

# PRIVACY POLICY

Pursuant to Federal Law No. 13,709/2018 (the "General Law on Personal Data Protection", or "LGPD"), the firm TABET ADVOGADOS is committed to respect the privacy and to protect the private data it processes in connection with the users of its site on the Internet, clients (including the professionals that integrate their staff), collaborators (including collaborator candidates, ex-collaborators, partners and ex-partners), co-workers and suppliers, as well as with those that register themselves (i) to receive the Environmental Bulletin and other publications produced by the firm or (ii) to attend in-person or online events promoted by the firm (together, the "owners"). In order to clarify the reach of such commitment, the firm TABET ADVOGADOS adopts this Privacy Policy, which is available in its site on the Internet (www.tabet.com.br). More information about the processing of personal data performed by TABET ADVOGADOS can be obtained through direct contact with the Managing Partner of the firm (T. +55 (11) 99945 7560; fernando@tabet.com.br) or through the following e-mail address: compliance@tabet.com.br.

Obs.: For the purposes of the LGPD and this Privacy Policy, *processing* means "every operation carried out with personal data, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of the information, modification, communication, transfer, dissemination or extraction".

### I – Purpose

The purpose of the present Privacy Policy is to clarify the reach of the commitment of the firm TABET ADVOGADOS to respect the privacy and to protect the personal data that it processes in connection with the respective owners, in compliance with the provisions of the LGPD.

Obs.: Once this Privacy Policy is read and after the manifestation of the respective acceptance in the site of the firm TABET ADVOGADOS on the Internet, the consent concerning the collection of data provided by the owner will be deemed performed in a free, express, individual, clear, specific and legitimate form.

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## II - Controller

The controller is entitled to decide about the processing of personal data of the owners. Such role of controller will be performed by the firm TABET ADVOGADOS, in the context of its relationship with the owners.

# III – Data that can be subject to processing

Exemplifying, the firm TABET ADVOGADOS can perform the treatment of the following personal data, within the limits established by the applicable legislation and pursuant to its relationship with the respective owners:

- <u>Registration Data</u>: name, ID, Taxpayers' Registry, Brazilian Bar Association, labour registry, civil status, birth date, profession, position, telephone, e-mail, address.
- <u>Financial Data</u>: salary, fee, participation in profits, bonus.
- <u>Academic and Professional Data</u>: academic background, professional experience, performance reports, competence evaluations, participation in events and in sector entities, published books/articles.
- Behavioural Data: pages of the site of the firm TABET ADVOGADOS on the Internet that were visited, date and origin of the visit, with the use of cookies.
- <u>Sensitive Data</u>: medical certificate/opinion, occupational health certificate, labour accident communication, contact persons in case of emergencies.

# IV – Purposes for which the personal data can be subject to processing

There are several purposes for which the personal data can be subject to processing by the firm TABET ADVOGADOS, as described below:

• Visit to the webpage of the firm TABET ADVOGADOS



- Visit to the headquarters and branches of the firm TABET ADVOGADOS
- Registration of clients for the rendering of legal services, both in the consulting and in the litigation spheres
- Registration of collaborators and suppliers
- Retaining of persons and services
- Management of results
- Remittance of institutional communications, Environmental Bulletins and other publications produced by the firm TABET ADVOGADOS, for registered owners
- Enrolment with in person or online events
- Publication of relevant cases and collection of referrals, with prior consent given by the client, in specialized directories about firms and professionals of the legal area

Obs.: Pursuant to LGPD, there are several situations in which the processing of personal data is allowed regardless of the respective consent by the owner. Some personal data processing procedures, mainly the storage of data, will be performed in order to allow the firm TABET ADVOGADOS to fulfil legal obligations or in other regulatory provisions applicable to its activities. In the cases that the legislation requires such consent, as in the case of the use of registration to receive institutional communications and publications produced by the firm, or also for enrolment with in person or online events organized by the firm, the prior consent of the respective owner will be requested.

# V – Personal data sharing

Observing the limitations established pursuant to the LGPD, the firm TABET ADVOGADOS can share personal data of the owners with:

Clients, in the registration process with such clients



- Specialized directories about firms and professionals or the legal area
- Service providers, such as external consultants, companies of the transportation and travel sectors, accounting and information technology assistance, local correspondents and collaborators
- Public authorities, due to legal or regulatory obligation, as the case may be
- Technology service providers
- Institutional/sector representation entities

# VI – Personal data retention period

The collected personal data that is subject to processing by the firm TABET ADVOGADOS will remain stored until the purpose of the respective processing has ended, or when a legitimate purpose or legal and regulatory motive that would allow it seize to exist.

