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1. OBJECTIVE

Standardize the way personal data is processed by TIVIT, in line with Federal Law 13.709, of August 14, 2018 (Personal Data Protection Law).

2. APPLICABILITY AND INVOLVED AREAS

Applicable in situations where TIVIT is the Controller or the Processor, as detailed in item 5.

3. DEFINITIONS AND ASSUMPTIONS

Controller: natural or legal person, of public or private law, who is responsible for decisions regarding the processing of personal data;

Processor: natural or legal person, of public or private law, who performs the processing of personal data on behalf of the controller. Referred as "Operador" in the original LGPD text.

4. RESPONSIBILITY

The Security Governance area is responsible for updating this policy.

5. POLICY DESCRIPTION

5.1. Controller or Processor

For situations in which TIVIT collects data for its own purposes, it is acting as a **Controller**. In situations where collection takes place due to a service contracted and defined by its Customers, TIVIT acts as **Processor**.

In acting as Processor, TIVIT is responsible for its portion related to data protection, as agreed with its respective Customer, furthermore, it has no decision or even authority to process data that is not in accordance with the processes and flows agreed with the Customer.

5.2. Controller

In this role, TIVIT provides its own applications, SaaS solutions (Software as a Service) and manages the data of people who are required to conduct its business.

5.2.1. Data Subject Rights

As defined in the LGPD, the data subject has the following rights:

- Confirmation of the existence of processing: To know whether his/her data is subject to processing by TIVIT, as a Controller.

- Access to data: if the treatment is confirmed, the Data Subject has the right to access them in a controlled manner, in order to avoid access to his data by others.

- Correction of incomplete, inaccurate or outdated data: subject to limitations due to legal requirements for maintaining history, your data may be corrected. Depending on the treatment given to them, it may be necessary to provide documentation that bases the update, completeness or correction.

- Anonymization: Transformation that prevents the identification of the Data Subject, when it is not necessary.

- Limitation of treatment: It is the right of the Data Subject to limit the treatment of his personal data, which can be obtained when he/she disputes the accuracy of the data, when the treatment is illegal, when TIVIT no longer needs the data for the proposed purposes and when Data Subject has opposed the processing of the data.

- Elimination of unnecessary, excessive or data treated in non-compliance with the LGPD: It is the right to exclude data, except under the conditions provided for in the same Law.

- Data portability: At the time of publication of this policy, it was still pending regulation by national authority.

- Elimination of data or right to be forgotten: Represents the right to have his/her data excluded from TIVIT systems, except under the conditions provided for in the same Law.

- Information about sharing: To be informed about the sharing of his/her data, and with which entity (ies).

- Non-consent: when consent is requested for the collection and processing of data, the consequences of non-consent must be informed.

- Revocation of consent: Revocation may be requested at any time by the express manifestation of the Data Subject. Revocation does not cancel previous treatments, unless the elimination is also formalized.

5.2.2. Exercise of rights of Data Subject

The Data Subject can exercise his rights by written communication sent to TIVIT with the subject "LGPD", informing:

➢ Full name, CPF (Individual Taxpayer Registration) and e-mail address of the Data Subject, and if applicable, of his/her legal representative.;

> ➢ Right you wish to exercise with TIVIT;

> ➢ Order date and signature of the Data Subject or his/her legal representative;

> ➢ Any document that can demonstrate or justify the exercise of its right.

The communication should be sent to lgpd@tivit.com or by mail, to the address:

Eduardo Pereira Goncales.

Eldorado Business Tower

Av. das Nações Unidas, 8501 – 9º Andar

05423-110 – Pinheiros – São Paulo – SP – Brasil

5.2.3. Non-provide data to third party

The formalization described in the previous item is necessary in order to prevent TIVIT from inadvertently providing or tampering data of other Data Subject.

5.2.4. Types of data collected

Exclusively for managers and employees of TIVIT, copies of documents may be requested to fulfill obligations with external entities such as notary's office or digital certifiers. In these cases, when the need ends, the copies will be returned to the respective owners of the personal data.

When you are asked consent for the collection and processing of data, the information collected and the intended treatment will be informed, except for the access records described below.

As determined by Federal Law 12.965 / 2014 (Marco Civil da Internet), user access records will be collected and stored for a minimum period of 6 (six) months or 1 (one) year, depending on the type of access performed.

5.2.5. Children and Adolescents' Personal Data

TIVIT collects data from children and adolescents only in Personnel Administration processes, referring to a minor apprentice, intern, or dependents of TIVIT employees. In collecting these data, specific consent from at least one parent or legal guardian of the child or adolescent is required.

Types of data collected:

Full name, Date of birth, Sex, CPF, Education, Filiation, National Health Card (SUS), Number of live birth (DNV), Vaccination card (under 5 years)

How this data will be used:

- Referral to health care company for adherence to the health plan;

- Referral to dental care company for adherence to the dental plan;

- Referral to a pharmacy plan company for adherence to the plan.;

- Referral to the life insurance company, for adhesion and / or indication of beneficiaries;

- Referral to the partner company for supply of food vouchers;

- Referral to the federal government, in compliance with labor legislation.

Data collected only from adolescents in admission process, in addition to the above:

Address, NIS, RG, Professional ID, Photo, Marriage Certificate (if married), Bank Branch and Bank Account Number.

How this data will be used:

- Referral to the transportation company responsible for managing the Transport Ticket, if the employee opts-in;

- Sending wages and reimbursements to the bank;

- Referral to the federal government, in compliance with labor legislation.

If any Child or Adolescent data is provided to TIVIT outside of what is described in this item, we ask that a parent or legal guardian exercise the right to request removal as described in item 5.2.2.

5.2.6. Collection and processing of personal data without consent

TIVIT collects and processes data without obtaining consent only in the cases provided by law, such as:

- For the fulfillment of legal or regulatory obligation by TIVIT;

- When necessary for the execution of a contract or preliminary procedures related to a contract to which the data subject belongs, at his/her request;

- When necessary to serve TIVIT's legitimate interests, except where the fundamental rights and freedoms of the Data Subject prevail that require the protection of personal data;

- Mandatory registrations according to Marco Civil da Internet (Law 12.965 / 2014).

5.2.7. Purpose of data processing

In each situation of obtaining consent to data, the Data Subject will be informed:

- Specific purpose of the treatment;

- Type and duration of treatment;

- In these cases, the controller is TIVIT;

- The data for contacting TIVIT are those informed in item 5.2.2;

- If your data is shared with an external entity, you will be informed which, and the reason for sharing it;

- If external sharing is not a legal obligation, the receiver (Processor) can only process the data in the way it was informed.

5.3. Processor

In this role, TIVIT executes its Customers' business processes, based on the collection and treatment definitions established by the respective Customers.

5.3.1. Limitation of TIVIT's scope

As a Processor, TIVIT cannot act directly on the Data Subject's personal data on its own initiative. All treatment is defined with and by its Customers, and only these can request the taking of actions aiming at the treatment or the exercise of the right of the Data Subject.

5.3.2. Data Subject Rights

TIVIT recognizes all rights provided to Data Subject by LGPD.

To exercise his/her rights, the Data Subject must seek the contact of the Controller responsible for the data processed at TIVIT.

If TIVIT is triggered by Data Subject in order to exercise his/her rights, TIVIT may, as long as such information is available, respond only with the information of who is the Controller of such data and processing.

6. REFERENCE TO OTHER DOCUMENTS

"There is no reference to other documents"