

Through this Data Privacy Policy, BELAGO TECHNOLOGIES INFORMÁTICA LTDA, hereinafter referred to as BELAGO, reaffirms its commitment to complying with applicable regulations and legislation regarding the processing of information necessary for the provision of its services and the use of information and communication technologies. In particular, BELAGO expresses its commitment to compliance with regulations aimed at protecting personal data. As a reference framework, the following are considered:

- Law 13.709/2018 (LGPD) - General Data Protection Law.
- Law 12.965/2014 (Marco Civil da Internet) - Establishes principles, guarantees, rights, and duties for the use of the internet in Brazil.

This policy applies to any website, application, product, software, or service owned by BELAGO. Occasionally, a service may be linked to a different privacy policy that outlines specific privacy practices. This policy may be updated periodically, and we request that you review it on our website.

1. WHO WE ARE

Belago is dedicated to integrating cutting-edge technologies, providing complete solutions for business organizations, and being a reference in innovative and personalized technological solutions. Our mission is to integrate solutions, people, and businesses, offering the best in technology. Our headquarters aim to provide office services and administrative support to other areas of the organization.

In compliance with data protection regulations and to enhance and ensure proper management of personal data, BELAGO has appointed a Data Protection Officer (DPO), who can be contacted via email at privacidade@belago.com.

2. PERSONAL INFORMATION AND DATA COLLECTED

Personal information refers to any data related to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, through an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to their physical, psychological, genetic, mental, economic, cultural, or social identity.

We collect, store, and process information (including personal data) necessary for the provision of our services. Specifically, we process:

- Customer information required for service execution, including the representative's name (for legal entities) and CPF (for individuals), along with identification and contact details necessary for service provision and operational and commercial purposes. Although most of this data is

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commercial, it may include personal data.

- Data related to website and system development, maintenance, updates, hosting, and social media creation and updates. BELAGO staff may access personal information contained in client email lists. BELAGO is committed to maintaining confidentiality and security, adhering to confidentiality agreements and necessary external processing contracts.
- With the consent of data subjects, BELAGO may send commercial or informational emails (e.g., newsletters), using provided identification and contact details for predefined purposes. Proper opt-out mechanisms will be provided in such communications.
- Data collected through our website when users register for advertised events or use contact mechanisms.
- Access logs (stored for 30 days) and other automatically collected information that helps manage, protect, and improve our services, analyze usage, and enhance user experience.
- Internally, BELAGO collects, stores, and processes employees' and collaborators' personal data necessary for employment relationships, compliance with labor obligations, and provision of benefits.

3. HOW WE PROTECT PERSONAL DATA

BELAGO is strongly committed to information security and compliance with legal requirements. To ensure the confidentiality, availability, and integrity of the data we process, including personal data, we implement the following measures:

- Regular risk assessments regarding information security and data protection, analyzing our risk posture and defining appropriate action plans.
- Mandatory Information Security Policy for all parties involved in data processing.
- Implementation of access control, system security, incident management, and data protection procedures.
- Awareness and training actions to ensure compliance with policies and procedures.

If you detect a security incident, data breach, or vulnerability that may affect data integrity, availability, or confidentiality, you can report it to privacidade@belago.com.

4. DATA SUBJECTS' RIGHTS

BELAGO enables mechanisms to ensure the right to information and consent when necessary for the lawful processing of personal data. When collecting data, BELAGO commits to informing data subjects about the data controller's identity, purpose, possible data transfers, and their rights under the LGPD.

Data subjects have the right to:

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- **Access:** Confirm whether their data is being processed and access relevant details such as:
 - Purpose of processing.
 - Categories of processed data.
 - Recipients or categories of recipients who may receive the data.
 - Data retention period.
 - Right to request rectification, deletion, objection, or restriction of processing.
 - Right to file a complaint with a regulatory authority.
 - Data source (if not collected from the data subject).
 - Automated decision-making existence, including profiling and its consequences.
 - Information about international data transfers, including safeguards according to LGPD Articles 33-36.

