

# PRIVACY POLICY

- **DATA CONTROLLER** The Data Controller is TALENTOBE, located in 31100 Treviso (TV), Via G. Massari n. 2, Certified E-mail (P.E.C): [talentobe@legalmail.it](mailto:talentobe@legalmail.it)

Any material changes to the privacy policy (“Privacy Policy”) will be posted on this page.

This Privacy Policy applies to Talentobe, an Italian limited liability company. Talentobe is committed to the protection of your personal information. This Privacy Policy is intended to provide you information regarding how we collect, use, share, and otherwise process information relating to individuals' personal information, and your rights and choices regarding our processing of your personal information. Please read this Privacy Policy before exploring any Talentobe website or application, providing any personal information to Talentobe, or purchasing any products or services. If you do not agree with our policies and practices, do not use the Talentobe application, website or our products or services. By accessing or using any Talentobe website or application, providing Talentobe personal information, or purchasing any of our products or services, you agree to this Privacy Policy.

This Privacy Policy may change from time to time (see Policy Updates). Your continued use of the Talentobe website, application, or our products or services after we make changes is deemed to be your acceptance of those changes so please check this Privacy Policy periodically for updates. This Privacy Policy shall also apply to Talentobe cellular and web applications ("Apps").

While we have chosen to specifically identify and discuss GDPR, LGPD, above, this does not change our stance toward other privacy laws in effect in the jurisdictions in which Talentobe operates.

Those regulations strengthen the rights and obligations of data controllers, processors, data subjects, and recipients of the data.

As part of its business activity, Talentobe processes personal data by collecting information concerning its Customers, Members, and Prospects.

For the correct understanding of this Privacy Policy, it is specified that:

- **“Assessment”** means Talentobe's MyPrint Assessment or equivalent version utilized by Customers and Members under this Privacy Policy.
- **“Customers”** can be described as any physical persons or legal entities who purchase Talentobe Assessment Packs, a license or subscription to Talentobe Manager, or Talentobe’s API access. Customers typically include those who wish to recruit staff and/or assess the skills of their Members, but also for employment professionals, who can be described as any physical persons or legal entities whose business activity is in the field of personnel recruitment, especially recruitment agencies, temporary employment agencies, companies in the temporary work sector, or consultancy firms for interim management or human resources.
- **“Members”** can be described as any physical person who registers on the Talentobe website or application, regardless whether such individual completes the Assessment.
- **“Prospects”** can be described as any potential customer of Talentobe whose contact details were received during events, from business cards, etc.
- **“Talentobe Manager”** means Talentobe's SaaS Platform, application, and relevant APIs or its equivalent during the term of this Agreement; and

In order to meet its business needs, Talentobe implements and processes personal data relating to its Customers, Members, and Prospects.

The purpose of this policy is to fulfill Talentobe's obligation to provide information and thus formalize the rights and obligations of its Customers, Members, and Prospects with regard to the processing of their personal data.

The processing of personal data may be handled directly by Talentobe or through a processor that Talentobe specifically designates.

This policy is independent of any other document that may apply within the contractual relationship between Talentobe and its Customers, Members, and Prospects, including its Terms of Use, General Terms and Conditions, or its Cookies Policy.

## GENERAL PROVISIONS

### PURPOSE OF DATA PROCESSING AND LEGAL BASIS

The purposes of data processing are as follows: commercial (related to the contractual fulfillment of requested services) and compliance with administrative, accounting, and tax obligations imposed by law. Requesting services from TALENTOBE S.R.L. involves the necessary processing of the personal data you provide. The data and information will be processed for purposes strictly necessary to fulfill the requested service and specifically: to acquire the information useful for carrying out preliminary activities to provide the services; to carry out the activities necessary for concluding contracts related to the requested services and executing them; to perform all activities necessary and related to managing the contractual relationship regarding the provided service; to comply with legal obligations under the applicable regulations governing the provided services or to comply with instructions issued by authorities, supervisory and control bodies authorized by specific legal provisions.

Requesting services from TALENTOBE S.R.L. may involve, with your explicit consent, the processing of personal data also for: advertising and marketing purposes such as newsletters, promotional communications of additional services; and for customer satisfaction surveys. Such commercial and promotional communications may be carried out via postal mail, email, SMS, MMS, and/or other forms of electronic communication. You may at any time express the desire not to receive such communications and promotions.

