

This Privacy Policy ("Policy") is provided by BELAGO TECHNOLOGIES INFORMÁTICA LTDA., a private legal entity, CNPJ: 22.738.953/0001-94, headquartered at Avenida Doutor Víctor do Amaral, 588 - room 67 – Centro, Araucária/PR, ZIP code 83.702-040, electronic contact: info@belago.com, herein referred to as BELAGO; with the purpose of informing "You", as a "User", "You" or "Visitor", to make transparent its activities and demonstrate the privacy of the information that is collected on our website <http://belago.com>, as well as demonstrating how they are treated, in which situations they are shared and when they are deleted, under the following terms:

1. INTRODUCTION AND DEFINITIONS

1.1 This Term was prepared so that You are informed and aware of the important information about privacy and the protection of your personal data, which is why we ask that You take a few minutes to read it carefully.

1.2 In order to guide the interpretation of the items of this Term, the following definitions should be considered:

- a. "LGPD": General Data Protection Law No. 13.709/2018.
- b. "Platform": Website, community, and any virtual environment of Belago;
- c. "Terms of Use": document that deals with all the rules of use of the Platform;
- d. "User": natural person, capable, or legal entity, through its representative, who registers on the Platform and uses it, starting from a login and password;
- e. "You": natural or legal person accessing, registering, purchasing courses and/or using, in general, the site, as a "User" and/or "Visitor".

1.3 We value your privacy, follow the General Data Protection Law (Law No. 13.709/18), understand the relevance of each personal data to the User, and want You to have peace of mind using the Platform, aware of the entire flow involving the collected data. In this document, You will find everything You need to know about how we collect and treat your data.

1.4 We warn that if you do not agree with the content of this Policy, we do not recommend including data on this Platform.

2. DATA COLLECTION

2.1 BELAGO collects all Data entered by You on the Site ("User/Visitor Data"), such as:

2.1.1. Comments. When leaving a comment on the site, we collect the data provided in the comment form, in addition to the IP address and visitor's browser data to prevent spam. An anonymized string of characters (hash) created from the email may be sent to Gravatar to verify the use of the service. After the approval of the comment, the user's profile picture is publicly visible along with the comment.

2.1.2. Media. If images are uploaded to the site, we ask that they do not contain embedded location data (EXIF GPS) as other visitors may download these images and extract location data.

2.1.3. Cookies. When leaving a comment, the User can opt to save their name, email, password, and website in cookies for convenience, avoiding the need to fill in the data again when making another comment. These cookies last for one year.

2.1.4. User Account. When creating an account on the Site, temporary cookies are created to determine if the browser accepts cookies. In addition, when accessing the account, cookies are created to save the screen display and login preferences, which last two days and one year, respectively. If the "Remember Me" option is selected, access will be maintained for two weeks. When editing or publishing an article, an additional cookie will be saved to indicate the post ID related to the edited article, expiring after one day.

2.1.5. Embedded Content. Articles published on this Site may contain embedded content from other sites, such as videos, images, articles, etc., which behave similarly to the direct visit to the source site. These sites may collect data, use cookies, and include third-party tracking tools to monitor the visitor's interaction with the embedded content.

2.2. BELAGO may also have access to data from embedded media from other sites, such as videos, images, articles, etc. This embedded content from other sites behaves the same way as if the visitor were directly visiting the source site.

2.3. BELAGO also collects some Data automatically when You access and use the Platform ("Navigation Data"), such as:

- a. Device access characteristics
- b. Browser data used for access
- c. Internet Protocol (IP, date, time, minute, and second)
- d. Terms searched by the User during the use of the Platform
- e. Manifestations and comments made by Users in doubt forums, chat rooms, and/or other dialogue boxes available on the Platform.

3. LEGAL BASIS FOR DATA PROCESSING

3.1. BELAGO commits to carrying out the processing of personal data in accordance with the legitimate, specific, and explicit purposes established by the General Data Protection Law (LGPD).

