort of control.

In any case, in the event of any type of security incident which may pose a relevant risk of damage to any of our users, we will inform those who are affected and the National Data Protection Authority, in accordance with LGPD provisions.

## **7. Formal complaint with control authority**

Other administrative or judicial remedies notwithstanding, users who shared personal data with our organization and who feel their rights have been violated in any way may lodge a formal complaint with the National Data Protection Authority.

## **8. Changes to this policy**

This privacy policy is current as of December 16, 2020.

# PRIVACY POLICY



schneider,  
pugliese,

We reserve the right to modify these rules at any time, especially to adapt them to future changes made to our website, either by virtue of the enabling of new features, or by virtue of the suppression of current features.

Users will be promptly notified of any changes made to our privacy policy.



## 9. Contact us

If you should have any doubts regarding this Privacy Policy or our handling of personal data, you may contact our Data Protection Officer:

E-mail: [compliance@schneiderpugliese.com.br](mailto:compliance@schneiderpugliese.com.br)

Mailing address:

Schneider, Pugliese Advogados

C/O Ms. Cristina Lovato

Rua Cincinato Braga, 340, 9th floor

São Paulo, SP 01333-010

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