### PURPOSE OF PROCESSING, NATURE OF PROVISION, LEGAL BASIS

The purposes of processing are as follows: a) Commercial (related to the contractual fulfillment of requested services) b) Marketing (advertising and promotional purposes) c) Quality control of services e) Compliance with administrative, accounting, and tax obligations imposed by law.

- a) **Commercial Purposes (related to the contractual fulfillment of requested services)** The data and information will be processed for purposes strictly necessary to fulfill the requested service and specifically: to acquire useful information for carrying out preliminary activities to provide the services; to perform activities necessary for concluding contracts related to the requested services and executing them; to carry out all activities necessary and related to managing the contractual relationship regarding the provided service; to comply with legal obligations under the applicable regulations governing the provided services or to comply with instructions from authorities, supervisory, and control bodies authorized by specific legal provisions (compliance with administrative, accounting, and tax obligations imposed by law). Nature of provision: mandatory (requesting services from TALENTOBE S.R.L. requires the necessary processing of the personal data you provide). Consequences of refusal to provide data: failure to provide data will make it impossible for the Data Controller to proceed with providing the requested commercial service. Legal basis for processing: contract and explicit consent of the data subject.
- b) **Marketing Purposes (advertising and promotional purposes)** Requesting services from TALENTOBE S.R.L. may involve, with your explicit consent, the processing of personal data for advertising and marketing purposes such as newsletters, promotional communications of additional services. Such commercial and promotional communications may be carried out via postal mail, email, SMS, MMS, and/or other forms of electronic communication. You may at any time express the desire not to receive such communications and promotions. Nature of provision: optional. Consequences of refusal to provide data: failure to provide data for marketing purposes will not affect the execution of contracts and services requested, only making it impossible for the Data Controller to perform processing for the aforementioned purposes. Legal basis for processing: explicit consent of the data subject.
- c) **Quality Control of Services** With your explicit consent, the Data Controller may process your data to conduct quality control activities on the services provided during commercial relationships with the Data Controller. Purpose of processing: processing for quality control activities of the services provided during the relationships you will have with the Data Controller. Nature of provision: optional. Consequences of refusal to provide data: failure to provide data for such purposes will not

affect the execution of contracts entered into with the Data Controller, only making it impossible for the Data Controller to perform processing for the aforementioned purposes. Legal basis for processing: explicit consent of the data subject.

## **DATA PROCESSING AND STORAGE METHODS**

Processing will be carried out by TALENTOBE S.R.L. using both digital and paper-based methods, in compliance with Article 32 of GDPR 2016/679 by specifically designated individuals and in accordance with Articles 29 GDPR 2016/679. We inform you that, in compliance with the principles of legality, purpose limitation, and data minimization, according to Article 5 GDPR 2016/679, your personal data will be stored for the period necessary to achieve the indicated purposes.

## **STORAGE PERIOD**

Mandatory data for contractual and accounting purposes are retained for the time necessary to fulfill the contractual relationship. Data of those who do not purchase or use services, despite previous contact, will be immediately deleted or processed anonymously if their retention is not otherwise justified, unless valid informed consent has been obtained for subsequent commercial promotion or market research activities. Your personal data will be processed for the purposes referred to in point 2 letters b), c), and d) of this policy until you decide to withdraw consent and/or request the cessation of processing and, in any case, will be retained only for the period required by current regulations.

**SCOPE OF COMMUNICATION AND DISCLOSURE** We inform you that the collected data will not be disseminated and will not be communicated without your explicit consent. It should be noted that, for the pursuit of the purposes mentioned above, TALENTOBE S.R.L. communicates your personal data to third parties who perform and/or provide specific services necessary for establishing and executing the services you requested. The updated list of data controllers and authorized individuals is kept at the Data Controller's headquarters.

## **SPECIAL CATEGORIES OF PERSONAL DATA**

According to Articles 9 and 10 of EU Regulation no. 2016/679, you may provide TALENTOBE S.R.L. with data classified as "special categories of personal data," i.e., data revealing "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data concerning health or sexual life or sexual orientation." Such categories of data may be processed by TALENTOBE S.R.L. only with your free and explicit consent, provided after reviewing this policy. The website [www.talentobe.it](http://www.talentobe.it) and the Data Controller's services are not intended for minors under 18, and the Data Controller does not collect personal information about minors.

