

BHC Advogados Associados Privacy Policy – version: December/2021

1. INTRODUCTION

Bhering Cabral Advogados Associados (“BHC”), headquartered in the cities of Rio de Janeiro and São Paulo, is a law firm that provides legal services in various areas of law.

With the aim of ratifying its respect for the Data Subject's privacy, BHC presents this Privacy Policy and reaffirms its commitment to transparency and the security of the personal data of all people who interact with the firm.

This Privacy Policy is applicable to all clients, employees, partners, associates, interns, service providers, as well as other people who may have their personal data processed by BHC, including visitors to our website, as it covers all personal data processing processes carried out by the firm, whether automated or manual.

This Privacy Policy aims to clarify the general conditions of collection, use, storage, sharing, elimination and other forms of processing and protection of personal data by BHC, in accordance with Brazilian legislation currently in force, including, but not limited to, Law No. 12965, of April 23, 2014 (“Brazilian Civil Rights Framework”) and Law No. 13709, of August 14, 2018 (“General Personal Data Protection Law” or “LGPD”).

This Privacy Policy may be changed in the future due to the need to adapt to legislative changes or to promote the improvement of services offered by BHC. Therefore, it is recommended that Data Subjects periodically consult this Privacy Policy, which will always be available on the firm’s website (www.bhcadvogados.com.br) in its updated version.

2. DEFINITIONS

For the purposes of this document, the following definitions and descriptions must be considered:

Anonymization: technical process in which the personal nature of the data is removed, as well as the link between the Data Subject and the information provided.

National Data Protection Authority (ANPD): federal public administration body, responsible for ensuring, implementing and monitoring compliance with the General Personal Data Protection Law (LGPD).

Controller: natural or legal person, governed by public or private law, responsible for decisions regarding the processing of personal data.

Cookies: files sent by the platform server to the user's computer, as well as any other device used, with the purpose of identifying the computer and collecting data.

Personal Data: information related to an identified or identifiable natural person.

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 sexual life; genetic or biometric data linked to a natural person.

Data Protection Officer: natural or legal person appointed by the controller to act as a communication channel between the Data Subject and the National Data Protection Authority. Also known as DPO.

Operator: natural or legal person, who processes personal data on behalf of the controller.

Data Subject: natural person to whom the personal data that is subject to processing refers.

Data Processing: any operation carried out with personal data, such as collection, storage, classification, use, reproduction, transfer, access, archiving, evaluation, communication, control, dissemination, distribution, elimination, extraction, modification, processing, production, reception and transmission.

International Data Transfer: transfer of personal data to a foreign country or international organization of which the country is a member.

3. HOW AND WHEN DO WE COLLECT PERSONAL DATA?

In carrying out its activities, BHC will process personal data of its clients, employees, service providers and other natural persons, within the limits of the services provided by the firm and the relationship established with each Data Subject.

Personal data will be collected and processed in accordance with the legal bases established in current legislation and in compliance with the principles of necessity, purpose, adequacy, security and transparency.

Clients' personal data will be collected when contracting the firm's services or during the provision of contracted services, whenever necessary to defend the client's interests.

The personal data of employees, partners, associated lawyers and interns will be obtained at the time of hiring, joining the company or when signing the internship contract, as applicable.

Personal data from service providers or other third parties may be collected, when necessary, for the execution of a contract or due to compliance with a legal obligation.

The collection of data from children or adolescents will be carried out upon signature, by their legal guardians, of specific terms, as required by Art. 14, paragraph 1 of Law No. 13709/2018.

In the cases listed above, BHC will process personal data as data controller.

BHC will also process personal data, as operator, when the controller shares personal data with third parties, during execution and related to the legal services provision contract signed with BHC.

Regardless of the origin of the data, the processing will be governed by this Privacy Policy.

4. FOR WHAT PURPOSES DO WE COLLECT, PROCESS AND STORE PERSONAL DATA AND WHAT LEGAL BASIS IS USED?

4.1 In the provision of legal services

In conducting lawsuits of BHC clients and within the limits of the service provision contract, registration data and personal data will be used, and sensitive data may also be used, if necessary, for the execution of the contract.

The legal basis applied for this processing is the legal services provision contract (Art. 7, V, Law No. 13709/2018).

4.2 When executing an employment contract

When BHC hires the services of its employees (with a registered employment record), registration, personal, banking data and, if necessary, sensitive personal data will be collected.

The legal basis applied for this processing is the employment contract (Art. 7, V, Law No. 13709/2018).

4.3 Admission of partners or associated lawyers

The partners and associated lawyers are part of the BHC structure to conduct lawsuits. To this end, registration, personal and banking data and, if necessary, sensitive personal data are collected.

The legal basis for processing these data is the execution of the service provision contract (Art.7, V, of Law No. 13709/2018).

4.4 When executing an internship contract

Interns, who are also part of the BHC structure, with the purpose of contributing to their academic education, will have their registration, personal, banking data, and, if necessary, sensitive personal data collected.

The legal basis for processing these data is the execution of the internship contract (Art.7, V, of Law No. 13709/2018).

DATA SHARING WITH THIRD PARTIES

When necessary, data will be shared with third parties in accordance with the purpose of the personal data and as authorized by applicable legislation.

Sharing is intended to facilitate the activities developed by BHC, comply with legal requirements and improve the quality of services provided, always based on the principles of necessity, purpose, adequacy, security and transparency.

BHC may share personal data with partners and other entities that provide the firm with services that assist with internal functions and compliance with legal/regulatory obligations.

