

PRIVACY POLICY

Last update: September 18, 2020

This Privacy Policy (“Policy”) for MUNDIE E ADVOGADOS, a law firm registered in the CNPJ [business register] under No. 01.175.055/0001-03, headquartered at Avenida Juscelino Kubitschek, nº 50, 17º e 18º andares, Itaim Bibi, São Paulo – SP, CEP 04543-000, is intended to, in a simple and objective manner, disseminate and clarify how we process personal data from our clients, individuals connected to our clients, prospects, job seekers, our employees, users of our website, and any other individuals (“Data Subject”, “Data Subjects”, “you”, “your”, and “yours”), allowing us to work together.

I. Introduction

Since its founding in 1996, Mundie has provided high-quality legal services to clients in Brazil and abroad in all areas of business law, and we’ve earned recognition for our professionalism and outstanding work.

We've earned this respect using policies and strategies grounded in professional ethics, valuing our team, our work environment and those of our client companies, transparency, taking our work seriously, and respect for the law – adopting the highest standards of integrity as the foundation for our work.

That’s why we’ve updated our Policy. The revised version contains changes which, despite being small, are very important in solidifying our firm's commitment to guaranteeing the best experience to those with whom we interact.

This Policy clarifies how Mundie processes personal data in general. The purpose of this document is to:

- (i) Let our Data Subjects know about the personal data we process, as well as the methods and purposes for handling such information;
- (ii) Report how long we store personal data and the security measures implemented to ensure the protection and integrity of this information;
- (iii) Let our Data Subjects know their rights when it comes to data processing and how to exercise those rights; and
- (iv) Share the appropriate communications channel for suggestions and requests related to our personal data protection policy, bringing Mundie and our Data Subjects closer together.

This document was written based on the privacy obligations inherent to the legal profession, as well as respect for confidentiality, privacy, freedom of information, human rights, along with other principles outlined in current law. We ask that you take some time to read this document. If you have any questions, please contact us via email privacy@mundie.com.br.

II. Concepts and Definitions

To aid in the understanding of this Policy, we used the following definitions, in addition to those outlined in the General Personal Data Protection Law (Law No. 13.709/18) and other provisions:

- **Personal Data:** Any information related to an identified or identifiable individual. In other words, whenever information can be correlated with an individual, we will process it as personal data.
 - Examples: Names, addresses, CPF [individual taxpayer ID], telephone numbers, IP addresses, access logs, résumés/CVs, personal preferences, and other information that can be correlated with a person without considerable effort.
- **Sensitive Personal Data:** Any information on racial or ethnic background, religion, political opinion, membership in a union or group organized around religion, philosophy, or politics, data relating to health or sex life, genetic or biometric data, when it is linked to an individual.
- **Processing:** Any action done with personal data.
 - Examples: Collection, production, receiving, classification, use, access, reproduction, transmission, distribution, processing, filing, storing, deleting, evaluation or management of information, modification, communication, transfer, dissemination, or extraction.

III. Personal Data Collected

To make this easier to understand, personal data processed by Mundie are divided into categories, as follows (please note, this is not an exhaustive list):

PERSONAL DATA CATEGORIES	DESCRIPTION OF CATEGORY
Registry Data	While providing services, in order to ensure your safety and that of our employees, we might collect your first name, last name, address, RG [ID], CPF, parents' names [as a personal identifier], birthplace and date, email address, among others. Some examples of when we use this data are to grant access to our offices and wi-fi networks, along with other scenarios outlined in this Policy.
Personal Life	In certain court cases where we represent our clients and/or offer certain benefits to our employees and their dependents, we may process data related to the Data Subject's personal life, such as their family arrangement, data on family members, among others.
Professional Life	You may share data relating to your professional life with us, such as work status and history, education, awards,

	diplomas, among others, through your résumés/CVs, powers-of-attorney, and other contracts, or they might also be shared while we provide you services.
Earnings, Financial, and Tax Information	When you request our legal services, we may collect the information necessary for billing and payment, such as bank account details, among others.
Internet Data	We may collect information on your use of our website and/or access to our internal networks, such as IP addresses, cookies, among others.
Sensitive Data	Generally, we opt not to collect sensitive personal data from Data Subjects. However, in certain situations (e.g., to defend interests in court or administrative proceedings) and so long as current law allows, we may collect, for example, biometric data (e.g., for timecards), data concerning affiliation with union (e.g., when making required payments to the union on your behalf), or health data (e.g., to reimburse employee health expenses).

