

PRIVACY POLICY

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✓ 1. Introduction

GOLDEN TECHNOLOGIA is a company committed to data privacy, so in the terms of the Privacy Policy (Policy) we explain the ways in which we use, store, share and protect the personal data collected from the use of our services and solutions (collectively Services) and visiting our websites. Also with the data subjects they can exercise the rights provided for in the applicable legislation.

The personal data we collect depends on the context of your interactions with GOLDEN TECHNOLOGIA. To facilitate your understanding, we explain in this Policy how we treat data from GOLDEN TECHNOLOGIA customers (Customers), customers customers (Consumers) and users of our websites (Users), collectively (Owners).

Specific Privacy Policies may apply to some of our products and services. For more information about our privacy practices related to a specific product or service, request more detailed information using our e - mail: [governance @ goldentechnologia.com.br](mailto:governance@goldentechnologia.com.br).

✓ 2 Who are we

GOLDEN TECHNOLOGIA is a Brazilian company specialized in managed services and professional services. We offer a broad portfolio of services such as software license, *Cloud* management , consulting, and vertical solutions focused on innovation and digital transformation.

✓ 3 Important definitions

General Data Protection Law (LGPD) : Federal Law No. 13,709 published on August 14, 2018, which regulates the processing of Personal Data, including in digital media, by a natural person or a legal person under public or private law, with the aim of protecting the fundamental rights of freedom and privacy and the free development of the personality of the natural person.

Processing Agents : are those responsible for the Processing of Personal Data and are separated into two categories: the Controller and the Operator. The Controller is the person or company responsible for decisions regarding the Processing of Personal Data. The Operator, in turn, is the person or company that carries out the Processing of Personal Data on behalf of the Controller, following his instructions.

Personal Data : is information related to an identified or identifiable natural person. Processing is any operation performed with Personal Data in an automated or non-automated way, that is, it is the collection, production, reception, classification, use, access,

reproduction, transmission, distribution, processing, storage, archiving, disposal, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

4 Customers

DATA WE COLLECT:

In general, when a customer or your company contracts, uses or interacts with GOLDEN TECHNOLOGIA Services, we collect your personal data, which can be divided into three major categories:

I) Data you provide to us: when you contract, use or interact with the Services or communicate with us in any way, you (or your company) may provide us with some data. These data include:

- ✓ Professional contact details, such as full name, title, company, location, telephone number and e-mail address ;
- ✓ Account credentials, such as email address, username and password;
- ✓ Payment information, such as credit card details, bank details and invoice address;
- ✓ Data related to technical support and troubleshooting. This data includes call opening data, such as the type of product or service related to your request for help, contact or authentication data, and the content of your communications with us, including telephone recordings.

II) Data that we collect automatically: when you use our services, we can collect and store data automatically. These data include:

- ✓ Device data you use to access the Services, such as your IP address, operating system, geolocation information and device identifier.
- ✓ Log data, such as the IP address and your activities on the Services (such as the date and time associated with its use, the pages and files viewed, searches and other actions you perform (such as, for example, which features you used).
- ✓ Navigation data, that is, data on how you use and interact with our Services, which may include the dates on which you used the Services and your browsing activities. We also collect information about the performance of the Services, including metrics related to sending emails and other communications that you send through the Services.

III) Data we collect from other sources: we can collect data from other sources, such as public databases, data from public profiles on social networks and credit protection entities.

HOW WE USE THIS DATA:

We use data collected or received from the use of the Services for the following purposes:

- ✓•Comply with our contractual obligations to you or your company. This includes creating and managing the accounts that you may have with us, verifying your identity, charging the amounts owed by you, providing, personalizing and improving our services;
- ✓•Notify you of any changes to our products and services;
- ✓•perform internal operations including support, troubleshooting, analysis s , tests, and statistical surveys;
- ✓•Reinforce our security and protection procedures, aiming at providing a safer and more effective service;
- ✓•Provide information about other services and / or products we offer, similar to those already hired by you;
- ✓•Evaluate or understand the effectiveness of the advertising we serve, in order to provide relevant advertising for you;
- ✓•Manage risks and detect, prevent and / or remedy fraud or other potentially illegal or prohibited activities, in addition to violations of applicable policies, contracts or terms of use;
- ✓•As necessary, to establish, exercise and defend rights in judicial, administrative or arbitration proceedings;
- ✓•Comply with legal or regulatory obligations, or as required in a judicial process, by any competent law enforcement or government agency, or that claims to have competence, over the services managed by GOLDEN TECHNOLOGIA;
- ✓•For other purposes for which we provide a specific notice at the time of collection, or otherwise, as authorized or required by law.

5 Consumers

This section applies to the personal data of our Customers' Consumers, when we act as Operators. Note that in most of the products and services we offer, GOLDEN TECHNOLOGIA acts as an Operator of personal data, according to the instructions of our Clients. GOLDEN TECHNOLOGIA is not responsible for the privacy or security practices of our Customers. To understand how your data is handled by our customers, it is important to consult the respective privacy policies of these .