- **RIGHT TO ERASURE:** Obtaining the deletion of your data when any of the following circumstances occur (provided that the data does not comply with the provisions of the LGPD for processing without the data subjects' consent).
 - The personal data is no longer necessary for the purpose for which it was collected.
 - The data subject withdraws consent for data processing.
 - The data subject objects to the processing.
 - The personal data has been processed unlawfully.
 - The personal data must be deleted to comply with a legal obligation.
 - Modify inaccurate, erroneous, or incomplete data.

- **RIGHT TO DATA PORTABILITY:** The data subject may request BELAGO, which is processing their personal data, to transmit it to another controller when:
 - Upon explicit request, in accordance with ANPD regulations, subject to trade and industrial secrets.

- **RIGHT TO ANONYMIZATION, BLOCKING, OR DELETION OF UNNECESSARY DATA:**
 - Data that is excessive or processed in non-compliance with the LGPD.

- **RIGHT TO INFORMATION ABOUT PUBLIC AND PRIVATE ENTITIES WITH WHICH THE CONTROLLER HAS SHARED DATA:**

- **RIGHT TO INFORMATION ABOUT THE POSSIBILITY OF NOT PROVIDING CONSENT:**
 - And the consequences of refusal.

- **RIGHT TO WITHDRAW CONSENT:**
 - Withdrawal of consent, under the terms of § 5 of Art. 8 of the LGPD. Consent can be revoked at any time through an express request from the data subject, via a free and facilitated procedure. The processing carried out based on prior consent remains valid unless a deletion request is made, as per item VI of Art. 18 of the LGPD.

- **RIGHT TO REVIEW AND EXPLANATION OF AUTOMATED DECISIONS:**
 - The data subject has the right to request a review of decisions made solely based on automated processing of personal data that affect their interests, including decisions aimed at defining their personal, professional, consumption, and credit profile or aspects of their personality.
 - The controller must provide clear and adequate information about the criteria and procedures used for the automated decision-making, subject to trade and industrial secrets.
 - If the information under § 1 of this article is not provided due to trade and industrial secrecy, the national authority may conduct an audit to verify discriminatory aspects in the automated data processing.

- **RIGHT TO NON-RETALIATION:**
 - Personal data regarding the regular exercise of rights by the data subject cannot be used to their detriment.

- **RIGHT TO INDIVIDUAL AND COLLECTIVE ACTION:**
 - The defense of the data subjects' interests and rights may be exercised in court, individually or collectively, under the relevant legislation regarding individual and collective protection instruments.

To exercise these rights, BELAGO provides contact with the DPO via email at privacidade@belago.com.

5. WHAT INFORMATION DO WE COMMUNICATE / TRANSFER / SHARE?

As a general rule, BELAGO only shares personal data with third parties or grants them access when necessary to ensure the proper provision of the requested service, to comply with legal, tax, and corporate obligations, or for the development of specific organizational processes or activities outsourced to a third party. (Examples: Health plan, Accountant).

Specifically, we share and exchange information with banks based on the services provided, to manage invoicing and payments for services rendered, process payments to service providers, or meet legal, tax, and public rights requirements. Similarly, as part of these public duties, communications are made to other administrative agencies, such as Social Security or the Tax Administration.

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Moreover, BELAGO establishes agreements, partnerships, or collaborations with other entities that provide certain services or collaborate in the execution of specific activities, which may require access to the personal data we process. This applies, for example, to the legal and accounting sector (tax and labor advisory), which accesses our employees' personal data for payroll management, compliance with public duties, or occupational risk prevention.

Additionally, we subcontract certain services essential to the provision and development of our services. For these services, the corresponding external processing agreements have been signed, ensuring compliance with the requirements of the General Data Protection Law (LGPD).

