

PRIVACY POLICY

Samaia IT takes the protection of your personal data and the privacy of your information extremely seriously. Thus, presents its Privacy Policy and Protection of Personal Data so that You, our Client, can understand what are the practices adopted by Us, from a perspective of protection of the fundamental rights of freedom, privacy and free development of personality, based on current legislation.

For this reason, it is recommended that you read this Privacy and Data Protection Policy carefully.

First, we point out that this Policy applies to You, the consumer/supplier/individual/natural person, who in some way interacts with Samaia IT services (herein referred to as Samaia IT or Us).

Here we will explain how your Personal Data is collected, used and disclosed by Us. We will also demonstrate how you can access, rectify and update your Data, as well as make certain decisions about the use of your Data, such as: deletion, transfer, object to processing and withdrawal of consent.

We have already mentioned that the data collection performed by Samaia IT may occur both online and offline, through our various channels, including, but not limited to web sites, applications, third-party social networks, customer service, points of sale, surveys and events.

It should also be noted that Samaia IT may aggregate combined Personal Data from different sources (e.g. our website and offline events), even collected by different entities or partners.

However, it is important to mention that in the event of a refusal to provide Personal Data deemed necessary by Samaia IT (which will be explicitly indicated in the registration forms), it may be impossible to supply our products and/or services.

Below are the points that are part of our Privacy and Data Protection Policy:

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1. Personal Data Sources

The Personal Data are collected by Us, from your consent, through the following sources:

- **Samaia IT sites:** All of our sites can be used to collect personal data. This includes both sites operated directly by Us, i.e. through our domains and IP addresses, and sites or pages established by Us in services to third-parties (such as LinkedIn) or by other third-parties offering this type of service.
- **Email and instant messaging systems:** Services used to maintain electronic communications between You and Samaia IT. These include services provided directly by Us or those of third parties such as WhatsApp, Telegram, SMS (Short Message Service) and the like.
- **Customer Service and Sales Team:** Communications with You through our sales and service teams.
- **Ads, advertisements and online forms:** Interactions with any type of ads, advertisements and online forms from Samaia IT.
- **Offline records:** Records filled offline, distributed during events and other interactions with Samaia IT.
- **Data received from third parties:** Including, but not limited to, social networks and third party sites such as LinkedIn and similar, data aggregator services, Samaia IT partners, public sources, and data received during acquisitions from other companies.

2. What Personal Data we collect and how it is collected

During your interaction with Samaia IT, using one of the sources mentioned in item 1, we may collect various types of personal data about You, as explained below:

- **Contact Information:** Includes any information that may facilitate our contact with You, including your physical mailing address, phone numbers, email addresses, websites and social networking profiles.



- **Login information:** This is identification and authentication information on the services provided by Samaia IT, including your registration name (login) and security questions.
- **Technical information about your computing equipment or mobile devices:** Details about your computer or other portable device used to access one of our websites, services or applications, such as: IP address registration, geographical location, operating system type and version, web browser type and version. If You access a SamaiaIT website or application using a mobile device such as an intelligent mobile phone or tablet, the information collected will also include, where permitted, your phone's unique device ID, geographic location and other similar mobile device data.
- **Information about how You use our sites and services.** During your interaction with our sites and services, We use automatic data collection technologies to capture information about your actions. This can include details of which links are accessed, which pages or content are viewed, how long they are viewed, and other similar information and statistics about their interactions, such as response time to content, download errors and length of visits to particular pages. This information is captured through automated technologies such as Cookies (Browser Cookies, Flash Cookies and the like). You are free to object to the use of such technologies, please refer to the details in the Section "About your rights regarding Personal Data".
- **Market research and consumer feedback:** This is information that You voluntarily share with Samaia IT about your experience using our products and services.
- **Consumer generated content:** Any content that You create and share with Samaia IT on third-party social networks or by uploading to one of our sites, applications and other services online and offline. This includes the use of third party social networking applications such as LinkedIn and the like. This data includes texts, comments, articles, photos, videos, personal stories or other similar content and media. Where permitted, We collect and publish consumer-generated content in connection with a variety of activities, including promotion of Samaia IT products and services, contests, awards and other promotions, site community resources, consumer engagement, and third party social networks.
- **Sensitive Personal Data:** Samaia IT does not collect or process sensitive personal data (described in current legislation) in the normal course of your interactions with our products or services. When there is a legitimate interest or it is necessary to process them, for any reason, We will obtain your prior, express and formal consent, in a specific and prominent way, for specific purposes.



3. About Personal Data of Children and Adolescents

Samaia IT does not knowingly request, collect, process, store and/or share personal data from underage children and adolescents. If we discover the occurrence of any kind of unintentional handling of such data, we will remove it from our records as soon as we are aware of it.

4. About the use of Cookies, Log Files and the like

Cookies are small text files that can be placed on your computer or portable device by websites or services you use. They serve both to ensure the smooth running of websites and other online services, and to provide information to their owners.

At Samaia IT, Cookies are used to improve the use and functionality of websites and other web services, as well as to better understand how our visitors use our websites, online services and their tools and services offered by them. In other words, Cookies help in the process of adapting Samaia IT websites in order to better meet the personal needs of our customers, facilitating, whenever possible, their use.

