UPDATED ON: 14/12/2022



Privacy Policy

INTRODUCTION

At Techfy Corp. Technology Solutions, data protection is taken seriously! Thus, this "**Privacy Policy**" is designed to provide information about how we are complying with all current data protection regulations, what information we collect while youare browsing our Site and communication channels, as well as how this information is treated and protected by us, in accordance with International Law and Legislation, like GDPR (Europe) and LGPD (Brazil)

It's important that you know that your personal data will only be used in the cases detailed below and will not be used in any other cases without your consent or prior knowledge.

Regarding the changes **in** our Policy, we clarify that we reserve the right to adapt it at any time, however, do not worry, because if we make any changes, we will update this **Policy** on our Site and, for this reason, it is of great importance that you frequently access this content to check for any updates or changes that have been made.

You may access the updated version of this Policy at any time by clicking the button labeled "Privacy Policy" at the bottom of each page of this Site.

The latest version of this **Policy** was revised on December 14, 2022.

Definitions

For a better understanding of this **Policy** you need to know that:

PERSONAL DATA is all the information that allows your identification, such as your Name, E-mail, Phone Number, Address, among others.

SENSITIVE PERSONAL DATA is personal data related to racial or ethnic origin, religious belief, 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 You.

PROCESSING OF PERSONAL DATA is any operation such as the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction, carried out with your personal data.

"LGPD": General Data Protection Law (Brazilian Law No. 13,709, of August 14, 2018).

We: TECHFY CORP. SOLUÇÕES EM TECNOLOGIA LTDA, SIMPLY CALLED "Techfy".

Techfy Corp.

UPDATED ON: 14/12/2022

You: Any natural person, as a Guest and/or User (Customers, Suppliers, Partners and/or Investors) of the Site and/or Application who accesses or interacts with the activities and/or Functionalities made available therein.

What are the types, form and purposes of processing your personal data

Techfy has access to the data that has been provided by you when using our Site and other Communication Channels, to contact us or to apply for a selection process.

Such data may reveal, for example, your name, e-mail, address, telephone number, but rest assured, as this content is protected by this Policy, your personal data will be kept in a reserved way!

We also use the personal data collected through the Site to improve the content and functionality of the same, to better buy from our customers and market, as well as to improve our Products and Services, in order to launch them to our customers and potential customers, including those users registered on our Site, through the Cookies, which are detailed in the Cookies section of this Policy.

Personal data of children and teenagers



Techfy does not recognize the collection of personal data of minors under eighteen years of age, whether children and/or teenagers.

If You are under the age of eighteen, please do not provide any personal data to our Site.

If you become aware that a child/adolescent has provided their personal data, please contact us through our **Data Protection Officer**, Mr. Fabio Reis, through the e-mail: **lgpd@techfycorp.com**, and we will be responsible for deleting this personal data from our database.

Privacy Policy I Techfy Corp. IT Solutions UPDATED ON: 14/12/2022



Data that depends on your consent to be processed and what happens if it is not granted

In situations where the Law binds the processing of your data to your consent, we will present the possibility of acceptance or refusal, informing you of the consequences of each decision.

Such a presentation will be made, as a rule, through Notices in the place where you are accessing.

In this sense, we have listed below some examples of situations in which you can express and select your intention about the collection of data by Techfy:

<u>Permission to Use of Cookies</u> or similar technologies. When you access our Website, some text
files (cookies) are placed on your computer so that your experience is more efficient and
personalized, as we will explain in a specific topic of this **Policy**.

However, You are not obliged to accept the use of cookies, simply keep as default the non-activation of cookies, which is already carried out in "cookie configuration".

In addition, if you wish to keep the default of not enabling cookies, simply follow the specific instructions in the Cookies topic in your browser.

In any case, we remind you that disabling *cookies* may harm your use of our website and other companies.

Your Sensitive Personal Data in cases where there is no other Legal Basis. In the absence of
the other situations provided for in the Law for the Processing of Sensitive Data (item II of article 11
of the General Data Protection Law), your sensitive information will only be processed after effective
manifestation of your consent.

