

# **General Privacy and Data Protection Policy and Terms of Use**

## **Review History**

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This Privacy and Personal Data Protection Policy and Terms of Use is designed so that you, the user of our services, can understand our usage policies and practices about your Personal Data and how the processing of this data is performed.

This Policy covers our data collection activities on the accessible website of <https://www.algorix.com/> address made available and maintained by ALGORIX SISTEMAS DE INFORMÁTICA LTDA, which applies to individuals (natural persons) who interact with the products and services of ALGORIX SISTEMAS DE INFORMÁTICALTDA, as well as our customer support and service system (companies Contracting services marketed by ALGORIX SISTEMAS DE INFORMÁTICA LTDA), on the accessible website of <https://suporte.algorix.com/algorix/#!/> address.

This Policy explains the rules on obtaining, using the collected data, such as accessing and updating, processing, storage, data protection, transfer, enrichment of the data collected from users, in addition to recording their satisfaction, according to the law in force in Brazil.

The Policy clarifies the conditions for the collection, use, storage, processing and protection of data on the platform, in accordance with Law No. 13,709, DE 14 AUGUST 2018 and Decree No. 869/2018.

## 1. Definition

the. **Personal Data:** is information relating to an identified or identifiable person.

b. **User:** people who access the ALGORIX SISTEMAS DE INFORMÁTICA LTDA Portal.

c. **Controller:** "Natural or legal person, under public or private law, to whom decisions concerning the processing of personal data are responsible". In other words, every natural or legal person who collects personal information is considered a controller.

d. **Operator: is** the company or professional directly responsible for the processing of the data, directed or contracted by the controller. Both the operator and the controller must keep records of the data processing.

and. **Anonymized Data:** it is described as "data relating to the holder who cannot be identified, considering the use of appropriate technical means available at the time of its treatment". In other words, this is information that has been mischaracterized at some level so that its holder can no longer be identified by simple means, but which is still important to the controller.

F. **Consent:** free, informed and unambiguous manifestation by which the holder agrees to the processing of his/her personal data for a specific purpose.

g. **Sensitive Data: this** is very private and intimate information of the holder, such as data relating to ethnicity, political opinion, religious or sexual conviction. This information is considered to be delicate and therefore the controller should only request it for very specific purposes.

## **2. Sources of personal data as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

### **We collect your Personal Data from the following sources:**

- **Contact: is a** tool for direct contact, where the user will receive the service they need, ask questions, and know products or share experiences with us, covering any need for relationship that the user has with ALGORIX so that this tool is also used for contacts of former employees, journalistic media, and commercial presentation.
- **Channels:** We provide access to our channels, as well as Facebook and LinkedIn.
- **Support System:** is an online tool for internal and exclusive use of ALGORIX SISTEMAS DE INFORMÁTICA LTDA customers together with technical support and customer service group provided by the Company.

Only authorized users will have access to this System to answer questions, follow demands with requests for new products, services, functionalities or hiring of some new service marketed by the Company, among other requests.

It will be up to ALGORIX SISTEMAS DE INFORMÁTICA LTDA to register the Companies and all users who will have access to the Support System.

ALGORIX SISTEMAS DE INFORMÁTICA LTDA as Controller will register its internal technical support and customer service group.

The following data from these users will be stored:

- E-mail: Institutional e-mail of the Employee or Service Provider;
- Name: Name of the Employee or Service Provider;
- Login: the e-mail of the Employee or Service Provider will be registered;
- Password: a default password will be generated, and on the user's first access a new password will be requested;
- Landline: Employee's landline or Service Provider. This field is not required;
- Cell phone: Employee's cell phone or Service Provider. This field is not required;

ALGORIX SISTEMAS DE INFORMÁTICA LTDA as controller will allow access to the Support System only to authorized users who are in accordance with the General Privacy and Data Protection Policy and the Confidentiality Agreement promoted by the Company. At any time ALGORIX SISTEMAS DE INFORMÁTICA LTDA may disable the access of these users in the Support System.

ALGORIX SISTEMAS DE INFORMÁTICA LTDA as Controller will register and keep stored the registration data of its customers (Institutional data of the Contracting Company of the Services of ALGORIX SISTEMAS DE INFORMÁTICA LTDA) and the user data that will have initial access to the Support System. Preferably, at first, it will be the data of those who are responsible for the Operation contracted with ALGORIX SISTEMAS DE INFORMÁTICA LTDA.

