



## PRIVACY NOTICE – Brazil`s PRIVACY LAW (LGPD)

PRIVACY POLICY – DIGIBEE	
Information of the Data Protection Officer/DPO	If you have questions about how your personal information is being handled, you can contact our Data Protection Officer (DPO) via email: <a href="mailto:compliance@digibee.com">compliance@digibee.com</a>
Data subject access rights	I – the specific purpose of the processing; II – the type and duration of the processing, being observed commercial and industrial secrecy; III – identification of the controller; IV – the controller’s contact information; V – information regarding the shared use of data by the controller and the purpose; VI – responsibilities of the agents that will carry out the processing; and VII – the data subject’s rights, with explicit mention of the rights provided in Art. 18 of this Law.
What if the Data subject decides to stop using his Personal Data or delete them from the system?	You can communicate the decision by e-mail from the Data Protection Officer.  Note: the user acknowledges to be aware that, even in case of deletion request, Digibee will observe the minimum legal period of storage of information determined by Brazilian legislation.
With whom or in	1. When necessary for the operational activities of Digibee;



what situations may Digibee share users' Personal Data?	<ol style="list-style-type: none"><li>2. By court order, arbitration or by request of administrative authorities;</li><li>3. For external agents such as suppliers, accounting and legal.</li><li>4. With service providers or partners to manage or support certain aspects of our business operations on our behalf, such as hosting and data storage service providers, fraud management, sales on our behalf, order fulfillment, content personalization, advertising, and marketing activities (including digital and personalized advertising), and IT services.</li></ol>
Information Security	<p>The information of the users will be stored by Digibee, in its own servers or of third parties, contracted by it, always protected by confidentiality agreements and following all the security measures required by law.</p> <p>Digibee uses its best efforts to safeguard users' information. However, due to the very nature of the Internet, there is no way to ensure that unauthorized third parties will not succeed in improperly accessing the information stored.</p>
Confidentiality	<p>The information collected is considered confidential and will be treated and stored in accordance with the provisions of this Policy and with the proper adoption of appropriate security measures.</p>

## 1. OVERVIEW AND SCOPE

### 1.1. Overview

This policy and applicable support procedures are designed to provide Digibee with a documented and formalized process to protect the privacy of individuals. Respect for the privacy of personal and other information is paramount to us. This privacy policy describes our collection of personal information from users of our website ("Site" or "Network"), our Platform, as well as all related applications, widgets,



software, tools, and other services provided by us and in which a link to this Policy is displayed (collectively, together with the Site, our "Service"). This Policy also describes our use and disclosure of such information. By using our Service, you consent to the collection and use of personal information in accordance with this policy.

1.2 Digibee values and recognizes the importance of your privacy. Therefore, we have created this Privacy Policy to inform you clearly about the Processing of your Personal Data and demonstrate our commitment to the protection of your privacy and your Personal Data, under the terms of the General Law of Protection of Personal Data ("LGPD"), Law No. 13,709/18.

### 1.3 Scope

This policy and support procedures cover the privacy of all data collected by Digibee in its interaction with individuals in its business operations.

You are not required to share the Personal Data we request. However, if you choose not to share them, in some cases we will not be able to fulfill the purposes described in this document.

## 2. DEFINITIONS

3.1 The terms contained in this Privacy Policy, whenever used with the first letter in capital, shall have the meaning set forth below, whether plural or singular:

- i. Digibee is DIGIBEE – SOLUÇÕES EM TECNOLOGIA LTDA, registered with the CNPJ/ME under No. 27.902.981/0001-19, a private legal entity, with address at Alameda Vicente Pinzon, 54, 5º andar, Vila Olímpia, São Paulo/SP.
- ii. Data subject: means a natural person to whom the Personal Data belongs.
- iii. Personal Data: means information that allows the identification, directly or indirectly, of natural persons.
- iv. Sensitive Personal Data: means Personal Data on racial or ethnic origin, religious belief, political opinion, membership of a trade union or organization of a religious, philosophical, or political



character, data relating to health or sex life, genetic or biometric data, when linked to a natural person.

- v. Processing of Personal Data: means any operation carried out with Personal Data, such as the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.
- vi. Data Protection Laws: means all legislation applicable to the Processing of Personal Data, which includes, without limitation, Law No. 13,709/2018.

### 3. COLLECTION OF PERSONAL DATA

3.1 Digibee may collect Personal Data and Sensitive Personal Data when you access the website or when you contact us through our email, telephone, Contact Us, or any other means of communication made available by the company, as shown below:

Data collected	Purposes
Name, email, phone number and address.	<ul style="list-style-type: none"><li>• To answer your questions, compliments, complaints, suggestions when you send us a message on our website.</li><li>• For the realization of meetings, in person or virtually, telephone discussions or for discussions in general.</li></ul>
Data provided in your resume (such as name, address, date of birth, telephone, e-mail, academic history, professional history, desired position, objectives, competencies, as well as any other information that you spontaneously include in the resumes you send us).	<ul style="list-style-type: none"><li>• To recruit new members, contacting them and allowing them to participate in all stages of the respective selection processes.</li></ul>



When accessing the website cookies will be collected;	• To comply with our legal obligations.
Registration data of service providers (name, address, telephone, e-mail, and document data).	• For the management of our commercial relationship and operationalization of the services provided.