In addition to the categories listed in the table above, we would like to make it clear that we may process any other information you provide to us voluntarily and/or when current law allows (e.g., data that is clearly public).

IV. Collection Methods for Personal Data

In general, your personal data will be collected using the following digital and hard-copy methods:

- Our Website. You may share personal data with us when filling out the contact us, suggestion, or complaint forms available on our website (www.mundie.com.br). In addition, to ensure the proper functioning of our website and to offer you the best possible experience, we may collect information through cookies (a data-collection tool in your web browser).
- Email and Other Tools for Exchanging Messages and Digital Files. We may have access to your personal data such as full name, email address, and other information you have shared through message exchanges between you and Mundie using various tools (e.g., Outlook, Microsoft Teams, Skype, Microsoft SharePoint, among others).
- Physical Documents. We may collect information on you through hard copies of documents that we receive in various ways, including contracts, powers-of-attorney, résumés/CVs, petitions, copies of case files, among others.
- Conferences, Gatherings, Seminars, Meetings, Internship Fairs, among other events. If you participate in conferences, gatherings, seminars, meetings, internship fairs, and any other events sponsored by Mundie and/or where it is present, we may collect certain information, so long as it is necessary for a specific purpose.

- Third-Party Sources. We may collect information about you that is clearly public (e.g., from electronic legal case systems, the Brazilian Federal Tax Authority's database), or through third parties (e.g., credit bureau databases), for specific purposes, so long as current law allows.

In addition to these methods, we may collect information provided by you in other ways including, but not limited to, from you contacting us through our social media profiles.

V. Purpose of Personal Data Processing

Mundie guarantees that the processing of Data Subjects' personal data will only occur for purposes that are legitimate, specific, explicit, and as explained in advance in this Policy. A portion of the personal data we collect is used to allow us to provide our legal services, always respecting the privacy obligations inherent to our profession, rights to confidentiality and privacy, and information security.

We may also process your information for the following activities:

- To manage our client base and the respective contractual relations, in fulfillment of contracts already signed or based on our legitimate interests, when applicable;
- To receive, triage, and respond to questions, suggestions, and requests made by you through various means, such as, through our website, social media, and other means, in fulfillment of the contracts you have signed or applicable law, based on our legitimate interests or with your consent, when applicable;
- So that we can send reports, newsletters, corporate communication, invites, gifts, among other company marketing activities, within the limits of applicable law, based on our legitimate interests or with your consent, when applicable;
- To allow us to manage our suppliers and service providers, for the purposes of, including, but not limited to, billing and the fulfillment of other obligations, the fulfillment of signed contracts and applicable law and/or our legitimate interests, when applicable;
- To allow for the management, selection, and recruitment of employees, in fulfillment of signed contracts or applicable law, based on our legitimate interests or with your consent, when applicable;
- To manage selection processes and promotions of any kind or allow you to participate in initiatives, events, competitions, conferences, gatherings, seminars, meetings, internship fairs, and other events, including those promoted or sponsored by Mundie, in fulfillment of contracts signed by you, or based on our legitimate interests, or with your consent, when applicable;
- To make the fulfillment of any legal or regulatory obligations possible;
- To allow for the performance of contracts or procedures that precede the contracts you are party to;

- So that we can duly exercise our rights in court, administrative, and arbitration cases;
- To promote our and/or your legitimate interests, by undertaking fraud-prevention actions, as outlined in applicable law;
- Due to a subpoena addressed to Mundie; and
- To guarantee credit protect, allowing us to manage the risk inherent in providing our services.

VI. How Long We Keep Data

How long we keep a Data Subject's personal data depends on the purpose of processing that data. In general, this information is kept as long as it is necessary for the provision of the services offered, to fulfill legal or contractual obligations, to transfer it to third-parties, or to allow for the firm to legitimately exercise its rights. Except in those and other situations outlined in applicable law, our firm commits to permanently delete or anonymize the personal data stored, out of respect for your privacy.

According to current law, every Data Subject has the right to request that their personal data processed with their consent is deleted, except in the cases mentioned in the previous paragraph.