Data integrity and security

Techfy constantly seeks to adopt all reasonable measures in the market in order to protect, bring security and maintain the reliability and accuracy of the information and personal data of our database.

We store your personal data only for as long as necessary to fulfill the initial purpose for which such data was collected or in compliance with any legal report or document retention demands.

Our servers and databases are protected by industry-standard security technology, and employees who have access to personal data have been trained to manage it appropriately and in accordance with our security protocols.

Privacy Policy I Techfy Corp. IT Solutions UPDATED ON: 14/12/2022



While we cannot guarantee that there will be no loss, misuse, unauthorized sharing, switching or destruction of data, we will make every effort to prevent such events from happening while preserving the privacy of your data.

For this reason, in order to assist us in the joint fight against unauthorized access, we encourage you to:



Cookies



A cookie is a small file added to your device or computer by Sites You visit. They are widely used to make the Websites work more efficiently, as well as to provide a personalized access experience and provide information to the owners of such Websites.

We at Techfy use **Cookies** and**/or** similar technologies to improve the use and functionality of our Site, to better understand how our visitors use our Site, as well as the toolsand services offered therein.

UPDATED ON: 14/12/2022



You can refuse to use cookies by simply keeping as default the non-activation of cookies, which is already carried out in "cookie configuration", however, if You do this You may not be able to use all the functionalities and features of this Site.

It is recommended that you leave all cookies enabled if you are not sure whether or not you need them if they are used to provide a service that you use.

You can also disable cookies by adjusting your browser settings (see the Help menu of your browser to learn how to do this), butbe aware that disabling cookies will affect the functionality of this and many other websites you visit. Therefore, it is recommended that you do not disable cookies.

Cookies we use:

- Account-related cookies: If you create an account or sign up with us, we will use cookies for the
 management of the sign-up process and general administration. These cookies will usually be deleted
 when you log out of the system, but in some cases they may remain later to remember your site's
 preferences when you leave.
- Login-related cookies: We use cookies for cases where you are logged in, so that we can remember
 this action. This saves you from having to log in every time you visit a new page. These cookies are
 typically removed or cleared when you log out to ensure that you can only access restricted features
 and areas when you log in.
- Cookies related to email newsletters and chat: This website offers newsletter or email subscription services, as well as digital channels of contact and interaction. Cookies can be used to remember whether you are already registered, logged in or registered, and whether to show certain notifications valid only to subscribed/unsubscribed users.
- Orders processing related cookies: This website eventually offers e-commerce facilities and some
 cookies are essential to ensure that your order is remembered between pages, so that we can
 process it properly and safely.
- Survey-related cookies: From time to time, we offer surveys and questionnaires to provide interesting
 information, useful tools or to understand our user base more accurately. These surveys may use
 cookies to remember who has already participated in a survey or to provide accurate results after the
 pages have changed.
- Forms-related cookies: When you submit data through a form such as those found on the contact, comment, subscription, and rich content download pages, cookies may be set to remember the user's details for future correspondence and prevent further completion.
- Website preferences cookies: To provide you with a great experience on this website, we provide the functionality to set your preferences for how this website runs when you use it. To remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.
- Third Party Cookies: In some special cases, we also use cookies provided by trusted third parties, such as social networks (e.g. Facebook Pixel and equivalents) and search engines. These cookies can track things like how much time you spend on the site and the pages you visit, so we can continue to produce compelling content.

This website also uses the Google Analytics tool, a service offered by Google, Inc. ("Google"). *Google Analytics* uses cookies. The information generated by a cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States.

UPDATED ON: 14/12/2022



Google will use this information to evaluate your use of the Site, gathering information about Site activity for website operators, providing other services related to the Site and Internet usage. Google may also transfer this information to third parties where there is a legal demand or where these third parties process information for Google itself. Google will not associate your IP address with any other data administered by Google.

