

PRIVACY POLICY

This privacy policy of the company **Alcatraz Engenharia** aims to treat the personal data of users, customers, partners, suppliers, service providers and employees, collected when the user accesses our Platforms, websites, social networks, applications, among others.

The purpose of this Policy is to:

- Ensure that you understand what personal data we collect, the reasons why it is collected and used, and with whom we share it;
- Explain how we use the personal data shared by you on the platforms, websites, and other accesses mentioned above;
- Explain to you your respective rights in relation to your personal data collected and processed by us and how we will protect your privacy.

Therefore, we hope that this Policy helps you understand our commitment to your privacy and if you would like to obtain more information and/or ask questions, please contact us [using the contacts listed in item 11 of this Policy](#), or if you do not agree with the content described here, you can choose not to share certain optional data, however, you should be aware that this may prevent the use of some features when browsing.

1) User Rights and Preferences

The General Data Protection Law (“Law No. 13,709/18 or “LGPD”) grants certain rights to individuals regarding their respective personal data. As provided for in the terms of the applicable legislation and unless limited by it and in this way, we also guarantee you the following rights regarding the processing of your personal data:

- Right to confirmation of the existence of processing;
- Right to access data;
- Right to correct incomplete, inaccurate or outdated data;
- Right to anonymize, block or delete unnecessary, excessive data or data processed in non-compliance with the Law;
- Right to transfer data to another service or product provider, safeguarding the commercial and industrial secrets of the company issuing this Policy;
- Right to guarantee the availability, authenticity, integrity and confidentiality of data;
- Right to be notified of changes in data processing;
- Right to limit/oppose data processing;
- Right to be forgotten;

- Right to restrict data processing;
- Right to delete personal data processed with the consent of the data subject, except in cases of legal custody and others provided for by law;
- Right to information from public and private entities with which we share data;
- Right to information about the possibility of not providing consent and about the consequences of refusal;
- Right to revoke consent, in accordance with the law.

When we send you electronic advertising messages based on your consent or in another legally permitted way, you may, at any time and free of charge, withdraw your authorization or declare your refusal. The electronic advertising messages that you receive from our company, via e-mail and/or other forms of electronic transmission, have refusal mechanisms within the message itself.

2) How do we collect user personal data? We collect user personal data in the following ways:

- When you show interest in the products and/or services we offer, whether to purchase, quote, browse, etc., through platforms, emails, telephone, social networks, printed forms, we collect certain personal data, such as email, full name, date of birth, profession, CPF, company, city, state, social media profiles (LinkedIn, Instagram, WhatsApp, Telegram, Twitter, Facebook), audio and video, among others, and these may be requested optionally and provided by you voluntarily.
- When receiving service and/or contracting our products and/or services, through our portals, you must provide us with certain data, including: full name, city, state, country, profession, date of birth, telephone/cell phone, email, social networks (LinkedIn, Instagram, WhatsApp, Telegram, Twitter, Facebook) and your service will be recorded by audio and video. Among such data, the mandatory data are only: full name, email, telephone, audio and video. The other data are optional or necessary only for accessory services and at the time of effective contracting, in addition to the mandatory items, we collect CPF number, RG or other identification document, address, profession, data on the company you work for and income.
- For access to our company's premises: If the user has access to our offices, stores and internal departments, located in buildings with doormen, their personal data may be collected by the reception of the building or location, with such data processing being the exclusive responsibility of the condominium, business center or administrator of the property where we are located and/or where our events are held.
- When purchasing and/or hiring our services or curating our events: if you are a legal entity or individual and hire or provide a service to our company, you will

be required to provide the following data: name, telephone number, company, CNPJ, contact details (first name, last name, email and telephone number) of the person responsible for hiring, profile (position, department) of the target audience. Furthermore, we may request data from employees or third parties responsible for logistics or support, as well as names and positions/occupations of event participants, for possible audience segmentation during the events. In the event of effective hiring of our products and services, it is necessary to provide, in addition to your full name, email and telephone number, your CPF, RG or other identification document, address, profession, company details and income.

- When using our Platform: when you purchase and/or use our Services, we collect personal data about your use of the Platforms automatically or semi-automatically, as described in item 4 below.
- We use anonymized and aggregated Information for purposes including: creating marketing and promotional models, improving our services, and developing new Platform features and functionality.