DATA WE COLLECT:

- I) Data we receive from our Clients: GOLDEN TECHNOLOGIA Clients can provide us with their personal data through the Services. When, for example, a Customer uploads his contact base to use our E-mail services, when you sign up for a Customer newsletter, when our Customer stores data on our servers or *storage*, the Customer can provide us with certain information such as your name, your email address, phone number or payment details.
- II) Data we collect automatically: when you interact with the Services purchased by the Customer, for example, when you interact with a marketing communication, browse the Customer website or make a purchase at the Customer's online store, we may collect information about your device and your activities. This information includes:
- ✓•Device data that you use to access the Services, such as your IP address, operating system, geolocation information and unique device identifiers;
 - ✓•Navigation data, that is, data about how you use and interact with our Services, which can include the dates on which you used the Services and your browsing activities, such as the pages you viewed, if you opened an email or added a product to the cart. We also collect information about the performance of the Services, including metrics related to sending emails or other forms of communication sent by our Customers through the Services.
- III) Data we collect from other sources: we can collect data from other sources, such as public databases, data from public profiles on social networks, credit protection entities, especially when you make a purchase on a website you use our payment intermediation services.

HOW WE USE THIS DATA:

We may use the data collected or received from the use of the Services by our Customers for the following purposes:

- ✓•Provide, customize and improve our Services;
- ✓•Perform internal operations, including support to our customers, problem solving, data analysis, tests, research and statistics;
- ✓•Proceed with payment requests made by you, in payment intermediation operations ;
- ✓•G erenciar risks and detect, prevent and / or remedy fraud or other potentially prohibited or illegal activities, and policy violations or applicable terms of use;
- ✓•Establish, exercise and defend rights in judicial, administrative or arbitration proceedings;

- ✓•Comply with legal or regulatory obligations, or as required in a judicial proceeding, by any competent law enforcement or government agency, or that claims to have competence, over GOLDEN TECHNOLOGIA.
- ✓•For other purposes for which we provide a specific notice at the time of collection, or otherwise, as authorized or required by law.

6 Users

This section applies to the personal data we collect when Users visit GOLDEN TECHNOLOGIA websites.

DATA WE COLLECT:

I) Data you provide to us: our websites have different ways in which you can contact us. You can provide us with personal data, for example, when you express interest in obtaining more information about our products and services, participate in surveys, sign up for our newsletter, download informational content or contact us in some other way . These data include:

- ✓•Data professional contact, such as your name, title, company, location, phone number and e-mail;
- ✓• Hobbies and interests;
- ✓•Nature of your communication with us;
- ✓•Marketing preferences;
- ✓•Any other information you choose to provide to us .

II) Data we collect automatically: when you use our websites, we can collect and store data automatically. This data includes m:

- ✓•Device data you use to access the Services, such as your IP address, operating system, browser information, geolocation information and unique device identifiers.
- ✓•Navigation data, that is, data on how you use and interact with our Services, which may include the dates on which you used the Services and your browsing activities, including for example your interaction with our informational materials . We also collect information about the performance of the Services, including metrics related to sending emails and other communications that you send through the Services.

HOW WE USE THIS DATA:

We may use data collected or received from the use of websites for the following purposes:

- ✓ Provide, customize and improve our websites;
- ✓ Reinforce our security and protection procedures, aiming at providing a safer and more effective service;
- ✓ Perform internal operations, problem solving, data analysis, tests, research and statistics;
- ✓ Process transactions and manage your online accounts;
- ✓ Evaluate or understand the effectiveness of the advertising we serve, in order to provide relevant advertising for you;
- ✓ Manage risks and detect, prevent and / or remedy fraud or other potentially illegal or prohibited activities, in addition to violations of applicable policies or terms of use;
- ✓ As necessary, to establish, exercise and defend rights in judicial, administrative or arbitration proceedings;
- ✓ Comply with legal or regulatory obligations, or as required in a judicial proceeding, by any competent law enforcement or government agency, or that claims to have jurisdiction, over GOLDEN TECHNOLOGIA;
- ✓ For other purposes for which we provide a specific notice at the time of collection, or otherwise, as authorized or required by law.

7 How we share personal data

We may share the personal data collected with third parties and business partners, which are relevant for the purpose of enabling the provision of the Services. Said sharing occurs based on the following criteria and for the purposes described below.

Third-party service providers: We work with third-party service providers to help us operate, execute, improve, understand, personalize, support and advertise our Services. When we share data with third party service providers, we require that they use your data in accordance with our instructions and terms or with your express consent, where applicable.

Credit Protection Entities: We may share your registration data with entities dedicated to reducing credit risk and protecting companies and individuals against fraud in order to validate the information provided by you.

