

# PRIVACY POLICY

## 1. OBJECTIVE

1.1. The purpose of this Privacy Policy ("Policy") is to inform the guidelines of the personal data processing activities that the CHORAIUI & HOHL law firm ("CH LAW") carries out during the provision of its services. In this way, we reinforce our commitment to respect privacy and the protection of the personal data of individuals who have their personal data processed by CH LAW.

## 2. EFFECTIVE DATE

2.1. This Policy comes into effect from its publication. With an indefinite duration, this Policy can be reviewed and updated whenever necessary.

## 3. TO WHOM IT APPLIES

3.1. This Policy applies to:

- a) Partners, Employees, Ex-Employees, their dependents and Candidates;
- b) Representatives of Clients;
- c) Professionals from Suppliers;
- d) Users and visitors to our facilities; When mentioned together, the individuals related above will be referred to in this Policy simply as "Data Subjects".

## 4. GENERAL GUIDELINES

4.1. In this Policy, we explain clearly and transparently to the Data Subjects how their personal data is treated by CH LAW. Chodraui & Hohl Lawyers - Law Firm +55 11 3078.0160 | [contato@chlaw.com.br](mailto:contato@chlaw.com.br) Rua Jerônimo da Veiga, 164, 11th floor Itaim Bibi | São Paulo – SP zip code 04536-000 [www.chlaw.com.br](http://www.chlaw.com.br)

4.2. The following topics elucidate the purposes for which the personal data of the Data Subjects is used, the storage time, how it is possible to access them, update them or obtain additional information about the processing activities carried out with them.

## 5. WHAT PERSONAL DATA DO WE TREAT?

Below, we detail the categories of personal data that can be collected, stored and processed by CH LAW, according to the following categories of Data Subjects:

5.1 Partners, Employees, Ex-employees, their dependents and Candidates • Registration data: name, surname, corporate email, RG, CPF, CNH, marital status, date of birth, telephone, address, profession, training, professional registration (OAB), signature, contact person, position held, work card, PIS, voter registration, education, sex, registration, termination date, admission date and changes in position, academic certificates, dependents (name, date of birth, birth, marriage or stable union certificates), spouse's age and children, photo. • Financial data: remuneration and bank details. • Sensitive personal data: digital biometrics, occupational health certificates (ASO's admission, periodic, return to work and dismissal), disability certificate, medical certificate, physical disability. • Behavioral data: professional experience, competence assessment.

5.2 Representatives of Clients • Registration data: name, RG, CPF, CNH, education, email, commercial address, residential address, landline, mobile, position, company, profession, sex, date of birth, nationality, marital status, signature, CCTV image.

5.3 Professionals from Suppliers • Registration data: name, RG, CPF, CNH, PIS, INSS registration number, email, commercial address, residential address, landline, mobile, position, department, company, profession, date of birth, birthplace, marital status, signature, CCTV image. • Financial data: remuneration and bank details.

5.4 Users and visitors to our facilities • Registration data: name, RG, CPF, nationality, position, email, telephone, mobile, company, area of interest, date of birth, sex, contact person, CCTV image.

5.5. CH LAW requires specific consent from one of the parents or legal guardian to carry out treatments involving personal data of children or adolescents.

5.6. CH LAW treats sensitive personal data supported by legal grounds, such as explicit consent of the Data Subject or to meet a legal obligation.

## **6. WHO IS RESPONSIBLE FOR THE TREATMENT?**

6.1. CH LAW, when acting as a personal data controller, will make decisions regarding the personal data processed within the scope of the relationship established with the Data Subject.

6.2. CH LAW, when acting as a personal data operator, will process the personal data received from its Clients strictly to fulfill the obligations established by this in the service contract that links it with CH LAW and will use personal data strictly necessary and adequate to achieve the proposed purpose.

## **7. FOR WHAT PURPOSES ARE PERSONAL DATA PROCESSED?**

There are several purposes for which personal data is processed by CH LAW, being:

7.1 Partners, Employees, Ex-Employees, their dependents and Candidates: • Hiring people: recruitment, selection, admission, dismissal, granting benefits to Partners, Employees and their dependents, people management, professional development, corporate education, internal communication and contractual obligations. • Management of expenses and costs. • Coordination of projects and work demands. • Security and physical access control to CH LAW facilities. • Registration for use of banking services. • Maintenance of document custody for support to legal, fiscal and business requirements. • Records of activities carried out to ascertain amounts due. • Compliance with legal or regulatory requirement (e-Social, DIRF and D-SUP - City Halls). • Information security and business continuity plan.

7.2 Representatives of Clients: • Contracting with Clients. • Prospecting Clients through contact research via physical means, internet and social networks. • Security and physical access control to CH LAW facilities. • Promotion of the brand value and relationship with new contacts and potential clients through sponsored events. • Compliance with legal or regulatory requirement. • Information security and business continuity plan.

7.3 Professionals from Suppliers: • Hiring professionals for specialized services in outsourced services (security, reception, cleaning, maintenance). • Supplier management: evaluation, approval, registration, contract preparation and payments. • Maintenance of document custody for support to legal, fiscal and business requirements. • Security and physical access control of people to CH LAW facilities. • Information security and business continuity plan. • Compliance with legal or regulatory requirement.

