

PRIVACY POLICY (EXTERNAL)

VERSION 1.1

DATE: 09/25/2024

SECTION 1 – GENERAL INFORMATION

This Privacy Policy (“Policy”) contains information about the collection, use, storage, treatment and protection of personal data of users and visitors to the website <https://www.tecnoil.com.br>. This document aims to clarify to all interested parties about the types of collected data, the reasons for collection, the main purposes of use and the way in which users can manage or exclude their personal information.

This Privacy Policy applies to all users and visitors to the website <https://www.tecnoil.com.br> and other websites (“Platforms”) and forms an integral part of the General Terms and Conditions of Use of websites owned by TECNOIL DESENVOLVIMENTO E INTEGRAAÇÃO DE NEGÓCIOS LTDA., a company incorporated under the laws of the Federative Republic of Brazil, with headquarters at Rua Lauro Muller, 116, Conjunto 1401, 22290-906, in the city of Rio de Janeiro, State of Rio de Janeiro, registered with CNPJ/ME under no. 42.369.306/0001-60, here represented in accordance with its Bylaws, hereinafter referred to as “TECNOIL”.

This Policy does not apply to employees, contractors and candidates for positions at TECNOIL, to whom different policies and standards apply.

This document was prepared in accordance with the General Data Protection Law (Law 13,709/18), the Civil Framework of Internet (Law 12,965/14) and Brazilian data protection legislation. Furthermore, this document may be updated by TECNOIL, as a result of possible regulatory updates, and users are encouraged to periodically consult this section.

SECTION 2 – HOW DO WE COLLECT PERSONAL DATA FROM USERS AND VISITORS?

The personal data of users and visitors are collected as follows:

- When users and visitors access the Platforms, some interaction and access information is collected by TECNOIL to ensure a better user experience (“UX”) and navigability for each user and visitor.
- When a user or visitor interacts with TECNOIL at a specific event within the company's area of activity, an exchange of contacts is carried out with TECNOIL professionals, and these indicate that the user and visitor can seek more information about the company, and its activities, on the Platform, with the understanding that TECNOIL is a company active in the market
- Data from users and visitors who are, or intend to be, TECNOIL's customers and business partners may be collected in accordance with negotiations involving purchase/sale or intermediation of services in general, including those provided by TECNOIL. Additionally, personal data of third parties may appear in various contracts, proposals interactions and corresponding documents.
- When this data may also involve, in general, keywords used in a search, the sharing of a specific document, comments, page views, profiles, the URL from which the user and visitor originated, the browser they use and their IP addresses, among others that may be stored and retained.

SECTION 3A – WHAT PERSONAL DATA DO WE COLLECT ABOUT THE USER AND VISITOR?

The personal data of the user and visitor collected are as follows:

- Request for Information/Quotation/Newsletter: In the above cases, the e-mail provided by the visitor who chooses to interact with TECNOIL, or seek information and commercial quotations about its services, will be collected and stored until the user requests to unsubscribe.
- Contact data such as name, e-mail, telephone number and company where the user works may also be collected for contact, marketing, prospecting or in response to quotes requests

SECTION 3B – FOR WHAT PURPOSES DO WE USE USER’S AND VISITOR’S PERSONAL DATA?

User and visitor personal data are processed for the following purposes:

- User and visitor well-being: improve user experience and provide specific functionalities depending on the user’s basic characteristics.
- Platform improvements: understand how users use the platform services, to help with business and technical development.
- Commercial: data can be used to personalize the content offered and generate support for the platform to improve the quality-of-service operation
- User profile: automated processing of some personal data to evaluate the use of the platform.

The processing of personal data for purposes not specified in this Policy will occur upon prior communication to the user, so that the rights and obligations set forth herein remain applicable.

If you are just a visitor, it is possible that we may not have collected any personally identifiable data that would allow us to contact you, so some of these rights may not apply to the visitor, but only to the user who has a relationship with TECNOIL.

SECTION 4 – HOW LONG IS PERSONAL DATA STORED?

The personal data of the user and visitor are stored for the period necessary to provide the service and/or fulfil the purposes set out in this document, in accordance with the provisions of item I of article 15 of Law 13,709/18.

Data may be deleted or anonymized at the user's request, except in cases where we are obliged, by law, regulation or other obligation, to maintain the data or carry out other processing.