For more information about Google Analytics cookies, please refer to the official Google Analytics page.

We periodically test new features and make changes to the way the site presents itself. When we are still testing new features, these cookies can be used to ensure that you receive a consistent experience while on the site, while understanding which optimizations our users appreciate most.

As we market products and services, it is important for us to understand statistics about the acquisition behavior of our visitors on the website in order to optimize our processes for marketing goods and services and to facilitate the user experience. Therefore, this is the type of data that these cookies will track. This is important to you as it means we can analyse and make predictions of effective solutions and business with greater accuracy, based on your interest and needs.

Sharing of personal data with third parties

Techfy works in partnership with several companies, which may need information about you to be able to perform their functions with Techfy, however, it is important to emphasize that these companies are not authorized to use the personal data we share with them for any purpose other than those specified in this Policy.

In addition, if appropriate, before sharing personal data with these companies, Techfy will contractually require them to take the necessary precautions to protect such data from unauthorized use or sharing.

Thus, the information collected through the Site may be shared in the following cases:

- ii. With partner companies, in the development of Techfy's commercial or operational activities;
- ii. To protect Techfy's interests in any type of conflict, including legal claims;
- **III.** In the case of transactions and corporate changes involving Techfy, in which case the transfer of the information will be necessary for the continuity of the services; or,
- iv. By court order or by the request of administrative authorities that have legal competence for its request.

Legal basis for the processing of data of individuals

UPDATED ON: 14/12/2022



Techfy Corp. carries out the Processing of Personal Data in accordance with the Legal Bases established by the LGPD and GDPR, in an appropriate and compatible manner with the purpose of its collection. We process your Personal Data as part of the performance and management of our contractual relationship with you and/or the company contracting our services, in our legitimate interest or that of third parties, provided that the legal requirements for doing so are met, in compliance with certain legal or regulatory obligations, or when it is necessary for the regular exercise of rights in legal proceedings, administrative or arbitral.

Your Personal Data may also be processed with base in your prior consent, when, under certain circumstances, it is determined by law.

Your rights



In compliance with the applicable and current privacy and data protection regulations - LGPD - with regard to the processing of your personal data, Techfy guarantees You the possibility of submitting requests based on the following rights:

- (i) confirmation of the existence of treatment;
- (ii) access to data:
- (iii) the correction of incomplete, inaccurate or outdated data;
- (iv) the anonymization, blocking or deletion of unnecessary, excessive or non-compliant processed data;
- (v) the portability of your data to another service or product provider, upon express request by the User;
- (vi) the deletion of your data processed with your consent;
- (vii) obtaining information about the public or private entities with which ARGOS has shared your data;
- (viii) information about the possibility of not providing your consent, as well as of being informed about the consequences, in case of refusal; and
- (ix) the revocation of your consent.

The form and contacts for the exercise of these rights by you are explained below:

Contact

UPDATED ON: 14/12/2022





To exercise your Rights as a holder of Personal Data, as well as to ask questions or comments about this **Policy** and our privacy practices or even to make a complaint, please contact our **Data Protection Officer**, Mr. Fabio Reis, responsible for assisting you in all demands involving your Personal Data.

The contact can be made through the e-mail: **lgpd@techfycorp.com**, attaching a proof of your identity (such as the RG, CNH or similar).

If the application is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected. Please note that any identifying information provided by us will only be processed in accordance with applicable laws.

We will receive and investigate any complaints about the way We manage your Personal Data (including complaints about non-compliance with your rights under applicable privacy laws and regulations).

Applicable law and jurisdiction

This Policy will be interpreted in accordance with the laws, rules and regulations of Brazil, in the Portuguese language, especially in accordance with Law No. 13,709/2018 (General Data Protection Law). Any conflicts will be resolved in the national territory and in accordance with the applicable Brazilian legislation, in force at the time, being elected the Forum of the District of domicile of the user to resolve any dispute or controversy involving this document, except for specific reservation of personal, territorial or functional competence by the applicable legislation.