

PRIVACY POLICY AND ACCORDING TO LGPD (GENERAL DATA PROTECTION LAW)

This policy belongs to **PEMA EPP** whose business and company's trade name is Wolffish Serviços (Wolffish Services).

Our privacy policy was prepared under the aegis of the **privacy** aspects of the Federal Constitution, other legislation applicable to the species, in particular in full **concordance** with the General Law for the Protection of Personal Data, the LGPD.

The LGPD (under the number 13.709/2018 and subsequent amendments) regulates the use of **personal data** and establishes rules for the treatment of this information both physically and digitally.

Broadly, the law was created to regulate the **privacy of people** in personal data processing operations, giving to the data **holder** more control and the possibility of knowing in a **transparent** way how their data is used in personal data processing operations, enabling that he can exercise the **rights foreseen** in the LGPD.

For legal purposes, "**PERSONAL DATA**" are considered: any information obtained under this contract, related to an identified or identifiable natural person, such as: name, CPF (Natural Person Taxpayer Registry), RG (General Identification Registry), residential or business address, landline or mobile phone number, e-mail address, geolocation information, among others.

And "**PROCESSING**": any operation or set of operations carried out with personal data or on sets of personal data, by automated or non-automated means, such as collection, registration, organization, structuring, conservation, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, broadcast or any other form of availability, comparison or interconnection, a limitation, deletion or destruction.

The physical or legal persons that use the personal data of the holders for the purpose of offering or supplying **goods or services** must be transparent about the purpose of the use, storage and consumption of the **data** used. In short, the LGPD brought the following relevant points:

- ✓ It **formalized** the obligation of responsibility for the users of third-party information to protect it and how to **handle it**;
- ✓ All companies are required to prepare a **Privacy Policy adhering to the LGPD** as a good **governance** practice;
- ✓ Similarly, it is trying to **prevent risks** of lawsuits through an adequate privacy policy that protects the company against **lawsuits** and consequent **finances**;
- ✓ It establishes the **conditions** under which people and organizations will be able to **use personal data** belonging to third parties for economics or even administrative purposes, necessary for carrying out works of mutual interest;
- ✓ It establishes the **rights of the data holders** and the **obligations of the managers** of such data;

- ✓ It recommends the adoption of **good corporate governance practices** (**Corporate Governance** can be defined as the mechanisms or principles that govern the decision-making process within an organization and a set of rules that aim minimizing the agency problems.) related to data privacy, trying to prevent the data loss, leakage and misuse;
- ✓ It creates the obligation of the data holder's **consent**, even though personal data are widely used for access to sites, professional platforms, technology resources for the everyday work, personal and professional issues of interest;
- ✓ It creates a **federal agency** responsible for regulating and inspecting the issue;
- ✓ It establishes **sanctions** applicable to agents who violate its dispositions, ranging from warning, disclosure of **liability** for failure to protect and heavy **fin**es.

Our role is to ensure that all **data processing cycles**: collection, retention, processing, sharing and elimination are fulfilled following the mapping and analysis of organizational processes and the assessment of risks involved **in compliance with the General Data Protection Law**.

Mapped processes

The processes below were mapped following the LGPD guidelines. They report all transactions that use personal data regarding the scope of the process and the need to use some personal data:

- a) **Payroll** process;
- b) **Payment** process to individuals;
- c) Registration and maintenance of **individuals register in our operational digital platform** (WEB/cloud) for the preparation of financial analyses, concluding with the RDF – Financial Performance Report;
- d) Capture of personal data via **our website**.

a) Payroll process

The **payroll** process is carried out by Agostini Assessoria Administrativa Ltda. located at rua Padre Vieira, 552 - Centro - Campinas/SP - Brazil, our **outsourced** accounting office. Employees are registered under the CLT (Consolidation of Labor Laws) regime. In this process, the following personal data are **processed**: name, RG, CPF, PIS card, birth certificate of children, address, e-mail and bank details. These documents are filed in the employee record held at the aforementioned third-party accounting office.

The **retention** period is determined according to the employee's length of stay and in compliance with the specific legislation about document custody.

This data are provided and/or granted by employees upon admission to comply with the current legislation, **treatment hypothesis**, as well as the **purpose** of generating the

payroll and the effective credit in the bank account informed of: salary, 13th salary, vacation and other related earnings.

All personal data are **stored** in the AO3 Tech HR database and in the platform that belongs to the AO3 Tech Company. This platform resides in WEB and cloud. As a security measure, the access to the system is by encrypted login and password. They are kept in the outsourced accounting office for the time necessary to comply with **labor and social security legislation**.

The processed data and the payroll are encrypted on the AO3 Tech platform. These activities are **based** on the following **hypotheses (art.11)**:

- a) Consent of the holder;
- b) Compliance with the legal or regulatory obligation;
- c) Execution of contracts.

Personal data is only **shared** for:

- a) Compliance with legal obligations and payment of contributions and taxes for the Federal Revenue Service of Brazil and Caixa Econômica Federal;
- b) Fulfillment of contract with health plans.

b) Payment process to individuals

The payment process to individuals, employees, consultants and other service providers, is carried out **solely and exclusively** by the financial manager who is the main executive of PEMA EPP.

