



Data Private Policy

Effective on April 18, 2022

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1. Purpose of our Privacy Policy and General Conditions of Use

Lovigny e Tonet Sociedade de Advogados (“LT Consulting”) is committed to raise awareness on the personal data processed by LT Consulting.

These Privacy Policy and General Conditions of Use (“Privacy Policy”) aim at clarifying how the privacy of users of LT Consulting website, its customers, and third parties (“Data Owner”, “Owner” or “User”) is protected and how personal data are processed. For additional information, contact m.tonet@lovignyconsulting.com.

2. Personal Data

Definitions:

- a) “Personal Data”: information related to identified or identifiable natural persons;
- b) “Sensitive Personal Data”: personal data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sex life, genetic or biometric data, when linked to a natural person;

To the extent permitted by the applicable law, LT Consulting may process the Personal Data described below:

- Identification and contact data: full name; address; birth date; nationality; identification document(s) data, email address; telephone number;
- Academic and professional data: employing company; profession; position; academic background.

In the case of contracting the legal services of LT Consulting, we may access and process a wide range of Personal Data of the Data Owner.

The data listed above will be processed in certain cases and when necessary to reach the purposes mentioned in this Privacy Policy, especially for the provision of legal services.

LT Consulting may collect this information in several ways: i) directly from the Data Owner; ii) from a third party related to the Data Owner; or iii) from publicly available sources.

3. Processing

The processing of personal data collected aims to provide customer legal advisory or litigation services, including, but not limited to:

- Drafting, review, or negotiation of contracts;
- Conducting or participating in audits to verify a company's compliance with Brazilian, European, or North American legislation and risk analysis;
- Management of investigations, inquiries, judicial, administrative, or arbitration proceedings, which includes the analysis and preparation of documents, and actions monitoring, among others;
- Analysis of new products, structures, cases, or any situations presented by customers to prepare a response to queries, memos, legal opinions;

- Preparation of mandatory documents under Brazilian, European, or North American legislation;
- Intermediation of the clients' relationship with government authorities and bodies;
- Pro bono services;
- Training programs;
- Holding meetings, videoconferences, or telephone conferences to discuss generic matters;
- Public licensing;
- Public bids participation;
- Coordination of merger, acquisition or capital market operations; and
- Agreements with LT Consulting, billing for individual customers or legal entity representatives.

In addition, we will process Personal Data through:

- Sending newsletters, institutional communications, memos or bulletins, and invitations to events;
- Organization of events, including managing subscribers, sending save-the-date, reminders, and acknowledgments. To ensure easy access and comfort at the event, LT Consulting may ask if you have a disability or mobility restrictions;
- Conducting a satisfaction surveys and feedbacks on our services;

From time to time, LT Consulting may mention your personal data so that national or international legal publications can contact you in order to evaluate and refer our services to such publications.

4. Sharing personal data with third parties

LT Consulting may share Personal Data with:

- Providers of software, cloud hosting services, and other information technologies to manage your relationship with our office, registration, documentation, and other actions;
- Correspondents, experts, referees, partner offices (national and international), auditors, accountants, translators, and financial institutions in the provision of our legal services, as the case may be;
- Non-governmental organizations in case of pro bono works;
- National or international legal publications;
- Regulatory bodies and other authorities, such as for example, Insurance and Sanitation Regulatory Agencies.

Furthermore, LT Consulting may transfer Personal Data to outsourced service providers or partner offices located abroad, including cloud service providers. For Personal Data transmitted outside Brazil, LT Consulting will take the appropriate measures to ensure the adequate protection of your personal data following the requirements of applicable data protection laws, including by entering into appropriate data transfer agreements with third parties, of your personal data, where necessary.

5. Storage of Personal Data Duration

LT Consulting will keep a copy of Personal Data in the following cases:

- (i) for the time required by law;
- (ii) until the end of the processing of Personal Data; and
- (iii) for the time necessary to protect the regular exercise of LT Consulting's rights.

The end of the processing of personal data and its elimination will occur in the following cases:

- When the purpose for which the Personal Data of the Data Owner was collected, is achieved;
- When the Data Owner is in his right to request the termination of the treatment and the deletion of his personal data by means of a written request; and
- Upon the order of the competent authority.

6. Data Owner Rights

Regarding his Personal Data, the Data Owner is entitled to:

- (i) confirm their treatment;
- (ii) access them;
- (iii) request the correction of incomplete or outdated data;
- (iv) anonymization, blocking or deletion of the data;
- (v) transfer through written request;
- (vi) sharing information;
- (vii) information about the possibility of not providing consent and about the consequences of not giving it;
- (viii) right to bring a claim before the National Data Protection Agency (ANPD).

Some circumstances may restrict the exercise of certain rights provided for by law, such as, for example, when the provision of information may include a business secret of LT Consulting or to compliance with any legal/regulatory obligation or to allow LT Consulting's defense in any judicial or administrative lawsuit.

You may exercise such rights by contacting m.tonet@lovignyconsulting.com

7. Data Protection

We store your Personal Data securely through the Google Workplace system which data center is located either in the European Union or the United States of America and adopts the best technical and administrative practices to protect Personal Data from unauthorized access, destruction, loss, modification, communication, or any other form of inappropriate or illicit treatment.

However, no platform is completely secure. If you have any concerns or suspect that your Personal Data is at risk, please contact us immediately.

8. Cookies

LT Consulting does collect Personal Data through cookies, pixels, beacons, or other tools. The use of cookies by the Platform is restricted to statistical analysis about the use of the Platform, without any link to the IP or other Personal Data of the user.

9. Websites of third parties

As a feature of our website, we may provide links to other websites on the internet. LT Consulting is not responsible for these websites and content thereof, nor does it share, subscribe, monitor, validate or accept the way in which these websites or storage, collect, process, and transfer your personal data.

We recommend that you consult the respective privacy policies of such websites to get adequately informed about the treatment of your personal data.

10. Controller

LT Consulting will be the controller of your personal data within the scope of the relationship established with the Data Owners. Under the applicable laws, the controller is responsible for the decisions regarding the processing of personal data.

11. Complains

You can file a claim using the LT Consulting contact details provided above.

You can also send a message to the National Data Protection Authority.

12. Changes to this Privacy Policy

LT Consulting may change this Privacy Policy at any time, by publishing the updated version thereof on this page.