3.2. The processing of personal data will be carried out based on the consent of the holder, when necessary, in accordance with the provisions of article 7 of the LGPD.

3.3. BELAGO will implement adequate technical and organizational measures to ensure the security of personal data, as required by article 46 of the LGPD.

3.4. The collection of data, such as IP address and browser data, will be carried out with the specific objective of preventing spam, being treated securely and protected.

3.5. BELAGO will provide data holders with clear and accessible information about the processing of their personal data, in compliance with article 9 of the LGPD.

3.6. Users will be informed about the collection of data in comments, use of cookies, and any other form of data processing carried out by BELAGO.

3.7. BELAGO will ensure the exercise of the rights of data holders, as established by articles 17 and 18 of the LGPD.

3.8. Data holders will have the right to access, correct, and request the deletion of their personal data, when applicable, upon request to BELAGO.

3.9. BELAGO will be responsible for complying with all provisions of the LGPD related to the processing of personal data.

3.10. BELAGO commits to maintaining records of data processing activities carried out in compliance with the requirements of the LGPD.

3.11. The processing of navigation data will be carried out based on the User's consent, as provided in article 7, item I, of the LGPD.

4. UNSOLICITED INFORMATION

4.1 You have the freedom to send ideas, suggest content, and forward other unsolicited information to BELAGO, being called "Unsolicited Information".

4.2 All Unsolicited Information is considered and has a non-confidential and/or non-secret nature, and may be reproduced, disclosed, used, and distributed freely by BELAGO, without any limitation or attribution.

5. PURPOSE OF DATA PROCESSING

5.1 BELAGO will only use the information collected according to the ways described in this Privacy Policy, considering your authorization, and because they are all considered confidential.

5.2 The Data we collect are stored in our database and treated to:

- a. Present the Platform and its contents
- b. Customize, personalize, and adapt the navigation and interaction of Users
- c. Communicate and respond to communications
- d. Verify identity
- e. Provide information, products, or services
- f. Provide notices about the account, including expiration and renewal notices
- g. Carry out obligations and exercise the rights of BELAGO arising from any contracts entered into between You and BELAGO
- h. Notify about updates on the Platform, the Policy, the Terms of Use, or any services offered by BELAGO
- i. Allow You to participate in interactive features of the Platform
- j. Improve the quality of Services, being able to perform statistical, empirical, quantitative, or qualitative analyses of the collective characteristics and behavior of "Users" or "Visitors"
- k. Track participation, progress, and completion of activities performed on the Platform
- l. Allow the sending of offers or discounts on courses, activities, or other services that may be of interest to You

- m. Allow communication between You and BELAGO, including sending and receiving emails, telephone contacts, and/or sending messages through social networks
- n. Comply with legal, regulatory, financial, and fiscal obligations
- o. Any other purpose, provided with your prior consent.

5.3 If You do not wish to receive promotional emails, You should contact BELAGO through the BELAGO Communication Channel, requesting not to receive these messages, or You can unsubscribe through the links provided in the promotional emails.

6. DATA OF MINORS

6.1 For legally incapacitated individuals, the use of the Platform must be authorized and carried out under the supervision of parents or legal guardians, and their data will also be collected.

7. SHARING INFORMATION

7.1 BELAGO does not share personal data of clients, Visitors, or Users with third parties, except in cases where it is necessary for the provision of services offered or contractual and legal obligations it is subject to. In these cases, it may share the Data collected through the Platform with companies based in Brazil or in international territory, always following the necessary security measures, in the following situations:

- a. With BELAGO's partner companies, for advertising purposes, to offer personalized products and ads to You, and to evaluate the Services and improve their offering by BELAGO;
- b. With government authorities to take judicial and administrative measures to defend BELAGO's interests in any type of conflict, including lawsuits, and/or to comply with legal, judicial, and administrative determinations and also comply with authorities' subpoenas;

- c. In the case of transactions and corporate changes involving BELAGO. BELAGO may also transfer your Data, for a fee or for free, to a third party or successor, if it is involved in a bankruptcy process, judicial or extrajudicial recovery, corporate restructuring, reorganization, or sale of assets. From now on, You agree that your Data may be sold or transferred as part of this transaction. This Privacy Policy will be applicable to your Data as they are transferred to the new entity(ies); and

7.2 Whenever You provide such data or publish content on the Platform, You agree to make such data publicly available, free of charge, and for an indefinite period.

