

# Privacy Policy

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## 1. Purpose of this Policy

Amaral Lewandowski Advogados (hereinafter, "**ALLAW**" or "**we**") is committed to making the users of the ALLAW website (hereinafter, "Data Subject", "Subject" or "you") aware of the personal data we process.

Committed to respecting your privacy and valuing transparency, ALLAW prepared this privacy policy (hereinafter, "**Privacy Policy**") to provide you with a clear understanding of how ALLAW processes your personal data. For more information about the processing of personal data, please contact our DPO by email to [privacidade@allaw.com.br](mailto:privacidade@allaw.com.br).

## 2. Who is the personal data controller?

ALLAW will be the controller of your personal data within the scope of our relations with you. For the purposes of applicable laws, the controller is responsible for decisions regarding the processing of personal data.

## 3. Which personal data is processed?

To the extent permitted by applicable laws, ALLAW may process the personal data described below:

- (a) Identification, qualification and contact data: full name, address, date of birth, nationality, identification document data (such as ID Card, Taxpayer Card, Driver's License, Lawyer's License, as the case may be), email address and phone number; and
- (b) Academic and professional data: company you work for, occupation, position, education.

In providing legal services, considering the support to clients in the most diverse areas and specialties of Law, ALLAW will may have access and process a large repertoire of your personal data, or even personal data of others involved in a given case (for instance, the other party in a lawsuit), depending on the object or reason of the claim. Some examples of personal data that ALLAW may process in the provision of such services include:

- (a) **Record data**: name, id card, taxpayer card, address, phone number;
- (b) **Financial information**: compensation; transaction history; credits; sales; possessions; debt certificate; loans;
- (c) **Family information**: family structure and relationships; and
- (d) **Information contained in lawsuits**: date of birth, nationality, place of birth, age, marital status, country, address, driver's license, voter's registration, military enlistment, occupation, education, languages, occupational license, PIS/PASEP, CTPS, NIS, NIT, CEI.

The abovementioned personal data are only processed in certain cases and when necessary to meet the purposes described in this Policy, especially for the provision of legal services.

ALLAW may collect such information in a variety of ways. Such personal data may be: (i) collected directly from the Data Subject; (ii) obtained from someone related to the Data Subject (e.g., the company you work for); or (iii) accessed from publicly accessible sources.

Regardless of the origin of the data, the processing thereof will be governed by this Policy and you can contact us by email to [privacidade@allaw.com.br](mailto:privacidade@allaw.com.br).

#### 4. What purposes do we process your personal data for?

In general, we process your personal data for customer service and the provision of legal services, in an advisory or litigation context, including, but not limited to:

- (a) Preparing, reviewing or discussing agreements;
- (b) Conducting or participating in an audit to verify a company's compliance with Brazilian laws, and risk assessment;
- (c) Management of investigations, inquiries, lawsuits, administrative or arbitration proceedings, which includes assessing and preparing documents, progress monitoring, etc.;
- (d) Analysis of new products, structures, cases or any situations presented by customers, in order to prepare a response to queries, memoranda, legal opinions or

reports;

- (e) Preparation of mandatory documents under Brazilian laws;
- (f) Intermediation of the client's relationship with government authorities and bodies;
- (g) *Pro-bono* services;
- (h) Conducting training sessions;
- (i) Holding meetings, video calls or conference calls to discuss topics in general;
- (j) Obtaining the necessary licenses, consents and permits;
- (k) Assistance in taking part in bids;
- (l) Coordination of merger, acquisition or stock market operations.

We may as well process your personal data for the purposes of formalizing your agreement with us, charging and billing, in the event you are a natural-person customer or a representative of a legal-entity customer.

In addition, we may process your personal data to maintain our relationship with you by means of:

- (a) Sending institutional communications, memoranda or newsletters with topics of interest to you and invitations to events;
- (b) Organization of events, including subscribers' management, sending invitations, reminders and thanks. In order to ensure your access to the event, ALLAW may ask if you are a disabled person or have any mobility restrictions;
- (c) Conducting a satisfaction survey and feedback on our services and initiatives.

