

PRIVACY POLICY

Leoni Siqueira Advogados (“LSA”) is committed to protect privacy and look after the safety of the Users.

This Privacy Policy (“Policy”) intends to provide to clients, partners, suppliers, users of this website, job candidates, and other data owners, adequate transparency about how their data is going to be treated when they access the website or when they interact with LSA in other channels, organizing the rules related to data processing, following measures of the Data Protection Law (Federal Law nº 13.709/2018) and other applicable regulations of the Brazilian legal system.

This Policy applies to our website and our operation as a whole, to all users, covering all forms of treatment we can give to personal data, including the data collected *offline*, in a physical form.

To access and/or use the LSA website, the User declares being at least 18 (eighteen) years old and having the full and expressed capacity to accept the terms and conditions of this Privacy Policy and consent to all law purposes.

1. DEFINITIONS

Users: all individuals that are going to use or visit the LSA website, over 18 (eighteen) years old or fully capable of practicing actions of civil life, as well as the absolutely or relatively incapable properly represented or assisted;

Personal Data: means any information provided to and/or collected by the LSA related to an identified or identifiable natural person;

Purpose: means realizing data processing for purposes that are legitimate, specific, explicit, and informed to the data holder/user;

Consent: free, informed, and unequivocal manifestation by which the holder/user agrees to the processing of their personal data for a specific purpose;

Treatment: every operation performed with personal data, such as those related to the collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of the information, modification, communication, transfer, dissemination or extraction;

Treatment Agents: the controller and the operator, being certain that LSA controls decisions regarding the processing of users personal data, which will only be processed by authorized operators and data controllers;

Person in charge of Data Protection: is the person indicated by the LSA to act as a communication channel between the controller, the users, and the competent authorities, such as the National Data Protection Authority. The Officer in Charge will be responsible for receiving complaints and communications from the users, responding and adopting measures, and receiving communications from the National Data Protection Authority.

2. AGREEMENT TO THE TERMS AND CONDITIONS OF THIS POLICY

As a condition of access to the legal content and information offered by LSA and use of the functionalities of the website, the User declares to have read this Privacy Policy in its entirety, being in full agreement with all the conditions provided.

In case the User does not fit or agree, even partially, with the terms and conditions contained in this Privacy Policy, they should not access and/or use the LSA website, as well as the services operated by it.

3. FOR WHAT PURPOSE DOES LSA PROCESS PERSONAL DATA? WHAT WILL BE PROCESSED?

In general, all data will be processed only for the purposes necessary within the scope of the website and for the execution of the activities and services made available and provided by the LSA.

LSA only receives or collects the following information related to Users:

- name;
- e-mail;
- contact;
- address;
- information about Users use of the Site (some information may be collected automatically, such as IP Address, unique mobile device identifier, browser type, browser language, and access times); and
- it is also possible to automatically collect the User's location, as long as this permission is enabled on their mobile device.

LSA uses the collected data for the following purposes:

- provision of legal services by LSA;
- identification of the profile of the Users that are accessing the website;
- sending relevant content to the User, such as: institutional communications; memos; newsletters, feedback surveys, among others
- communication about updates, functionalities, news, and other relevant events for the maintenance of the relationship with the Users;
- improving site usage and experience; and
- observance with a court order or administrative requisition.

4. CONSENT

The Consent for data collection is obtained freely, expressly, individually, clearly, specifically, and legitimately and may be revoked at any time by the user, by means of a request to the data protection officer, at the address given at the end of this document. Revocation of consent may imply the impossibility of the relationship with LSA.

Consent is not required for the processing of personal data made manifestly public by the user, as long as it is done following purpose, good faith, and public interest, safeguarding the rights of the holder.

By using the services and accessing the LSA website, you are consenting and aware of the provisions of this Privacy Policy and the purposes of treatment described and provided in this document, as well as knowing your rights and how to exercise them

5. DATA RETENTION

LSA retains all data provided, including personal data, for as long as the user's registration is active and as needed to perform its services.

Therefore, data is stored only for as long as is necessary to fulfill the purposes for which it was collected, unless there is any other reason for its maintenance, such as, for example, the need to comply with any legal, regulatory, contractual, or other obligations permitted by applicable law.

The user may request, at any time, the elimination of the data collected through our communication channel informed at the end of this document.

6. YOUR RIGHTS AS THE DATA HOLDER.

We at LSA are committed to and transparent in ensuring the rights granted by the Data Protection Law to you, the user.

For this purpose, the user who is the owner of the data may, at any time, request to the person in charge of LSA

- (i) confirmation of the existence of data processing
- (ii) access to data;
- (iii) correction of incomplete, inaccurate, or outdated data;
- (iv) the anonymization, blocking, or elimination of data that are unnecessary, excessive, or processed unlawfully;
- (v) portability of data to another service or product provider;
- (vi) elimination of data;
- (vii) information of the public and private entities with which the controller has shared data;
- (viii) information about the possibility of not providing consent and the consequences of refusal; and
- (ix) revocation of consent.

Whenever you file a request to exercise your rights, LSA may ask for additional information and/or documents so that we can verify your identity.

7. SAFETY AND CONFIDENTIALITY

All appropriate technical and organizational measures, considering the nature, scope, and context of the Personal Data that is extracted from our website and/or by other means of technologies and the risks involved in their processing, have been implemented to preserve the security of the Personal Data.

Internally, User data is accessed only by duly authorized professionals or partners, respecting the principles of proportionality, necessity, and relevance to the objectives of the LSA, as well as the commitment to privacy.

LSA does not disclose and/or market Personal Data. However, if requested by an order issued by a competent authority in compliance with its legal powers, or in case of violations or suspected violations of this Privacy Policy, the Terms of Use, or the Law, LSA may be required to make Personal Data available. However, LSA undertakes to disclose the information to the minimum necessary to achieve the required purposes.

8. PERSON IN CHARGE OF DATA PROTECTION

The LSA offers you several options to access and control the processing of your data. Therefore, if you believe that your personal data has been treated in a manner inconsistent with this Policy, or if you have questions or wish to request the deletion, correction, or amendment of your data, we have a data protection officer who is at your disposal, simply send your request to any of the following addresses:

Mailing address: Rua Rainha Guilhermina 75, 1^o andar, Leblon, Rio de Janeiro/RJ,
CEP 22441-120

E-mail: lsa@lsa.com.br

9. CHANGES AND UPDATES TO THE PRIVACY POLICY

LSA reserves the right to adapt and update this Privacy Policy at any time to better reflect our personal data handling practices and to provide greater security and transparency to our operations. We recommend that you check this Policy periodically to familiarize yourself with any changes.

In case of significant updates and that require collection of consent, the LSA will notify the User through the contact means provided by the User.