3.2 In addition, the Personal Data processed may also be used in the manner we deem necessary or appropriate: (a) for the regular exercise of rights in judicial, administrative, or arbitral proceedings; (b) to comply with a legal or regulatory obligation; (c) to enforce the Terms of Use; and (d) in other ways permitted by law.

#### **4. USE OF PERSONAL INFORMATION**

We use personal information to provide you with services and information you request; to improve, improve, operate, and maintain the Site and Service, our programs, services, website and other systems; to prevent fraudulent use of our Site; to personalize your user experience; to keep a record of our dealings with you, and for other administrative purposes.

We may also use the personal information you provide to contact you about our products and services. We allow you to opt-in to receive marketing communications from us as described in the "Choice" section below.

#### **5. DISCLOSURE OF PERSONAL INFORMATION**

5.1. Digibee always safeguards the identity of the Holders.

5.2. Digibee may share your data by court order, arbitration or at the request of administrative authorities.

5.3. Digibee may share data with service providers or partners to manage or support certain aspects of our business operations. These providers may be providers of hosting and data storage services, fraud management, sales on our behalf, order fulfillment, content personalization, advertising and marketing activities (including digital and personalized advertising), and IT services.

5.4. The sharing of data with third parties may occur when this is essential and inherent to the purposes already described.

#### **6. RIGHT TO CHOOSE**



If you receive commercial emails from us, you can unsubscribe at any time by following the instructions contained in the email. You can also opt out of receiving commercial emails from us by sending us an email to [contact@digibee.com](mailto:contact@digibee.com).

## **7. LINKS**

For your convenience, the Site may contain links to other websites, products, or services that we do not own or operate. If you choose to visit or use any third-party products or services, please be aware that this policy will not apply to your activities or any information you disclose when using third party products or services or making any interaction with third parties.

## **8. INTERNATIONAL VISITORS**

Our Site is hosted in the United States and Brazil and is generally intended for visitors from the United States and Brazil. Our Site clearly identifies the region in which it is hosted. If you access from the European Union or other regions with laws governing the collection and use of data that may differ from the laws of the U.S. and Brazil, please be aware that you are transferring personal information to the United States or Brazil. Both the United States and Brazil do not have the same data protection laws as the European Union and some other regions. By providing personal information to us, you consent to its transfer to the corresponding hosting country and its use in accordance with this policy.

## **9. SAFETY**

Digibee protects the Personal Information it collects with reasonable and adequate physical, electronic, and procedural safeguards. We use reasonable security measures that are designed to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, note that no data security measure can be guaranteed to be completely effective. Consequently, we cannot guarantee or warrant the security of any personal information or other information. You thus transmit information to us at your own risk.

## **10. IN CHARGE OF THE PROCESSING OF PERSONAL DATA**

12.1 If you wish to exercise any of the rights provided for in this Privacy Policy and/or in the Data Protection Laws, or resolve any questions related to the Processing of your Personal Data, please contact us through our e-mail from: [compliance@digibee.com](mailto:compliance@digibee.com)



## **11. USER RIGHTS**

You may at any time request Digibee: (i) confirmation that your Personal Data is being processed; (ii) access to your Personal Data; (iii) corrections to incomplete, inaccurate or outdated data; (iv) anonymization, blocking or deletion of data that is unnecessary, excessive or processed in violation of the provisions of the law; (v) portability of Personal Data to another service provider, provided that this does not affect our trade and trade secrets; (vi) deletion of Personal Data processed with your consent, to the extent permitted by law; (vii) information about the entities with which your Personal Data has been shared; (viii) information on the possibility of not providing consent and on the consequences of the refusal; and (ix) revocation of consent. Your requests will be handled with special care so that we can ensure the effectiveness of your rights. You may be asked to provide proof of your identity to ensure that only the data subject exercises their rights over the Personal Data.

You should be aware that in certain cases (for example, due to legal requirements), your order may not be immediately fulfilled, and Digibee may not be able to fulfill it due to compliance with legal obligations.

You can exercise your rights by contacting our Data Protection Officer via email [compliance@digibee.com](mailto:compliance@digibee.com)

## **12. UPDATES TO THIS POLICY**

We may occasionally update this Policy. When we do, we will also give a summary of the "last updated" at the beginning of the policy. Your continued use of this Service after such changes will be subject to then-current policy. We encourage you to periodically review this policy to stay informed about how we collect, use, and disclose personal information.

## **13. CONTACT US**

If you have any questions, comments or any questions that raise concerns regarding this privacy policy or your personal information, please contact us via a private/private email. If you have a complaint that we have violated these privacy principles and we have attempted in good faith to resolve the complaint through our customer service process, but the complaint has not been resolved by us within a reasonable period, then you may apply these privacy principles against us.



#### **14. APPLICABLE LAW AND VENUE**

This Privacy Policy shall be governed by and construed in accordance with the laws of the Federative Republic of Brazil.

The Parties elect the Forum of the District of São Paulo, as the only competent to resolve any dispute resulting from this Privacy Policy.

This Privacy Policy was last updated: May 12, 2023.