



BATUX Privacy Policy and Personal Data Processing

Last Updated: April 19, 2023

1. INTRODUCTION

This Privacy Policy and Personal Data Processing Policy (“Policy”) was created to reaffirm the commitment of A Batux Comunicação Ltda, with CNPJ/ME No. 00.946.790/0001-00, located at Rua Gomes de Carvalho, no. 1666, conj. 21, Vila Olímpia, São Paulo/SP, CEP 04.547-006, and Batuque Promoção, Eventos e Marketing Promocional Ltda., with CNPJ/ME nº 10.459.029/0001-90, located at Rua Viradouro, no. 63, 14th floor, Itaim Bibi, São Paulo/SP, CEP 04.538-110, hereinafter referred to as (“BATUX” or “we”), to your privacy and the protection of your personal data (“you”), in a clear manner and in accordance with the laws in force. This Policy describes the main rules regarding the Processing of your Personal Data within the scope of the use of services offered by Batux and when you use our features through digital environments, especially our website www.agencuabatux.com.br. For the purposes of understanding this Policy, our physical and digital environments are collectively referred to as “Our Environments”.

2. WHAT PERSONAL DATA DO WE PROCESS?

2.1. How we Process Data. We process Data, including Personal Data, especially in accordance with the services we provide and products we offer to our clients, which includes:

- Advertising campaigns, in which we carry out a set of marketing actions to promote the products and services of our clients;
- Development and planning of incentive campaigns, whose objective is the promotion of our clients' products to their internal audience, and the delivery of prizes to the winners;
- Relationship and loyalty campaigns, whose intention is to generate value in the relationship between consumers and their brands;
- Development of digital media campaigns with influencers and media outlets;
- Creative development and production of communication materials, as well as their logistics, which may or may not be delivered to the residential addresses of our clients;

2.1.1. Personal Data may also be processed by us, always in compliance with the criteria established by applicable legislation, including for (i) expanding our relationship, by sending informative content that we consider relevant; (ii) allowing the provision of more personalized services, in line with our legitimate and commercial interests; and (iii) promoting customer service for managing queries and requests.

2.1.2. We will also process any Personal Data arising from the use of our electronic environments, always in compliance with the criteria established by applicable legislation, which includes, for example, IP address, operating system version of the device used, and geolocation, for the purposes of: (i) user identification and authentication and (ii) compliance with legal obligations, such as those established by the Brazilian Civil Rights Framework for the Internet (Law nº 12.965/2014).



2.1.3. We will only process Personal Data that is strictly necessary to fulfill the intended purposes.

2.2. Technologies Used. We use the following technology(ies): (i) Cookies, used to improve the functionality of our digital environments, in accordance with the information available on our Website, especially in our platform regarding cookie management; and (ii) Google Analytics, for the registration of non-identifiable browsing data for analysis.

2.2.1. All technologies used will always respect current legislation and the terms of this Policy. We do not use any type of exclusively automated decision that impacts you.

3. HOW WE SHARE PERSONAL DATA AND INFORMATION

3.1. Cases of Personal Data Sharing. The Personal Data collected and the activities recorded may be shared in the following cases: (i) With competent judicial, administrative, or governmental authorities and regulatory bodies, such as the Economic Monitoring Secretariat of the Ministry of Economy (SEAE/ME), whenever there is a legal determination, request, requisition, or judicial or administrative order; (ii) Automatically, in the event of corporate transactions, such as merger, acquisition, and incorporation; (iii) With authorized partner companies, clients, and suppliers, for the proper provision of services, always requiring these organizations to comply with security and data protection guidelines, as per item “4.3”; and (iv) With companies of the same economic group, always in compliance with data security and protection guidelines to fulfill the purposes of this Policy.

4. HOW WE PROTECT YOUR DATA AND HOW YOU CAN ALSO PROTECT IT

4.1. Measures We Take. We employ our best efforts to maintain the privacy and security of information, through the adoption of technical, physical, and administrative security measures: (i) Technical measures, such as the transmission of Personal Data through a secure internet page, storage of Data in electronic media that maintain high security standards, use of a system whose access is controlled; (ii) Physical measures, such as restricted access to authorized persons maintained in facilities, use of market security tools; and (iii) Administrative measures, including the adoption of security policies and standards, training and awareness work for employees, signing of confidentiality agreements.

4.2. Access to Personal Data, Proportionality, and Relevance. Internally, the Personal Data collected is accessed only by duly authorized professionals, respecting the principles of proportionality, necessity, and relevance for the objectives of our business, in addition to the commitment to confidentiality and preservation of your privacy under the terms of this Policy.