7.4 Users and visitors to our facilities: • Maintenance of security and physical access control to CH LAW facilities. • Establishment of a contact channel with the Client through the institutional website. • Website improvement.

## **8. WITH WHOM CAN PERSONAL DATA BE SHARED?**

8.1. Partners, Employees, Ex-employees, their dependents and Candidates: CH LAW may share your personal data with: • Companies providing benefits, such as medical insurance, life insurance, private pension, transportation voucher and meal voucher. • Clients for the accreditation process carried out in the contracting

of services. • Financial institutions for use of banking services. • Partner offices to assist during the provision of CH LAW services. • Public authority (judicial and extrajudicial), governmental entity, competent regulatory or fiscal agency, before which the company is subject to comply with a legal or regulatory obligation or according to applicable local legislation. • Operating agents who process your personal data according to CH LAW instructions. • Technology service providers. • Specialized service providers for internal and external communication, such as photography and filming. • Document storage service • Suppliers related to physical security whenever you access CH LAW facilities.

8.2. Representatives of Clients: CH LAW may share your personal data with: • Public authority (judicial and extrajudicial), governmental entity, competent regulatory or fiscal agency, before which CH LAW is subject to comply with a legal or regulatory obligation or according to applicable local legislation. • Operating agents who process your personal data according to CH LAW instructions. • Specialized service providers for the execution of the contract and provision of services aimed at you. • Technology service providers. • Document storage service company. • Suppliers related to physical security whenever you access CH LAW facilities.

8.3. Professionals from Suppliers: CH LAW may share your personal data with: • Suppliers related to physical security whenever you access CH LAW facilities.

8.4. Users and visitors to our facilities: CH LAW may share your personal data with: • Operators who process your personal data according to CH LAW instructions. • Technology service providers. • Suppliers related to physical security whenever you access CH LAW facilities.

## **9. ARE PERSONAL DATA TRANSFERRED?**

9.1. CH LAW uses cloud storage systems and, therefore, it is possible that personal data may be transferred outside of Brazil, as the servers of the cloud storage service providers we use may be located in other countries. In order to ensure that your transferred personal data are processed exclusively for the purposes mentioned, we adopt protection measures such as specific clauses for the protection of personal data in the contracts entered into between CH LAW and these providers.

## **10. HOW LONG ARE PERSONAL DATA KEPT?**

10.1. The personal data collected and processed by CH LAW will be stored for the time necessary to ensure the fulfillment of the purposes informed here, or until

there is no longer a legitimate purpose or a legal and regulatory reason that allows the retention of personal data.

## **11. WHAT ARE MY RIGHTS?**

11.1. In order to guarantee your privacy and the protection of your data, CH LAW will facilitate the exercise of the rights described in article 18 of Law 13.709/2018 - General Law on Personal Data Protection ("LGPD"), as applicable, namely:

- a. Confirmation of the existence of treatment.
- b. Access to personal data.
- c. Correction of incomplete, inaccurate or outdated personal data.
- d. Anonymization, blocking or elimination of unnecessary, excessive or processed personal data in non-compliance with the provisions of the LGPD.
- e. Elimination of personal data processed with the consent of the Data Subjects, except in the cases provided for in article 16 of the LGPD.
- f. Information from public and private entities with which CH LAW has carried out shared use of your personal data.
- g. Information about the possibility of not providing consent and about the consequences of the refusal.
- h. Revocation of consent, under the terms of §5 of article 8 of the LGPD.

11.2. To meet the requests mentioned above, we will make all reasonable efforts in the shortest possible time, but you should be aware that there may be:

- a. Possible delay in service for justifiable factors, such as the complexity of the request;
- b. Rejection of your request for formal reasons (for example, if you cannot prove your identity) or legal reasons (for example, the request for elimination of data that can be kept by force of law or regulation; request for a copy of a document that will only be provided if there is explicit consent; request for portability due to lack of specific regulation for the activity carried out by CH LAW).

11.3. For any hypothesis of impossibility of meeting your request, CH LAW will present its legitimate justifications.

## **12. HOW CAN I EXERCISE MY RIGHTS?**

12.1. You can request the requests mentioned in the previous item by sending an email to [contato@chlaw.com.br](mailto:contato@chlaw.com.br). In this email, you should provide the following information: • Full name; • CPF; • Email; • Telephone; • Description of the request with clear and precise details.

### **13.HOW DO WE PROTECT YOUR PERSONAL DATA?**

13.1. CH LAW adopts the best practices in information security to protect your personal data, such as: • Use of firewalls and intrusion detection systems; • Use of encryption techniques; • Regular audits; • Access control to information; • Use of secure environments for the storage of information; • Awareness and training of employees.

### **14.CHANGES TO THIS POLICY**

14.1. CH LAW reserves the right to change this Policy at any time, so we recommend that you review it periodically.

### **15.CONTACT**

15.1. If you have any questions about this Policy, please contact us at [contato@chlaw.com.br](mailto:contato@chlaw.com.br).

### **16.APPLICABLE LAW AND JURISDICTION**

16.1. This Policy will be governed by and interpreted in accordance with the laws of the Federative Republic of Brazil. The Judicial District of the Capital of the State of São Paulo is elected to settle any disputes or controversies related to this Policy, to the exclusion of any other, however privileged it may be.