VII. Technological, Organizational, and Security Measures Implemented

Mundie is committed to information security and, for this reason, we have adopted many security, technological, and management measures to protect personal data from unauthorized access and accidental or illegal actions involving the destruction, loss, modification, communication, or any other inappropriate or illegal type of data processing. These measures will be periodically updated as needed.

Among other practices involving technology, hard copies, and management adopted by Mundie to protect persona data, we highlight:

- Attorneys, interns, and management staff commit to the privacy obligations inherent to our profession;
- Access to our facilities is restricted;
- We use a VPN that encrypts information;
- We monitor user access to personal data and other confidential information;
- We take measures to track access and changes to personal data;
- We use protection software such as anti-virus, firewalls, anti-malware, among other mechanisms to detect breaches;
- We periodically back up person data; and
- Our policy requires that system passwords be changed periodically.

VIII. Transfer of Data to Third Parties

Mundie is committed to the privacy of Data Subjects and we have a policy of not communicating or transmitting your information to any third parties, except when you expressly consent or in the situations outlined in this Policy or in applicable law and, in all cases, security precautions are taken.

We would like to clarify that in order to offer you services, as permitted and required by applicable law and regulations, we may share your personal data with third parties in the following situations:

- To Suppliers or Service Providers. To make it possible for or assist us in providing our services and in fulfillment of the obligations established in our contracts and in applicable law and regulations, certain personal data may be shared with partner companies, suppliers, or service providers. These third parties are subject to confidentiality agreements, as well as privacy and data protection terms that prohibit the processing of such information from violating the instructions provided by Mundie and applicable law;
- To Government Agencies. In fulfillment of legal and regulatory obligations applicable to Mundie, certain personal data may be shared with or transferred to the competent authorities when there is a legal obligation to send it, including, but not limited to, the Brazilian Federal Tax Authority, as well as state and municipal tax authorities;
- In fulfillment of any legal or regulatory obligations; and
- To allow for us to duly exercise rights in court, administrative, and arbitration cases.

In addition to the situations mentioned above, we may share your personal data in other situations for which applicable law allows or requires, or if there is a legitimate interest in doing so. In all cases, we commit to only disclose information that is strictly necessary to achieve the desired ends.

IX. International Data Transfer

Mundie's goal is to provide high-quality legal services to clients in Brazil and abroad. As a result, certain personal data may be transferred outside the country in the course of providing our services, respecting the limitations imposed by current law.

Having been recognized specifically for our modern and objective approach to legal services, we are always seeking out the latest technologies. We would thus like to make it clear that we may store your personal data in a cloud system or using similar infrastructure or tools. The servers are generally located across many countries, including the United States.

We would like to make it clear that international transfers of personal data will only occur in conjunction with all the precautions and safeguards outlined in applicable law and market best practices, including, but not limited to, using standard terms and/or data processing agreements, as per regulations.

X. Rights of Personal Data Subjects

Mundie is committed to ensuring that all rights outlined in applicable law are protected. As a result, we guarantee the rights of all our Data Subjects to request confirmation of the occurrence of data processing, correction, contestation, deletion, and/or limitation, of the entirety or part of their personal data, along with their rights to request portability and/or anonymization of the information.

It is important to highlight, however, that even when the deletion of certain personal data is requested, we may keep certain data in our databases, if the purposes of the processing so justify.

If you wish to no longer receive information relating to newsletters, events, or the firm's news, we allow you to exercise your right to revoke the consent that you granted previously. All you have to do is send an email to privacy@mundie.com.br with "OPT-OUT" or "UNSUBSCRIBE" in the subject line. After doing so, Mundie will no longer send you messages. If you wish, you may provide consent in the future and opt-in again.

To exercise the rights mentioned in this Policy and/or outlined in applicable privacy and data protection law, contact us at the following email address privacy@mundie.com.br.

XI. General Provisions

Mundie reserves the right to update this Policy at any time, disseminating the new version in advance on our website www.mundie.com.br, via electronic mail, or through any other equally-effective means. We recommend that you visit this page periodically.

This Policy will be governed, interpreted, and executed based exclusively on the laws of the Federative Republic of Brazil and will take effect when Law No. 13.709/2018 comes into force.
