

Privacy Policy

At Gryfo, privacy and security are our priorities, and we are committed to transparency in the treatment of users'/customers' personal data. That's why, this Privacy Policy establishes how the collection, use and transfer of information from customers or others who access or use our website.

By using our services, you understand that your personal information will be collected and used in the ways described in this Policy, under the rules of Data Protection (GDPL, Brazilian Federal Law 13.709/2018), of the provisions consumerists of the Brazilian Federal Law 8078/1990 and the applicable rules of the Brazilian Legal System.

Thus, Gryfo Tecnologia da Informação Ltda, also known as "Gryfo", registered with the CNPJ/MF under No. 32.026.969/0001-28, in the role of Data Controller, undertakes to provide in this Privacy Policy.

1. What data do we collect about you and for what goal?

Our website collects and uses some of your personal data in order to enable the provision of services and improve the user experience.

1.1. Personal data provided by the holder (user/customer).

- Name
- Email
- Telephone
- Company
- Function

This data is considered "identifying information" as it may personally identify you, being prompted for personal information relevant to providing you with a quality experience. So, if requested by the user/client, Gryfo can contact through the data provided for any updates or information related to features, services and updates, as long as they are necessary or reasonable, as well as respond to any request or query made through the service channels available on our platform.

1.1. Personal data collected automatically

- IP Address
- Browser type and version
- Pages visited on our domain
- Time and date of your visit to our pages
- Duration time on each page
- Device Type
- Operating System
- Geographic location

When the holder visits our website, our servers record automatically the data that is provided by default by your browser; such data is considered to be "non-identifiable information or data anonymized", as they do not personally identify the holder. The data collected may depend on individual device and software settings, and it is recommended that you check the device manufacturer's policies or software vendor to find out what information is available to us.

This information is used to generate aggregated unidentified data, such as statistics about users, their jobs or areas of specialization, number of impressions or clicks on a specific project or visitor demographics.

2. How is data collected?

The collection of personal data takes place as follows:

- Contact forms
- Landing pages
- Website
- Blog

The information is collected by fair and lawful means, with the knowledge and consent of the owner and the motivation of the collection for the purpose of use, being granted the freedom, to the holder, to refuse the request of information, being aware that, without it, the provision of the best experience may not be complete by Gryfo.

2.1. Permission

It is from the consent of the holder that **Gryfo processes** your personal data. Consent is the free, informed and unequivocal expression by which the holder authorizes **Gryfo** to process their data.

Thus, in line with the General Data Protection Law, your data only will be collected, treated and stored upon prior and express consent.

The permission will be obtained specifically for each purpose described above, evidencing Gryfo's commitment to transparency and good faith to its users/customers, following the relevant legislative regulations.

By using Gryfo's services and providing your personal data, the holder declares awareness and grants its consent to the provisions of this Privacy Policy Privacy, in addition to knowing your rights and how to exercise them.

At any time and at no cost, the holder may revoke the consent now granted.

It is important to note that the withdrawal of consent for the treatment of the data may imply the impossibility of the adequate performance of some functionality of the site that depends on the operation. Such consequences will be previously informed to the holder, upon revocation of the consent.

1. What are the rights of the owner of personal data?

Gryfo assures its users/clients their rights as a holder provided for in the article 18 of the Brazilian General Data Protection Law (Federal Law No. 13709/18). Of that in this way, the holder may, free of charge and at any time:

- **Confirm the existence of data processing**, in a way simplified or in a clear and complete format;
- **Access your data**, being able to request them in a readable copy under printed form or by electronic means, safe and suitable;
- **Correct your data**, when requesting to edit, correct or update of these;
- **Limit your data when unnecessary, excessive or treated in non-compliance** with legislation through anonymization, blocking or elimination;
- **Request the portability of your data**, through a report of registration data that Gryfo processes about you;
- **Erase your data** processed from your consent, except in the cases provided for by law;
- **Revoke your consent**, disallowing the treatment of your data;
- **Inform yourself** about the possibility of not providing your consent and the consequences of denial.

