

PRIVACY AND DATA PROTECTION POLICY

SIQUEIRA CASTRO ADVOGADOS is a law firm committed to privacy and protection of personal data, and for that reason establishes with the owners of personal data (“OWNERS”) a commitment to respect the Brazilian and European laws and regulations on the protection of personal data.

This Privacy and Personal Data Protection Policy (“Policy”) has the purpose of informing the OWNERS about the measures used by SIQUEIRA CASTRO ADVOGADOS for the collection, storage, use or any other operation for treatment of personal data carried out by the firm.

By clicking on the button below, the OWNERS declare they are aware of the terms and conditions of the present Policy, giving their free, informed and unequivocal consent to the treatment of their personal data for the purposes determined hereby.

1. Data Collection

When supplied by the OWNERS, by any means and/or in any form, the personal data are collected, stored, used and treated by SIQUEIRA CASTRO ADVOGADOS. Some forms of data collection are listed below, but the treatment of personal data is not limited to the examples described below:

- supply of information in the act of enrolling at the website
- sending a message via the contact page of the firm
- sending a résumé via the institutional website or e-mail

The data collected by SIQUEIRA CASTRO ADVOGADOS include, without limitation, names, e-mail addresses, physical addresses, telephone numbers, profession, and associated institution and/or company.

The website of SIQUEIRA CASTRO ADVOGADOS does not employ “cookies” to collect personal information or navigation history. The service providers of the firm, however, may collect data for the purpose of compiling statistics.

The OWNERS are responsible for the veracity of the data reported to SIQUEIRA CASTRO ADVOGADOS. When reporting personal data of third parties, the OWNERS must certify they have authorization to do so, with SIQUEIRA CASTRO ADVOGADOS not having any responsibility over this act.

SIQUEIRA CASTRO ADVOGADOS does not collect sensitive personal data via its website. If the OWNERS voluntarily decide to report their sensitive personal data, the OWNERS expressly consent to the treatment of such data as described in this Policy. Sensitive personal data collected by other means by SIQUEIRA CASTRO ADVOGADOS shall be treated for the specific purpose informed and authorized by the OWNERS.

During the use of the site of SIQUEIRA CASTRO ADVOGADOS, if the OWNERS are conducted via a link to another site, the OWNERS must verify the privacy policy of the new site visited. SIQUEIRA CASTRO ADVOGADOS does not assume any responsibility for the collection and use of personal data and for the content of the sites of third parties.

2. Purposes for Use of Personal Data

SIQUEIRA CASTRO ADVOGADOS undertakes to use the personal data collected from the OWNERS for the following purposes:

- Provision of legal services
- Compilation of statistics about the activities and behavior of the OWNERS
- Aggregation of content to the website and the activities of the firm
- Response to the requests and doubts regarding the services offered by SIQUEIRA CASTRO ADVOGADOS
- Disclosure of legal and/or market content, as well as events organized and/or promoted by SIQUEIRA CASTRO ADVOGADOS
- Administration of enrollments for events organized and/or promoted by SIQUEIRA CASTRO ADVOGADOS
- Responding to the subscriptions of users of the informative legal news clippings available at the website
- Inclusion of OWNERS on the firm's mailing list
- Sending institutional communications
- Promotion of institutional marketing
- Recruitment of professionals and/or interns
- Safeguarding the rights and obligations related to the legitimate interest of SIQUEIRA CASTRO ADVOGADOS

The consent to the collection, storage and treatment of the personal data of the OWNERS, to serve the purposes proposed by SIQUEIRA CASTRO ADVOGADOS, is voluntary. If the OWNERS decided not to consent to the collection of data, the only consequence will be no supply of the services and/or meeting of the purposes by SIQUEIRA CASTRO ADVOGADOS.

SIQUEIRA CASTRO ADVOGADOS shall not perform the treatment of the personal data of the OWNERS without their consent, except in the situations where it is legally necessary or obligatory, including:

- compliance with a legal or regulatory obligation;
- performance of a contract;
- regular exercise of rights in a judicial, administrative or arbitral proceeding;
- in response to the legitimate interests of SIQUEIRA CASTRO ADVOGADOS.