3) What personal data do we collect from the User?

In the tables below, we organize the groups of user personal data that we collect and use:

- Data provided when you express interest in quoting our products and services: Includes your email, full name, CPF, city, state, social media profiles (LinkedIn, Instagram, WhatsApp, Telegram, Twitter, Facebook), audio and image.
- Data provided at the time of purchase and/or contracting our services and/or products: Includes your full name, CPF, RG or other identification document, address, profession, income, city, state, country, position, company, date of birth, telephone/cell phone, social networks (LinkedIn, Instagram, WhatsApp, Telegram, Twitter, Facebook), audio, video and financial data (bank, branch and checking account). Additional questions may also be asked occasionally.
- Data provided when hiring our services or curating our events: Includes your name, telephone number, company, ID or other identification document, CPF or CNPJ, contact details (name, surname, email and telephone number) of the person responsible for hiring, profile (position, department) of the target audience. In addition, data from employees or third parties responsible for logistics or support may be requested.
- Automatic or semi-automatic collection data: These include, for example: IP address, source logic port, date, time and time zone of access, history of pages visited on our websites, not including pages visited outside our domain), among others.

4) For what purposes do we use the user's personal data?

When you interact with our Platforms, applications, websites and other applications, we use various technologies to process the personal data collected and here we explain the reasons why we process your personal data, the legal grounds associated with its use, the legal bases that legally allow us to process this data and for what purposes it is used.

The groups of personal data that we use are:

- Description of the reason why we process the user's personal data ("purpose of processing"), legal basis and purpose of processing;
- Data provided for registration with the company issuing this Policy;
- Data during the execution of the service;
- To provide our Platform and other Services and products of our company;
- To personalize and improve the user experience of our Platforms, and on other websites, services and products provided by us, for example, by providing personalized, individualized or location-adapted content, recommendations, features and advertising within or outside the Platform;
- In addition, the User's image and voice may be collected through recordings of our service calls for advertising and/or to improve service;
- For communication and/or user service for purposes related to offers, quotes and purchases of our products and services;
- Execution of contract;

Legitimate interest.

Platform usage data

- To keep records of access to the platform so that, in the event of a crime or illegal act occurring in this environment, we can identify the person responsible, in accordance with the Internet Civil Rights Framework Law;
- Compliance with legal obligations.

Marketing data

- To communicate with the user, directly or through partners, for personalized marketing purposes, related to the products and services provided by us;
- Legitimate interest.

5) Sharing of the User's personal data

We define the groups of recipients of the personal data collected or generated through the

use of the Platforms, websites and other means by the User and their data will be shared with suppliers and service providers involved in the sales of our products and/or services.

Publicly available information

The following User data may be made available on our Platforms or on our social networks, subject to specific authorization: User name, company represented, position, statement regarding the acquisition of products and services offered and/or sold by us, as well as your image and voice.

- Information that we may share
- Group of recipients
- Reason for sharing

Company responsible for processing user data

All data collected at the time of contracting our products and services is shared with third-party systems, such as, but not limited to, ERP/DMS (Enterprise Resource Planning) systems, product and service sales platforms, financing and other platforms and integrations necessary for the unified management and/or control of sales of products and services sold.

Company responsible for data processing (operator)

The data collected by us is processed and stored on (third-party servers), which operate in accordance with the security and confidentiality policies and mechanisms stipulated by the issuer of this policy.

Compliance with the law and data protection authority

We will share the User's personal data when we believe, in good faith, that it is necessary to comply with a legal obligation and/or legitimate interest of the user, such as, but not limited to, the granting of a product warranty by its manufacturer, under applicable law, or to respond to a valid legal process, such as, for example, a court order, a subpoena or a search warrant.

We will also share the User's personal data if we believe, in good faith, that it is necessary for our legitimate interest, or that of a third party, in matters of national security, law enforcement, criminal investigation, litigation, protection of the safety of any person, or to prevent death or imminent physical harm, provided that we consider that such interest does not prevail over the interests or fundamental rights and freedoms of the User that require the protection of their personal data.

Acquirers of our business

We will share your personal data when we sell or negotiate the sale of our business to a buyer or potential buyer.

In this situation, we continue to ensure the confidentiality of our Users' personal data and will notify them before transferring their personal data to the buyer, in which case they will accept our Privacy Policy of the respective acquirer.