## **EXISTENCE OF AUTOMATED DECISION-MAKING PROCESSES, INCLUDING PROFILING**

TALENTOBE S.R.L. does not adopt any automated decision-making processes, including profiling, as described in Article 22, paragraphs 1 and 4, of EU Regulation no. 679/2016.

## **CUSTOMER DATA**

### *TYPES OF DATA COLLECTED*

Non-technical Data (*depending on intended use*)

- Identity and identification (gender, first name, last name, year of birth, nickname, customer number)
- Contact information (e-mail, postal address, telephone number)
- Professional status when necessary (company, sector, career level, job, position)
- Place of employment and position/title
- Avatar / Profile picture
- Links to social networks: (Linkedin, Twitter, Facebook)

Technical Data (*depending on intended use*)

- Identification data (IP address)
- Login data (logs, tokens in particular)
- Acceptance data (clicks)

## *SOURCE OF DATA*

Talentobe collects data from its Customers through:

- Data provided by the Customer (paper forms, purchase orders, business cards, etc.)
- Electronic forms filled out by Customers
- Data entered online (website, social networks, etc.)
- Registration for events organized by Talentobe (e.g. organization of trade shows). We may also rent or purchase databases.

Collection may also be indirect via specialized companies or via Talentobe's partners and suppliers.

## *PURPOSES*

As appropriate, Talentobe processes the data of its Customers for the following purposes:

- Customer Relationship Management (CRM)
- Managing events organized or attended by Talentobe (conferences, breakfasts, etc.)
- Sending our newsletters or news feeds
- Managing customer accounts
- Answering questions put to us (by phone or online)
- Improving our services
- Fulfilling our administrative obligations
- Managing communities
- Conducting surveys
- Compiling statistics
- Contacting Members or other recruiters through the application
- Proposing qualified Members based on the job offers created by the recruiters

## **MEMBER DATA**

### *TYPES OF DATA COLLECTED*

Non-technical Data (*depending on intended use*)

- Identity and identification (gender, first name, last name, year of birth)
- Geographical information including city, state, and country
- Contact information (e-mail)
- Professional status, and, if employed, this includes company, sector, career level, job, position; for students, this includes name of school or university, highest degree earned, and job experience.
- Place of employment and position/title
- Avatar / Profile picture

Technical Data (*depending on intended use*)

- Identification data (IP address)
- Connection data (logs)
- Acceptance data (clicks)
- We store “tokens” when Members or Users sign up or login using third party single sign-on (SSO) providers (i.e. Twitter, Facebook, LinkedIn, Google, etc.)

Talentobe does not deal with sensitive data within the meaning of Article 9 of the GDPR, except those included in Article 9.2 (f), i.e. the data necessary "for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity".

## *SOURCE OF DATA*

Talentobe collects data from its Members through:

- Information collected through the Customers
- Electronic forms filled out by Members

- Registration or subscription to our online services (newsletter, social networks, etc.)

### *TALENTOBE PURPOSES*

As appropriate, Talentobe processes the data of its Members for the following purposes:

- Managing the sending of invitations to Members for registration on the website
- Managing the registration process for a Member
- Managing Customer accounts
- Sending summaries and reports of the Assessment to the Members
- Sending our newsletters or news feeds
- Answering questions put to us (by phone or online)
- Improving our services
- Fulfilling our administrative obligations
- Managing communities
- Conducting surveys
- Compiling statistics
- Contacting other Members or recruiters through the application
- Proposing qualified job offers based on the profiles of the Members.

### **USE OF INFORMATION GATHERED THROUGH BUSINESS SOLUTIONS**

Customers, including but not limited to recruiters, headhunters, individual counselors, and/or coaches, may enter certain information about Members when using Talentobe's business solution, Talentobe Manager. For example, a Customer's recruiter who has requested access to the personal profile of a Member who applied as a candidate for a job opening will have the Member's profile in their Talentobe account. The recruiter will then be able to add comments about the Member's profile that may then be shared with the recruiter's colleagues or managers. This information is only available to and shared with the Customer's employees who have access to Customer's Talentobe Manager enterprise account. Customers using Talentobe Manager may also add other information to their account, such as labels created to categorize their candidate pool, or include the Member's Assessment results when using the Talentobe Manager analysis tools.

