

We, SCHNEIDER, PUGLIESE, SZTOKFISZ E FIGUEIREDO SOCIEDADE DE ADVOGADOS, collect and use certain personal data belonging to users of our website. In doing so, we act as the controller of this data and are subject to the provisions of Federal Law No. 13.709/2018 (General Data Protection Law - LGPD).

We take the protection of your personal data seriously and, for that reason, we provide this privacy policy, which contains important information about:

- Who should use our website;
- What data we collect and how we use it;
- Your rights regarding your personal data; and
- How to contact us.

Definitions

For the purposes of this Privacy Policy:

- **Personal Data** means any information related to an identified or identifiable person.
- **Processing of Personal Data** means any operation performed with personal data, such as collection, storage, use, sharing, among others.
- **Controller** is the natural or legal person, under public or private law, responsible for decisions regarding the processing of personal data.
- **Processor** is the natural or legal person, under public or private law, that processes personal data on behalf of the controller.
- **Cookies** are small text files stored on your device when you visit our website, used to remember your preferences and improve your experience.
- **Child** is a natural person under the age of 12, according to the Child and Adolescent Statute (ECA).
- **Adolescent** is a natural person between the ages of 12 and 18, according to the ECA.

1. Data We Collect and Why

Our website collects and uses some personal data from our users, as outlined below.

1. Sensitive Data

We do not collect sensitive data from our users, as defined in Articles 11 and onward of the LGPD. Therefore, we do not collect data related to racial or ethnic origin, religious beliefs, political opinions, trade union membership, health or sexual orientation, genetic or biometric data when linked to a natural person.

2. Cookies

Cookies are small text files automatically downloaded to your device when you access and browse a website. They serve mainly to identify devices, user activity, and preferences.

Cookies do not allow access to files or information from the user's hard drive, nor do they allow access to personal information not provided by the user or generated by their use of the website.

a. First-Party Cookies

These are cookies sent to the user's device exclusively by the website. The information collected is used to improve and personalize the user experience, such as remembering preferences and offering personalized content.

b. Third-Party Cookies

Some of our partners may set cookies on users' devices. These cookies generally allow our partners to offer personalized content and services based on the user's interaction with the site.

More information on third-party cookies can be found via these links:

JSDELIVR:

<https://github.com/jsdelivr/jsdelivr/blob/master/Privacy%20Policy.md>

Google Analytics:

<https://policies.google.com/privacy?hl=pt-BR>

The entities responsible for collecting cookies may share the information with third parties.

c. Cookie Management

Users may refuse cookies by disabling them in their browser settings.

Instructions for major browsers are available here:

- **Internet Explorer:** https://support.microsoft.com/pt-br/topic/como-excluir-arquivos-de-cookie-no-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc_
- **Microsoft Edge:** <https://support.microsoft.com/pt-br/topic/excluir-e-gerenciarcookies-168dab11-0753-043d-7c16-ed5947fc64d>
- **Safari:** <https://support.apple.com/pt-br/guide/deployment/depf7d5714d4/web>
- **Google Chrome:** <https://support.google.com/chrome/answer/95647>
- **Mozilla Firefox:** <https://support.mozilla.org/en-US/kb/third-party-cookies-firefox-tracking-protection>

What is a Cookie Banner?

A Cookie Banner is a visual element designed to inform users about the use of cookies on the website. It appears as a prominent bar that provides information regarding cookie usage. In addition, the banner offers tools that provide users greater control over the handling of these cookies, giving them the option to consent to or reject specific categories of cookies.

It is an essential component for compliance with data protection regulations, such as the General Data Protection Law (LGPD) in Brazil and the General Data Protection Regulation (GDPR) in the European Union.

How to Accept or Reject Cookies?

If you choose not to receive cookies from our website, you can refuse them through the cookie banner available on our site or configure your browser preferences to reject them or notify you when cookies are sent. This gives you control to accept or reject cookies in a personalized way. To disable cookies, we recommend checking your browser settings under the “Tools” section or a similar location.

It is important to note that we recommend enabling cookies, as disabling them may affect the proper display of some web pages and access to services that require login.

Below, we provide specific instructions for the most common browsers:

- If you use Internet Explorer
- If you use Firefox
- If you use Safari
- If you use Google Chrome

Disabling cookies, however, may affect the availability of certain tools and features of the website, compromising its proper and expected functionality. Another possible consequence is the removal of user preferences that may have been saved, which could negatively impact your experience.