Occasionally, ALLAW may indicate your personal data for legal publications, national or international, to contact you so that you can evaluate and refer our services to such publications.

## 5. Whom do we share your personal data with?

ALLAW may share your personal data with:

- (a) Providers of software, cloud hosting services and other information technologies, for the purpose of managing your relationship with our office, data filing, documentation and other measures;
- (b) Correspondents, experts, expert reviewers, partner offices (domestic and international), auditors, accountants, translators and financial institutions, for them to assist in the provision of legal services, depending on demand;
- (c) Non-governmental organizations, in the case of *pro-bono* services;
- (d) Domestic or international legal publications;
- (e) Regulatory agencies and other authorities, such as the Superintendence of Private Insurance (SUSEP) and the National Telecommunications Agency (ANATEL).

## 6. Transfer of your personal data outside Brazil

ALLAW may transfer your personal data to service providers located abroad, including cloud service providers. In addition, ALLAW may share your personal data with other ALLAW offices located abroad or with partner offices.

When your personal data is transferred to foreign countries, ALLAW will take appropriate measures to ensure adequate protection of your personal data in compliance with the requirements of applicable data protection laws, including by entering into appropriate data transfer agreements with third parties, covering your personal data, where necessary.

## 7. How long will we retain your personal data?

We store and retain your information: **(i)** for as long as required by law; **(ii)** until the personal data processing conclusion, as mentioned below; **(iii)** for such time as necessary to preserve ALLAW's legitimate interest, as the case may be; **(iv)** for such time as necessary to protect the regular exercise of ALLAW's rights in lawsuits and administrative or arbitration proceedings.

Thus, we will process your data, for example, during the applicable statute of limitations or while necessary to comply with a legal or regulatory obligation.

The personal data processing conclusion will take place in the following cases:

- (a) When the purpose for which the Personal Data of the Data Subject was collected is achieved and/or the personal data collected is no longer necessary or relevant to the scope of that purpose;
- (b) When the Data Subject is in their right to request the processing conclusion and the deletion of their personal data, and they do so; and
- (c) When there is a legal determination in that regard.

In such cases of personal data processing conclusion, except for the cases set forth in applicable laws or in this Privacy Policy, the personal data will be deleted.

## 8. What are your rights in relation to your personal data?

You have the following rights regarding your data: (i) confirmation of data processing; (ii) access; (iii) correction of incomplete, inaccurate or outdated data; (iv) pseudonymization, blocking or deletion; (v) portability; (vi) elimination; (vii) information about sharing; (viii) information about the possibility of not providing consent and about the consequences of consent denial; (ix) withdrawal of your consent, if we have requested your consent; and (x) right to petition to the Brazilian Data Protection Agency (ANPD).

There are circumstances that may restrict the exercise of certain rights provided for by law, such as, for instance, when the provision of information may disclose any ALLAW trade secret, or as a result of compliance with any legal/regulatory obligations, or to allow ALLAW's defense in any lawsuit and administrative or arbitration proceedings.

You may exercise such rights by contacting our DPO by email to [privacidade@allaw.com.br](mailto:privacidade@allaw.com.br).

## 9. Data protection and security

We are committed to the security of your personal data and we take reasonable precautions to keep such protection. In order to protect your data, ALLAW uses security systems and technical, physical and managerial procedures generally adopted in the industry.

## 10. Collection and use of cookies

This section describes how cookies and tracking technologies are used on our websites to enable functionalities and features, to analyze your use thereof, and to improve your browsing experience.

Please find below information about the types of cookies and tracking technologies we use, the types of information we collect through these technologies, and your specific rights with respect to such processing.

By using our websites, you accept the use of cookies in accordance with the conditions described herein. You should have seen a pop-up at the bottom of the page warning you about the use of that tool, on your first visit to our website. Although that notice will not pop up on subsequent visits, you can manage the use of cookies through our website by following the instructions below.

- If you do not agree with the use of these cookies, you can disable them at any time by adjusting your browser settings.
- Browsers are different, so please refer to your browser settings menu for instructions on how to manage your cookie preferences.
- If you choose not to accept cookies, our websites may not function properly and some features may be unavailable.