### **Contracting Company Data**

- Company Name;
- Institutional e-mail of the company;
- CNPJ: field is not required;
- Landline: field is not required;
- Cell phone: field is not required;
- Full address: field is not required;
- Company Description: Field is not required;

### **User Data**

- Contracting Company;

- User Name;
- Login: the user's e-mail will be registered;
- Password: a default password will be generated, and on the first access of the user will be requested to register a new password;
- E-mail: user's e-mail;
- Landline: field is not required;
- Cell Phone: field is not required;

### **3. What are your personal data we collect and how it is collected as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

During your interaction with ALGORIX SISTEMAS DE INFORMÁTICA LTDA, using one of the previously mentioned collection sources, we may collect various types of personal data about you, as set out below:

- **Direct data information:** full name and federation unit (UF).
- **Contact Information:** Includes any type of information that may facilitate our contact with you such as email, landline and/or mobile phone.
- **Demographic information and your interests:** any information that can describe your demographics, such as the federation unit (UF) in which you are located.
- **Sensitive Personal Data:** ALGORIX IT SYSTEMS does not deal with Personal Data considered sensitive in accordance with current legislation. In this way we do not collect or process sensitive personal data in the normal course of your interactions with our products or services. If, for any reason, there is a need to process any of your sensitive personal data, we will ask for your prior, express and formal consent to do so. If we need to process your sensitive personal data for other purposes, we rely on the following legal bases: (i) crime detection and prevention; and (ii) compliance with applicable law.

### **4. On personal data of children and adolescents as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

ALGORIX SISTEMAS DE INFORMÁTICA LTDA does not solicit, collect, process, store or knowingly share personal data of children and adolescents under age. If we discover the occurrence of any handling

of such data unintentionally, we will remove that child or adolescent's personal data from our records as soon as possible.

However, ALGORIX SISTEMAS DE INFORMÁTICA LTDA may collect personal data of children and adolescents directly from their parents or legal guardians, and with explicit consent, and in accordance with the rules of current legislation.

According to law 13.709/2018 Art.14 (§ 1º The processing of children's personal data must be carried out with the specific consent and highlighted given by at least one parent or legal guardian.)

## **5. About the use of your personal data as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

The following items describe the purposes for which ALGORIX SISTEMAS DE INFORMÁTICA LTDA collects your Personal Data and the different types of Personal Data collected for each purpose. Please note that not all of the uses below will be relevant to all individuals and may apply only to specific situations.

- **Contact:** With your consent, your Personal Data is used for the purpose of providing commercial services, including answering your questions, questioning and forwarding presentations of our products, in addition to being an open channel for other requests specified below. Usually this requires certain personal contact and other information made available in the previous registration.
  - **Reason for using your personal data in this situation:**
    - Comply with legal obligations;
    - Improve our products and services;
    - Assistance to and x-claborers;
    - Service of mídias;
    - Attendance of clientes;
    - Prospecting of clientes.
  - **Our legitimate interests in this situation:**
    - Continuously improve algorix SISTEMAS DE INFORMÁTICA LTDA products and services through the relationship with customers, suppliers or anyone who wants to communicate with us through the Contact channel;
    - Fully comply with legal obligations;
    - Prospect new clientes;
    - Meet requests from x-claborers;

- Be canal open for complaints, doubts and suggestions.
- **Social Networks / Our Channels:** We do not use your Personal Data when you interact. In order to interact, follow or share any content from algorix SISTEMAS DE INFORMÁTICA LTDA's social networks, you need to register with the social networking service in which we have published content, in which case, the responsibility of processing your data to the company that owns the social networking service.
  - **Reason for using your personal data in this situation:**
    - Our legitimate interests;
    - We have obtained your consent (when necessary).
  - **Our legitimate interests in this situation:**
    - Disseminate offers and any other content linked to ALGORIX SISTEMAS DE INFORMÁTICA LTDA.

## **6. On the retention and termination of the processing of your personal data as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

In accordance with current law, ALGORIX SISTEMAS DE INFORMÁTICA LTDA uses your Personal Data for as long as necessary to fulfill the purposes for which it was collected, as described in this policy, or to comply with applicable legal requirements.