In some cases, these services may be provided or require the intervention of entities or systems hosted in third countries. BELAGO ensures that, whenever international data transfers are necessary, they are made to countries that demonstrate a security level comparable to the LGPD. In this regard, compliance with the LGPD will be ensured, or, in its absence, certifications, contractual rules, or any other recognized mechanisms attesting to an adequate level of personal data protection will be considered.

6. HOW LONG DO WE RETAIN INFORMATION?

As a general rule, at BELAGO, we only retain personal data for the time necessary to fulfill the purpose for which it was collected, as well as to address any complaints or liabilities arising from data processing. In general, once the service has been provided, the data is blocked to prevent any further processing beyond making it available to Public Administrations, Judges, and Courts to address potential liabilities arising from processing, during the applicable statutory limitation period, after which it must be deleted.

Additionally, to determine data retention periods, BELAGO considers local laws, contractual obligations, and the expectations and requirements of our clients. When personal information is no longer needed, we securely archive it.

7. INTELLECTUAL AND INDUSTRIAL PROPERTY

The content of BELAGO's services and websites, including its structure, design, texts, source code, as well as logos, trademarks, and other distinctive signs appearing on them, are the property of BELAGO and are protected by the corresponding intellectual and industrial property rights. Images, videos, sounds, audio files, and other graphic elements contained on the portals are also protected by applicable rights.

Therefore, in accordance with Law 9.610/98 (Copyright Law - LDA), copying, reproducing, publishing, or modifying any content from BELAGO's websites, for which BELAGO holds proprietary rights, is expressly prohibited without prior authorization. BELAGO authorizes the total or partial reproduction of texts and content from its portal, provided that the following conditions are met:

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- The integrity of the content, documents, or graphics is maintained.
- BELAGO is explicitly cited as the source and origin of the content.
- The purpose and intent of such use align with BELAGO's activities.
- No commercial use is intended, and its distribution, public communication, or transformation is expressly prohibited.

The User (whether an employee, collaborator, or any other individual in relation to BELAGO) commits to respecting BELAGO's intellectual and industrial property rights.

8. GENERAL TERMS OF USE AND LIABILITY

BELAGO's websites are intended to facilitate public awareness of its activities, products, and services, as well as to offer the possibility of contracting certain services. Additionally, the partial or total provision of certain services contracted by clients may also be allowed.

The use of any of these websites implies full and express acceptance of the terms set forth herein, without prejudice to specific details that may apply to some of the services offered via the site.

To ensure that the information published on the portals remains up to date, its content may be modified, corrected, deleted, or supplemented at any time. Therefore, users are advised to verify its validity and accuracy through official sources.

Similarly, this privacy policy may be subject to changes, corrections, or modifications to keep it aligned with BELAGO's needs and applicable legislation.

a. Liability for Website Operation

BELAGO cannot guarantee the absence of errors in accessing its web services or content, although it implements the necessary mechanisms to minimize these issues and resolve them as quickly as possible.

Likewise, BELAGO is not liable for errors, interferences, or service interruptions caused by factors such as computer viruses, telephone or network failures, disconnections, or other malfunctions beyond the control of the website owner.

BELAGO reserves the right to temporarily suspend its web services whenever necessary for maintenance, repair, updates, or improvements. It also reserves the right to deny or withdraw access to the portal and/or offered services without prior notice, either on its own initiative or at the request of a third party, for users who fail to comply with these General Terms of Use.

Additionally, BELAGO is not responsible for content published by users or third parties through forums, comments, or social media associated with its websites. However,

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it provides mechanisms to remove such content when necessary and to ensure compliance with applicable laws, respect for individuals' rights, and public order. If users detect any content that violates these terms, they are encouraged to contact BELAGO as soon as possible via the provided communication channels.

b. Liability for Links

The links contained in our web services may direct users to external websites managed by third parties, providing access to information or resources related to BELAGO's services.

