

1. PURPOSE

1.1 Thinking about the privacy of its employees, customers, and users, Prozyn has created the Privacy Governance Program herein to manage risks in the management and processing of personal data, aimed to guarantee communication safety and ensure that the use of personal data is conscious and objective, with specific purposes and with risks mapped and under control.

1.2 This paper was developed under the terms of the General Data Protection Law, “LGPD” (LAW No. 13,709, OF AUGUST 14th, 2018, wording given by Law No. 13,853, of 2019, which provides for the protection of personal data and amends the Law No. 12,965, of April 23rd, 2014 (Civil Framework for the Internet).

2. COVERAGE

2.1 This Policy applies, in general, to all PROZYN users and potential users of the products offered and services provided, including website users or other means operated by PROZYN; it summarizes information on the processing of personal data, in accordance with the applicable legal bases, and all applicable privacy and data protection laws.

2.2 The processing operations are highlighted below and encompass any activity that uses personal data in the execution of its operation.

3. DEFINITIONS

I. Personal Data: any information provided and/or collected by PROZYN, by any means, even if public, that:

a. Identify, or that, when used along with other information processed by PROZYN, identify, or make identifiable an individual; or

b. Through which, either the identification or contact information of an individual may be derived. Personal data can be stored in any media or format, including electronic records as well as blue-printed files.

II. Sensitive Personal Data: personal data related to racial or ethnic origin, religious conviction, political opinion, union affiliation or organization of a religious, philosophical, or political nature, data referring to health or gender-related life, genetic or biometric data, when linked to a natural person.

User: Any natural person who will use or visit the website, over 18 (eighteen) years or emancipated and fully capable of performing civil-life acts or absolutely or relatively incapable persons duly represented or assisted.

III. Access: act of entering, navigating, knowing, or consulting information; the possibility of using information assets of a body or entity, observing the restrictions that may apply.

IV. Legal basis: legal basis that legitimates and entitles PROZYN to process personal data for a specific purpose;

V. Collection: collection of data with a specific purpose;

VI. Storage: action or result of storing or keeping data in a repository;

VII. Deletion: act or effect of deleting or destroying data from the repository;

VIII. Purpose: the goal or purpose that PROZYN aims to achieve from each act of processing personal information;

IX. Consent: express and unequivocal authorization given by the user, holder of the personal data to PROZYN to process his/her Personal Data for a

previously described purpose, in which the legal basis necessary for the act requires the express authorization of the holder;

X. Modification: act or effect of data alteration;

XI. Need: reason why it is strictly necessary to collect personal data, to achieve the purpose, avoiding excessive collection;

XII. Controller: natural person or legal entity, either public or private, who is responsible for decisions regarding the processing of personal data;

XIII. DPO (Data Protection Officer): person appointed by the controller and operator to act as a communication channel among the controller, the data holders, and the National Data Protection Authority (ANPD);

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

XV. Breach: circumstances in which the personal data security is breached, such as, loss, theft, copying, leakage, among others.

4. HOLDERS' RIGHTS

The LGPD has set forth a legal framework which empowers personal data holders, providing them with rights that shall be exercised before controllers. Such rights must be ensured throughout the existence of the processing of the holder's personal data.

As the holder of personal and non-transferable data, the User can exercise the following rights provided for in the LGPD:

- i.** Confirmation of the processing of your personal data.
- ii.** Access to your personal data.
- iii.** Rectification of incomplete, inaccurate, or outdated data.
- iv.** Anonymization, blocking and deletion of unnecessary, excessive, or non-compliant data.
- v.** Portability.
- vi.** Information about the third parties with whom your data is shared.
- vii.** Information about the possibility of not providing your consent for certain data processing and its effects.
- viii.** Revocation of your consent and deletion of data related to it.
- ix.** Exclusion of some of your personal data, such as in cases where it is no longer necessary for the provision of services.
- x.** Request for a copy of the personal data provided, in a readable format, either printed or electronic.

The afore mentioned shall be requested to PROZYN's DPO at: dpo@prozyn.com.br.

5. SHARING AND PROCESSING OF PERSONAL INFORMATION

5.1 Processing operations encompass all activities using personal data in the execution of its operation, such as: collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or information control, modification, communication, transfer, diffusion, or extraction.

5.2 PROZYN is entitled to disclose the Personal Data collected to third parties, in the following situations and within the limits required and authorized by law:

- i.** With its Administrators and partners when necessary and/or appropriate for the provision of related services.
- ii.** With companies and individuals contracted to perform certain activities and services on behalf of PROZYN.
- iii.** With suppliers and partners, to conduct the services contracted with PROZYN (such as information technology, accounting, among others).
- iv.** For administrative purposes such as: research, planning, service development, security, and risk management.
- v.** Whenever necessary, because of legal obligation, determination of competent authority, or court decision.

5.3 In the event of sharing personal data with third parties, all subjects mentioned in the above items must use it consistently and in accordance with the purposes for which it was collected (or with which the User previously consented) and in accordance with what was established by this Privacy Policy, other website or country privacy statements, and all applicable privacy and data protection laws.

5.4 Whenever one accesses and uses Prozyn's service platform, we will automatically receive and store such information, including the IP address and cookie information, which will be related to the personal information you provide us with.

5.5 PROZYN will disclose your personal information, without prior notice, only in the following events: (a) applicable law, regulation, legal process, or governmental request; (b) carry out investigation of possible violations; (c) fraud or security; or (d) protect against harm to the rights, property, or safety of Prozyn, its users or the public, as required or permitted by law.

5.6 PROZYN will register the user, keeping specific records of the transactions carried

out in its system.