Personal Data used to provide you with a personalized experience will be kept solely for as long as permitted in accordance with applicable law.

When at the end of the processing of your Personal Data, it will be eliminated within the scope and technical limits of the activities, authorized the retention in the situations provided for in the current legislation.

## **7. About the disclosure, storage or transfer of your personal data as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

ALGORIX SISTEMAS DE INFORMÁTICA LTDA takes appropriate measures to ensure that your Personal Data is kept confidential and secure. However, these protections do not apply to information that you have chosen to share in public areas, such as third-party social networks.

The database collected by ALGORIX SISTEMAS DE INFORMÁTICA LTDA is the property and responsibility of ALGORIX SISTEMAS DE INFORMÁTICA LTDA, being shared only with companies and with our company from the private holder, **and** will not be marketed or sold to third parties. Its use, access and sharing will be used within the purposes of the activities of ALGORIX SISTEMAS DE INFORMÁTICA LTDA and may be provided only for use upon judicial request.

- **Persons who may access your Personal Data:** Your Personal Data will be processed by our employees or authorized agents, provided that they need access to such information and depending on the specific purposes for which your Personal Data has been collected.
- **Measures taken in operational environments:** We store your Personal Data in operational environments that use appropriate security measures, both technical and administrative, to prevent any type of unauthorized access. We follow appropriate protocols to protect Personal Data.
- **Measures that ALGORIX SISTEMAS DE INFORMÁTICA LTDA expects you to take: it is important that you also have a** role in keeping your Personal Data safe. When creating an online account, please make sure to choose a password that is strong to prevent unauthorized parties from guessing it.

We recommend that you never reveal or share your password with others. You are solely responsible for keeping this password confidential.

## **8. About your rights in personal data as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

You have the right to confirm the existence, access, review, modify and/or request an electronic copy of the information of your Personal Data that is processed by ALGORIX SISTEMAS DE INFORMÁTICA LTDA.

You also have the right to request details about the origin of your Personal Data or the sharing of your Personal Data with third parties.

At any time, you may also limit the use and disclosure, or revoke consent to any of our activities for processing your Personal Data, except in situations provided for in applicable law.

These rights can be exercised through the communication channels detailed in this policy.

Where an application is submitted without providing the evidence necessary to prove the legitimacy of the data subject, the application shall be automatically rejected. We emphasize that any identification information provided to ALGORIX SISTEMAS DE INFORMÁTICA LTDA will only be processed in accordance with and to the extent permitted by applicable laws.

Please note that in certain cases we may not delete your Personal Data without also deleting your user account. Additionally, some situations require the retention of your Personal Data after you request your deletion, to satisfy legal or contractual obligations.

ALGORIX SISTEMAS DE INFORMÁTICA LTDA does its best to answer any questions you may have about how we process your Personal Data. However, if you have unresolved concerns, you have the right to complain to the competent data protection authorities.

- **Data Processing Agents as Controller of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

Controller: ALGORIX SISTEMAS DE INFORMÁTICA LTDA.

Operator: ALGORIX SISTEMAS DE INFORMÁTICA LTDA.

## **9. Changes to our Privacy Policy**

Whenever ALGORIX SISTEMAS DE INFORMÁTICA LTDA decides to change the way we process your Personal Data, this Policy will be updated. We reserve the right to make changes to our practices and this Policy at any time, provided that compliance with current transparency legislation is maintained.

We recommend that you visit it frequently, or whenever you have questions, to see any updates or changes that have been made to our Privacy Policy.

## **10. How to get in touch**

You can contact:

- Ask questions or comments about this Policy and our privacy and personal data protection practices;
- Make a complaint;
- Confirmation of the existence of processing of your Personal Data;
- Learn how to access your Personal Data;
- Perform the correction of incomplete, inaccurate or outdated personal data;
- Obtain information on anonymization, blocking or deletion of unnecessary, excessive or processed data in non-compliance with the provisions of current legislation;
- Obtain information about the portability of your personal data to another service provider or product, upon express request, in accordance with current legislation;
- Request the deletion of personal data processed with your consent, except for the circumstances provided for in current legislation;
- obtain information on the possibility of not providing consent and on the consequences of such a negative;
- Revoke the consent for the processing of your Personal Data, except for the hypotheses provided for in current legislation;
- Other rights of the holder of the personal data, according to current legislation.