SIQUEIRA CASTRO ADVOGADOS warrants that it does not commercially exploit the personal data of the OWNERS. However, the personal data of

OWNERS may be shared with external agents, contracted by SIQUEIRA CASTRO ADVOGADOS, for the performance of technical services and/or to support the activities of the firm, exclusively to attain the purposes stipulated hereby.

In respect for the personal data of OWNERS, SIQUEIRA CASTRO ADVOGADOS requires that the external agents that process the data do so in harmony with their own parameters for confidentiality and security, with observance of the present Policy.

3. Rights of Users

The OWNERS have the right to solicit, at any time, access to their data and portability of same, as well as to modify, correct, update, limit and/or exclude the personal data collected by SIQUEIRA CASTRO ADVOGADOS.

The OWNERS may also lodge objection to the treatment of data for legitimate reasons, as well as solicit the anonymization, blockage or elimination of data they deem to be unnecessary and/or excessive.

If so desiring, the OWNERS can solicit their exclusion from the mailing list of the site of SIQUEIRA CASTRO ADVOGADOS, ceasing to receive any informative e-mail messages.

To exercise their rights, the OWNERS must send an e-mail or letter with the solicitation to the addresses provided below in item 6. *Contact Data* (below).

4. Storage of Data

SIQUEIRA CASTRO ADVOGADOS stores the personal data of the OWNERS collected in secure form, only for the period necessary to carry out the operations established hereby, in conformity with European and Brazilian laws and regulations, including the Brazilian Internet Civil Framework, which determines the storage of access records to internet applications for a period of 6 (six) months.

Data related to clients are stored for the period established in the engagement agreement and/or the General Contractual Terms of the firm.

The storage of the data shall respect this Policy and/or other instruments that may be signed with the OWNERS. However, the data may be stored for a longer period, for legal reasons or by judicial order.

Under the terms of the legislation on protection of personal data, if the OWNERS want, they may revoke the consent given previously to SIQUEIRA CASTRO ADVOGADOS for treatment of their personal data. This right must be exercised through the channels made available in item 6. *Contact Data* (below).

SIQUEIRA CASTRO ADVOGADOS stores data in its own servers and/or those of contracted service providers, located in Brazil and/or abroad, and also in

cloud computing servers, so that the transfer and treatment of the personal data of OWNERS may occur outside of Brazilian territory.

5. Security

SIQUEIRA CASTRO ADVOGADOS has a commitment to the secure treatment of the personal data of users through the implementation of advanced mechanisms of information technology, which involve the technical, physical and logical security procedures normally utilized in the market. These procedures aim to protect the personal data against loss, misuse, alteration, destruction or leakage.

Any member of SIQUEIRA CASTRO ADVOGADOS who has access to the information collected is informed about its confidential nature, besides the commitment to act in conformity with this Policy.

The OWNERS must adopt the preventive measures necessary for use of the internet, including the use of antivirus programs, personal access passwords and other technical and managerial measures, with the purpose of preventing failures, invasions or other unwanted occurrences associated with access to the tools made available by the firm. SIQUEIRA CASTRO ADVOGADOS shall not be liable for any damages resulting from the exclusive blame of the OWNERS and/or third parties.

6. Conclusion of the Treatment of Personal Data and Contact Data

The identity and information of the person in charge of the treatment of personal data of SIQUEIRA CASTRO ADVOGADOS is given below:

Person in charge: **(full name)**

E-mail: xxxxx@siqueiracastro.com.br

Address: Rua Tabapuã, 81 – 4º andar – Itaim Bibi – São Paulo – SP, Brazil – CEP 04533-010

Any complaint or communication from OWNERS must be directed to the person(s) in charge who are duly authorized by SIQUEIRA CASTRO ADVOGADOS to provide clarifications and/or adopt measures regarding the treatment of personal data by the firm.

7. Alterations of this Policy

This Policy may be altered at any time, by previous communication via the website of SIQUEIRA CASTRO ADVOGADOS (www.siqueiracastro.com.br) and/or electronic correspondence addressed to the OWNERS, to be sent to the e-mail address reported to the firm.

This Privacy and Data Protection Policy takes effect on November 5, 2018.