# VII - Safety of personal data subject to processing

The firm TABET ADVOGADOS adopts safety standards in compliance with the applicable legislation and regulation, such as:

- Control of the storage in owned or retained servers
- Internal safety training and protocols
- Cryptography of collected data
- Protection against non-authorized access
- Maintenance of confidentiality by the professionals that have access to personal data
- Access of the owner to the respective collected personal data



Obs.: Even with the use of best efforts to protect the privacy and personal data of the owner, once no database is completely safe against invasions, the firm TABET ADVOGADOS cannot entirely guarantee that all the information it collects and/or sends does not become a target of non-authorized access and access performed with the use of procedures developed to obtain information illegally, such as virus and hacker attacks, or by means of judicial order. If the owner has any concern or suspects that its personal data is under threat – for example, in the case someone has a non-authorized access –, it is recommended that the owner immediately contacts the firm TABET ADVOGADOS. In the case that the firm TABET ADVOGADOS becomes aware that there was a non-authorized access to personal data that is under its custody, the firm will immediately adopt all measures to mitigate the possible consequences of such occurrence and will inform the owner about it.

## VIII – Websites maintained by third parties

With the purpose to facilitate the access to public information of interest related to the practice area of the firm TABET ADVOGADOS, the firm can provide links to websites of third parties on the Internet. However, the firm undertakes no responsibility for such websites or their respective content. It is recommended that the owners verify the respective privacy policies of such websites before visiting them.

#### IX - Cookies

Cookies are small text files downloaded automatically in the device of the visitor of a site on the Internet. Basically, they are used to identify devices, activities and preferences of the users. The information collected through the cookies of a site are used to improve and personalise the experience of the user.

The website of the firm TABET ADVOGADOS uses cookies defined by the CloudFlare service for the identification of reliable web traffic. Such cookies do not store any type of personal data of the user and its conservation deadline in the systems will be of 5 (five) years. Cookies defined by the Google Analytics service or of the type \_gid are also used, whereas such cookies can obtain information about the IP address, the used navigator, the language configurations and the visited pages. Such data will be used on an anonymous basis, only, for analytical purposes, and will be deleted as soon as the anonymous

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data analysis is performed, which occurs no later than 02 years. Cookies of the type \_gat are also used. Such \_gat cookies just collect data about a high number requests in one page (in such cookies, certain requests for the access to the page are blocked and the results can be accessed by the manager of the system).

The user can oppose himself/herself to the registration of cookies through the website, by just inactivating such option in his/her own navigator. More information about how to do this in some of the mainly used navigators nowadays can be accessed through the following links:

# **Internet Explorer:**

https://support.microsoft.com/pt-br/help/17442/windows-internet-explorer-delete-manage-cookies

## Microsoft Edge:

https://support.microsoft.com/pt-br/topic/exrluir-e-gerenciar-cookies-168dab11-0753-043d-7c16-ede5947fc64d

#### Safari:

https://support.apple.com/pt-br/guide/safari/sfri11471/mac

## Google Chrome:

https://support.google.com/chrome/answer/95647?hl=pt-BR&hlrm=pt

#### Mozila Firefox:

https://support.mozilla.org/pt-BR/kb/ative-e-desative-os-cookies-que-os-sites-usam

Obs.: The inactivation of the cookies can affect the availability of some tools and functionalities of the website, compromising its correct and expected functioning. Another possible consequence is the removal of the user preferences that were potentially saved, jeopardizing his/her experience.

# X – Rights of the owners of the respective personal data

The owners of the respective personal data have the following rights, pursuant to the LGPD: (i) confirmation of the processing existence; (ii) access to the data; (iii) correction of incomplete, inaccurate or out of date data; (iv) anonymization, blocking or deletion of unnecessary data, or data treated without compliance with

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the provisions of the LGPD; (v) data portability; (vi) deletion of personal data with the consent of the owner; (vii) information about the public and private entities with which the controller has made a shared use of data; (viii) information about the possibility of no consent providing and about the respective consequences; (ix) revocation of the consent.

Obs.: The rights of the owner can be exercided through request to the Managing Partner of the firm (T. +55 (11) 99945 7560; <a href="fernando@tabet.com.br">fernando@tabet.com.br</a>) or through the e-mail <a href="compliance@tabet.com.br">compliance@tabet.com.br</a>. The request, however, can, on a motivated basis, be rejected, due to formal (for example, the lack of evidence about the ownership of the relevant data) or legal order reasons (when, for example, the retention of data can be performed based on the law or regulation).

## XI – Validity

This Privacy Policy is valid as from September 10, 2020, and can be amended, thoroughly or in part, as deemed necessary, under the criterion of the firm TABET ADVOGADOS, whereas the amended version will just be effective as from its availability on the site of the firm on the Internet. The latest amendment and consolidation of this Privacy Policy occurred on January 10, 2023.

## XII – Applicable Law and Jurisdiction

The present Privacy Policy will be ruled and interpreted pursuant to the Brazilian legislation, whereas such legislation shall prevail in case of conflict of laws. The Central Forum of the County of São Paulo, State of São Paulo, is elected as having authority to address any litigation or controversy involving the privacy of personal data of the owners in the context of its relationship with the firm TABET ADVOGADOS.

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