3. Collection of Data Not Explicitly Provided For

Occasionally, other types of data not explicitly mentioned in this Privacy Policy may be collected. In this case, the user's consent will be required or if their collection is permitted based on another legal basis provided by law, then that will be the justification.

In any case, the collection of such data and the related processing activities will be disclosed to the users of the website.

2. Sharing of Personal Data with Third Parties

We do not share your personal data with third parties. However, we may do so in order to comply with a legal or regulatory obligation, or to fulfill an order issued by a public authority.

3. How Long Your Personal Data Will Be Stored

The personal data we collect will be stored and used for the following period:

12 months

The indicated duration will not exceed what is strictly necessary, in accordance with the purposes and legal justifications for processing the data.

It is important to note that, if there is a legal or regulatory justification, the data may continue to be stored even after the original purpose for which it was collected or processed has been fulfilled.

Once processing is complete, and in accordance with the provisions of this section, the data will be deleted or anonymized.

4. Legal Bases for the Processing of Personal Data

A legal basis for the processing of personal data is the legal justification that authorizes it. In other words, each personal data processing operation must have a corresponding legal basis.

We process our users' personal data under the following circumstances:

- Based on the data subject's consent
- To comply with legal or regulatory obligations applicable to the controller

1. Consent

Certain personal data processing activities carried out on our website depend on the user's prior agreement, which must be freely, informedly, and unequivocally given.

Users may withdraw their consent at any time. If there is no legal basis that permits or requires the retention of the data, any data provided based on consent will be deleted.

Additionally, users may choose not to consent to specific data processing activities based on consent. In such cases, however, it may not be possible to use certain website features that rely on that specific processing. The consequences of withholding consent for a given activity will be communicated before the processing occurs.

2. Compliance with Legal or Regulatory Obligations by the Controller

Some personal data processing operations, particularly data storage, may be necessary for us to comply with legal requirements or other regulatory provisions applicable to our activities.

5. User Rights

Users of the website have the following rights, granted by the Brazilian General Data Protection Law (LGPD):

- **Right to Confirmation:** To confirm the existence of processing of their personal data;
- **Right to Access:** To request access to their personal data and information about how it is used;
- **Right to Correction:** To request the correction of incomplete, inaccurate, or outdated data;
- **Right to Anonymization, Blocking, or Deletion:** To request the anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- **Right to Data Portability:** To request the transfer of their personal data to another service or product provider, upon

express request and in accordance with regulations issued by the national authority, subject to commercial and industrial secrecy;

- **Right to Deletion:** To request the deletion of personal data processed with the user's consent, except in situations provided for by law;
- **Right to Information:** To be informed about the public and private entities with which the controller has shared personal data;
- **Right to Object:** To object to the processing of personal data carried out based on one of the legal grounds that exempts the need for consent, in cases of non-compliance with the LGPD;
- **Right to Withdraw Consent:** To withdraw consent at any time for the processing of personal data.

It is important to note that, under the LGPD, there is no right to request deletion of data processed based on legal grounds other than consent—unless the data is unnecessary, excessive, or processed in violation of the law.

1. How the Data Subject Can Exercise Their Rights

To ensure that the user requesting to exercise their rights is indeed the data subject, we may request documents or other information to help confirm their identity. This is necessary to protect the rights of the requester and third parties. Such verification will only be carried out when strictly necessary, and the requester will be fully informed about the process.

Users can also access our Privacy Portal at: <https://lgpdschneiderpugliese.nuvemx.com.br>, where they will find more information on how to manage their privacy preferences and how to contact our Data Protection Officer (DPO), as defined in Appendix 1, for any privacy-related inquiries.

6. Security Measures for the Processing of Personal Data

We employ appropriate technical and organizational measures to protect personal data from unauthorized access and from situations of destruction, loss, misplacement, or alteration of such data.

The measures we implement take into account the nature of the data, the context and purpose of the processing, the risks a potential breach could pose to users' rights and freedoms, and the standards currently adopted in the market by companies similar to ours.

Among the security measures we adopt, we highlight the following:

- Our users' data is stored in a secure environment;
- We limit access to user data so that unauthorized third parties cannot access it;
- We use SSL (Secure Socket Layer) certificates to ensure that data transmission between users' devices and our servers is encrypted;
- We keep logs of all individuals who, in any way, come into contact with our data.