Regulatory bodies, judicial or administrative authorities: we may share your personal information in order to provide the competent authorities with all information that is requested in relation to the Holder and operations performed by him on the Sites. In addition, we may share your personal data with public authorities or private entities to combat fraud and abuse



in the use of the Services, to investigate suspected violations of the law, or to combat any other suspected non-compliance with our policies and contracts.

Transfer of Assets: If a company or business unit of GOLDEN TECHNOLOGIA is reorganized or sold and all or substantially all of the assets are transferred to a new owner, your personal information can be transferred to the buyer regardless of his authorization to ensure continuity of services .

With your authorization: In other cases not provided for above, with the purpose of sharing personal data and information, we will send you a notification with information regarding such sharing to request your consent, for a determined purpose.

8 Cookies and Tracking Technologies

We and our partners may use various technologies to automatically collect and store data on the use of the Services. These technologies include cookies, pixels, web beacons and SDKs . We use the information collected through these technologies to optimize and personalize your browsing experience, target advertising campaigns, develop and apply security features and fraud prevention procedures, among other possible uses.

9 Transfers of personal data outside Brazil

We may transfer some of your personal data to service providers located abroad, including cloud service providers. When your personal data is transferred outside of Brazil, GOLDEN TECHNOLOGIA will take appropriate measures to ensure adequate protection of your personal data in accordance with the requirements of applicable data protection legislation, including by entering into appropriate data transfer contracts. data with third parties of your personal data when required.

10 Interactions With Third Party Sites

We may provide links to other sites on the Internet. GOLDEN TECHNOLOGIA IS NOT RESPONSIBLE FOR THESE SITES AND CONTENTS AND STILL DOES NOT SHARE, SUBSCRIBE, MONITOR, VALIDATE OR ACCEPT THE FORM THAT THESE SITES OR STORAGE TOOLS COLLECT, PROCESS AND TRANSFER AND TRANSFER AND TRANSFER. We recommend that you consult the respective privacy policies of such sites to properly inform yourself about the use of your personal information by other sites or other tools. We may register your access to third party websites in order to measure the relevance of these websites to our users.

11 Security

Personal Data processed by GOLDEN TECHNOLOGIA are protected by physical, technical and organizational security measures to reduce risks of loss, misuse and unauthorized access, disclosure and alteration, such as firewalls and data encryption, physical access controls to data centers , in addition to controls for authorization of access to information.

12 Holder Rights

Personal data holders have some rights with regard to their personal data and can exercise them by contacting us through the email [governanca @ goldentechnologia.com.br](mailto:governanca@goldentechnologia.com.br).

- ✓•Confirmation of the existence of personal data processing;
- ✓•Access to personal data, under the terms of the applicable legislation;
- ✓•Correction of incomplete, inaccurate or outdated data;
- ✓•Data portability;
- ✓•Exclusion of data, when it is processed based on the consent of the Data Subject or when the data is unnecessary, excessive or treated in non-compliance with the applicable legislation;
- ✓•Request for information on shared use of data. Please note that this Privacy Policy describes the personal data sharing activities by GOLDEN TECHNOLOGIA.
- ✓•Revocation of consent, when applicable.

For security reasons, we can only respond to your request if we are sure of your identity. Therefore, we may request additional data or information to confirm the identity and authenticity of the Cardholder. Note that, as mentioned above, in most of the products and services we offer, GOLDEN TECHNOLOGIA acts as an operator of personal data, according to the instructions of our Customers. If you are a Consumer and wish to exercise your rights in relation to the personal data that GOLDEN TECHNOLOGIA treats as an operator, you must contact the Customer using the Services.

13 End of Treatment

This Privacy Policy applies to the circumstances mentioned above throughout the period in which GOLDEN TECHNOLOGIA stores personal data. We store and maintain your information:

- For the time required by law;
- Until the end of the processing of personal data ;

- For the time necessary to preserve the legitimate interest of GOLDEN TECHNOLOGIA.

Thus, we will treat your data, for example, during the applicable statutory periods or as long as necessary to comply with legal or regulatory obligations . The termination of the processing of personal data will occur in the following cases:

- When the purpose for which the personal data was collected is achieved, and / or the personal data collected is no longer necessary or relevant to the achievement of such purpose;
- When the Holder requests the deletion of his data;
- When there is a legal determination in this regard.

In cases of termination of the processing of personal data, except in the cases established by applicable law or by this Policy, personal data will be eliminated and this Policy will no longer apply to your relationship with GOLDEN TECHNOLOGIA.

14 Change in Privacy Policy

With the constant evolution of the business model, GOLDEN TECHNOLOGIA reserves the right to change this privacy policy at any time, by publishing the updated version on its website. If there is a material change in the treatment of personal data, you will be informed and will have the opportunity to review the revised policy before deciding to continue using our Services.



15 Review Board

Review Board		
Date	comments	Revised / Approved by:
9/23/2020	Document creation	Lidiane Raulino / Jefferson Farias