

## **PRIVACY POLICY**

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## INTRODUCTION

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Filhorini Advogados Associados ("**FIRM**") is committed to respect the privacy and protect the personal data of the parties with which it interacts, with observance of the applicable legal documents, in particular:

- Law 8,906/1994, Statute of the Legal Profession
- Code of Ethics and Discipline of the Brazilian Bar Association
- Law 12,965/2014, Internet Civil Framework
- Law 13,709/2018, General Data Protection Law ("**LGPD**") and its Regulations

This Privacy Policy ("**POLICY**") has the objective of informing clients, commercial partners, suppliers, service providers and employees about how their personal data will be treated by the **FIRM**, by describing the rules related to the treatment of personal data.

In case of doubt about this Policy, contact the Data Protection Officer ("DPO") directly, at the e-mail: [encarregado@filhorini.com.br](mailto:encarregado@filhorini.com.br).

## 1. TERMS AND DEFINITIONS

The main terms utilized in this **POLICY** are defined below.

TERM	DEFINITION
PERSONAL DATA	Data related to an identified or identifiable individual (see the <b>LGPD</b> ).
SENSITIVE PERSONAL DATA	Data of an individual related to racial or ethnic origin; religious conviction; political opinions; membership in a labor union or religious, philosophical or political organization; health or sexual life, genetics or biometrics (see the <b>LGPD</b> ).
DATA SUBJECT	Individual to whom the personal data refer (see the <b>LGPD</b> ).
CLIENT	Individual or legal entity to whom the <b>FIRM</b> renders legal services or formulates consultations for possible future provision of legal services.
TREATMENT	Any operations involving <b>PERSONAL DATA</b> , such as those involving the collection, reception, classification, utilization, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, or its modification, communication, transfer, diffusion or extraction (see the <b>LGPD</b> ).
CONTROLLER	Individual or legal entity entrusted with decisions regarding the treatment of <b>Personal Data</b> (see the <b>LGPD</b> ).
OPERATOR	Individual or legal entity that treats <b>Personal Data</b> on behalf of the <b>Controller</b> (see the <b>LGPD</b> ).
DATA PROTECTION OFFICER (DPO)	Individual or legal entity designated to act as a channel for communication between the Controller, Data Subjects and National Data Protection Authority (“ANPD”) (see the <b>LGPD</b> ).
FIRM	The legal entity Filhorini Advogados Associados, enrolled on the CNPJ under no. 27.169.312/0001-80.
PARTNER	Individual who integrates the <b>FIRM</b>
EMPLOYEE	Individual hired by the <b>FIRM</b> .

## 2. THE FIRM AND DUTY OF SECRECY AND CONFIDENTIALITY

In general, all the data, information and documents, in any medium, supplied to a lawyer associated with the exercise of the legal profession, including the client-attorney relationship, must be considered secret and confidential, and treated as such.

*Art. 35. The lawyer has the duty to safeguard the secrecy of the facts that come to his/ her knowledge in the exercise of the profession.*

*Sole paragraph. Professional secrecy covers the facts the lawyer has learned by virtue of the functions performed in the Brazilian Bar Association.*

*Art. 36. Professional secrecy is a matter of public policy, irrespective of solicitation for reservation thereto expressed by the client.*

*Paragraph 1. The communications of any nature between the lawyer and client are presumed to be confidential.*

*Paragraph 2. The lawyer, when exercising the functions of mediator, conciliator or arbitrator, shall be subject to the rules of professional secrecy.<sup>1</sup>*

For these reasons, all the information and documents of clients, **including** from consultations for a possible engagement that the Firm is impeded from accepting, are stored and protected in physical or digital files, as the case may be. For the purpose of this **POLICY**, such documents are considered secret and confidential and shall not receive any treatment for a purpose other than for which the **FIRM** was contracted.

The provisions on confidentiality and secrecy of the Statute of the Legal Profession apply to such information and documents.

## 3. DATA COLLECTED AND FORMS OF TREATMENT

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<sup>1</sup> Code of Ethics and Discipline of the Brazilian Bar Association (OAB).

Besides the data, information and documents collected in the exercise of the legal profession, to which the Statute of the Legal Profession applies, the **FIRM** collects the least volume possible of **PERSONAL DATA**, which are allocated exclusively for the declared purposes related to their collection, as summarized in the tables below.

TYPE OF DATA COLLECTED	CONTACT DATA
Data collected	Name, telephone, e-mail.
Purposes	To respond to doubts, praise, complaints, suggestions and to communicate with clients, suppliers and service providers.  To accompany work performed.  To manage the relationship of the Firm with clients, service providers and commercial partners, including for billing and charging of fees, costs and/or expenses involving provision of the contracted services.
Legal basis	Legitimate interest and contractual performance

TYPE OF DATA COLLECTED	DESCRIPTIVE DATA AND DOCUMENTS
Data collected	Name, nationality, marital status, profession, address, CPF (individual taxpayer number), PIS/NIT, copy of the RG (identity card), copy of the CNH (driving license), proof of residence, number of the CTPS (labor and social security record booklet).
Purposes	To conduct negotiations on behalf of clients and represent clients in judicial and administrative proceedings.  To prepare judicial submissions or supporting documents, according to applicable legislation.
Legal basis	Contractual performance / Provision of services

