

Dated April 17, 2025

**PRIVACY POLICY – LEFOSSE ADVOGADOS**

**Lefosse** 

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## Contents

|    |  |   |
|----|--|---|
| 1  | History of Update and Effective Date .....     | 1 |
| 2  | Purpose .....                                  | 1 |
| 3  | Target public .....                            | 1 |
| 4  | Definitions .....                              | 1 |
| 5  | Guidelines .....                               | 2 |
| 6  | Why does Lefosse Process Personal Data? .....  | 2 |
| 7  | Sharing of Personal Data .....                 | 3 |
| 8  | For How Long do We Retain Personal Data? ..... | 3 |
| 9  | How do We Keep Personal Data Safe? .....       | 4 |
| 10 | Data Subjects Rights .....                     | 4 |
| 11 | International Transfer .....                   | 4 |
| 12 | Third Parties .....                            | 5 |
| 13 | Law and Jurisdiction .....                     | 5 |
| 14 | Contact .....                                  | 5 |
| 15 | Approval Track .....                           | 5 |

## 1 History of Update and Effective Date

| Revision No. | Date       | Update                 |
|--------------|------------|------------------------|
| 003          | 04.17.2025 | Revised without update |
| 002          | 03.19.2024 | Template update        |
| 001          | 08.11.2021 | Various updates        |

Lefosse Advogados reserves the right to amend this Privacy Policy ("Policy") at any time, by publishing the updated version on the intranet for its professionals.

This document is also available for consultation at any time at <https://lefosse.com/politica-de-privacidade/>.

## 2 Purpose

We at Lefosse Advogados ("Lefosse" or "we") are committed to respecting and protecting the personal data of our clients, individuals and representatives of legal entities, partners, professionals, users of our website or any other natural persons related to our activities ("Data Subject", or "you"), following the laws and regulations and best practices related to the protection of personal data.

The purpose of this Policy to explain how we process personal in developing our activities in a simple, transparent, and straightforward manner.

## 3 Target public

The rules of this Policy apply to our clients, individuals and representatives of legal entities, partners, professionals, users of our website or any other persons related to our activities.

## 4 Definitions

Where used in this policy, the terms shall have the meanings set forth in this "Glossary".

| Term          | Meaning  |
|---------------|--|
| Controller    | means the natural or legal person of public or private law responsible for personal data processing activities decisions. In this Policy, Lefosse is the Controller of the processed personal data.                            |
| Data Subject  | means the natural person to whom personal data submitted to processing activities relates.   |
| Personal data | means all information related to an identified or identifiable natural person, such as name, contact details, electronic identifiers, among others.  |
| Lefosse       | means Lefosse Advogados.   |
| Processor     | means the natural or legal person of public or private law who performs personal data processing activities on behalf of the Controller. As indicated in this Policy, Lefosse may engage some Processors to act on its behalf. |
| Policy        | means this Privacy Policy, which aims to inform how Lefosse processes Personal Data.   |



## 5 Guidelines

### 5.1 What Personal Data do we Process?

We process the following personal data:

#### (i) **Personal Data Provided by the Data Subject or by Third Parties**

In the development of our activities, we may process:

- (a) identification, qualification, and contact data, such as but not limited to full name, position, company, professional and academic information, addresses, e-mails, and telephone numbers.
- (b) financial data, for payment purposes.
- (c) other information provided by Data Subjects or our clients, such as: (c1.) Personal Data necessary us provide our services; (c.2) Personal Data from public sources; (c.3) Personal Data provided when you register on our website <www.lefosse.com> or other platforms, or otherwise send us by email or register to attend an event organized or sponsored by us; and (c.4) Personal Data provided when you engage in networking activities with our partners and associates, submit your résumé when applying for a job opening, or otherwise interact with our professionals.

#### (ii) **Personal Data Automatically Collected**

We also collect some information automatically, through our website or other platforms made available by the office, such as, IP address (with date and time), IP source, information on clicks, or any search term entered on the site, among others. We may use some standard technologies, such as cookies.

In the case of processing activities of minors' personal data, we will request prior consent from their respective parents or legal representatives. To the fullest extent permitted by the applicable laws and without limiting any other provision of this Policy, we accept no liability whatsoever for Personal Data submitted in violation of this Policy.

## 6 Why does Lefosse Process Personal Data?

Lefosse only processes Personal Data necessary to achieve lawful purposes. Accordingly, we process Personal Data for the following primary purposes:

#### (i) **Provision of Legal Services**

To provide legal services such as but not limited to: (a) acting *pro bono*; (b) coordination of merger &, acquisition transactions, capital market transactions, including carrying or participating in due diligence and audit proceedings; (c) drafting, reviewing or negotiating contracts; (c) drafting of documents, reply to consultations, memoranda, legal opinions or opinions in general; (d) management of investigations, inquiries, judicial, administrative or arbitration proceedings; (e) holding of meetings, training sessions, conference calls or video conferences to discuss a wide variety of issues.

#### (ii) **Formalization of contracts with clients, billing, and payments**

For the formalization of contracts on fees and legal services with our clients, as well as for billing and payment purposes, in cases where you are natural person client or representative of a legal entity client.

(iii) **Formalization of contracts with suppliers and for making payments**

For formalization of contracts with suppliers, and for making payments purposes.

