

POLÍTICA DE PRIVACIDADE

LDCM ADVOGADOS

Welcome to **LDCM ADVOGADOS!**

1. Who are we?

O **LDCM ADVOGADOS** is a firm specialized in strategic litigation, acting in complex disputes involving sectors such as M & A and capital markets, education, credit recovery, construction and infrastructure, energy, oil and gas, technology, telecommunications etc.

The firm is concerned about the protection of your privacy and data. This Privacy Policy ("Policy ") describes how your personal data will be treated by **LDCM ADVOGADOS**, in compliance with the applicable legislation - Law No. 13.709/2018 (General Law of Data Protection)

Please read this Privacy Policy carefully. By accessing and/or using our Services and Website, you declare to be fully aware of the terms set forth herein.

2. The purpose of this document

LDCM ADVOGADOS' Privacy Policy seeks to reinforce the relationship and the commitment with the adequate treatment of its users' data, in line with the provisions of the General Data Protection Law (Law 13.709/18).

3. Definições Importantes

- a) "**LDCM ADVOGADOS**": law firm responsible for providing legal services;
- b) "**User**": person who uses the **LDCM ADVOGADOS** platform, although navigating without logging in;
- c) "**LGPD**": acronym in Portuguese that, in English, means "General Data Protection Law" (Law No. 13.709/2018);
- d) "**Personal data**": any information related to a person that identifies him or her or, used in combination with other processed information, identifies an individual. Also, any information through which the identification or contact information of a natural person is possible.
- e) "**Sensitive Personal Data**": personal data on racial or ethnic origin, religious conviction, political opinion, affiliation to a union or religious, philosophical or political organization, data relating to health or sexual life, genetic or biometric data, when linked to a natural person.
- f) "**Anonymized Data**": data related to a Holder that cannot be identified, considering the use of reasonable and available technical means at the time of processing;
- g) "**Database**": a structured set of personal data, established in one or several places, in electronic or physical support.

- h) **“Holder”**: person to whom the personal data object of the processing refers.
- i) **“Processing of personal data”**: the processing of personal data is the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication , transfer, dissemination or extraction of data from individuals.
- j) **“Anonymization”**: use of reasonable technical means available at the time of processing, whereby data loses the possibility of association, directly or indirectly, with an individual;
- k) **“Controller”**: a natural or legal person, under public or private law, who is responsible for decisions regarding the processing of personal data;
- l) **“Operator”**: a natural or legal person, under public or private law, who processes personal data on behalf of the controller;
- m) **“Purpose”**: what **LDCM ADVOGADOS** aims from the processing of personal data;
- n) **“Necessity”**: reason why the processing of personal data is justified in order to achieve the intended purpose. The processing of personal data, however, must be limited to the minimum necessary to achieve the desired purpose, that is, it must be relevant, proportionate and not excessive;
- o) **“Consent”**: free, informed and unambiguous (without leaving any doubt) authorization by which the User agrees to the processing of his/her personal data for a previously stipulated purpose.
- p) **“Deletion”**: deletion of data or set of data stored in a database, regardless of the procedure used.
- q) **“Data Sharing”**: communication, dissemination, international transfer, interconnection of personal data or shared treatment of personal data banks by public bodies and entities in compliance with their legal powers, or between these and private entities, reciprocally, with specific authorization, for one or more modalities of treatment allowed by these public entities, or between private entities.

4. Who does this Privacy Policy apply to?

This Privacy Policy applies to all those who use the **LDCM ADVOGADOS** platform , as well as those who, in any way, have their personal data processed by **LDCM ADVOGADOS**. **The use of the platform by the User implies acceptance of this Privacy Policy.**

5. processing of personal data

5.1. Provision of Services

For the provision of **LDCM ADVOGADOS** Services , the processing of Personal Data is carried out as necessary and in line with the ethical principles of legal practice and professional secrecy in the context of the client and lawyer relationship.

Personal Data collected and used in providing the Services is provided directly by our customers. Thus, such personal data are used strictly within the scope of the provision of the Services, which includes:

- a. Registration data (e.g.: name, profession, marital status, etc.)
- b. Contact details (eg email address, postal address, telephone number etc.);
- c. Financial data (eg bank number, branch number and bank account number);
- d. Occasionally, Sensitive Data such as union membership, racial or ethnic origin, depending on the Service to be provided;
- e. Other Personal data necessary for the provision of our Services

Além disso, processamos informações de identificação e histórico do cliente para fins de análise de conflito de interesses e cumprimento de quaisquer obrigações legais ou regulatórias às quais possamos estar sujeitos.