### **PROSPECT DATA**

#### *TYPES OF DATA COLLECTED*

Non-technical Data (*depending on intended use*)

- Identity and identification (gender, first name, last name, year of birth, nickname, customer number)
- Contact information (e-mail, postal address, telephone number)
- Professional status when necessary (company, sector, career level, job, position)
- Place of employment and position/title
- Avatar / Profile picture
- Links to social networks: (Linkedin, Twitter, Facebook)

Technical Data (*depending on intended use*)

- Identification data (IP address)
- Connection data (logs)
- Acceptance data (clicks)

Talentobe does not deal with sensitive data within the meaning of Article 9 of the GDPR, except those included in Article 9.2 (f), i.e. the data necessary "for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

#### *SOURCE OF DATA*

Talentobe collects data from its Members through:

- Business cards
- Registration or subscription to our online services (website, social networks, etc.)

- Registration for events organized or attended by Talentobe
- Lists sent by the organizers of events or conferences in which we participate. Exceptionally, we may rent databases.

Collection may also be indirect via specialized companies or via Talentobe's partners and suppliers. In this case, Talentobe takes the greatest care to ensure the quality of the data it is provided with.

### *PURPOSES*

As appropriate, Talentobe processes the data of its Prospects for the following purposes:

- Prospect Relationship Management (PRM)
- Managing events organized by Talentobe (conferences, breakfasts, etc.)
- Sending our newsletters or news feeds
- Answering questions put to us (by phone or online)
- Managing communities
- Compiling statistics
- Conducting surveys.

## **LEGAL BASIS**

### **TYPES OF DATA COLLECTED**

The data processing purposes listed have the following legal basis:

- **Customers:** Pre-contractual or contractual purposes - general terms and conditions of sale concerning recruiters;
- **Members:** Pre-contractual or contractual purposes - general terms and conditions of service concerning Members;
- **Prospects:** Legitimate interest and where required by law, consent (e.g. newsletter)

### **RECIPIENTS OF THE DATA**

Talentobe ensures that the data is accessible only to authorized internal or external recipients.

The recipients of Customers', Members', and Prospects' personal data within Talentobe are subject to a non-disclosure obligation.

Talentobe decides which recipient will be able to access which data according to an authorization policy.

Talentobe will not be held liable in any way for damages of any kind that may result from unlawful access to personal data.

All access relating to the processing of personal data of Customers, Members, and Prospects is subject to traceability analysis.

Furthermore, personal data may be transferred to any authority legally entitled to have access to it. In this case, Talentobe is not responsible for the conditions under which the personnel of these authorities have access to and use the data.

### **CONCERNING CUSTOMERS**

#### Internal Recipients

- Authorized staff of the marketing department, departments responsible for customer relations, administrative departments, logistics, and IT services and their managers

#### External Recipients

- Service providers or support services (e.g. IT service provider, etc.)
- Authorized staff of the departments responsible for control (auditor, departments responsible for internal control procedures, etc.)
- Judicial administration, judicial auxiliary staff, where appropriate
- Other Customers or other Members
- Our trusted vendors

## ***CONCERNING MEMBERS***

### Internal Recipients

- Authorized staff of the department responsible for customer relations, the marketing department, administrative departments, logistics and IT services and their managers

### External Recipients

- External recruitment firm (in accordance with this Privacy Policy and a Member may withdraw consent at any time)
- Talentobe Customers (in accordance with this Privacy Policy and a Member may withdraw consent at any time)
- Service providers or support services (e.g. IT service provider, print services, etc.)
- Judicial administration, judicial auxiliary staff
- Authorized staff of vendors, subcontractors, and external data processors

## ***CONCERNING PROSPECTS***

### Internal Recipients

- Authorized staff of the department responsible for relations with Prospects, marketing, IT services, and their managers

### External Recipients

- Service providers or support services (e.g. IT service provider, print services, etc.)

## **SOCIAL MEDIA**

Our website and application may use social media features, such as the Facebook “like” button, the “Tweet” button and other sharing tabs and links (“Social Media Features”). You may be given the option by such Social Media Features to post information about your activities on a website to a profile page of yours that is provided by a third party social media network in order to share with others within your network. Social Media Features are either hosted by the respective social media network or hosted directly on our website or application.

To the extent the Social Media Features are hosted by the respective social media networks, they may receive information that you have visited our website from your IP address. If you are logged into your social media account, it is possible that the respective social media network can link your visit of our website or application with your social media profile.

Your interactions with Social Media Features are governed by the privacy policies of the companies providing the relevant Social Media Features.