(iv) **Provision of relevant contents**

For remittance of: (a) newsletters of practices; (b) institutional communications; (c) invitations; (d) reminders and acknowledgements related to events (including webinars organized and/or sponsored by us); (e) materials produced by us for events; and (f) newsletters.

(v) **Registration for Events**

For Data Subjects registration in events, organized or sponsored by Lefosse, upon their registration or request in this regard, including in an online environment.

(vi) **Prospecting for Professionals**

For prospecting potential candidates for positions in our office, including through social medias, as well as for examining résumés that Data Subjects may send for our analysis.

(vii) **Other Purposes**

We may also use Personal Data for other purposes not conflicting or excessive in relation to the ones mentioned above, always in compliance with Brazilian laws and regulations, based on our lawful interest, except in cases in which the Data Subject's legal rights and guarantees shall prevail.

## **7 Sharing of Personal Data**

We may share the Personal Data we collect with service providers, subcontractors or other material suppliers, opinion issuers, experts, auditors, accountants, and associated firms. Depending on the case, these third parties may be Controllers or Processors. Regardless, we always share Personal Data in compliance with the applicable Brazilian laws and regulations in force. Besides, we continuously adopt the best information security practices to ensure the security and confidentiality of Personal Data.

If any law enforcement, administrative or judicial authority (such as the Police, the Public Prosecution, Governmental agencies, among others) requests access to Personal Data that we process and such request is supported by applicable Brazilian laws, we may share Personal Data with them to comply with the mentioned request.

In addition, we may provide our client's Personal Data to Brazilian or international publishers of legal material who may contact them to ask them to evaluate and refer our services to such publications.

Finally, we may share Personal Data to protect our interests in any conflict, including court actions.

## **8 For how long do we retain Personal Data?**

Personal Data collected for the purposes described in this Policy will be stored by Lefosse for the period necessary to meet the purposes described herein, unless the Data Subject objects to such processing. If you, as Data Subject, no longer wish to receive any Lefosse's communications, or only communications on specific issues, you may request such exclusion or modification by sending an e-mail to [dpo@lefosse.com](mailto:dpo@lefosse.com) at any time.

## 9 How do we keep Personal Data Safe?

We adopt the best standards of security and confidentiality to protect Personal Data, such as storing such data, previously encrypted, in a secure operating environment which is not accessible to the public or, in some cases, in physical files, access to which is granted only to authorized employees or suppliers, among others.

Notwithstanding, we cannot guarantee the complete security of your Personal Data because electronic means, by their very nature, are subject to security breaches arising, for example, from unauthorized use of accounts, hardware, or software failure, among other factors.

## 10 Data Subjects Rights

In compliance with applicable regulations regarding the processing of Personal Data, we respect and assure you the possibility of submitting requests based on the rights provided for in the LGPD, namely:

- (i) Confirmation of the existence of personal data processing by Lefosse;
- (ii) Access to personal data processed by Lefosse;
- (iii) Correction of incomplete, inaccurate, or outdated data in the Lefosse database;
- (iv) Anonymization, blocking, or elimination of unnecessary, excessive data or data processed by Lefosse in violation of the applicable laws and regulations in force;
- (v) Portability of data processed by Lefosse to another provider of services or products;
- (vi) Elimination of personal data processed based on consent, except in the events provided for in the applicable laws and regulations in force;
- (vii) Information on the public and private entities with which Lefosse shares the Data Subject's personal data;
- (viii) Information regarding the possibility of the Subject not providing consent and the consequences of their refusal; and
- (ix) Revocation of your consent.

If you need to exercise any of the foregoing rights or believe that your Personal Data has been and/or is being used in a manner inconsistent with this Policy, you may contact us through the e-mail [dpo@lefosse.com](mailto:dpo@lefosse.com). In this e-mail, you may indicate, at least, your full name, CPF number, and the detailed description of your request.

Upon receiving the Data Subject's request, we will use our best efforts to comply with the request within the shortest possible time. In this regard, we hereby clarify that: (i) requests will be analyzed on a case-by-case basis and may, in some situations, not be fully complied with due to limitations authorized or established by the applicable laws; and (ii) even if the Data Subject requested the elimination of all their Personal Data from Lefosse's databases, we may keep some Personal Data to comply with any legal or regulatory obligations or allow the fulfillment of contractually assumed obligations, as applicable.

## 11 International Transfer

We may transfer Personal Data to service providers and associated offices located abroad, always within the limits of the purposes outlined in this Policy. In any case, we take appropriate

measures to ensure adequate protection of Personal Data transferred abroad in compliance with the requirements set out in the applicable data protection laws and regulations.

## 12 Third Parties

Lefosse's website may contain links to other websites. However, we are not liable for your access to any third-party websites or their respective privacy policies.

## 13 Law and Jurisdiction

This Policy shall be governed by, interpreted, and executed according to the Brazilian Laws, particularly Law No. 13,709/2018 (Brazilian General Law Data Protection Law, the so-called "– LGPD").

## 14 Contact

Any matters relating to this Policy including, but not limited to, questions, comments and suggestions, or how we treat your personal data, shall be addressed to the following e-mail [dpo.lefosse@lefosse.com](mailto:dpo.lefosse@lefosse.com).

## 15 Approval Track

| Prepared by: | Reviewed by: | Approved by: |
|--------------|--------------|--------------|
| Carla Segala | Paulo Lilla  | Paulo Lilla  |