Furthermore, users' personal data may be kept by TECNOIL after the end of their processing in the following cases, which are permitted by law:

- Compliance with any legal or regulatory obligation by the controller
- Study by a research body, guaranteeing, whenever possible, the anonymization of personal data.
- Transfer to a third party, provided that the data processing requirements set out in this Law are respected.

- Exclusive use of TECNOIL, in its capacity and capacity as controller, access by third parties is prohibited, and provided that the data is anonymized.

If you are just a visitor, we may not have collected any personally identifiable information that would allow us to contact or identify you in the event of a request for information.

SECTION 5 – PERSONAL DATA SECURITY

Although any information system and/or website is subject to defects and possible violations that could lead to data leakage, TECNOIL is committed to applying appropriate technical and organizational measures with the aim of protecting personal data from unauthorized access and situations of destruction, loss, alteration, communication or dissemination of such data.

The platform and TECNOIL are exempt from liability in cases of exclusive fault of third parties, such as in attacks by hackers or crackers, or when there is exclusive fault of any user, as in the case in which he himself transfers his data to third parties without notifying TECNOIL.

Personal data stored in agreements and contracts in general are treated confidentially, within legal limits, and are subject to TECNOIL's confidentiality and information security policies and practices.

SECTION 6 – WILL STORED PERSONAL DATA BE TRANSFERRED TO THIRD PARTIES?

The personal data of users and unique visitors to the Platform are generally not shared with third parties, except in situations where TECNOIL may use “cookies” on its platforms, or when TECNOIL recommends or directs its users and customers to use a third-party application, website, service or platform that has a partnership with TECNOIL, but has no corporate relationship with it.

When redirected to a third-party applicative, website, service or platform, the user will no longer be governed by this Privacy Policy. We are not responsible for the privacy practices of other websites and encourage all users and visitors to read the privacy statements of websites or services to which they have been redirected

If you are just a visitor, it is possible that we do not have personal data subject to transfer, and that TECNOIL does not recommend any partner to you.

SECTION 07 – COOKIES OR BROWSING DATA

“Cookies” refer to files sent by the platform to the user's and visitor's device, and that are stored on the device, with information related to navigation on the website. Such information is usually related to access data such as location and time of access and is stored by the browser so that the platform server can read it later in order to personalize the platform's services

The user and visitor to the Platforms acknowledges and accepts that a data browsing collection system may be used through the use of “cookies.

The persistent “cookie” remains on the user's and visitor's hard drive after the browser is closed and will be used by the browser on subsequent visits to the website. Persistent “cookies” can be removed by following your browser's instructions. The session “cookie” is temporary in nature and disappears after the browser is closed. It is possible to reset your web browser to refuse all types of “cookies”, including those from TECNOIL, but some platform features may not function correctly if the ability to accept cookies is disabled

Cookie List

A cookie is a small piece of data (text file) that a website, when visited by a user, asks your browser to store on your device, to remember information about you, such as your language preference or login information. These cookies are defined by us and are called first party cookies (“1st Party”). We also use third-party (“3rd Party”) cookies – which are cookies from a domain other than the domain of the website you are visiting – for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies for the following purposes:

Functionality Cookies

These cookies allow the website to provide enhanced functionality and personalization. They may be set by us or by external providers whose services we add to our pages. If you do not allow these cookies, some or all of them, these features may not function properly.

Cookes Subgroup	Cookies	Used Cookies
document.cookie	1 cookie	Website data on device To improve your visit, websites often save your activity, usually on your device. Manage website data from the website you are visiting. The website can save the language you prefer or the items you want to purchase. This information is available for the site and its subdomains. tecnoil.com.br

SECTION 08 – WHAT ARE MY RIGHTS AS A PERSONAL DATA HOLDER AND HOW CAN I EXERCISE THEM?