Even though we take all reasonable measures to prevent security incidents, it is possible that a problem may occur due to causes beyond our control—such as hacker or cracker attacks, or solely due to the users' fault, for example, when the users themselves share their data with a third party. Therefore, although we are generally responsible for the personal data we process, we disclaim liability in the event of exceptional circumstances such as these, over which we have no control.

In any case, if any type of security incident occurs that may pose a relevant risk or harm to any of our users, we will notify the affected individuals and the National Data Protection Authority (ANPD) about the incident, in accordance with the provisions of the Brazilian General Data Protection Law (LGPD).

7. Complaint to a Supervisory Authority

Without prejudice to any other administrative or judicial remedy, data subjects who feel they have been harmed in any way may file a complaint with the Brazilian National Data Protection Authority (ANPD).

8. Changes to this Policy

This version of the Privacy Policy was last updated on: June 13, 2025.

We reserve the right to amend this Policy at any time, particularly to adapt it to any changes made to our website, whether due to the provision of new functionalities, the removal of existing ones, or updates to regulatory requirements.

Whenever changes occur, our users will be notified about the modifications.

9. How to Contact Us

If you have any questions about this Privacy Policy or about the personal data we process, please contact our Data Protection Officer (DPO) through one of the following channels:

Emails:

1. compliance@schneiderpugliese.com.br
2. camila.bueno@schneiderpugliese.com.br

Postal Address:

Schneider Pugliese Advogados
Attn: Camila Martins Cuba Bueno
Av. Paulista, 283 – 4th Floor – Bela Vista, São Paulo – SP, 01311-000

Privacy Portal:

<https://lgpdschneiderpugliese.nuvemx.com.br>

Appendix 1 – Appointment Term of the Data Protection Officer (DPO)

APPENDIX 1 – APPOINTMENT TERM OF THE DATA PROTECTION OFFICER (DPO)

SCHNEIDER, PUGLIESE, SZTOKFISZ E FIGUEIREDO SOCIEDADE DE ADVOGADOS, acting as a personal data processing agent hereinafter referred to as the "Controller", through this "Appointment Term of the Data Protection Officer (DPO)", formally appoints Camila Martins Cuba Bueno, hereinafter referred to as the "Appointee", "Data Protection Officer" or simply "DPO", as the Data Protection Officer pursuant to Article 41 of Brazilian Law No. 13.709/2018 (General Data Protection Law – LGPD) and Article 37 of Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR).

This appointment was made on May 5, 2025, and shall take effect from this date and remain valid for as long as the relationship between the Appointee and the Controller exists.

SCHNEIDER, PUGLIESE, SZTOKFISZ E FIGUEIREDO SOCIEDADE DE ADVOGADOS informs that both Data Subjects and the Brazilian National Data Protection Authority (ANPD) may directly contact our DPO via the following email address: dpo@schneiderpugliese.com.br, or through our Privacy Portal: <https://lgpdschneiderpugliese.nuvemx.com.br>.

In addition, the DPO, Ms. Camila Martins Cuba Bueno, will be responsible for providing the necessary guidance and support regarding internal procedures related to the collection, storage, and any form of processing of personal data. She will also be responsible for performing the activities described in paragraph 2 of Article 41 of the LGPD:

The DPO's responsibilities include:

I – Receiving complaints and communications from data subjects, providing clarifications, and taking appropriate actions;

- II – Receiving communications from the national authority and responding accordingly;
- III – Advising the company’s employees and contractors regarding practices related to personal data protection;
- IV – Carrying out other duties assigned by the Controller or established in supplementary regulations.

In certain situations, the firm may act as a Data Controller, particularly when processing personal data in the context of its relationships with partners and employees.

There may also be cases in which the firm processes personal data on behalf of another Controller, thereby acting as a Data Processor. In any case, all activities will be conducted in accordance with Section III (Articles 42 to 45) of Chapter VI of the LGPD.

Section: Conflict of Interest

Article 18 – The DPO must act with ethics, integrity, and technical autonomy, avoiding situations that could give rise to conflicts of interest.

Article 20 – The DPO must disclose to the data processing agent any situation that may constitute a conflict of interest, being responsible for the accuracy of the information provided.

Section: DPO Substitution

In the event of absence, impediment, or vacancy of the DPO, the role shall be temporarily exercised by a previously appointed substitute, in accordance with the company’s organizational structure. The substitute Jéssica Orlandin Carvalho shall be designated to ensure the continuity of operations and compliance with the responsibilities of the role.