A cookie is a small text file that is stored by your browser when you visit a website. Almost all websites use cookie technology. Cookies may store certain information, such as your IP address, information about the content you view, information about the content you provide, so that you do not have to re-enter it each time you visit our website, and your preferences and settings.

Cookies also help us to provide you with personalized content, speed up browsing on our website and allow us to learn more about your visit and use of online services.

Four types of cookies may be used on our websites: strictly necessary cookies, performance cookies, functional cookies, and marketing cookies, as described below:

- **Strictly necessary cookies:** These are essential to enable you to browse our websites and use their features. These are temporary cookies that only last as long

as your browser is open and are used for technical purposes, such as allowing you to browse our website better. Without these cookies, your browsing on our website could be significantly affected. When you close your browser, the cookie automatically disappears.

- **Performance cookies:** These are stored on your computer for longer periods and are used for other purposes, such as tracking the number of one-time visitors to our website and information such as the number of views a page gets, how long a user stays on a page and other pertinent statistics. The information collected is aggregated and therefore pseudonymized. These cookies are used exclusively to improve the website performance and, therefore, your experience as a user.
- **Functional cookies:** they allow the website to store information that you have already entered (such as usernames, language options and your location) so that it can offer enhanced and more customized functions. Functional cookies are also used to enable features requested by you, such as playing videos. These cookies collect anonymous information and cannot track your activities on other websites.
- **Analytics:** We contract with Google Analytics web analytics services, which use cookies to collect information, such as your IP address and other identifiers, such as browser information and the content you view, in order to analyze how visitors use our website. The information generated by the cookies about the use of the website will be transmitted and stored by these service providers on servers in Brazil, the United States and the United Kingdom. These service providers will use such information on our behalf for the purpose of evaluating the number of users on our website, the location of our users, the most used sections of our website, the most used browsers, to improve the functionality and interests of our users. These service providers may retain information for up to one year.

If you enable IP pseudonymization, your IP address will not be reported. Only in exceptional cases, the IP address will first be transferred to a Google server in the United States of America, where it will be pseudonymized. The IP address that your browser transmits within the scope of Google Analytics will not be associated with any other data held by Google.

We reserve the right to send e-mails to our clients, partners and third parties who have in any way been related to our law firm, in order to deliver information that we believe to be of interest to them, and you may request to unsubscribe from these distribution lists in the footer of the forwarded messages.



In addition to cookies, our marketing-related emails may contain tracking pixels, also known as *web beacon*, *web bug*, *tracking bug* or *tracking pixel*, which are intended to inform us if our emails are opened and to check all clicks on links within the email. We may use such information (such as personal identity and email) to determine which of our emails are most interesting to you and to ask whether users who do not open our emails wish to continue to receive them. The pixel will be deleted when you delete the email. If you do not want the pixel to be downloaded to your device, you must choose not to click on the links we send you.

When you subscribe for any in-person or on-line event that we stage, the accompanying emails also include a pixel. We track your interaction with these emails and our events to validate participation for accreditation purposes and to help determine what information is of interest to you, as described above.

We advise all customers that we will never send electronic messages, by any means, requesting confirmation of personal information, whether by email, WhatsApp or any other means of electronic communication. For this reason, we are not responsible for any fraudulent electronic communications that collect your personal data (*phishing* and the like).

Regarding incoming emails, we recommend checking the content of the entire email before calling any internet address or clicking on any link. Be wary of emails that contain a suspicious header and sender field or with strange content, messages that have Portuguese errors or even flawed photos and logos.

After your first visit to this website, we may change the cookies we use. This policy will always let you know what is being collected and their respective purposes and will provide you with the means to opt out, so you should check it out from time to time.

## 11. Third-party websites

As a feature of our website, we may provide links to other websites on the internet. ALLAW is not responsible for these websites and content, and also does not share, subscribe, monitor, validate or accept the way in which these websites or content storage tools collect, process and transfer your personal data.

We recommend that you consult the respective privacy policies of such websites to properly inform yourself about your personal data processing.

## 12. Amendments to this Privacy Policy

ALLAW reserves the right to amend this Privacy Policy at any time, by publishing the updated version on this webpage.