6) Storage, conservation and deletion of data

We inform you that the data collected is stored on our own and third-party servers, located in national and/or international territory, meeting all security standards established by the General Data Protection Law ("Law No. 13,709/18 or "LGPD").

We retain your personal data for as long as necessary to provide our Services and/or sell our products and for legitimate and essential business purposes, such as to maintain the performance of the platforms, websites, for the purpose of making business decisions about their features and offers, as well as for compliance with legal obligations and/or conflict resolution.

Longer storage periods.

For auditing, security, fraud control, credit protection and preservation of rights purposes, we may keep the record history of your Data for a period longer than the hypotheses listed in Law and/or Regulatory Standard.

The Data we collect will be stored on servers located in Brazil, the United States of America and/or Europe and we adopt the necessary measures to ensure that Data transfers are adequately protected, in accordance with the General Data Protection Law ("Law No. 13,709/18 or "LGPD").

The Data may be stored in an environment using resources or servers in the cloud (cloud computing), which may require the transfer and/or processing of this Data outside of Brazil.

The User is guaranteed the right to request the deletion or anonymization of his/her personal data so that it does not identify him/her, except in cases where there is a legal obligation, legitimate interest and/or other hypotheses determined by the General Data Protection Law and supplementary and/or complementary legislation, including, but not limited to, the following situations:

- The data provided when you show interest in our services: Such as your email, full name, CPF, date of birth, position, company, city, state, social media profiles (LinkedIn, Instagram, WhatsApp, Telegram, Twitter, Facebook), audio and video.
- The data provided at the time of contracting our services: Full name, driver's license or ID or other identification document, CPF, address, city, state, country, profession, company information, income, date of birth, email, telephone/cell phone, social media (LinkedIn, Instagram, WhatsApp, Telegram, Twitter, Facebook), audio, video and financial data (bank, branch and checking account). Additionally, additional questions may be requested in order to adapt the service and/or product offered.

- The data provided when hiring our services or curating our events and others: Name, ID or other identification document, CPF, telephone, company, CNPJ, contact (name, surname, email and telephone) of the person responsible for hiring, profile (position, department) of the target audience, and data from employees or third parties responsible for logistics or support may also be requested.
- Automatic or semi-automatic collection data: These include, for example: IP address, source logical port, date, time and time zone of access, history of pages visited on our websites (not including pages visited outside our domains), among others.

We hereby record that we may keep your personal data to comply with legal, tax, auditing and accounting obligations, legitimate commercial interests, such as, but not limited to, granting a guarantee, complying with the prevention of Anti-Corruption, Fraud and/or Money Laundering Policies and/or to maintain the security of our Users.

7) Links

We may display third-party advertisements and other content with links to third-party websites. We cannot control, nor are we responsible for, the privacy practices and content of third parties. If you click on a third-party advertisement or link, you should be aware that you will be leaving our websites and Platforms and that any personal data you provide will not be covered by this Policy. Therefore, you should read their respective privacy policies to find out how these third parties collect and process your personal data.

8) Keeping your personal data safe

We are committed to protecting your personal data and, to this end, we implement technical and organizational measures to help protect the security of your personal data; however, we emphasize and inform you that no system is completely secure and that the security measures implemented, as provided for by law, take into account the nature of the data and its processing, as well as the risks involved in making existing technologies available.

9) Children and Adolescents

Our websites, platforms and other technology applications are not intended for children and adolescents, that is, individuals under the age of 18.

We do not deliberately collect personal data from children and adolescents. If the User is under the age of 18, he/she should not use our Platforms or provide us with any personal data. Therefore, if we become aware that we have collected personal data from a child or adolescent, we will take reasonable steps to delete the personal data in question.

10) Changes to this Privacy Policy

We may occasionally make changes to this Policy without prior notice, and when this occurs, we will provide appropriate communication according to the circumstances, such

as, but not limited to, inserting an alert on the platforms, websites and applications that use this Policy or by sending an email to the User.

Therefore, it is essential that you make sure to read any communication carefully and if you want to know more about this Policy and how our Platforms, websites and other applications use your User's personal data, please contact us through the channels mentioned below.

11) Contact Us

If you have any questions, please contact us using our contact form.