In accordance with Brazilian legislation, TECNOIL guarantees to the user the possibility of submitting requests, as holder of personal data or “data subject”, based on the following rights:

- Access and confirmation of the existence of data processing: request a copy of: (i) the categories and specific personal data collected about you; (ii) the specific categories and sources from which the data is collected; (iii) the purpose of collection; and (iv) the categories and specific third parties with whom TECNOIL eventually shared personal data.
- Update: correction of incomplete, inaccurate or outdated data
- Deletion: Anonymization, blocking or deletion of data that is unnecessary, excessive or processed in non-compliance with the provisions of the LGPD. In this case, we will inform the third parties with whom the personal data have been shared of the correction and update
- Data portability, subject to applicable standards and commercial and industrial confidentiality.
- Information on public and private entities with whom TECNOIL has shared data.
- Information about the possibility of not providing consent and the consequences of refusal.
- Revocation of consent: this can be requested at any time and free of charge, by express request. You have the right to be informed whether the provision of Personal Data is a statutory or contractual requirement or a requirement necessary to enter into a contract, as well as whether the data holder is obliged to providing Personal Data and the possible consequences of not providing such data.

- Request the elimination of personal data processed with consent, except in cases where data maintenance is necessary or permitted by law. In this case, we will inform the third party with whom the personal data has been shared about your decision.
- Opposition to processing carried out based on other legal bases: in case of non-compliance with the LGPD, the user or visitor can make this request, noting that there may be situations in which TECNOIL will continue to carry out the processing and refuse your opposition request, especially when there are legal purposes.
- Request to stop receiving targeted offers of products and services through our channels, whether by e-mail or other direct and targeted marketing channels.

To exercise your rights over your personal data, you can contact us at contato.dpo@tecnoil.com.br or using the form on the Platform.

TECNOIL will strive to provide information in a transparent, intelligible and accessible manner, in clear and simple language, and within appropriate deadlines. We are sometimes required by law and contracts to notify third parties of your request, which may increase these deadlines.

Furthermore, we will request other information from you so that TECNOIL can ensure the authenticity of your request, such as proof of identity and other valid documents.

We emphasize that we may keep some data and/or continue to process it, even in the case of a request for elimination, opposition, blocking or anonymization, in some circumstances, such as to comply with legal, contractual and regulatory obligations, to protect and exercise the rights of the company, users and customers, to prevent illegal acts, comply with legal and judicial deadlines and in view of judicial, administrative and arbitration proceedings, including by questioning third parties about their activities and in other cases provided for by law.

SECTION 9 – ACCEPTANCE AND CONSENT

By using the services and providing personal information on the Platform, the user acknowledges having read, understood and agreed to this Privacy Policy.

By eventually registering for any TECNOIL marketing or relationship channel, the user expresses that they understand that this Privacy Policy applies, that they are interacting with TECNOIL and consenting the use of their personal data and that they can exercise their rights to contract and cancel your registration, access and update your personal data and guarantee the veracity of the information made available.

If you are just a visitor, we may not have collected any personally identifiable information about you.

The user has the right to withdraw their consent at any time by contacting us via email at contato.dpo@tecnoil.com.br.

SECTION 10 – CHANGES AND GOVERNANCE OF THE PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time, so it is recommended that the user and visitor review it regularly.

Changes and clarifications will take effect immediately after they are published on the platform. When changes are made, users who have ongoing relationships with TECNOIL may receive notifications.

By using the service or providing personal information after any modifications, the user and visitor demonstrate their agreement and full consent to the new rules.

The Governance of this Privacy Policy is also carried out and supervised by the TECNOIL Compliance Committee and the Executive Board, which may, in situations not included in this Privacy Policy, provide opinions and make decisions on matters covered by this Policy.

SECTION 11 – DISPUTE RESOLUTION

For the resolution of disputes arising from this instrument, Brazilian law will be fully applied since, for all legal purposes, the Platforms and TECNOIL are located in Brazil.

Any disputes must be presented in the Central court of the district of Rio de Janeiro/RJ. where the company's headquarters are located.

SECTION 12 – RESPONSIBLE AND CONTACT INFORMATION

If you believe that your personal data has been used in a way that is incompatible with this Privacy Policy or your choices as the data holder, or if you have any questions, comments or suggestions related to this Policy, please formally contact us.

TECNOIL has a Data Protection Officer (DPO), who operates in compliance with LGPD guidelines, and who is available at the following contact addresses:

Responsiboe (DPO): Priscilla Teixeira

Address for Correspondences:

Rua Lauro Müller 116, sala 1401, Botafogo,

Rio de Janeiro - RJ

CEP 22.290-906

E-mail for Contacts: contato.dpo@tecnail.com.br