## **PHONE APPLICATION (“App”) and TELEPHONE LOG INFORMATION**

If you use certain service features, we may also collect telephony log information (like phone numbers, time and date of calls, duration of calls, SMS routing information, and types of calls), device event information (such as crashes, system activity, hardware settings, browser language), and location information (through IP address, GPS, and other sensors that may, for example, provide us with information on nearby devices, Wi-Fi access points and cell towers).

## **ANALYTICS**

We may use third-party service providers to monitor and analyze the use of our Services.

“Google Analytics” We use a tool called “Google Analytics” and may use other third party analytic tools to collect information about use of Talentobe websites. Google Analytics collects information such as how often users visit Talentobe websites and what pages they visit when they do so. We use the information we get from Google Analytics only to improve Talentobe. Google Analytics does not collect your name or other identifying information. Although Google Analytics plants a permanent cookie on your device to identify you as a unique user the next time you visit Talentobe sites, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your usage of Talentobe websites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

## **CHILDREN’S PRIVACY**

Our websites and services are not intended for children under 16 years of age. No one under age 16 may provide any information to or through our services. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information to our websites or services or on or through any of their features, do not register to become a member of our website or service, use any of the interactive features of our website or services, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us via email address [staff@talentobe.com](mailto:staff@talentobe.com) or write to us at: Talentobe, Via Giorgio Massari 2, 31100 Treviso, Italy.

### **NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA, GDPR, LGPD or any other applicable international, federal, or state data privacy protection rights.

### **RIGHTS OF THE DATA SUBJECT**

At any time, you may exercise the rights under Articles 15 to 22 of EU Regulation no. 2016/679, including:

- a) requesting confirmation of the existence of your personal data;
- b) obtaining information about the purposes of processing, categories of personal data, recipients or categories of recipients to whom the personal data has been or will be communicated, and, when possible, the retention period;
- c) obtaining rectification and deletion of data;
- d) obtaining restriction of processing;
- e) obtaining data portability, i.e., receiving data from a data controller in a structured, commonly used, and machine-readable format and transmitting it to another data controller without hindrance;
- f) objecting to processing at any time, including for marketing purposes;
- g) objecting to automated decision-making processes related to individuals, including profiling;
- h) requesting access to personal data and its rectification or deletion or restriction of processing, and objecting to its processing, as well as the right to data portability;
- i) withdrawing consent at any time without affecting the lawfulness of processing based on consent before withdrawal;
- j) filing a complaint with the Supervisory Authority, which is the Garante for the Protection of Personal Data, located in Rome Piazza di Monte Citorio no. 121 - 00186 Rome - [www.garanteprivacy.it](http://www.garanteprivacy.it) - Email: Fax: 06.69677.3785 Telephone switchboard: 06.69677.1

To exercise the rights under Articles 15-22 of GDPR, you may contact TALENTOBES.R.L. via PEC or by registered letter at the addresses provided below.

### **IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER**

The Data Controller is TALENTOBE, located in 31100 Treviso (TV), Via G. Massari n. 2, Certified Email (P.E.C): [talentobe@legalmail.it](mailto:talentobe@legalmail.it)

The updated list of data processors is available on the website [www.talentobe.it](http://www.talentobe.it) in the Privacy section.

### **MANDATORY OR OPTIONAL NATURE OF DATA PROVISION**

As stated in this document, the user/client has the option to decide whether to provide their personal data. Only the data strictly necessary for browsing and viewing the website pages are mandatory. For service requests and for contact and/or information requests, the provision of data is required within the limits specified in the individual notices provided. The user/client may refuse consent or revoke consent previously given at any time. However, in case of refusal, it will not be possible to fulfill commercial service requests.

### **UPDATES AND MODIFICATIONS TO THE PRIVACY POLICY**



This Privacy Policy may undergo changes over time, including following the entry into force of new sector regulations, updates, or the introduction of new services, or technological innovations. Therefore, the user/visitor is encouraged to periodically review this page.

### **FURTHER INFORMATION FOR USERS IN BRAZIL**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal information“ as it is defined in the **LGPD**.

#### **The grounds on which we process your personal information**

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

#### **Categories of personal information processed**

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

#### **Why we process your personal information**

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

#### **Your Brazilian privacy rights, how to file a request and our response to your requests**

##### **Your Brazilian privacy rights**

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;

- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision;
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

### **How to file your request**

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

### **How and when we will respond to your request**

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

### **Transfer of personal information outside of Brazil permitted by the law**

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;

- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.