Data may be shared with:

- Third-party software platforms and tools for the purpose of managing the provision of services offered by BHC;
- Partner companies and suppliers, in the development of services aimed at the Data Subject, including companies responsible for updating and maintaining the quality of our clients' data;
- Tax authorities and governmental, police and judicial bodies for the purpose of responding to complaints, investigations, legal measures and legal proceedings; as well as complying with legal, regulatory and tax obligations;

Correspondents, experts, referees, partner firms, auditors, accountants and translators, to assist in the provision of legal services.

6. RIGHTS OF PERSONAL DATA SUBJECTS

Law No. 13709/2018 guarantees some rights to Data Subjects, which may be exercised at any time. Upon receiving the request, we will evaluate the request and inform, within a reasonable period of time, in a well-founded manner, whether or not the request can be fulfilled.

The Personal Data Subject has the right to obtain from the controller: **(i)** confirmation of processing of their personal data; **(ii)** facilitated access; **(iii)** correction of incomplete, inaccurate or outdated data; **(iv)** the anonymization, blocking or deletion of unnecessary, excessive or processed data that do not comply with the law; **(v)** data portability to another service or product provider; **(vi)** elimination; **(vii)** information about sharing; **(viii)** information about the possibility of not providing consent and the consequences of refusal; **(ix)** revocation of consent; and **(x)** right to petition the National Data Protection Authority (ANPD).

7. INTERNATIONAL DATA TRANSFER

BHC may transfer personal data to service providers located abroad, including cloud service providers. When personal data are transferred outside Brazil by BHC, the Firm will adopt appropriate measures to ensure adequate protection of personal data in accordance with the requirements of applicable data protection laws.

8. PERSONAL DATA STORAGE TIME

BHC will keep personal data for as long as necessary to fulfill the purposes for which we collected such data. This means that they will also be stored for the purpose of complying with legal and contractual obligations or requests from competent authorities.

We store and maintain your information: **(i)** for the time required by law; **(ii)** until the end of the processing of personal data, as mentioned below; **(iii)** for the time necessary to preserve the legitimate interests of BHC and its clients, as applicable; **(iv)** for the time necessary to protect the regular exercise of the rights of BHC and its clients in judicial, administrative or arbitration proceedings.

Therefore, we will process your data, for example, during the applicable statute of limitations or as long as necessary to comply with a legal or regulatory obligation.

The processing of personal data will be terminated in the following cases: **(i)** when the purpose for which the Data Subject's personal data were collected is achieved and/or the personal data collected is no longer necessary or relevant to achieving such purpose; **(ii)** when the Data Subject has the right to request the termination of processing and the deletion of their personal data and does so; and **(iii)** when there is a legal determination in this regard. In these cases of termination of processing of personal data, except in the cases established by applicable legislation or this Privacy Policy, personal data will be deleted.

There are circumstances that may restrict the exercise of some rights provided for by law, such as, for example, to comply with some legal or regulatory obligation or to guarantee, if necessary, the defense of BHC in any judicial or administrative process.

PROTECTION OF PERSONAL DATA, SECURITY OF STORED DATA AND SENDING OF E-MAILS BY BHC

The security of personal data is one of BHC's main concerns. To protect personal data, we use measures that aim to ensure the confidentiality of all data collected.

BHC adopts technical and organizational measures, using good market practices as a parameter and has security measures in physical, electronic and administrative areas, which protect personal data and information. These protection measures help us prevent fraud and unauthorized access to information, as well as maintain data integrity.

All members who are part of the BHC structure and who have access to personal data collected are required to maintain confidentiality, in addition to being instructed to act in accordance with this Privacy Policy.

The security of your data also depends on you. Therefore, it is important for the Data Subject to protect their data against unauthorized access.

BHC does not send electronic messages requesting confirmation of personal data via email or that contain executable attachments or links for downloads.

For this reason, we are not responsible for any fraudulent electronic communications that collect personal data. Regarding emails received, we recommend checking the content of the entire email before accessing any internet address or clicking any link.

BHC may send e-mails to its clients, partners or third parties who have, in any way, related to BHC, containing institutional communications, memos or bulletins, invitations to events, news or content that it may consider relevant, as well as to carry out satisfaction surveys and feedback about services and initiatives. You can request to be unsubscribed from these distribution lists in the footer of any messages received.

10. WEBSITE AND USE OF COOKIES

BHC **does not** use cookies on its website to collect personal or browsing information.

Users can obtain access to information available on the website without the need for identification.

BHC's website may contain links to third-party websites. These websites have their own privacy policies, which are not the responsibility of BHC. Therefore, we recommend that you consult the respective privacy policies of these third-party websites to obtain information about the personal data protection practices used by them.

11. DATA PROTECTION OFFICER

During the period of storage of personal data, BHC will appoint the person responsible for processing personal data, in accordance with art. 41 of the General Personal Data Protection Law.

Below we identify the data protection officer appointed by BHC:

Name: Vivian Azevedo

E-mail: dpo@bhcadvogados.com.br

Address: Rua do Passeio, nº 70, 13º andar, Centro, Rio de Janeiro/RJ, CEP: 20021-290.

Any complaints or communications from Data Subjects must be addressed to the DPO via the email address provided above. The DPO is duly authorized by BHC to provide clarifications and adopt measures regarding the processing of personal data by the firm.

12. INTERPRETATION AND CHANGES TO THIS PRIVACY POLICY

This Privacy Policy must be interpreted in accordance with Brazilian Laws. If any provision is considered void or illegal, the other conditions will remain applicable.

BHC reserves the right to change this Privacy Policy at any time, by publishing the updated version through its website or other means of communication.