

# Privacy Policy

This **Privacy Policy** ("Policy") describes the practices we follow to respect the privacy of all visitors to our sites "intelie.ai" and "intelie.com" ("INTELIE Sites"), whose owner is the company INTELIE SOLUÇÕES EM INFORMÁTICA LTDA., a duly constituted and validly existing company according to the laws of Brazil, headquartered at 64, Dom Gerardo street, 9th floor - Center, CEP 20090-906, Rio de Janeiro, State of Rio de Janeiro, registered in the National Register of Legal Entities of the Ministry of Economy (CNPJ/ME) under number 10.454.306/001-71 ("INTELIE").

INTELIE takes your privacy seriously and ensures the security and data protection of all our customers, business partners, suppliers and employees.

If you have any questions regarding the treatment or processing of your personal information on the INTELIE Sites, you can contact us directly by sending a message to the email: [dpo@intelie.com.br](mailto:dpo@intelie.com.br)

## Definitions

- A) "Personal Data": all information related to an identified or identifiable natural person. Included in this definition of Personal Data:
- a) **Direct Personal Data**: those that directly identify a natural person without the need for other information, such as name, CPF, voter registration and ID, among others;
  - b) **Indirect Personal Data**: those that allow the identification of a natural person with the help of additional information for this purpose, such as gender, profession, age, among others;
  - c) **Sensitive Personal Data**: racial or ethnic origin, religion, political opinion, affiliation to a union, philosophical or political organization, data relating to health or sexual life, genetic or biometric data; and
  - d) **Pseudonymised data**: those that do not allow the identification of an individual unless additional information is provided, which will be kept in a separate and secure place.
- B) "**Holder of Personal Data**" or "**Holder**" means any natural person to whom they Personal Data that is subject to treatment.
- C) "**Treatment**": any operation or set of operations carried out with Personal Data, whether by automated means or not, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, disposal, evaluation or control of information, modification, transfer, dissemination or extraction.

- D) **“Data Protection Laws”**: all national, foreign or local laws, regulations or decrees, or other governmental norms related to data protection, privacy, confidentiality or security of Personal Data, in particular, the Brazilian General Data Protection Law , Law No. 13,709/2018 (**“LGPD”**).

### **1. The scope of the Privacy Policy**

This policy applies to the INTELIE Sites (“intelie.com.br”, “intelie.com”, as well as to all those who may be related to INTELIE and its respective products and / or services) and contemplates how INTELIE collects , uses, discloses and protects your Personal Data, as well as respects your rights guaranteed by national, foreign or local laws, regulations or decrees, or other governmental norms related to data protection, privacy, confidentiality or security of Personal Data and, in particular, Data Protection Laws.

We may provide additional information about the collection and use of Personal Data at other locations on the INTELIE Sites, as related to a specific product or service, upon request.

This Policy does not apply to any third party websites, applications, products, services or resources that may be offered or accessed through the INTELIE Sites. Accessing these resources will cause you to leave the INTELIE Sites and may result in the collection or sharing of information about you by third parties. We do not control, endorse or assume any responsibility in relation to these third party sites or their privacy practices, which may be different from ours. We recommend that you review the privacy policy of any website with which you interact before allowing the collection and use of your Personal Data.

### **2. Adequate Legal Treatment**

INTELIE only collects, uses, discloses or processes Personal Data in an appropriate manner and in accordance with applicable Data Protection Laws.

In some cases, the collection of some Personal Data is necessary for the provision of our services as well as for the good functionality of the INTELIE Sites. In such situations, if the Holder does not want to share his Personal Data with INTELIE, it will not be possible to provide him with the services and / or features offered.

### **3. How does INTELIE collect your Personal Data?**

- a. Personal Data provided by the Holder. Data that you provide us, voluntarily, so that we can contact you and provide the requested services, such as, for example, hiring one of our Products, requesting a Demo, receiving a Newsletter or using one of our resources as Webinars. Personal data collected in this way may include: name, surname, telephone, e-mail, address, position, CPF, among others.
- b. Personal data collected automatically. Data collected when a user visits the INTELIE Sites, such as data collected by cookies and other technologies (for

example, analysis tools-tags and pixels). See the item below on “Cookies and similar technologies”. Personal data collected in this way may include: the type of operating system and the type and version of the web browser, information about your navigation on the pages of the INTELIE Sites, the IP address, among others.

