

PRIVACY POLICY

Ferraz de Sampaio Sociedade de Advogados (**FSSA**) respects your privacy.

FSSA is committed to the security and privacy of personal data. The firm adopt appropriate measures for protection, restricting the number of people with access to personal data and only authorize it to people in the organization who need to process it for a legitimate purpose based on the law.

Due to these assumptions, this Privacy Policy (Policy) was created, which aims to:

- 1 Inform in a simple, objective and transparent manner what personal data is processed by **FSSA** in the performance of its activities;
- 2 Describe how your personal data is treated and the purpose of the respective treatments;
- 3 Inform data subjects about their rights.

If after reading this Policy you still have any questions or, for any reason, need to communicate with the **FSSA** for matters involving your Personal Data, you can contact the Personal Data Protection Officer through the channels below:

Michelle Landanji – dpo@ferrazdesampaio.com.br – Tel (11) 5506-3936

PERSONAL DATA COLLECTION



We do not collect personal data from visitors who access the website www.ferrazdesampaio.com.br, which only uses cookies that are strictly necessary for the functioning of the website.

We disclose our contacts (addresses, telephones and e-mails) and interested people can seek us out and share personal data.

Our clients and employees share with us the personal data of their interests or that are necessary for our activity. We may collect personal data on public databases, such as sites of Boards of Trades, Courts, among others, specifically to address the purpose of the processing.

Thus, we can act as controller and/or operator of personal data, processing registration, financial and sensitive personal data, such as:

PERSONAL DATA	Name, ID, CPF, Driver's License, PIS, CTPS, passport, voter registration card, education level, e-mail, business address, home address, landline, cell phone, language, title, company, profession, gender, date of birth, nationality, marital status, photos, videos, CCTV image, bank account details.
SENSITIVE DATA	Health data provided through health certificates, medical reports, among other documents.

We do not process personal data for third-party marketing or advertising purposes.

PURPOSE OF PERSONAL DATA PROCESSING

We can process personal data when the legal basis, consisting in the performance of a contract or in the regular exercise of law in judicial or administrative cases, is present. We process personal data to provide our services, run the Organization, issue invoices, render accounts, among other activities related to the performance of legal activities.

The processing of personal data of **anyone under eighteen years old** is only carried out with the specific and prominent consent given by at least one of the parents or legal guardian.

We can disclose to our registered clients our professionals and their specialties.

SHARING DATA









The data may be shared with processing agents and/or in obedience to the law, and may be carried out in accordance with FSSA's instructions for third parties, such as:

- ① Service Providers in specialized subjects related to legal services, such as technical assistants, accountants, translators, among others, hired by FSSA;
- ② Technology service providers;
- ③ Building access control providers where located our offices;
- ④ Companies that FSSA hire to offer benefits for the employees; and,
- ⑤ Accounting office.

In order to ensure that the processing of personal data is carried out only for the purposes mentioned, we adopt measures and guarantees, such as the implementation of specific clauses and standard contracts in compliance with the LGPD. For data security, we use a cloud system, and it is possible for the supplier to transfer personal data outside Brazil (currently, to Chile and the USA, countries where the current supplier usually performs a backup for data storage).

DATA SUBJECT RIGHT

These are the data subject rights, according to article 18 of the LGPD:

-  Confirmation of the existence of processing of personal data by **FSSA**;
-  Access to personal data;
-  Correction of personal data that are incomplete, inaccurate or out of date;
-  Anonymization, blocking or deletion of unnecessary, excessive or processed personal data in disagreement with the provisions of the LGPD;
-  Portability of your personal data, upon request, in accordance with the regulations of the National Data Protection Authority (ANPD);
-  Elimination of personal data based on consent, except in the cases determined by LGPD authorizing its retention;
-  Information of public and private entities with which the **FSSA** shared personal data;
-  Information about the possibility of not providing your consent and the consequences;

- ✕ Consent revocation for processing personal data, when personal data are processed based on consent.

In order to meet the requests of the data holders, we will dedicate all our attention and efforts to perform our obligations in the shortest possible time, which may be affected by factors beyond the control of the FSSA, such as:

- ① Any delay due to the complexity of the request, the age of the data, the means of sharing, or other reasonable factors; and
- ② The rejection of the request, if there is a legal basis for data maintenance, absence of regulation by ANPD, another justifiable reason, according to the LGPD.

