

PRIVACY POLICY

WHO WE ARE

Excapy is the data controller on this site and values transparency regarding how customers' personal data is processed. Our contact channel is info@excapy.com.

OBJECTIVE

This Privacy Policy demonstrates our commitment to information security and the privacy of Personal Data subjects, as well as our commitment to providing clarity to data subjects about how their data is handled in our online environment.

Therefore, we kindly ask you:

Before anything else, **PLEASE READ THIS PRIVACY POLICY CAREFULLY** to fully understand how we handle your personal data.

This Privacy Policy provides clear, complete, and precise information about the collection, use, storage, processing, and protection of personal data.

TERMS AND DEFINITIONS

- **USERS:** Natural persons who use the platform.
- **PRIVACY POLICY:** Document that informs users how their data is handled.
- **CONTROLLER:** Natural or legal person responsible for decisions regarding the processing of personal data.
- **PERSONAL DATA:** Any information or set of information related to an identified or identifiable person.
- **SENSITIVE PERSONAL DATA:** Information related to racial or ethnic origin, religious belief, political opinion, membership of a union or organization of a religious, philosophical, or political nature, data relating to health or sexual life, genetic or biometric data when linked to a natural person.
- **DATA PROTECTION OFFICER (DPO):** Person who liaises between the Controller and data subjects.
- **LGPD:** General Data Protection Law (Law No. 13.709/2018).
- **DATA SUBJECT:** You, the user, a natural person to whom the personal data being processed relates.
- **DATA PROCESSING:** Any operation performed with your personal data, such as collection, production, reproduction, classification, use, distribution, storage, elimination, modification, transfer, extraction, etc.

WHAT PERSONAL DATA WE COLLECT AND FOR WHAT PURPOSES

We collect your data:

- Through the platform at the time of your newsletter registration, we collect: Name, email, mobile phone. These data are used so we can contact you and offer our services.
- Through the platform when you register as a user, we collect: Full name, date of birth, gender, CPF, ID card, residential, commercial, and mobile phone numbers, residential address, and email. These data are used for the following purposes: (a) for the user to use the platform, receive our communications, and marketing information about our products; (b) to generate general statistics that do not identify the user, communicate with them, and enhance their navigation experience.

Additional information may occasionally be collected to validate certain contact procedures. The personal data collected will be strictly necessary, accurate, and complete for the purposes described later in this

policy.

No additional personal data is required for us to return your contact or facilitate the provision of services, but if you provide it, you will accept the collection of such information freely and spontaneously.

The services are exclusively for people over 18 years of age. In the event of registration or information submission by persons under 18 years old, the data will be immediately deleted.

We do not process data from criminal organizations that advocate crimes or autocratic regimes or promote any type of human discrimination.

The data subject is aware that the personal data provided will be collected, processed, and stored to achieve the purposes described here and for us to contact you.

Some personal data may be processed to fulfill legal and/or regulatory obligations, for internal studies, to improve services and promotions, or for the regular exercise of rights in judicial, administrative, or arbitration proceedings.

Any change in purpose for using your personal data will be communicated through site updates to this Privacy Policy.

Lastly, we inform you that the collected and safeguarded information will only be disclosed if we are legally obliged to do so.

WITH WHOM WE SHARE YOUR DATA

The provided data is not shared with third parties except:

- (i) with those responsible for maintaining, hosting the site, and cloud data storage. In the event of international data transfer, this will only occur for storage purposes in a country with a protection level equal to or greater than that established by Brazilian law.
- (ii) with partner marketing companies.

STORAGE OF YOUR DATA

For users who register on our site, we store personal information throughout our commercial relationship. The site may also retain information as per legal obligations and applicable regulations, to meet the purposes described in this policy, for exercising our legitimate interest, and for the regular exercise of rights when applicable.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You can exercise your rights by sending a detailed request via email to info@excapy.com.

As provided by the LGPD, you have the right to:

- (i) confirmation of the existence of data processing.
- (ii) access to your data.
- (iii) correction of incomplete, inaccurate, or outdated data.
- (iv) request anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed personal data.
- (v) portability of data to another service or product provider, according to the regulations of the National Authority and subject to trade and industrial secrets.
- (vi) deletion of personal data processed based on the consent of the data subject, except in cases where the law allows the data to be maintained, as provided in Art. 16 of the LGPD.
- (vii) information on which public and private entities have shared data.
- (viii) the possibility of refusing consent when a data processing request is made, being informed of the consequences of refusal.
- (ix) revocation of consent when data processing is based on the data subject's consent. In this case, you can also request data deletion.
- (x) object to processing that contradicts the LGPD, except in cases of consent.

After submitting your request, it will be evaluated and may be rejected with a legal justification. We will make every effort to fulfill the request as soon as possible and may reject requests that are unreasonable or not required by law, such as impractical ones that require disproportionate technical effort or expose us to operational risks like fraud.

The email address used during registration will be used for all our communications. It is recommended that our default email be added as a trusted sender to avoid SPAM blockage.

COOKIE POLICY

Cookies are small data units that can be stored on the user's computer or mobile device while browsing a website. They allow, among other things, the site to recognize the user's previous activity, making use more efficient and enjoyable by, for example, retaining user preference settings.

We collect cookies to verify who you are and enhance your browsing experience. Cookies do not harm the user's computer and are usually automatically deleted after a certain period.

We use cookies to make your experience easier, allowing us to recognize that you have returned to the platform, remember your login details, and conduct statistical analysis for remarketing.

Our website uses both necessary and analytical cookies.

- **Necessary cookies** are those used for the proper functioning of the site, providing security, accessibility, and network management. They allow our site to retain information that has already been entered by the user so that we can offer better and more customized functions.
- **Session cookies** allow your browser to recognize the user when accessing the platform again.
- **Cookies that collect information** about the user's browsing activities, including IP address and accessed page.
- **Analytical cookies** are used by us to improve your experience on our site and for marketing purposes. They collect information about site usage, allowing us to enhance browsing experience, conduct marketing analysis, market studies, and user profiling.

We use Google Analytics cookies to collect statistical data to improve the presentation and navigation experience. Google may complement aggregated data with demographic data and other interest-related information to better understand our users. We also use Facebook cookies for market analysis, marketing, and user profiling.

HOW WE PROTECT YOUR DATA

Your data is stored in secure and reliable locations, either in our own systems or in those of service providers for management and cloud storage, marketing management, among others.

We have implemented technical and administrative security measures to ensure that only authorized individuals can access your data and to prevent unauthorized access and processing other than for the purposes informed to you in this document.

Access to sensitive data, if collected, is restricted to authorized personnel.

CONTACT

You can access clear, complete, and precise information about the collection, use, storage, processing, and protection of your personal data. In case of any doubts regarding this Policy, please contact the Data Protection Officer via email at info@excapy.com.

To request modification, removal, or a copy of your personal data, or to exercise any of your rights, just send an email to info@excapy.com, and we will respond within 15 days.

UPDATES

This Privacy Policy may be changed at any time to comply with legislative changes, regulatory requirements, or operational needs.



When changes occur, you will be notified by a pop-up notification when accessing the site.
By continuing to access our services after the changes are made, you agree to be bound by the new version of the Policy.

Last updated: 02/02/2022