#### **4. For what purposes can INTELIE use your Personal Data?**

INTELIE may use your Personal Data for its business purposes, such as:

1. To make the operation of our business viable, that is, make our services available and meet your requests;
2. For data analysis, navigation, safety, tests, preparing statistics or carrying out research and surveys;
3. For the selection and hiring of new employees for job opportunities at INTELIE;
4. To comply with legal and regulatory requirements; and
5. To monitor trends, send marketing communications, promotions or other information about our trade policies and business opportunities.

In this context, we will treat your Personal Data only within the legal circumstances authorized by the LGPD, that is (i) when treatment is necessary to meet INTELIE's legitimate interests, (ii) to comply with legal or regulatory obligations and (iii) when necessary for execution of contract or pre-contractual conditions.

We may also, in certain circumstances and when required by applicable laws, request the Holder's explicit consent for the processing of Personal Data, such as in the case of Sensitive Personal Data.

#### **5. Sharing Personal Data with Third Parties**

INTELIE may share your information with third party suppliers, consultants or service providers that we contract to carry out activities on our behalf. These third parties include, for example, business management, marketing and support systems, among others.

INTELIE may also be requested by a government authority to provide Personal Data for its customers. In this case, INTELIE guarantees that it will strictly provide the requested Personal Data, in order to comply with its legal obligation.

#### **6. International Data Transfer**

As the Internet is a global environment, certain services offered by INTELIE may require the transfer of your data to other countries.

In such cases, the data is treated in accordance with the LGPD and other protection legislation. We take security measures in accordance with our policies and adopt standard clauses in contracts with suppliers and service providers.

By browsing our website or communicating with us, you consent to the processing of your information, including the international transfer of data, when necessary. We take steps to ensure that any information collected is treated securely, in accordance with data protection standards and in accordance with this Privacy Policy.

## **7. Cybersecurity**

INTELIE is at the forefront of any security threat, this is our specialty. In this sense, INTELIE has all the necessary tools and maintains administrative, technical, organizational and physical measures to protect Personal Data from any loss, misuse, unauthorized access, disclosure, modification or destruction. Such measures may include, for example, encryption, factor authentication and strict access controls. We also require our partners to take similar measures for the protection and privacy of Personal Data.

## **8. How long do we store personal information for?**

We store customer information in accordance with Brazilian law.

## **9. What are the data subject's rights?**

The holder of personal data has the right to obtain from INTELIE, at any time, upon formal request, information regarding his data.

The INTELIE will have 15 days to reply the requests from holders. Requests will be analyzed as provided for in current legislation and, due to legal issues, some requests may not be met.

Data subjects, according to the text of the LGPD, can exercise their rights through:

- I. Confirmation of the existence of treatment;
- II. Access to data;
- III. Correcting incomplete or outdated data indexed;
- IV. Anonymization, blockage or elimination of unnecessary or excessive data processed in disagreement with the regulations of national authorities, the observed industrial and commercial secrets;
- V. Deletion of personal data processed with the consent of the holder;
- VI. Information on public and private entities with which the controller shared data use;
- VII. Information about the possibility of not giving consent and about the consequences of the denial; and
- VIII. Revocation of consent.

## **10. Cookies and similar technologies**

Cookies are small data files that are collected on your computer or other devices (such as smartphones or tablets) while you are browsing the site.

We use cookies, pixels and other technologies (collectively, cookies) to recognize your browser or device, learn more about your interests, provide essential features and services and also to:

- Conducting research and diagnostics to improve content, products and services;

- Prevent fraudulent activities; and
- Improve security.

If you block or reject our cookies, some features of the website may not work properly.

#### **11. Other important information on data protection**

To ensure that the rules are clear and precise, we can change this policy at any time by publishing the revised Privacy Policy on this website and indicating the effective date of the document.

#### **12. Contact with the data protection officer of the INTELIE website?**

Finally, the data protection officer is the one chosen by INTELIE to act as a communication channel between the controller, the data holders and the National Data Protection Authority (“ANPD”).

#### **13. Change log**

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