

Privacy Policy

V.1.1

Preamble

Like every organization in the 21st century, Mannrich e Vasconcelos Advogados deals with information in the form of data. Much of this data concerns the personal characteristics of its customers, partners, employees, vendors, visitors and other related parties that gravitate towards Mannrich e Vasconcelos' services.

Furthermore, Mannrich e Vasconcelos is a law firm and carries out activities regulated and governed, among other rules, by the Brazilian Bar Association (Ordem dos Advogados do Brasil - OAB) Code of Ethics and Discipline, supported by Law no 8,906/94. Articles 25 to 27 of the Brazilian Bar Association Code of Ethics and Discipline establish the duty of professional secrecy, meaning that lawyers are **prohibited from disclosing personal data delivered in trust by their client within the scope of legal services.**

Without prejudice, Mannrich e Vasconcelos submits to personal data protection standards, especially law no 13,709/12 - Brazilian General Data Protection Law ("LGPD").

Application

This Privacy Policy applies to lawyers, interns, legal assistants, employees, visitors, prospectors, clients, vendors, and all those who give Mannrich e Vasconcelos access to personal data.

This Privacy Policy is applicable with the support of the Mannrich e Vasconcelos' Information Security.

Definitions

The terms used in this Policy will have the same meaning as the definitions present in article 5 of the LGPD. For a more immediate comprehension, realize the following definitions:

a) *Personal data*: Any information that allows an individual (natural person) to be identified.

Personal data are, among others, name, Taxpayer Identification Number, ID, address, telephone;

b) *Sensitive personal data*: Personal data related to 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, generic or biometric data, when linked to you;

c) *Data Protection Officer*: Natural person responsible for implementing the rules and procedures linked to the processing of personal data, responses to authorities and holders, and ensuring that Mannrich e Vasconcelos complies with data protection rules and procedures, applying technical and organizational measures considering the state of the organization and the costs involved;

d) *Holder*: Natural person to whom the personal data refers.

Principles

The principles applicable to this Policy are those set out in the article 6 of the LGPD.

Subsidiary Application

Apply to this Policy, subsidiarily, the Mannrich e Vasconcelos Code of Ethical Conduct, available at <https://mannrichvasconcelos.com.br/en/about-us/> and the Information Security Policy, which can be requested at any time by the Holder of the personal data.

Personal data we collect

We collect personal contact information, such as name, telephone, email, ID, Taxpayer Identification Number, address, role in the organization, among others. We may also have access to information such as account logins. Furthermore, information such as participation in companies or position, role and position in organizations, or, where applicable, financial information necessary for drafting contracts and handling complaints, inquiries and administrative or judicial proceedings.

Data storage and systems

Personal data travels through Mannrich e Vasconcelos' systems, which include, among others, emails, online meeting platforms (i.e., Teams, Zoom), procedural monitoring *softwares*, files stored on Mannrich e Vasconcelos' servers or in the cloud (i.e., OneDrive), all of which are the responsibility of the Mannrich e Vasconcelos and the developers. Your personal data may also be collected when you visit the Mannrich e Vasconcelos website or official profiles on social networks (i.e., LinkedIn, Facebook).

Mannrich e Vasconcelos has the right to interrupt, suspend or terminate the use of systems. In the latter case, your personal data will be shared to the replacement system or, if it does not exist, it will be deleted.

Any Mannrich e Vasconcelos programs, *softwares*, applications that are made available to you will be used in accordance with their respective Terms of Use, and their replication, in whole or in part, is prohibited.

Holder's rights

The holder of personal data has the fundamental right to have their privacy protected. This involves the protection of your personal data processed by Mannrich e Vasconcelos. Mannrich e Vasconcelos is aware and uses its best efforts to protect your personal data.

Mannrich e Vasconcelos ensures that holders' personal data:

- a) will be obtained through your prior, express and informed consent, or as preliminary measures for contractual execution, without prejudice to the observance of other legal bases that are exactly applicable;
- b) will be obtained to the exact and strict extent necessary to achieve the mutually agreed purposes;
- c) will not be shared with third parties, except with your specific consent, especially for contractual execution;
- d) will be used solely and exclusively in the scope of the provision of legal services and related activities, such as billing;
- e) will not be transferred internationally, except in the case of the provision of international services, even with the prior, express and informed consent of the holder;
- f) will not be modified, lost or deteriorated. Any profiling activity will exclusively meet the scope of the best provision of legal services, always to the extent of your expressed consent, including by contracting the services; and
- g) it will be shared by legal determination or obligation only in the exact dimension established by the determination or rule.

Personal data may be requested by its holder at any time. The holder's rights, provided for in articles 17 to 20 of the LGPD, may be exercised at any time and their implementation will be provided by Mannrich e Vasconcelos as quickly as possible.

Goal

Personal data will not be used for offers, advertising and promotions of any kind.

Personal data may be used to send information that Mannrich e Vasconcelos deems to be of interest to the holder and the organization(s) related to him, upon collection authorized by the holder who, at any time, may inform Mannrich e Vasconcelos to no longer receive such information.

Personal data will be used to achieve the purpose(s) for which it was collected, especially for the provision of our services and related activities, such as billing, Mannrich e Vasconcelos participation in *rankings* and indication of holders as references and indication for partners.

Security

Your personal data is processed within an environment protected by information security. Any security incident - understood as any event that may result in total or partial loss, unauthorized sharing or replication or unauthorized access to personal data(s) - involving your personal data will be promptly informed to you, being certain that Mannrich e Vasconcelos takes all precautions to ensure that these incidents do not occur.

Mannrich e Vasconcelos ensures that your experience on the platforms it maintains and the processing of your personal data on the systems it operates are as secure as possible.

Be careful with disclosing sensitive and confidential information

The name of the Mannrich e Vasconcelos, its facilities, its employees and associates, its clients and other related parties must also have their privacy preserved. Thus, publications on social networks, sharing of images, audio, video, disclosure of names and information that can identify the person will generate liability on the part of those responsible for such acts, and it is not up to the Mannrich e Vasconcelos to carry out surveillance at this level of privacy, but to the person responsible.

Sharing of personal data

Your personal data may be shared with service providers that help Mannrich e Vasconcelos develop its business, agencies, and credit analysis, with adverse parties in the case of contracting or agreement, with internal teams for the provision of legal services.

Mannrich e Vasconcelos Communications

Mannrich e Vasconcelos Advogados

mannrichvasconcelos.com.br

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Emails sent by Mannrich e Vasconcelos will always be identified with the extensions @mannrichvasconcelos.com.br, will always contain a title related to Mannrich e Vasconcelos' activities, in addition to your name in the greeting and may contain attachments. If you have any doubts about the authenticity of the email, you should contact Mannrich e Vasconcelos.

In case of any communication you receive on behalf of Mannrich e Vasconcelos and you suspect its veracity, or even no longer wish to be contacted, you are asked to contact Mannrich e Vasconcelos.

Contact

You can contact us by the email lgpd@mannrichvasconcelos.com.br, or by telephone + 55 (11) 3737-7777. These contacts are used for you to exercise your rights as a holder or to present criticisms, compliments or suggestions.

Data Protection Officer

Marco Antonio da Costa Sabino

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