5.2. Website

During the use of our Website, we collect personal data in two ways: (a) by providing it by the Owner through online forms; and (b) automatically, through cookies and similar technologies.

Origem dos dados	Dados tratados
Information you provide as a User	<p>LDCM ADVOGADOS collects the information that the User provides when it comes into contact, through the areas (when active):</p> <ol style="list-style-type: none"> a. “Contact us”: email. b. User registration: the data collected are name and email. c. “Work with us”: the data collected are name, email, address, CPF, RG, Marital Status and professional history. d. “Register to receive a Newsletter”: the data collected are name and e-mail.
Information collected automatically	<p>LDCM ADVOGADOS collects and stores information when the User interacts with the platform. Examples are the use of cookies , device IP number and date and time of access.</p>

6. Finalidade de tratamento e base legal adotada

Finalidade	Base Legal
Respond to requests, fulfill requests and provide technical support.	Art. 7, item V of the LGPD – execution of a contract signed between LDCM ADVOGADOS and the User.
Provision of contracted services	Article 7, item V - execution of a contract signed between LDCM ADVOGADOS and the Holder.
To carry out selection processes and choose candidates for job opportunities at LDCM ADVOGADOS	Article 7, item IX of the LGPD - legitimate interest of LDCM ADVOGADOS .
Para envio de newsletter e informes sobre temas jurídicos de relevância para nossa comunidade.	Art. 7º, inciso IX da LGPD - interesse legítimo da LDCM ADVOGADOS .
For advertising purposes - targeted or not - via banners, emails or other methods.	Article 7, item IX of the LGPD - legitimate interest of LDCM ADVOGADOS in optimizing its administration and management.
For the regular exercise of the right related to processes or requests from public or governmental authorities.	Article 7, item VI of the LGPD - regular exercise of rights in judicial, administrative or arbitration proceedings by LDCM ADVOGADOS .
In order to protect the rights, privacy, security, property and operations carried out by LDCM ADVOGADOS .	Article 7, item IX of the LGPD - legitimate interest of LDCM ADVOGADOS .

In general, the processing of personal data will be based on compliance with a legal or regulatory obligation, execution of a contract or preliminary contractual procedure, on the regular exercise of rights in process, on legitimate interest or consent, as provided for in items I, II, V, VI and IX of Article 7 of the LGPD.

The processing of personal data undertaken by **LDCM ADVOGADOS** will always be based on some legal basis, provided for in arts. 7th and 11th of the LGPD, although it was eventually not listed in the table above.

7. Sharing data with third parties

In order to fulfill the purposes described in this Policy, **LDCM ADVOGADOS** may share your Personal Data with partners, aiming at improving the quality of service provided and the user experience on the platform, which will be done in an exceptional and

justified manner.

The platform may include links to third-party websites, plug-ins or applications. Clicking on these links or enabling such connections may allow third parties to collect or share User data. The **LDCM ADVOGADOS** is not responsible for the privacy statements of such third party sites. Thus, when the User leaves this platform, he must be sure to read the specific Privacy Policy of each website visited.

In addition to these hypotheses, **LDCM ADVOGADOS** shares personal data of Users in cases where sharing is necessary to comply with applicable law or upon request from public or governmental authorities, subject to the ethical and statutory rules that conduct the legal activity performed by law firms, especially those that refer to the secrecy inherent to the profession.

8. Retention and Disposal of Personal Data

The personal data processed by **LDCM ADVOGADOS** will be stored for as long as the contract is in force (art. 7, item V of the LGPD). Upon termination of the contract, the Holder's information, including personal data of third parties, will be stored in accordance with the prescription rules of Brazilian law, unless the treatment is based on the consent of the holder or legitimate interest that justifies the storage, as well as if retention is authorized by current legislation.

After the statute of limitations, the personal data processed by **LDCM ADVOGADOS** will be deleted, except for cases in which the processing is necessary due to the cases provided for in the items of art. 16 of the LGPD, highlighted below:

- I - compliance with a legal or regulatory obligation by the controller;
- II - study by a research body, ensuring, whenever possible, the anonymization of personal data;
- III - transfer to a third party, provided that the data processing requirements set out in this Law are respected; or
- IV - exclusive use of the controller, its access by a third party being prohibited, and provided that the data is anonymized.

9. Cookies

9.1. What is a Cookie?

“Cookies” are small text files stored on the user's device. Cookies allow us to recognize your preferences in order, for example, to adapt the website and your navigation to your specific needs.

