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ROMEU

AMARA

ADVOGADOS



1. Purpose of this Policy

Romeu Amaral Advogados is committed to raising awareness among users of its website ("Data Subject", "you") regarding the personal data processed by us.

With a commitment to respecting your privacy and prioritizing transparency, **Romeu Amaral Advogados** has created this privacy policy ("Privacy Policy") to provide you with a clear understanding of how we handle your personal data. For more information about personal data processing, you may contact the Data Protection Officer via email at **privacidade@romeuamaral.com.br.**

2. Who is the controller of the personal data?

Romeu Amaral Advogados is the controller of your personal data within the scope of the relationship established with you. For the purposes of applicable legislation, the controller is responsible for decisions regarding the processing of personal data.

3. What personal data is processed?

To the extent permitted by applicable law, **Romeu Amaral Advogados** may process the following personal data:



- (a) <u>Identification, qualification, and contact information:</u> full name, address, date of birth, nationality, identification document details (such as ID, CPF, driver's license, OAB), email address, and phone number.
- (b) <u>Academic and professional data:</u> company you work for, profession, job title, education.

In providing legal services across various areas of law, we may have access to a wide range of personal data concerning you or even data from others involved in a case, depending on the nature of the request. Examples of personal data processed by **Romeu Amaral Advogados** include:

- (a) <u>**Registration information:**</u> name, CPF, ID, address, and phone number.
- (b) <u>Financial information</u>: remuneration, transaction history, credits, sales, possessions, debt certificates, loans.
- (c) <u>Family information:</u> family structure and relationships.
- (d) Information in legal cases: date of birth, nationality, naturalization, age, marital status, country, address, driver's license, voter registration, military registration, profession, education, languages, professional registration, PIS/PASEP, work card (CTPS), NIS, NIT, CEI.

The personal data mentioned above is processed only in specific cases and when necessary to achieve the purposes outlined in this Policy, particularly for the provision of legal services.



Romeu Amaral Advogados may collect this information in various ways. This personal data may be: (i) collected directly from the Data Subject; (ii) obtained from someone related to the Data Subject (for example, the company you are part of); or (iii) accessed from publicly available sources.

Regardless of the source of the data, the processing will be governed by this Policy, and you can contact us via email at **privacidade@romeuamaral.com.br**.

4. For what purposes do we process your personal data?

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

- (a) Drafting, reviewing, or negotiating contracts;
- (b) Conducting or participating in audits to verify a company's compliance with Brazilian legislation and risk analysis;
- (c) Managing investigations, inquiries, judicial, administrative, or arbitration proceedings, including analysis, drafting of documents, and monitoring the progress of such actions;
- (d) Analyzing new products, structures, cases, or any situations presented by clients for preparing responses to consultations, memorandums, legal opinions, or expert reports;
- (e) Drafting mandatory documents as required by Brazilian law;



- (f) Mediating the client's relationship with authorities and government agencies;
- (g) Performing pro bono work;
- (h) Conducting training sessions;
- Holding meetings, video conferences, or phone conferences for general discussions;
- (j) Obtaining necessary licenses, authorizations, and permits;
- (k) Assisting in participation in public tenders;
- (I) Coordinating mergers, acquisitions, or capital market operations.

We may also process your personal data for the purpose of formalizing a contract with **Romeu Amaral Advogados**, billing, and collection, if you are an individual client or a representative of a corporate client.

Additionally, we may process your personal data to maintain our relationship with you through:

- (a) Sending institutional communications, memorandums, or newsletters on topics of interest to you, as well as event invitations;
- (b) Organizing events, including managing registrations, sending invitations, reminders, and thank you notes. To ensure your access to the event, **Romeu Amaral Advogados** may ask if you have any disabilities or mobility restrictions;
- (c) Conducting satisfaction surveys and gathering feedback on our services and initiatives.

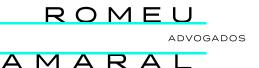


Occasionally, **Romeu Amaral Advogados** may provide your personal data to national or international legal publications so that they can contact you for the purpose of evaluating and referencing our services in such publications.

5. With whom do we share your personal data?

Romeu Amaral Advogados may share your personal data with:

- Software providers, cloud hosting services, and other IT technologies for the purpose of managing your relationship with our firm, registration, documentation, and other necessary measures.
- (b) Correspondents, experts, partner law firms (national and international), auditors, accountants, translators, and financial institutions to assist in the provision of legal services, depending on the demand.
- (c) Non-governmental organizations for pro bono work.
- (d) National or international legal publications.
- (e) Regulatory agencies and other authorities, such as the National Telecommunications Agency (ANATEL).



6. Transfer of your personal data outside of Brazil

Romeu Amaral Advogados may transfer your personal data to service providers located abroad, including cloud service providers. Additionally, we may share your personal data with other Romeu Amaral Advogados offices located abroad or with partner law firms.

When your personal data is transferred outside of Brazil, **Romeu Amaral Advogados** will adopt appropriate measures to ensure the adequate protection of your data in accordance with applicable data protection legislation requirements, including, when necessary, by entering into appropriate data transfer agreements with third parties.

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 end of the personal data processing, as mentioned below; (iii) for the time necessary to preserve **Romeu Amaral Advogados'** legitimate interests, as applicable; (iv) for the time necessary to safeguard the regular exercise of Romeu Amaral Advogados' rights in judicial, administrative, or arbitration proceedings.

Thus, we will process your data, for example, during the applicable statute of limitations periods or as long as necessary to comply with legal or regulatory obligations.



The termination of personal data processing will occur in the following cases:

- (a) When the purpose for which the personal data was collected is achieved, and/or the collected data is no longer necessary or relevant to achieving such purpose.
- (b) When you, as the Data Subject, request the termination of processing and the deletion of your personal data, and such request is granted.
- (c) When there is a legal determination to do so.

