



LUCAS LIVINGSTONE FELIZOLA SOARES DE ANDRADE
Sworn Public Translator

TS135807_001

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I, Lucas Livingstone Felizola Soares de Andrade, Sworn Public Translator, attest that I was presented with an original document in Portuguese language to be translated to the English language, which I perform in compliance with my duty, as follows://

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[There appears logo of PROADEC Brasil in the header of all pages]

Privacy Policy

PROADEC BRASIL LTDA, a legal entity of private law, registered in CNPJ under No. 03.821.074/0001-87, with headquarters at Rua Leozir Ferreira dos Santos, No. 705, São José dos Pinhais/PR, aiming to reaffirm the commitment to transparency and the protection of personal data of customers and visitors, clarifies what information is collected from users when browsing our website, as well as what their rights are.

Only the necessary and adequate personal data for the purposes that support the collection are obtained. Personal data are not collected without a previously established purpose.

Your personal data may be collected to promote compliance with a regulatory or legal obligation, to regulate the exercise of the right, legitimate interest, or with your consent.

To better understand how we deal with your data, we separate the personal data by categories and purposes for which it is intended:

DATA VOLUNTARILY PROVIDED

Full name	This data is collected in the “contact” tab when the user voluntarily submits a question or requests a contact.
Date of birth	
Nationality	The aforementioned data are collected based on the consent; legal basis provided for in art. 7º I of the Law 13.709/18.
Address	
Telephone	
email	

In this case, the user is solely responsible for the authenticity and accuracy of the provided data.

NAVIGATION DATA

Date and time of your interactions on our website	This data are collected to comply with the rules described in the Brazilian Civil Rights Framework for the Internet (Marco Civil da
Number of IP	

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Cookies Which screens the user accessed on our website	Internet - Law No. 12.965/14), to identify and authenticate the user, as well as monitor the security of our website. The aforementioned data are collected based on the fulfillment of legal obligation; legal basis provided for in art. 7º II of Law 13.709/18.
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HOW DO WE USE COOKIES?

The use of “Cookies” has the purpose of enabling the correct functioning of the website and providing the best experience for the user, through the analysis of the navigation pattern for continuous improvement of the content.

TYPES OF COOKIES:

We use on our website two types of Cookies: “session Cookies” (which expire just after you close your browser) and “persistent Cookies” (which remain on your computer until you delete them).

HOW CAN I CONTROL OR DELETE COOKIES?

Persistent Cookies can be removed by following the instructions in your internet browser’s help file. The user can choose to limit, refuse or disable Cookies through settings on the browser. However, in doing so, some areas of the website will not function properly, which may prevent the user from benefiting of some features.

If the user uses different devices to access the website (computer, tablet, smartphone, etc...), they must ensure that the browser of each device is adjusted according to your preferences regarding the use of Cookies.

GOOGLE ANALYTICS

The website uses Google Analytics, a tool that records user interactions on the website, with the support of “cookies”.

The information obtained from the navigation of the website is automatically transferred to a Google server, where it remains stored. Google will use the information generated to evaluate your use of the website and to report on your activity.

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DATA COLLECTED BY GOOGLE ANALYTICS

Anonymous IP address (not being able to identify the user) Website accessed The website from which the user accessed our website (referrer) The subpages that are accessed on our website Time of navigation on the website Frequency in which the website is accessed Date and time of the request Browser used Websites that are accessed by the user's system through our website	The use of Google Analytics allows the analysis of the user's browsing behavior, which continuously improves the website in order to provide a better user experience.
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Google Analytics' tool is configured to do not save the entire IP addresses by using a mask in the final numbers of the user's IP address (example: 123.456.78.**). In this way, the user will be anonymized, losing the possibility of direct or indirect association with the IP information of an individual.

The data obtained from Google Analytics (reports), will be deleted after 12 (twelve) months counted from the issued date of the tool's report.

CHILDREN AND ADOLESCENTS DATA

Our content is not intended for children and adolescents. We do not make age assessment or purposeful collection of their personal data.

DATA SHARING

We do not lease, sell or transfer your data to third parties.

If there is a legal determination or court order, we may share your data with judicial, administrative, or governmental authorities.

HOW LONG WE STORE YOUR DATA

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We keep your personal data for the period required by the Brazilian Civil Rights Framework for the Internet. From the moment the storage period required by law ends, your data will be deleted from our databases or make them anonymized, making it impossible to identify the user.

The data collected on our website are kept for a period of 6 (six) months, counted from the date of your access, in compliance with Article 15 of the Brazilian Civil Rights Framework for the Internet.

International Data Transfers

Any transfer of personal data to a third country or an international organization will only be carried out in compliance with legal obligations or in accordance with applicable community and national legal rules.

THE USER IN CONTROL OF THEIR DATA

The user may request the deletion of their personal data. For this, simply send an email requesting the deletion of these data to the address: marketing@proadec.com.br

However, even if the user requests deletion, PROADEC may keep personal data for compliance with legal obligations, such as IP, date, and time of your interactions on the website.

HOW WE ENSURE THE SECURITY OF YOUR DATA

The security of your personal data is very important to us.

We use technical and organizational information security measures in order to maintain the integrity, confidentiality, and availability of your information.

If there is a need to subcontract services from third-party companies that may have access to users' personal data, PROADEC's sub-contractors will be obliged to adopt the security protocols and technical measures necessary to protect the integrity, confidentiality, and availability of their information.

YOUR RIGHTS

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Brazilian Civil Rights Framework for the Internet and the Brazilian General Data Protection Act, ensure rights to the user concerning the processing of their personal data.

The user may obtain at any time and upon request:

- Confirmation of the processing existence;
- Access to data;
- Correction of incomplete, inaccurate, or outdated data;
- Anonymization, blocking, or deletion of unnecessary, excessive or processed data in non-compliance with the provisions of the Brazilian General Data Protection Act;
- Data portability to another service or product provider, upon express request, in accordance with the regulations of the national authority, observed commercial and industrial secrets;
- Deletion of personal data processed with the holder's consent, except in the cases provided for in Article 16 of the Brazilian General Data Protection Act;
- Information of public and private entities with which the controller has made shared use of data;
- Information on the possibility of not providing consent and on the consequences of refusal;
- Revocation of consent, by free and facilitated procedure, ratified the procedures carried out under the support of the previously expressed consent.

Privacy Policy Change

In order to ensure the updating, development and continuous improvement of our website, at any time PROADEC may make changes considered appropriate or necessary in this Privacy Policy, and its publication is ensured to guarantee transparency with its users.

CONTACT

Through this Privacy Policy, we aim to be as transparent as possible about how we process your personal data, privacy, and information security.

If you have any questions or would like to exercise any of your rights, please contact our manager by the email: marketing@proadec.com.br

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This was the full content of the document that I faithfully translated, verified and attest. This translation is not a judgment on the form, authenticity and/or content of the document. Lucas Livingstone Felizola Soares de Andrade, CPF (Federal Individual Taxpayers' Register) 009.109.715-01, enrollment JUCESP 1879. São Paulo, 04/09/2021.//

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