4.3. Processing by Third Parties Under Our Direction. If outsourced companies process, on our behalf, any Personal Data we collect, they will comply with the conditions stipulated herein and information security standards, mandatorily.

4.4. Communication by E-mail. To optimize and improve our communication, when we send you an e-mail, we may receive a notification when it is opened, provided this possibility is available. It is important for you to be aware that e-mails are sent by domains related to our operations, such as: @batux.net.br.

5. HOW WE STORE YOUR PERSONAL DATA AND ACTIVITY LOGS

5.1. Storage Period. We store your Personal Data for the period necessary or when, for legal or regulatory reasons, we are obliged to do so, or for a longer period to preserve rights. Otherwise, we may delete this data from our databases or anonymize it so that it is no longer capable of identifying you.

5.1.1. The storage period will vary according to the purpose for which the personal data is processed, such as to perform our services or even for our legitimate interest.

5.3. International Storage. The collected Data will be stored on our servers located in Brazil, as well as in an environment for the use of resources or servers in the cloud (cloud computing), which will be carried out through a transfer and/or processing of this Data outside of Brazil.

6. WHAT ARE YOUR RIGHTS AND HOW TO EXERCISE THEM

6.1. Your Basic Rights. You, as a Data Subject, may request from our Data Protection Officer the confirmation of the existence of Personal Data processing, as well as the display or rectification of your Personal Data, if applicable, through our Service Channels indicated in item 7.4 below.

6.2. Limitation, Opposition, and Deletion of Data. Through the Service Channels, you may also request, if applicable: (i) The limitation of the use of your Personal Data; (ii) The alteration of any of your personal data; (iii) Express your opposition and/or revoke consent regarding the use of your Personal Data; or (iv) Request the deletion of your Personal Data that has been collected by us.

6.2.1. If you request the deletion of your Personal Data, it may occur that the Personal Data needs to be kept regardless of the deletion request, as provided in item 5.1 of this Policy, for compliance with a legal or regulatory obligation.

6.2.2. After the retention period and the legal necessity, the Personal Data will be deleted, using secure disposal methods, or used exclusively in an anonymized form for statistical purposes.

7. INFORMATION ABOUT THIS POLICY

7.1. Amendment of Content and Update. You acknowledge our right to amend the content of this Policy at any time, according to the purpose or necessity, such as for adaptation and legal compliance with a provision of law or regulation that has equivalent legal force.

7.2. Inapplicability. If any point of this Policy is considered inapplicable by a Data or judicial Authority, the other conditions will remain in full force and effect.

7.3. Electronic Communication. You acknowledge that all communication carried out by e-mail (to the addresses provided in your registration), SMS, instant messaging applications, voice communication services, or any other digital form, are also valid, effective, and sufficient for the disclosure of any matter referring to the services we provide, your Personal Data, as well as the conditions of their provision or any other matter addressed therein, except as otherwise provided in this Policy.



7.4. Service Channels. If you have any questions regarding the provisions contained in this Privacy and Data Processing Policy, you may contact the Data Protection Officer, which is Comp9 Consultoria Empresarial e Treinamento Ltda represented by Juan Musso, via email at juan.musso@comp9.com.br or through the Privacy Channel by clicking on the following link: [PRIVACY CHANNEL](#)

7.5. Applicable Law and Jurisdiction. This Policy shall be interpreted in accordance with Brazilian law, in the Portuguese language, and the jurisdiction of the city of São Paulo, State of São Paulo, is elected to resolve any controversy involving this document, unless there is a specific reservation of personal, territorial, or functional jurisdiction by applicable law.

8. GLOSSARY

8.1. For the purposes of this Policy, the following definitions and descriptions should be considered for your better understanding:

(i) Data: Any information entered, processed, or transmitted through our environments. **(ii) Personal Data:** Data related to an identified or identifiable natural person. **(iii) Anonymization:** Use of reasonable and available technical means at the time of Processing, through which data loses the possibility of direct or indirect association with an individual. **(iv) Data Protection Officer (DPO):** Person appointed by us to act as a communication channel between the controller, data subjects, and the National Data Protection Authority (ANPD). **(v) Cloud Computing:** Or cloud computing, is a service virtualization technology built from the interconnection of more than one server through a common information network (e.g., the Internet), with the objective of reducing costs and increasing the availability of supported services. **(vi) Cookies:** Small files sent by our environments, saved on your devices, that store preferences and a few other pieces of information, with the purpose of personalizing your browsing according to your profile. **(vii) Solely Automated Decisions:** These are decisions that affect a user that have been programmed to function automatically, without the need for human operation, based on automated processing of personal data. **(viii) Processing:** Any operation carried out with Personal Data, such as those relating to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.