All payments **are made** to checking account via deposit, TED and PIX (Instant Payment System of the Central Bank of Brazil).

The flow occurs as follows:

- a) The financial manager receives **the payroll** by e-mail from the outsourced accounting office that prepare the payroll;
- b) It makes **payments** to employees, salaries and other labor amounts via credit in a checking account using the data provided by the employees: CPF and bank details;
- c) It also makes **payments to third parties** for services rendered.

The data provided are **CPF and bank details**. All payment receipts are filed in the accounting movement and kept at the accounting office during **5 years** to comply with the **income tax legislation**.

These activities are based on the following **hypotheses (art. 11)**:

- a) Consent of the holder;
- b) Execution of contracts, type of work, type of consultancy, among others.

Bank details **are shared** with the banks Itaú, Santander and Bradesco, which hold the accounts of **employees and third parties hired** to make payments. It is known that

both paying and receiving banks have all data encrypted, in addition to their privacy and protection policies. Without prejudice to the LGPD, there is also the issue of bank secrecy which gives us security regarding this issue. Sharing is mandatory for making payments.

Accounting is outsourced. The company Agostini Assessoria Administrativa Ltda., Rua Padre Vieira, 552 - Centro - Campinas/SP - Brazil is **contracted** to perform the accounting and other accessory obligations required by the Simples Nacional tax regime (Special Unified Regime for the Collection of Taxes and Contributions due by Micro and Small Businesses).

Documents intended for accounting are printed and filed at the accounting office.

c) Registration process and maintenance of individuals register on the operational digital platform

This process handles personal data for the employees **register**, website users, customer users, supplier users and customers of our costumers, future costumers and work partners in the digital platform named “**Wolffish System**”.

For every **user**, always an individual (PF) and **employee of a new costumer** (PJ – Legal Person), or a new user, the following data are collected: company name, address, CNPJ (National Register of Legal Entities), user name and corporate e-mail.

For suppliers/customers **users** of our costumers, the following are collected: corporate e-mail and business telephone. For a good management of our work in complying with agreement with our costumers, we also ask our costumers’ suppliers and costumers:

- a) Name of the main executive, name of the financial executive and accountant, corporate e-mails and business telephone number;
- b) Name and CPF of the partners and/or responsible;
- c) Name, e-mail and telephone number of the representatives of the 3 biggest customers and suppliers of the suppliers/customers of our costumers that are being demanded for a financial analysis and subsequent elaboration of our RDF - Financial Performance Report.

In this sense, the personal data: name, CPF, corporate e-mail and business telephone number of users registered on the platform are necessary for the activities of the operation and are based on the **following hypotheses**:

- a) Consent of the holder;
- b) Execution of commercial contracts or agreements.

When we are requested by our costumers’ costumers/suppliers we sign confidentiality agreements. No **data is shared, given or sold** to others. As security measures we note that:

- a) The data is **encrypted** on our platform so that there is total data security in a secure environment;
- b) For network **security** control, for physical and environment protection, our digital platform was developed and is operated via **WEB with encryption** and restricted access (with password);
- c) **Backup copies** are made hourly and daily.

The data collected is kept for as long as users are active using our platform, which is the main work tool for our costumers and their respective suppliers/costumers whose financial analyses were prepared.

If the user wishes to change o delete any data, he must request Wolffish service via e-mail to: contato@wolffish.com.br

All **employees**, partners and other service providers hired by Wolffish are registered on the platform with the corporate e-mail. Every registered user receives a login and password directly from the system, which must be **changed** as soon it is received. These data are stored on the Wolffish operating platform, and everyone involved is responsible for the adoption of transparency measures so that the holders are informed about what personal data will be collected and shared for the purpose of carrying out the main activity developed by Wolffish.

d) Process of capturing personal data via our website

We use our website www.wolffish.com.br to promote our company, our products and other matters of general interest within the market in which we operate.

We make use of cookies. A cookie is a small piece of data (text file) sent by our website, which is saved in your computer's web browser or similar devices, such as a Tablet or Smartphone.

So that we can answer questions and doubts from potential costumers and others interested in our products, we ask for the data: name, telephone, e-mail. At this point, we ask for authorization to be able to use the data to give a feedback to the requester.

This activity is based on the hypothesis (art. 11) of **consent** of the data holder.

No data **is shared**, given, used in advertising or sold to others.

The captured data **is encrypted**.

This policy will be updated whenever there is a need due to any change in current workflows, changes in the LGPD, changes in the legislation that deals with the mapped processes, or other issue relevant to these matters. It becomes **effective when it is published in our website**.

Wolffish is responsible for adopting the necessary and appropriate measures to guarantee the security and protection of the personal data processed, as well as to comply with other applicable legal and regulatory requirements, will maintain the



confidentiality of the personal data processed by virtue of the service provision, ensuring that all persons authorized to process such data are committed and subject, expressly and in writing, to the duty of confidentiality, as well as properly instructed and trained for the processing of personal data.

Notwithstanding any provision to the contrary, the obligations defined in this Data Protection Policy will last as long as it is in possession, acquire or carried out any operation of Personal Data Processing as a result of the contractual relationship and association, even if the contract is terminated or expires.

PEMA EPP – Wolffish Serviços
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