BELAGO neither manages nor analyzes, nor can it be held responsible for the content, operation, or information of external websites with which it has no relationship. BELAGO shall not be liable for any damages or issues arising from linked websites. Similarly, the inclusion of these external links does not imply any form of association, merger, or partnership with the linked entities.

c. User Responsibility

The user guarantees that any personal data provided to BELAGO (if required) is accurate and is responsible for notifying any changes. The user bears sole responsibility for any damage or harm, whether direct or indirect, that may be caused to the data controller or third parties due to submitting false, inaccurate, incomplete, or outdated information.

The user agrees to use the website, its content, and its services in compliance with the law, this Legal Notice, good customs, and public order. Additionally, the user agrees not to use the website or its services for purposes that conflict with this Legal Notice, are illegal, or harm the interests and/or rights of third parties, such as:

Disseminating content or propaganda that is racist, xenophobic, illegal-pornographic, terrorist-apologetic, or violates human rights.

Causing damage to BELAGO's physical and logical systems, its suppliers, or third parties.

Introducing or spreading computer viruses or any other physical or logical systems that may cause damage to the aforementioned entities.

Attempting to access, and when accessed, using other users' accounts to modify or manipulate their messages.

The user expressly agrees not to destroy, alter, disable, or otherwise damage the data, programs, or electronic documents found on this website, nor to interfere with its proper functioning.



Furthermore, the user agrees not to obstruct other users' access to the service by consuming excessive computing resources, nor to take actions that damage, interrupt, or generate errors in these systems. The user agrees not to introduce programs, viruses, macros, applets, ActiveX controls, or any other logical device or sequence of characters that could cause website errors.

9. APPLICABLE LAW AND JURISDICTION

To resolve any issues arising from this document, such as conflict resolution, disputes, or claims related to the web services covered by this privacy policy, the provisions of national laws shall apply.

The parties elect the Central Court of the District of Curitiba, Paraná, expressly waiving any other jurisdiction, regardless of any privileges it may offer.

10. COOKIE POLICY

The BELAGO website and its domains use cookies (small information files that the server sends to the computer of the person accessing the page) to ensure the proper functioning and visualization of the sites for the user, as well as for statistical collection. In particular, the following cookies are used:

The cookies range from PHP, especially PHPSESSID, which is the unique session identifier and does not collect data, to those provided by third parties such as Google Analytics (a third-party tool with its own standards).

On this site, we use the necessary cookies to ensure its proper functioning.

We may also use additional cookies to analyze traffic on our site and user access patterns, which help us improve the experience and usability of the site.

Additionally, other mechanisms such as search engines (e.g., Google, Bing, and similar) and social media platforms (e.g., Facebook, Instagram, or similar) may provide plugin-style tools that connect to the site to generate information through cookies and display related advertisements.

The fact that a user is exposed to ads related to the same products or services does not mean they have been personally identified by visiting a website. Most of the time, this information is collected anonymously based on browsing profiles, without revealing the user's identity.

We emphasize that you, the user, can disable these cookies directly in your browser settings, but this may affect your experience on our site.



a. Acceptance of the Cookie Policy

BELAGO displays information about its Cookie Management at the bottom of all pages on the portal for awareness.

b. How to change cookie settings

You can restrict, block, or delete cookies from any website using your browser. Each browser has a different process; the 'Help' function will show you how to do it:

- Internet Explorer: [windows.microsoft.com/es-xl/internet-explorer/delete-manage-cookies#ie="ie-10"](https://windows.microsoft.com/es-xl/internet-explorer/delete-manage-cookies#ie=ie-10)
- FireFox: support.mozilla.org/es/kb/Borrar%20cookies
- Chrome: [support.google.com/chrome/answer/95647?hl="es"](https://support.google.com/chrome/answer/95647?hl=es)
- Safari: www.apple.com/es/privacy/use-of-cookies/



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