7.3 If a password reset is requested, You agree that the IP address will be included in the password reset email, sharing data.

8. INFORMATION STORAGE

8.1 The information provided by You on websites, communities, and platforms will be stored by BELAGO, on its own servers or those hired by it, which may be located in Brazil or in foreign territory. Therefore, You consent to your Data being transferred internationally, and thus, may be transferred, stored, and treated in Brazil or in foreign territory.

8.2 BELAGO employs all reasonable efforts to ensure the security of its systems in the custody of said data; and

8.3 This Policy represents BELAGO's effort to safeguard your information. However, due to the very nature of the Internet, it is not possible to guarantee that malicious third parties will not succeed in improperly accessing the obtained information.

8.4 Data retention will occur as follows:

8.4.1. Comments. Comments and their associated information will be retained indefinitely for the purpose of recognizing and automatically approving subsequent comments.

8.4.2. User Profiles. Personal information provided in User profiles will be maintained while the account is active. Site administrators will have permission to view, edit, or delete this information.

8.5 The data are stored for the following time:

Purchase Data	10 years
Marketing	Until consent is revoked or 6 years
Financial Management	10 years
Registration Data	6 years
Navigation	At least 6 months
Fiscal Management	10 years
Labor Data	20 years or permanently
Contractual Data	10 years

9. DELETION OF DATA BY BELAGO

9.1 BELAGO may delete your Data when:

- a. The purpose for which the Data was collected has been achieved, or when the Data is no longer necessary for achieving this purpose;
- b. When there is a cancellation of the consent given by You for the processing of the Data; or
- c. Upon determination by the authority.

9.2 You may request an exported file with your personal data maintained by BELAGO, as well as request the removal of these data, except those necessary to be maintained for administrative, legal, or security purposes.

9.3 You can request the deletion of your data through the emails privacidade@belago.com or mayra.heler@belago.com.

9.4 BELAGO will make every effort to meet all requests for deletion in the shortest possible time. However, such deletion will also remove your registration from the Platform, preventing new accesses, including to any courses and content purchased;

9.5 BELAGO clarifies that it will respect the minimum storage period of certain information, as determined by Brazilian legislation and in this Policy, even if You request the deletion of such information; and

9.6 BELAGO reserves the right to keep all Data necessary to comply with current Brazilian legislation, even in the case of a request for its deletion.

9.7 BELAGO may oppose the deletion of data when:

- a. The treatment is necessary for compliance with obligations to which the society is subject
- b. The data are necessary for the exercise or defense of a right in judicial action that BELAGO may be demanded
- c. There is a norm that imposes its maintenance for a minimum time
- d. The data are anonymized
- e. The purpose on which the treatment was based remained unchanged
- f. There is a legitimate interest of the company
- g. The data are necessary and adequate for the treatment for which they were captured
- h. The treatment is linked to a public interest (health, life, safety)

10. RIGHTS OF USERS, VISITORS, and YOU

10.1 You may request BELAGO:

- a. Confirmation of the existence of processing of your Data and access to your Data collected through the Platform

- b. The correction of your Data, in case they are incomplete, inaccurate, or outdated
- c. The anonymization, blocking, or elimination of unnecessary, excessive Data or Data processed in non-compliance with applicable Brazilian legislation, according to the technical resources available to BELAGO
- d. The portability of your Data, to yourself or to a third party
- e. The elimination of Data processed with your consent, provided that there is no legal hypothesis for permission to keep them
- f. Obtaining information about public or private entities with which BELAGO shared your Data
- g. Information about the possibility of not providing your consent to the processing of the Data, as well as being informed about its consequences, in case of refusal.