To do this, we ask you to contact us using the following channels:

- **Responsible for the Processing of Personal Data:**

dpo@algorix.com

**ALGORIX IT SYSTEMS** will receive, investigate and respond, within a reasonable time, to any request or complaint about how we treat your Personal Data, including claims about your rights under applicable personal data privacy and protection laws.

## **11. ALGORIX SISTEMAS DE INFORMÁTICA LTDA as Operator**

In this role ALGORIX SISTEMAS DE INFORMÁTICA LTDA executes business processes of its Clients, Information Controllers, from collection and treatment definitions established by the respective Clients.

- Limitation of the performance of ALGORIX SISTEMAS DE INFORMÁTICA LTDA

As an Operator, ALGORIX SISTEMAS DE INFORMÁTICA LTDA cannot act directly on the personal data of the holder on its own initiative. All treatment is defined with and by POLICY of its Clients, and only these can request the taking of actions aimed at the treatment or exercise of the right of the holder.

- Attendance to the Rights of the Holder of Personal Data as operator

ALGORIX SISTEMAS DE INFORMÁTICA LTDA recognizes all rights provided to the data subject by the LGPD.

To exercise their rights, the holder must seek the contact of the Controller responsible for his/her data.

If ALGORIX SISTEMAS DE INFORMÁTICA LTDA is triggered by a data subject in order to exercise its rights, ALGORIX SISTEMAS DE INFORMÁTICA LTDA may, provided that it has such information, respond only with the information of who is the Data Controller and its processing.

ALGORIX SISTEMAS DE INFORMÁTICA LTDA will provide the necessary support and support to its Controllers to enable the attendance of The Right of Holders when such data are part of the scope of their contracting and / or service provision.

## **12. Sources of personal data as operator of ALGORIX SISTEMAS DE INFORMÁTICA LTDA**

We collect your Personal Data from the following sources:

- Support System: is an online tool for internal and exclusive use of ALGORIX SISTEMAS DE INFORMÁTICA LTDA customers together with technical support and customer service group provided by the Company.
- Back end System: each client of ALGORIX SISTEMAS DE INFORMÁTICA LTDA will have their own Rear System. It is an online tool for internal and exclusive use of ALGORIX SISTEMAS DE INFORMÁTICA LTDA customers together with technical support and customer service provided by the Company.

Only authorized users will have access to this system in the case of the Support System to answer questions, follow demands such as requests for

new products, services, functionalities or hiring of some new service marketed by the Company, among other requests.

The Rear System will be Administered by the Clients of ALGORIX SISTEMAS DE INFORMÁTICA LTDA, it will be up to them, to carry out the entire Management, Operationalization and Monitoring of their Products and Services with their Owners.

It will be up to ALGORIX SISTEMAS DE INFORMÁTICA LTDA to register all users who will have access to the Support System upon request and sending the Data by the Controller. The Controller is responsible for sending the registration data, updating and eventual deactivation of this user's account. The Controller is also responsible for what its support users do with the information they have access to in the Support System.

In relation to the RearSystem, the Controller is responsible for registering the Rear System Access Profiles, features released to each profile both in relation to the visualization of the Data Of The Holders, as well as the alteration of these data, operations, reports and others, in addition to users who will have access to the RetaguaRdaSystem.

### **User Data**

- Contracting Company;
- User Name;
- Login: the user's e-mail will be registered;
- Password: a default password will be generated, and on the first access of the user will be requested to register a new password;
- E-mail: user's e-mail;
- Landline: field is not required;
- Cell Phone: field is not required;

### **• Incident notification to Controllers**

ALGORIX SISTEMAS DE INFORMÁTICA LTDA will communicate, within a reasonable period, as defined by the Regulatory Body or stipulated in contractual clauses with its controlling customers, the cases of identification of data bouts collaborating and providing assistance for investigations, treatment of the incident and response with the ANPD - National Data Protection Agency.

## **12. Applicable fora legislation**

The legal basis presented of the privacy policy will be interpreted according to Brazilian law by law 13.709/2018, in the update of provisional measure no. 869/18.