In such cases of termination of personal data processing, except for situations established by applicable law or this Privacy Policy, the personal data will be deleted.

8. What are your rights regarding your personal data?

You have the following rights regarding your data: (i) confirmation of data processing; (ii) access to your data; (iii) correction of incomplete, inaccurate, or outdated data; (iv) anonymization, blocking, or deletion of unnecessary data; (v) portability of your data; (vi) deletion of personal data; (vii) information about data sharing; (viii) information about the possibility of not providing consent and the consequences of such refusal; (ix) revocation of consent, when applicable; and (x) the right to file a complaint with the National Data Protection Authority (ANPD).



There are circumstances that may restrict the exercise of certain rights provided by law, such as when the provision of information may reveal a trade secret of Romeu Amaral Advogados, or due to compliance with a legal/regulatory obligation or to allow the defense of **Romeu Amaral Advogados** in a judicial, administrative, or arbitral proceeding.

You may exercise these rights by contacting the Data Protection Officer via email at **privacidade@romeuamaral.com.br.**

9. Data protection and security

We are committed to the security of your personal data and take reasonable precautions to ensure this protection. **Romeu Amaral Advogados** employs security systems and technical, physical, and managerial procedures commonly adopted in the market to safeguard your data.

10. Collection and use of cookies

This section describes how cookies and tracking technologies are used on our websites to enable functionalities and features, analyze usage, and enhance your browsing experience. By using our websites, you acknowledge the use of cookies as described in this Policy

Below is information about the types of cookies and tracking technologies we use, the types of information we collect through these technologies, and your specific rights regarding such processing.



By using our websites, you acknowledge the use of cookies under the conditions described here. You should have seen a pop-up in the bottom corner of the page notifying you of the use of this tool during your first visit to our website. Although this notice will not appear 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 vary, so please refer to your browser's settings menu for instructions on how to change your cookie preferences.
- If you choose not to receive cookies, our websites may not function properly, and some features may become unavailable.

A cookie is a small text file that is stored by your browser when you visit a website. Nearly all websites utilize cookie technology. Cookies can store specific information, such as your IP address, details about the content you view, and data you provide to prevent the need for re-entering it on subsequent visits to our site, as well as your preferences and settings.

Cookies also enable us to deliver personalized content, enhance website navigation speed, and gather analytics about your visit and usage 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 last only as long as your browser is open and are used for technical purposes, such as enabling better navigation on our site. Without these cookies, your browsing experience on our website may 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 unique visitors to our site and gathering information like the number of page views, the amount of time a user spends on a page, and other relevant statistics. The information collected is aggregated and, therefore, anonymized. These cookies are used exclusively to improve website performance and, consequently, your user experience.
- Functional cookies: These allow the website to store information you have already entered (such as usernames, language preferences, and your location) so it can provide enhanced and more personalized features.
 Functional cookies are also used to enable features you request, such as video playback. These cookies collect anonymous information and cannot track your activities on other websites.



• Analytics: We use the web analytics services of Google Analytics, which employ cookies to collect information such as your IP address and other identifiers like browser details and the content you view, with the aim of analyzing how visitors use our website. The information generated by the cookies about the use of the site will be transmitted to and stored by these service providers on servers in Brazil, the United States, and the United Kingdom. These service providers will use this information on our behalf to evaluate the number of users on our website, the location of our users, the most frequently used sections of our website, and the most commonly used browsers, in order to improve functionality and cater to our users' interests. These service providers may retain information for up to one year.

If you enable IP anonymization, your IP address will not be reported. Only in exceptional cases will the IP address be first transferred to a Google server in the United States of America, where it will be anonymized. The IP address transmitted by your browser through Google Analytics will not be associated with any other data held by Google.

We reserve the right to send emails to our clients, partners, and third parties who have in some way interacted with the firm, in order to share information we believe may be of interest to you. You can request to unsubscribe from these mailing lists by using the link provided at the bottom of the emails.

In addition to cookies, our marketing-related emails may contain tracking pixels, also known as web beacons, web bugs, tracking bugs, or tracking pixels, which serve to inform us if our emails are opened and to track any clicks on links within the email. We may use this information (such as personal identity and email) to determine which of our emails are of most interest to you and to inquire whether users who do not open our emails wish to continue receiving them. The pixel is deleted when you delete the email.



If you do not wish for the pixel to be downloaded to your device, you should avoid clicking on the links we send you.

When you sign up for any event, whether in person or online, that we promote, the accompanying emails also include a pixel. We track your interaction with these emails and our events to validate your participation for accreditation purposes and to help determine which information is of interest to you, as described above.

We advise all clients that we will never send electronic messages, through any medium, requesting confirmation of personal information, whether by email, WhatsApp, or any other form of electronic communication. For this reason, we are not responsible for any fraudulent electronic communications that collect your personal data (phishing or similar).

Regarding the emails you receive, we recommend verifying the content of the entire email before accessing any web address or clicking on any link. Be cautious of emails that contain suspicious headers and sender fields, or with strange content, messages with spelling or grammatical errors, or even images and logos with flaws.

After your first visit to this site, we may change the cookies we use. This policy will always inform you of what is being collected, its respective purposes, and provide ways for you to disable them, so you should refer to it from time to time.



11. Third-party websites

As a feature of our website, we may provide links to other websites on the internet. **Romeu Amaral Advogados** is not responsible for these websites and their content, nor does it endorse, monitor, or accept how these websites or storage tools collect, process, or transfer your personal data.

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

12. Changes to this Privacy Policy

Romeu Amaral Advogados reserves the right to modify this Privacy Policy at any time by publishing an updated version on this page.