

**DATA PROTECTION POLICY  
FOR PHYSICAL AND  
JURIDICAL PERSONS**  
PROSPECTA GLOBAL SOLUTIONS

## DATA PROTECTION POLICY FOR PHYSICAL AND JURIDICAL PERSONS D&S GERACAO DE DEMANDA COMERCIAL LTDA

The purpose of our PPDSI (Data Protection and Information Security Policy) is to guide regarding the guidelines applicable to the privacy and data protection of the personal data of customers, natural person, collaborators and employees of D&S GERACAO DE DEMANDA COMERCIAL LTDA that has access based on the performance of its activities, establishing the applicable rules on the collecting, recording, storing, using, sharing, enriching and deleting data collected, in accordance with the laws in force and especially with the General Law of Personal Data Protection sanctioned on September 18, 2020.

### 1. Coverage

This PPDSI or DPISP applies to all managers and employees of D&S GERACAO DE DEMANDA COMERCIAL LTDA, as well as third parties, service providers and/or suppliers that have access to information of the natural person customers involved. Everyone must define their practices and directions from the guidelines in our DPISP considering all specific needs and the legal and regulatory aspects to which they are subjected.

### 2. Guidelines

#### 2.1 Initial Provisions

This policy aims to demonstrate the commitment of D&S GERACAO DE DEMANDA COMERCIAL LTDA in:

- A.** Ensure the privacy and protection of the personal data collected from natural person customers, collaborators and employees, depending on the performance of their activities.
- B.** Adopt guidelines that ensure comprehensive compliance with rules and good practices related to privacy and personal data protection provided for in legislation and more recently in the General Law for the Protection of Personal Data.
- C.** Promote transparency about the way in which personal data will be treated.
- D.** Adopt protective measures in relation to the risk of a security incident involving personal data.

### 3. Information subjected to policy

Are subjected to this policy:

**3.1** In the controller position, provided for in the General Law of Data Protection, all the information collected about the data holder in the context of service providing by D&S GERACAO DE DEMANDA COMERCIAL LTDA, comprising capturing, transporting, processing information and closure of the service, as well as the offer to other services and related products will only be made upon the consent formalized by the data holder;

**3.2** As a Controller, all information received from Operators in the context of the provision of services by D&S GERACAO DE DEMANDA COMERCIAL LTDA to its natural person costumers, including the capture, transportation, processing of information and closure of the service providing through the signature of a document that demonstrates which data is being received and for which goal.

**3.3** All the customer's information, collaborators and employees collected in the context of legal or contractual obligation.

### 4. Regarding its nature, the information can be classified into 2 (two) groups

**4.1** Information received is that information from the data holder or his legal representative, resulting from contact, registration, access to the website or contract with us and consequently with our suppliers, such as: full name, SSN, date of birth, full address, email address, telephone number and other possible personal data provided for in the LGPD and necessary for the fulfillment of our services.

**4.2** Information collected about the data holder to carry out the services of our providers to the data holder.

Point of Attention: The specific privacy practices in relation to other products and services of D&S GERACAO DE DEMANDA COMERCIAL LTDA available to its customers will be associated with customer or third-party acceptance of each product or service.

### 5. Collected data, method and finality of the collection and consent

**5.1** The information is collected by legal means or in accordance with the demands provided and is stored in a safe and controlled environment, while the service provision contract is in effect. The D&S GERACAO DE DEMANDA COMERCIAL LTDA undertakes to take all the appropriate measures to maintain the absolute secrecy and strict confidentiality of all information, personal data or specifications to which you have access or perhaps you may come to know or become aware of on its customers, due to sales or service provision (that is, capture, transport, information processing, among other services), being allowed to share, while Controller, for the purposes provide in the General Law of Data Protection.

**5.2** The D&S GERACAO DE DEMANDA COMERCIAL LTDA keeps the data while the contract with the data holder is in effect. After the end of the contract or in the event of its cancellation, the data will be deleted immediately, or in accordance with the inactive documents disposal policy, as well as in another period foreseen by the legislation.