TYPE OF DATA COLLECTED	SENSITIVE PERSONAL DATA
Data collected	Union membership, information about special needs, diseases, medical affidavits, medical reports, occupational health affidavits (ASOs), work-related accident reports (CAT), among other information that can be supplied for rendering legal

	services.
Purposes	To render legal services related to consulting or handling administrative or judicial litigation.
Legal basis	Contractual performance / Provision of services

<b>TYPE OF DATA COLLECTED</b>	<b>DATA FOR LISTING OF CLIENTS, SERVICE PROVIDERS, COMMERCIAL PARTNERS, SUPPLIERS</b>
Data collected	Name, address, telephone, e-mail, CPF (individual taxpayer number), CNPJ (corporate taxpayer number), PIS/NIT number, banking data (bank, branch, account, transfer number).
Purposes	To manage commercial relations and operationalize payments for services rendered.
Legal basis	Contractual performance / Provision of services

<b>TYPE OF DATA COLLECTED</b>	<b>DATA FOR PARTICIPATION IN EVENTS SPONSORED BY THE FIRM</b>
Data collected	Name, e-mail, employer, position held, areas of interest.
Purposes	<p>To send content produced by the <b>FIRM</b>, such as institutional communications, newsletters, e-books, materials on legal questions of interest, invitations to events and feedback/satisfaction surveys.</p> <p>To permit participation in the events promoted by the <b>FIRM</b> and its interaction by sending questions.</p>
Legal basis	Consent

<b>TYPE OF DATA COLLECTED</b>	<b>DATA FOR RECRUITMENT AND SELECTION</b>
Data collected	Name, telephone, e-mail, address, academic and professional background, foreign languages spoken.
Purposes	<p>To communicate with people interested in employment opportunities.</p> <p>To evaluate the adherence of the professional profile to the positions applied for.</p>
Legal basis	Consent and legitimate interest

#### 4. SHARING OF PERSONAL DATA

The **FIRM** can share personal data with:

- **Commercial partners, service providers and suppliers**, when strictly necessary for them to exercise their functions and contractual activities, such as providers of information technology, web hosting, e-mail and data services, organization of events, auditors, corresponding lawyers/law firms and translators, among others.
- **Governmental authorities** that request personal data, among them the ANPD, oversight bodies, regulatory agencies, bodies of the judiciary or police authorities.
- **Third parties**, by request of the data subject.

#### 5. PERIOD OF TREATMENT OF PERSONAL DATA

The personal data will be treated only for the time necessary to attain the specific purposes of each treatment, and will be deleted from our servers when no longer necessary to render our services, except if there is legal support allowing retaining data, such as the need to safeguard the rights of the **FIRM**.

In this sense, the time frames for retention of each category of personal data are defined according to the specific characteristics of each treatment, including the nature of the data, the purposes of their treatment and the legal obligations.

#### 6. INTERNATIONAL TRANSFER OF PERSONAL DATA

The **FIRM** uses cloud hosting services, so that **PERSONAL DATA** can be transferred internationally.

In these cases, the **FIRM** will adopt appropriate measures to protect **PERSONAL DATA**, in conformity with Brazilian legislation. The **PERSONAL DATA** transferred to other countries also can be subject to the pertinent local laws and rules.

## 7. RIGHTS OF DATA SUBJECTS

The **DATA SUBJECTS** have rights afforded to them by the **LGPD** in relation to their **PERSONAL DATA**, with observance of the provisions of the Statute of the Legal Profession and the Code of Ethics of the OAB. The **FIRM** undertakes to respect these rights, to assure that **DATA SUBJECTS** have the power to exercise these rights at any time, if their **PERSONAL DATA** are still in power of the **FIRM**, i.e., have not been deleted.

The following are the main rights afforded to **DATA SUBJECTS**, among others:

1. **Confirmation** about the existence of treatment of **PERSONAL DATA**.
2. **Access** to their own **PERSONAL DATA**.
3. **Rectification** of their **PERSONAL DATA** when found to be incomplete, inaccurate or outdated.
4. **Anonymization, blocking or exclusion** in cases when data have been unnecessarily or excessively treated or treated in violation of legislation.
5. **Portability** of data to another service or product supplier, according to the regulations issued by the ANPD.
6. **Exclusion of data treated with consent**, in cases where this consent was the legal basis for a determined treatment activity, reservation made for the possibility of continuing storage of data when necessary to comply with a legal obligation or to defend the interests of the **FIRM** in judicial or administrative proceedings.
7. **Information about sharing** of data with public and private entities.
8. **Information about the possibility of denying consent**, in cases where this consent was the legal basis for treatment of **PERSONAL DATA**, with indication of the consequences of that denial.
9. **Revocation of consent**, at any time, simply and at no charge, only requiring communication of the decision to the Data Protection Officer of the **FIRM**. The





revocation of consent shall not invalidate or make illegitimate the treatment activities carried out before the revocation date.

All these rights can be exercised at any time, at no charge, and the **FIRM** shall endeavor its best efforts to comply with such requests, transparently and speedily.

The **FIRM** may solicit the information or supporting documents necessary to confirm your identity, in the sense of preventing fraud and assuring your privacy.

The requests shall be answered in a regional time period, in conformity with applicable legislation, with the caveat that the **FIRM** can only respond to some requests after receiving the confirmations identified above.

## **8. ALTERATIONS**

The **FIRM** may alter this **POLICY** at any time, without notice. It is advisable to access it periodically. To facilitate this, we indicated at the start of this document the date of the last update. If there are relevant alterations that cause the need for new authorizations, we will inform you in advance to obtain your consent.