Limiting or deleting personal data may prevent **FSSA** from being able to fulfill its commitments to customers and employees. In situations like this, **FSSA** is not obliged to comply with the request for deletion, restriction, objection or data portability. Other circumstances, such as the right to freedom of expression and information, the fulfillment of a legal obligation that requires the processing under Brazilian law or in the country of our clients or for the establishment, exercise or defense of legal cases, may also justify the processing and maintenance of data.

The holder may exercise any of the above rights by contacting the data protection officer (DPO), sending an e-mail to dpo@ferrazdesampaio.com.br . Proof of identity is required. We will evaluate the validity of the request and inform the requester of the decision.

MEASURES FOR THE SECURITY OF PERSONAL DATA

The collected personal data is stored in compliance with the procedures defined in the Internal Information Security Policy, aiming to protect them from unauthorized access, destruction, loss, alteration, communication or any form of inappropriate or unlawful treatment. Your data is collected and stored in compliance with market security standards; access is permitted only to authorized employees and partners for proper use.

Our employees receive ongoing training and our partners are instructed on the desired levels of protection, signing terms of confidentiality. Everyone is aware of the Privacy Policy presented here, in addition to the laws applicable to the processing of Personal Data and are committed to confidentiality and restricted use of these data.

FSSA reinforces that, although relevant investments are permanently made in data preservation and that our goal is to preserve privacy, world experience shows that no data sharing or storage is completely secure. Thus, if, by any chance, any data breach occurs, **FSSA** will act proactively, aiming to minimize the effects, as well as remedy the occurrence, providing all available information and assistance.

RETENTION OF PERSONAL DATA

Personal Data will remain stored as long as they are necessary for the purposes described. Personal Data may be kept anonymously, when applicable, that is, without being related to the owner, for longer periods.

TERM AND CHANGES

This policy is effective from May 1, 2021 and may be changed at any time, and its updated version must be easily accessible on www.ferrazdesampaio.com.br.

GLOSSARY

Term	Definition
Website	FSSA's electronic address www.ferrazdesampaio.com.br
LGPD	Law No. 13.709/2018 (General Data Protection Law), with its subsequent amendments.
Personal data	Information related to an identified or identifiable natural person (art. 5, I, LGPD).
Sensitive personal data	Personal data on racial or ethnic origin, religious conviction, political opinion, affiliation to union or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data, when linked to a natural person (art. 5, II, LGPD).
Anonymized data	Data relating to a holder that cannot be identified, considering the use of reasonable technical means available at the time of processing (art. 5, III, LGPD).
Database	A structured set of personal data, established in one or several places, in electronic or physical means (art. 5, IV, LGPD).
Data Subject	Natural person to whom the personal data that are the object of processing belong (art. 5, V, LGPD).
Controller	A natural person or company, under public or private law, who is responsible for decisions regarding the processing of personal data (art. 5, VI, LGPD).

Operator	A natural person or company, under public or private law, who processes personal data on behalf of the controller (art. 5, VII, LGPD).
DPO	Person appointed by the Controller and Operator to act as a communication channel between the Controller, the Data holder and the National Data Protection Authority (ANPD) (art. 5, VIII, LGPD).
Processing agents	The controller and the operator (art. 5, IX, LGPD).
Processing	Any operation performed with personal data, such as those relating to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction (art. 5, X, LGPD).
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 (art. 5, XI, LGPD).
Consent	Free, informed and unambiguous expression by which the holder agrees with the processing of their personal data for a specific purpose (art. 5, XII, LGPD).
Block	Temporary suspension of any processing operation, by guarding personal data or the database (art. 5, XIII, LGPD).
Elimination	Deletion of data or set of data stored in a database, regardless of the procedure used (art. 5, XIV, LGPD).

International Transfer of Data	Transfer of personal data to a foreign country or international organization of which the country is a member (art. 5º, XV, LGPD).
Shared Data Use	Communication, dissemination, international transfer, interconnection of personal data or shared processing of personal database 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 kind of processing allowed by these public entities, or between private entities (art. 5º, XVI, LGPD).
National Data Protection Authority (ANPD)	Public administration agency responsible for overseeing, implementing and supervising compliance with this Law throughout the national territory. (art. 5, XIX, LGPD).