## **6. The personal data collected and/or shared is given exclusively for fulfillment of purposes informed in this Policy and within the necessary limit to the performance of activities related to the normal course of our business, including but not limiting to**

**6.1** The clients that hire the services and/or products of D&S GERACAO DE DEMANDA COMERCIAL LTDA.

**6.2** Operators that offer and sale the company's product for holders of personal data.

**6.3** Independent auditors.

**6.4** Competent regulatory bodies such as, for example, the National Authority of Data Protection.

**6.5** Service providers and companies that enable the delivery of the products and/or services sold by D&S GERACAO DE DEMANDA COMERCIAL LTDA.

**6.6** Is essential the consent of the data holder with his free, informed and unequivocal statement by which they agree with the processing of their personal data for the defined purpose of the D&S GERACAO DE DEMANDA COMERCIAL LTDA. according to art. 5, XII, of the GLDP. We consider free and informed consent, free of vices, of the data holder, after prior access, complete and detailed information on the data processing, including its nature, objectives, methods, duration, justification, purposes, risks and benefits, as well as your complete freedom to refuse or stop data processing at any time. The D&S DEMAND GENERATION COMERCIAL LTDA has the obligation to inform the data holder, in appropriate language, of not technique, so that they understand it.

The use of the collected information by D&S GERACAO DE DEMANDA COMERCIAL LTDA, in any hypothesis provided in the items above, is made exclusively to fulfill the purposes informed in this policy in the activities performance of D&S GERACAO DE DEMANDA COMERCIAL LTDA

## **7. The D&S GERACAO DE DEMANDA COMERCIAL LTDA will inform about new purposes, whenever it is necessary to use information collected for purposes other than those defined in this policy or those expressly by the data holder. When necessary, it will also collect a new consent**

## **8. Relationship with the suppliers (Operators)**

The D&S GERACAO DE DEMANDA COMERCIAL LTDA requests to all operators to maintain the confidentiality of information shared with them or that they have access to in function of their activities, as well as to use such information exclusively for purposes expressly allowed. The D&S GERACAO DE DEMANDA COMERCIAL LTDA, however, is not responsible for misuse of such information, weather by its suppliers or by its customers, due to non-compliance of this policy and the contractual obligations of D&S GERACAO DE DEMANDA COMERCIAL LTDA through its own instruments. The data will only be shared through a documentation signature that demonstrates which data is shared and for which purposes it will be used.

## 9. Information security

**9.1** The D&S GERACAO DE DEMANDA COMERCIAL LTDA, aiming the safety of the information provided by the customer's line up with physical security processes, logical, technical, and administrative compatible with the sensibility of the collected information, in which the efficiency is periodically evaluated.

**9.2** The D&S GERACAO DE DEMANDA COMERCIAL LTDA implements new procedures and continuous technological improvements to protect all personal data collected from customers.

**9.3** The D&S GERACAO DE DEMANDA COMERCIAL LTDA despite security measures adopted, is not responsible for damages resulting from the violation of the information's confidentiality due to the occurrence of any fact or situation that is not attributable to it.

**9.4** The D&S GERACAO DE DEMANDA COMERCIAL LTDA in the processing of the information collected, is guided by the standards of good practices and governance and the general principles established in the Law No. 13.709/2018 General Law Personal of Data Protection.

**9.5** The D&S GERACAO DE DEMANDA COMERCIAL LTDA uses processes that always respect the current legislation and the terms of this policy.

## 10. Cooperation with regulatory authorities

In cases where it is necessary to disclose the personal data of customers, employees or any other relevant party, whether due to compliance with the law, determination court or competent supervisory body of the activities carried out, such information must be disclosed only in the strict terms and within the limits required for its disclosure, and the holders of the disclosed information, as far as possible, will be notified of such disclosure, so that they can take protective measures or appropriate repairs.