Cookies usually also have an expiration date. For example, some cookies are automatically deleted when you close your browser (so-called session cookies), while others may be stored longer on your computer until manually deleted (so-called persistent cookies).

9.2. Why do we use Cookies?

Our website uses cookies to store your preferences, always with the aim of facilitating use and better adapting our applications to the interests and needs of users, as well as to provide a better and more efficient access experience on our website.

Through cookies, we also store information about browser activities, including IP address and the page accessed. These activity records (logs) will be used only for statistical and metric purposes of the services provided.

9.3. How can I remove or block cookies?

The user has the option to accept or refuse the use of cookies on their device, using the settings of their preferred browser. However, we remind you that, if you do not accept some cookies, certain services and functions on our website may not work optimally.

You will find more explanations on how to proceed by clicking on the links below. To find information related to other browsers, visit the browser developer's website.

Internet Explorer (Windows)

<http://windows.microsoft.com/es-es/windows-vista/block-or-allow-cookies>

Microsoft Edge

<https://support.microsoft.com/es-ar/help/4027947/microsoft-edge-delete-cookies>

Firefox

<https://support.mozilla.org/es/kb/habilitar-y-deshabilitar-cookies-que-los-sitios-we>

Google Chrome

<http://support.google.com/chrome/bin/answer.py?hl=es&answer=95647>

Safari (Mac)

<http://www.apple.com/legal/privacy/es/cookies>

10. Rights of Data Holders

O Usuário tem o direito de solicitar ao **LDCM AVOGADOS** informações referentes ao tratamento de seus dados pessoais, por meio dos pedidos abaixo:

I. Access to data - it is the right of holders to request access to existing data processed by **LDCM AVOGADOS**

II. Correction of incomplete, inaccurate or outdated data - data subjects may request **LDCM AVOGADOS**, at any time, to change their personal data, in case they are incorrect, inaccurate or out of date. Examples: name update, telephone and address change. It is important that personal data are accurate and current, thus, it is up to the Holder to keep **LDCM AVOGADOS** informed in cases where their personal data need to be corrected.

III. Anonymization, blocking or deletion of unnecessary, excessive or treated in disagreement with the LGPD - the Holder may request the blocking and deletion of their personal data. Such request will only be denied by **LDCM AVOGADOS** in cases where the request cannot be met or in cases where storage is mandatory or permitted, in accordance with the hypotheses listed in art. 7 of the LGPD and other applicable devices. Since anonymization prevents the identification of the individual, the anonymized data are

no longer considered personal data and, therefore, are outside the scope of application of the LGPD.

IV. Data portability to another service or product provider, upon express request, in accordance with the regulations of the National Authority, observing commercial and industrial secrets - the portability of personal data does not include data anonymized by **LDCM ADVOGADOS**.

V. Deletion of personal data processed with the consent of the holder - the holder's personal data will be deleted after the purpose is fulfilled, except in certain cases:

- a) compliance with a legal or regulatory obligation by **LDCM ADVOGADOS**;
- b) transfer to a third party, provided that the data processing requirements set out in the LGPD are respected; or
- c) exclusive use of **LDCM ADVOGADOS**, its access by a third party being prohibited, and provided that the data is anonymized.

VI. Information from public and private entities with which the controller shared data: it is the Right of the Holder to request access to personal data that are forwarded to public and private entities.

VII. Information on the possibility of not providing consent and on the consequences of denial: **LDCM ADVOGADOS** is available to answer and assist, in a transparent manner, any doubts that may exist due to the processing of personal data of the holders, including the possible impacts arising from its failure to provide consent.

VIII. Revocation of consent: the consent, provided by the holders of personal data, may be revoked at any time by means of a written request to **LDCM ADVOGADOS** through a free procedure when this is the legal basis for the processing of data.

11. Data security

A **LDCM ADVOGADOS** employs technical and administrative security measures to protect personal data under their control and keeps track of all personal data processing operations performed.

We adopt access profile management, backup policy, two-step verification, among other electronic safeguards and security procedures in order to protect the privacy and the Personal Data we store.

12. Privacy Policy Modification

A **LDCM ADVOGADOS** may modify, alter or replace this Privacy Policy at any time. In case of change, the Holders will be informed through the platform interface 15 (fifteen) days.

13. Informações para contato

LDCM ADVOGADOS offers the following channel to issues related to this Privacy Policy and the holder of the rights exercise:

E-mail: contato@ldcm.com.br