

## PRIVACY POLICY

### 1. Purpose of this Privacy Policy

Bronstein, Zilberberg, Chueiri, Potenza (“BZCP”, “we”, or “us”) is committed to raising awareness of its website users, individual clients and representatives, partners, or any other individuals related to BZCP (“Data Subject”, “Subject”, or “you”) concerning the personal data processed. As we are committed to respect your privacy and to value transparency, BZCP created this privacy policy (“Privacy Policy”) to provide you a clear understanding of how we treat your personal data. For more information about the processing of personal data, please contact us through [privacy@bzcp.com.br](mailto:privacy@bzcp.com.br).

### 2. Data Processing Activities

BZCP will be the controller of your personal data within the scope of the relationship that was built with you. For the purposes of the applicable law, the controller is responsible for decisions regarding the processing of personal data. To the extent permitted by the law, BZCP may process the personal data described below:

- Identification, qualification, and contact data: full name; address; date of birth; nationality; identification document(s) (such as identity document, individual taxpayer identification, driver’s license, professional registration, e-mail address; telephone number;
- Academic and professional data: company; profession; job title or position; education.;
- Financial information: remuneration; transaction history; credits; sales; possessions; debt certificate; loans;
- Family information: family structure; relationships;
- Information contained in files: date of birth, nationality, place of birth, age, marital status, country, address, driver’s license, voter registration, military draft, professional, education, languages, professional registration, social contributions (PIS/PASEP), social security card, and other Brazilian files, such as NIS, NIT, and CEI.

As we provide legal services, considering all the support to clients in assorted areas of law, we will be able to access and process a large collection of your personal data or even the personal data of others involved in a given case (for example, the other party in a lawsuit), depending on the object or reason of the situation.

The personal data above is processed only in certain cases and when necessary to achieve the purposes mentioned in this Privacy Policy, especially for the provision of legal services. We may collect this information in several ways. This personal data can be collected directly from the Data Subject, from someone related to the Data Subject (for example, the company you are part of), or from publicly accessible sources. Regardless of the source of the data, the processing will be under this Privacy Policy and you will be able to contact us by emailing [privacy@bzcp.com.br](mailto:privacy@bzcp.com.br).

In general, we process your personal data for customer service and the provision of legal services in the scope of consultancy or litigation, including, but not limited to:

- Drafting, reviewing, or negotiating contracts;
- Performing or participating in an audit to verify a company's compliance with Brazilian law and risk analysis;
- Management of investigations, inquiries, judicial, administrative, or arbitration proceedings, which includes the analysis and preparation of documents, monitoring of progress, among other actions;
- Analysis of new products, structures, cases, or any situations presented by clients to prepare responses to queries, memos, or legal opinions;
- Preparation of mandatory documents under Brazilian law;
- Intermediation of the client's relationship with government authorities and agencies; - Trainings, meetings, videoconferences, or conference calls to discuss topics in general;
- Obtaining necessary licenses, authorizations, and permits;
- Assistance in bidding processes;
- Coordination of merger, acquisition, or capital market transactions.

We may also process your personal data when formalizing an agreement with BZCP, billing, and collecting if you are an individual client or representative of a legal entity client. In addition, we may process your personal data to maintain our relationship with you through sending institutional communications, memos, or newsletters with topics of interest and invitation to events.

### **3. Sharing of Personal Data**

We may share your personal data with:

- Software providers, cloud hosting services, and other information technologies to manage your relationship with our firm, registration, documentation, and other measures;
- Correspondents, experts, reviewers, national and international business partners, auditors, accountants, translators, and financial institutions that support the provision of legal services, depending on the situation;
- National or international legal publications;
- Regulatory bodies and other authorities;

We may transfer your personal data to service providers located abroad, including cloud service providers. When we transfer your personal data outside of Brazil, we will take appropriate measures to ensure adequate protection of your personal data in accordance with the data protection law, including by entering into data transfer agreements with third parties of your personal data when necessary.

#### **4. Data Retention and Elimination**

We store and maintain your information: (i) for as long as the law provides for; (ii) until the end of the processing of personal data, as mentioned below; (iii) for the time necessary to preserve BZCP's legitimate interest, as the case may be; (iv) for the time necessary to safeguard the regular exercise of BZCP's rights in judicial, administrative, or arbitration proceedings. 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 Data Subject's 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 Data Subject has the right to request the termination of processing and the deletion of its personal data and does so; and
- When there is a legal determination in this regard. In those cases of termination of the processing of personal data, except in the cases established by the law or by this Privacy Policy, personal data will be eliminated.

#### **5. Data Subject's Rights**

You have the following rights regarding your data: (i) confirmation of processing; (ii) access; (iii) correction of incomplete, inaccurate, or outdated data; (iv) anonymization, blocking or elimination; (v) portability; (vi) elimination; (vii) information about sharing; (viii) information about the possibility of not consenting and the consequences of the refusal; (ix) revocation of your consent, if we have requested it from you; and (x) the right to petition the Brazilian Data Protection Agency (ANPD).

Some circumstances may restrict the exercise of certain rights provided for by the law, such as when the provision of information may reveal BZCP's confidential information within its business, due to the fulfillment of any legal/regulatory obligation, or enable BZCP's defense in judicial or administrative proceedings.

#### **6. Security**

We are committed to the security of your personal data and take reasonable precautions to maintain that protection. We employ renowned security systems and technical, physical, and managerial procedures to protect your data.

#### **7. Cookies**

By using our websites, you acknowledge the use of cookies in accordance with the conditions described here. You should see a pop-up at the bottom of the page alerting you to use this tool on your first visit to our website. Although this notice will not appear on subsequent visits, you can manage the use of cookies through our website, following the instructions below.

If you do not agree with the use of these cookies, you can disable them at any time by adjusting your browser settings. Browsers are different, so refer to your browser settings menu for instructions on

how to change your cookie preferences. If you choose not to receive cookies, our websites may not function properly and some features may be unavailable.

Cookies can store certain information, such as your IP address, information about the content you view, information about the content you provide so that you don't have to re-enter it each time you visit our website and your preferences and settings. Cookies also help us to provide you with personalized content, speed up navigation on our website, and allow us to learn more about your visit and use of online services.

### **8. Third party's Websites**

As a feature of our website, we may provide links to other websites on the internet. We are not responsible for these websites and content and does not share, subscribe, monitor, validate or accept the way these websites or content storage tools collect, process, and transfer your personal data. We recommend that you consult the respective privacy policies of such websites to properly inform yourself about the processing of your personal data.

### **9. Changes to this Privacy Policy**

BZCP reserves the right to change this Privacy Policy at any time, by publishing the updated version on this page.