2. How can you exercise your proprietary rights?

To exercise your proprietary rights, you must contact Gryfo through the following available means:

- contato@gryfo.com.br
- +55 (16) 3419 7100

In order to ensure your correct identification as the owner of the personal data object of the request, it is possible that Gryfo requests documents or other evidence that can demonstrate your identity. In that case, you will be informed in advance.

3. How and for how long your data will be stored?

The personal data collected by Gryfo will be used and stored for the time necessary for the provision of the service, or, until the purposes listed in this Privacy Policy were achieved, considering the rights of data subjects and controllers.

In general, the data will be kept as long as the contractual relationship between the holder and the Gryfo endure. As the personal data storage period has expired, these will be deleted from our databases or anonymized, except for the cases legally provided for in article 16 of the Brazilian General Law of Data Protection, namely:

I – compliance with a legal or regulatory obligation by the controller;

II – study by a research body, guaranteeing, whenever possible, the anonymization of personal data;

III – transfer to a third party, provided that the treatment requirements are respected of data provided for in this Law; or

IV - exclusive use of the controller, its access by a third party being prohibited, and provided that data anonymized.

Thus, personal data that are essential for the fulfillment of legal, judicial and administrative determinations and/or for the exercise of the right defense in judicial and administrative proceedings, which may be maintained by the Gryfo, despite the exclusion of other data.

The storage of data collected by Gryfo reflects the commitment to the security and privacy of your personal data. Gryfo employs measures and technical protection solutions capable of guaranteeing confidentiality, integrity and inviolability of the data

provided by the holder. Furthermore, it also has security measures appropriate to the risks and with control access to stored information.

4. What does Gryfo do to keep our customers' data provided safe?

To keep your personal information secure, Gryfo uses physical tools, electronic and managerial oriented to the protection of your privacy.

The tools and protective measures are used taking into account consideration of the nature of the personal data collected, the context and the purpose of the treatment and the risks that eventual violations would generate for the rights and freedoms of the data subject collected and processed.

Among the measures adopted, the following stand out:

- Only people authorized by Gryfo have access to your personal data provided;
- The access to personal data is made only after the formalization of the confidentiality agreement;
- Personal data is stored in a safe and suitable environment.

The Gryfo is committed to adopting the best postures to avoid security incidents.

However, it is necessary to point out that no virtual page is entirely safe and risk-free. It is possible that, despite all the security protocols, exclusively third-party fault issues may occur, such as cyber-attacks by hackers, or as a result of negligence or recklessness of the user/customer.

In the event of security incidents that may generate relevant risk or damage to you or any of our users/customers, Gryfo is committing to communicate the hazards and the National Data Protection Authority about the fact that occurred, in accordance with the provisions of the Brazilian General Data Protection Law.

5. Who can your data be shared with?

In order to preserve your privacy, Gryfo will not share your personal data with any unauthorized third parties.

The holder also declares that he is aware that the data provided may be shared in the following cases:

I – Legal determination, request, requisition or court order, with competent judicial, administrative or governmental authorities, in the limits of determination;

II – Automatically in cases of corporate transactions, such as merger, acquisition and incorporation;

III – Protection of the rights of Gryfo in any type of conflict, including those of judicial content.

5.1. Third-party access to information

Gryfo may use third party services to get:

- User authentication;
- Advertising and promotion;
- Content Marketing;
- Email Marketing.

These services provide access to data solely for the purpose of performing specific tasks, not sharing any personal identification without the explicit consent of the holder, not being the permission has been granted to disclose or use any of the data provided for any other purpose.

6. Cookies or navigation data

The Gryfo takes use of Cookies, which are text files sent by platform to your computer and are stored on it and which contains information related to site navigation. In short, Cookies are used to improve the user experience.

By accessing our website and consenting to the use of Cookies, you express know and accept the use of a data collection system of browsing with the use of Cookies on your device.

Gryfo uses data from Cookies to ensure the functioning of the website, to analyze and personalize our content and advertisements during your browsing at our website and partnering third-party services. By browsing through the website, you authorize Gryfo to collect such information and use it for these purposes. You can change your permissions at any time.

The main categories and purposes of Cookies used by Gryfo are:

Mandatory cookies

Mandatory Cookies are necessary to ensure the functioning of the website as you browse. These features include session management, for example.