## 11. Alterations

This DPISP can be modified at any moment, according to the purpose or necessity for adaptation and compliance with the provision of law or whenever deem it necessary. The continuous use of services or of service providing of D&S GERACAO DE DEMANDA COMERCIAL LTDA according to the situation, post disclosure of the changes will be considered acceptance from the customers, employees and any other parties regarding the new terms and conditions.

## 12. Consequences management

The CUSTOMERS, employees or other relevant parties who observe any deviations from the guidelines of this Policy, may report the fact to our Privacy and Data Protection Officer (DPO), who may or may not identify himself. Internally, non-compliance of the guidelines of this Policy gives rise to the application of measures of accountability of the agents that fail to comply according to the respective severity of the non-compliance.

## 13. Responsibility

**13.1** It is up to administrators, employees and third parties to observe and ensure compliance with this policy and, when necessary, call the DPO for consultation on situations involving conflict with this policy or upon occurrence of situations described therein.

**13.2** The DPO is responsible for maintaining this policy updated, in order to ensure that any regulatory/legal changes to the guidelines and general rules here established are observed; Prepare reports within the compliance set out in the General Law of Data Protection; Clarify doubts regarding this Policy and its application; To accept complaints and communications from data subjects, providing clarifications and adopting measures; Receive communications from the National Data Protection Authority ("ANPD") and take action; Guide employees and third parties regarding the practices to be adopted in relation to the protection of personal data; Adopt initiatives to share information about incidents containing personal data with ANPD and data subjects, when necessary.

**13.3** It is up to the Legal area to clarify doubts regarding the relevant legislation and regulations.

## 14. Legal Basis

This Data Protection and Information Privacy Policy is based on:

Article 5 of the Federal Constitution of 1988; Complementary Law No. 105/2001: Provides for the secrecy of operations of financial institutions and makes other provisions. Law No. 13.709/2018, which provides for the processing of personal data, including in digital media, by a natural person or by a legal entity of public or private law, with a view to protecting the fundamental rights of liberty and privacy. Internal norms and procedures constantly improved, approved by the competent authorities and made available to all employees.

## 15. Concepts and Acronyms

Aiming that the data are used responsibly and the privacy of its holders is protected, the need for regulations arose. In this sense, the LGPD (General Law of Data Protection), which sets out how organizations collect, use, and share personal data. To clarify some terms used in this law, article 5 brings some important considerations:

**Controller:** natural person or legal entity, public or private, who is responsible for decisions concerning the processing of personal data.

**Operator:** natural person or legal entity, public or private, who processes data personal on behalf of the controller

**Holders:** Natural person, who has shared, registered in the organization's system, if exists, to whom the personal data that are the object of work refer.

**Personal data:** Any information related to an identified or identifiable natural person, such as for example first name, last name, date of birth, personal documents (SSN, divers license, Social Security of Work, passport, voter registration, among others), residential or business address, telephone, email, cookies and IP address.

**Sensitive personal data:** Any personal data about racial or ethnic origin, religious beliefs, political opinion, union affiliation or organization of a religious, philosophical or political nature, data relating to health or sex life, genetic or biometric data, when linked to a person Natural.

In addition to Article 5, some meanings are important for the full understanding of the LGPD:

**Information:** Data, whether processed or not, that can be used for production and for transmission of knowledge, contained in any medium, support or format.

**Privacy and Data Protection:** Possibility for the holder to autonomously determine the use, which is made up of your own personal data, together with the establishment of a series of guarantees to prevent this personal data from being used in a way that causes discrimination or damage of any kind.

**Stakeholders/Publics of Interest:** These are all relevant publics with interests relevant to the organization in question, or even individuals or entities that assume some kind of risk, direct or indirectly, in the face of society. Among others, the following stand out: shareholders, investors, employees, society, customers, suppliers, creditors, governments, regulatory bodies, competitors, press, class associations and entities, and non-governmental organizations

**Third parties:** Natural person or legal entities, public or private, who provide services to the organization in question, on their premises or remotely and, in the exercise of their activities, may have access to information related to the business of D&S GERACAO DE DEMANDA COMERCIAL LTDA.

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