6. LEGAL REASONS FOR DATA DISCLOSURE

6.1 PROZYN only processes personal data in situations where it is legally authorized, namely:

- I.** Upon the holder consents it.
- II.** For compliance reasons, in cases of legal or regulatory obligation.
- III.** Whenever necessary for the performance of an agreement or preliminary procedures related to an agreement to which the data subject is a party, at the request of the data subject.
- IV.** For the regular exercise of rights in judicial, administrative or arbitration proceedings, the latter pursuant to Law No. 9,307, of September 23rd, 1996 (Arbitration Law).
- V.** For life protection or physical safety of the holder or third parties.
- VI.** For health protection, exclusively, in a procedure carried out by health professionals or health services.
- VII.** Whenever necessary, to meet its legitimate interests, or those of a third party, except if the fundamental holder's rights and freedoms require the protection of his/her personal data.

7. CONFIDENTIALITY

7.1 A PROZYN is committed to the privacy of its users and makes its best effort to ensure the confidentiality of the information shared with it. Its processes, website and application were established in accordance with the best information security practices, to preserve personal data, which are stored on a secure server and can only be accessed by authorized individuals.

7.2 A PROZYN will inform users involved about any legal demands that result in the



disclosure of personal information, unless such notification is prohibited by law or by court order or, even, if the request is an emergency. PROZYN may contest such requests if it believes they are excessive, vague, or made by incompetent authorities.

8. SECURITY OF PERSONAL INFORMATION

8.1 All personal data is stored in PROZYN's database or in databases secured by service providers, contracted by PROZYN, which are duly in accordance with current data legislation.

8.2 PROZYN and its suppliers make their best efforts to keep personal data confidential and take technical and administrative measures to protect your processes and personal data, preventing the event of possible damages due to the processing of such data. Those measures include, but are not limited to, data encryption, access controls, daily backups, and security certificates.

8.3 Although PROZYN adopts physical, technical, and administrative securing measures to protect personal data against unauthorized disclosure, misuse or alteration, the user understands and agrees that there is no guarantee that there will be no incident of violation.

9. DATA RETENTION

9.1 PROZYN retains all data provided, including personal data, while the user's registration is active and as necessary to carry out its services, storing it until PROZYN requests for deletion, or in accordance with legal provisions.

9.2 Whenever necessary, PROZYN is entitled to keep User's personal data, even after receiving the deletion request or after the legally set forth deadlines have expired, to comply with legal obligations, resolve conflicts, maintain security, prevent fraud and abuse, and to ensure agreements are fulfilled.

10. KIDS' AND TEENAGERS' PERSONAL DATA



The processing of personal data of children and teenagers shall be carried out with the specific and highlighted consent of at least one of the parents or the legal guardian.

Consent will be waived when the collection of data from the child or teenager is necessary for their protection and/or contact the parents or the legal guardian.

In such circumstances, the data shall be used exclusively for this purpose and will not be stored nor passed on to third parties without the consent of at least one of the parents or the legal guardian.

11. USER PROTECTION

Tais Such interests include protecting both the User and PROZYN from threats, complying with the applicable legislation, the regular exercise of rights in judicial, administrative or arbitration proceedings, enabling the performance or administration of business, including quality control, reports and services offered, managing transactions businesses, understand and improve business and customer relationships, and enable users to find economic opportunities.

The User is entitled to deny or withdraw the consent provided to PROZYN, when such is the legal basis for the processing of personal data, and PROZYN may terminate the provision of its services to this user in the event of such a request.

Being the holder of your personal and non-transferable data, you are entitled to exercise the rights provided for in the Brazilian legislation for the protection of personal data, notably Law 13.709/2018 (General Data Protection Law – LGPD).

The User request all the above by contacting our DATA PROTECTION OFFICER at dpo@prozyn.com.br. Such requests will be considered in accordance with the applicable laws.

12. COMPLIANCE

PROZYN prioritizes the hiring of partners who are also subject to the same legal standard of protection of personal data.

The PROZYN website may contain links to third-party applications or websites that have data collection and processing policies different from its own, and the User is responsible for reviewing the terms and conditions of such policies before accessing them.

13. ADHERENCE TO POLICY

By using the website and providing personal information on PROZYN platforms, the user adheres to this Privacy Policy.

The user, when registering, declares to know and is entitled to exercise his/her rights to cancel his/her registration or update his/her personal data and guarantees the veracity of the information made available.

The user is entitled to withdraw his/her consent at any time. To do so, he/she will contact PROZYN's DPO.

14. POLICY UPDATES

Should PROZYN modify this Privacy Policy, such changes will be published in a visible way on its website.

15. MEDIATION AND FORUM

This policy is subject to the Law of the Federative Republic of Brazil, mainly the LGPD,



regardless of the Laws of other States or Countries, and the Jurisdiction of the City of São Paulo is competent to resolve any controversy related to it.

In the event of an incident with personal data, PROZYN, from now on, reserves the right to appoint the ANPD or other entities able to resolve issues involving data holder users, pursuant to article 52 of the General Data Protection Law.

16. CANAL DE CONTATO PROZYN

PROZYN has appointed the DATA PROTECTION OFFICER (DPO).

Should you have any questions related to the processing of your personal data or want to talk about this Privacy Policy and your rights, please contact our DPO at: dpo@prozyn.com.br.

DPO attributions are:

- I.** Receive complaints from Administrators about misuse of data.
- II.** ii. Provide clarifications and adopt measures to solve problems related to the issue.
- III.** iii. Receive communications and respond to the Legal Authorities, in particular the National Data Protection Agency (ANPD).

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