10.2 In this sense, for You to exercise your rights, just contact us through the BELAGO Communication Channel. BELAGO will strive to serve you in the shortest possible time.

11. THIRD-PARTY LINKS

11.1 For your convenience, BELAGO may disclose links to other sites operated by different companies ("Third-Party Sites"). Third-Party Sites operate independently from the Platform and may have their own privacy policies. You should be familiar with and review the policies of Third-Party Sites if you access some of these Sites. As Third-Party Sites are not part of the Platform, BELAGO is not responsible for their contents or their privacy practices. Therefore, You should review the privacy policy and terms of use that apply to Third-Party Sites to familiarize yourself with their respective practices of collection, use, storage, protection, and disclosure of personal information.

12. COOKIES

12.1 For certain activities, BELAGO may use cookies or similar technologies. Cookies are small files used to recognize, track, and store your navigation as a user on the Internet. The purpose of using cookies is to

personalize the User's navigation according to their personal preferences and through the analysis of the User's habits on the Platform.

12.2 BELAGO may use cookies or similar technologies for all purposes provided in this Policy, mainly for content personalization, ads, and account setting preferences created by You to use the Platform.

12.3 You can change your browser settings to block cookies or manage their use, blocking cookies from all sites or specific sites. It is possible that the functioning of the Platform and part or all of the Services offered by may be affected by such blocking. Consult your browser's instructions to learn more about how to configure the use of cookies.

13. CONSENT AND ACCEPTANCE

13.1 The acceptance of this Privacy Policy by the User will occur at the moment of your click on the "I have read and agree" button, when registering on the Platform, and, regarding the "User" or "Visitor", when navigating and using the Platform.

13.2 If You do not agree with this Privacy Policy, You will not be able to purchase any product, and should refrain from accessing and using the teaching platform.

13.3 In the access, navigation, registration, and/or use of the Platform, the provisions contained in the Terms of Use apply, together with this Privacy Policy.

13.4 By accessing and registering on the Platform, You declare to be at least 18 (eighteen) years old, as well as attest to be legally capable to understand, accept, and comply with these Terms of Use and the Privacy Policy. If You are not at least 18 (eighteen) years old, You should follow item 5 of this Policy.

14. UPDATES TO THIS POLICY

14.1 BELAGO reserves the right to change this Privacy Policy whenever necessary, in order to provide greater security and convenience to You, as well as to comply with applicable legislation, which may occur without prior notification, except in the case of express legal prohibition.

14.2 It is essential that You read the Privacy Policy and the Terms of Use of BELAGO, therefore, also following each update and modification thereof.

14.3 Each new update can be verified by the date stated at the end of the respective previously mentioned documents.

15. FINAL PROVISIONS

15.1 The misuse of BELAGO's Content will be governed and interpreted by the laws of the Federative Republic of Brazil, regardless of conflicts of these laws with laws of other states or countries, being competent the Court of Curitiba/PR, in Brazil, to resolve any doubt arising from this instrument. You expressly consent to the competence of this court, and waive, at this moment, the competence of any other forum, no matter how privileged it may be or become.

15.2 Any failure by BELAGO to demand any rights will not constitute a waiver, being able to regularly exercise its right, within the legal deadlines.

15.3 Any problem related to privacy and data protection should be reported to our Data Officer, Mayra Helen, (DPO - Data Protection Officer), who will be available to attend and clarify all your doubts, through the following emails: privacidade@belago.com or mayra.helen@belago.com.

15.4 Feel free to contact us in case of doubts about any of the practices related to information in the Services and/or about the Privacy Policy and/or Terms of Use of BELAGO.

Curitiba, January 16, 2024.