Functional Cookies

The Functional Cookies allow us to remember the choices you made about the type of experience you want on our websites and improve your experience and usability. For example, a functional Cookie is needed to remember which language you prefer.

Analytics Cookies

Analysis and performance cookies help to collect information, monitor events and analyze traffic on pages, in addition to identifying the origin and understanding the visitor behavior. The information collected by these Cookies are primarily used in aggregate form to assist us in analysis of performance results of the Gryfo websites.

Tracking Cookies

Tracking Cookies are used to track your personal behavior online. This information helps us understand your preferences and the contents you like most on our websites, and can be used for more personalized marketing strategies according to your interests.

You may, at any time and at no cost, change the permissions, block or refuse Cookies. However, the withdrawal of consent from certain Cookies may prevent the correct functioning of some platform features.

To manage your browser's Cookies, just do it directly in the browser settings, in the Cookies management area.

You may access tutorials on the topic directly from the links below:

In case of using Internet Explorer.

In case of using Firefox.

In case of using Safari.

In case of using Google Chrome.

In case of using Microsoft Edge.

In case of using Opera.

7. Alteration of this Privacy Policy

The current version of the Privacy Policy was formulated and updated by the last time on: 03/09/2021.

Gryfo reserves the right to modify its Privacy Policy at any time, mainly due to the suitability for eventual changes made on our website or in legislation. It is recommended to frequently review this Privacy Policy by the users.

Any changes will come into effect as of their publication on the website of Gryfo, and notification is sent to users about the occurred changes .

By using our services and providing your personal data after such modifications, the user will grant new consent in relation to their terms.

8. Responsibility

The Gryfo foresee the responsibility of the agents that act in the processes of data processing, in accordance with articles 42 to 45 of the Brazilian General Law of Data Protection.

Gryfo is committed to keeping this Privacy Policy up to date, observing its provisions and ensuring compliance.

In addition, Gryfo is committed to seeking technical and organizational conditions that are surely able to protect the entire process of handling data.

If the National Data Protection Authority requires the adoption of measures in relation to the processing of data carried out by Gryfo, it will commit to following them.

8.1. Disclaimer

As mentioned in Topic 6, although high standards are adopted in order to avoid security incidents, there is no virtual page entirely risk-free. In this sense, Gryfo is not responsible for:

I - Any consequences arising from negligence, recklessness or Users' malpractice with regard to their individual data. Being guaranteed and solely responsible for the safety of the processing of data and the fulfillment of the purposes described in this instrument. It is highlighted that the responsibility in relation to confidentiality of the access data belongs to the user.

II – Malicious actions taken by third parties, such as hacker attacks, unless proven culpable or deliberate conduct by Gryfo. It should be noted that in case of security incidents that may generate risk or relevant damage to you or any of our users/customers, there will be communication to the affected and the National Data Protection Authority about what happened and the compliance with the necessary measures.

III - Untruth of the information entered by the user/client in the records necessary to use Gryfo's services; any consequences arising from false information or entered in bad faith are entirely User/customer responsibility.

8.2. Limits of our privacy policy

This privacy policy only covers the collection and handling of data from the gryfo.com.br domain and/or from partners, affiliates and third-party providers whose privacy policies are aligned. Thus, eventually providing data directly by the user to third parties, even if partners or affiliates, outside the scope of action of Gryfo, does not generate Gryfo's responsibility for its own privacy practices to those.

The Gryfo website may contain links to external websites that are not operated by the company, the owner/user being aware that Gryfo has no control about the content and privacy policies of the other websites accessed, having no responsibility for their respective privacy practices.

10.3 Privacy of minors

This site does not consciously target users under the age of 18 and does not collect children's personal information. As responsible, if you believe that your child is participating in an activity that involves personal information on our website and you

have not received a notification or request for consent, please contact us at contato@gryfo.com.br.

9. Data Protection Office

The Gryfo provides the following means for you to be able to contact us to exercise your proprietary rights: contato@gryfo.com.br.

If you have any questions about this Privacy Policy or the personal data we process, you can contact us by the email: contato@gryfo.com.br.

This Privacy Policy takes effect on 03/09/2021.