Samaia IT uses the following types of Cookies on its compatible sites and services:

- **Session Cookies:** These are temporary Cookies, which are deleted at the moment You close Your browser. When you reset your browser and return to the site that created the cookie, that site treats you as a new visitor.
- **Persistent cookies:** Cookies remain in your browser until you manually delete them or until your browser deletes them according to the length of time set by the cookie. These Cookies will recognize your return as a visitor to a Samaia IT site or service.
- **Cookies required:** Cookies are strictly necessary for the operation of a Samaia IT compatible site or service. They allow You to browse the site and use our resources.

Samaia IT does not collect or use cookie information for marketing, advertising campaigns, or share this information with third parties or partners.

Samaia IT compatible sites and services may also use other tracking technologies similar to Cookies, which may collect information such as IP addresses, log files and web flags, among others. This data is also used to



help us adapt Samaia IT sites and other compatible services to your personal needs.

See more details below:

- **IP addresses:** An IP address is a number used on the Internet or a network to identify your computer. Every time you connect to the Internet your computer receives an IP assigned by your Internet Service Provider. We can register IP addresses for the following purposes:
 - Treatment of technical problems;
 - Maintenance of the protection and security of our sites and other online services;
 - Get a better understanding of how our websites and other online services are used;
 - Adapt our content to your needs, depending on your geographical location.
- **Log Files:** Samaia IT or a third party working on our behalf, may collect information in the form of log files that detail the activities of the site and collect statistics on user navigation habits. These records are usually generated anonymously and help us understand details like:
 - The type of browser and system used by users of our websites or online services;
 - Details about the user's session, including the source URL, date, time and which pages the user visited on our compatible sites and services, and how long the user stayed using them;
 - Other navigation or click count details including site traffic reports, unique visitor counts and similar data.
- **Web beacons:** We can use web **beacons** (or transparent pixels) on Samaia IT sites. Web beacons (also known as web bugs or web beacons) are small sequences of code that allow the delivery of a graphic image on a web page for the purpose of transferring data back to us. We use the information from the web flags for a variety of purposes, including:
 - Traffic reports from our sites and compatible services;
 - Perform unique visitor counting, auditing, email reports and customization of our sites and other compatible services.

It is important to note that it is up to You, our customer, whether or not to accept Cookies when configuring your computer or portable device.

Most browsers allow You to set rules to warn You before accepting Cookies or simply decline them. You do not need to have Cookies enabled to use or browse most of our online sites and services. However, in this case, we cannot guarantee access to all available resources.



Therefore, we recommend that you see in the "help" button of your browser how to perform this type of configuration. Remember that if You use browsers, or even different computers and/or portable devices, in different locations, You will need to ensure that each device and browser is set to your personal Cookie preferences.

Since our web beacons can be part of a web page, it is not possible to opt out of this type of feature. However, you can make it completely non-functional by enabling the "opt-out" feature for Cookies placed by this flag.

5. About the use of your Personal Data

The following items describe the purposes for which Samaia IT collects Personal Data and the different types of Data collected. We always remind you that Data is collected with your permission. It should also be noted that not all of the items below are relevant to all individuals and can only be used when necessary.

- **Consumer Services:** Your Personal Data are used for the purpose of providing services to the consumer, such as answering questions, questioning and receiving suggestions. This usually requires certain personal contact information and information about the reason for your question, doubt or suggestion. For example, what was your request, whether there is a technical problem, question or complaint about the product, i.e. questions in general.
 - **Reason for using your personal data in this situation:**
 - Fulfill contractual obligations;
 - Fulfill legal obligations;
 - Our legitimate interests.
 - **Our legitimate interests in this situation:**
 - Continuously improve Samaia IT products and services;
 - Continuously improve the effectiveness of our customer service.

6. About the disclosure of your Personal Data

Samaia IT has the partners described below that assist it in the operation of the business. Thus, it is sometimes necessary to share Personal Data. However, in order for such sharing to occur, Samaia IT must obtain the specific consent of the holder for such purpose.

- **Service providers:** External companies that assist Samaia IT in the operation of the business. Service providers and their selected employees are only authorized to access Personal Data on behalf of Samaia IT for specific tasks, which are requested from them based on our direct instructions. Our service providers are contractually obliged



to keep your Personal Data confidential and secure and, in cases of violation, they are jointly liable in accordance with current legislation.

7. About the retention and termination of the treatment of your Personal Data

Samaia IT will use your Personal Data for as long as necessary to satisfy the purposes for which they were collected or until they are no longer necessary or pertinent to the achievement of the intended purpose.

When the processing of Personal Data ends, they will be eliminated within the scope and technical limits of the activities, with the authorization of conservation in the situations provided for in current legislation.

8. About the disclosure, storage or transfer of your Personal Data

Samaia IT takes appropriate measures to ensure that your Personal Data is kept confidential and secure. However, these protections do not apply to information that You have chosen to share in public areas, such as third-party social networks.

- **Persons Who May Access Your Personal Data:** Your Personal Data will be processed (provided that You have previously authorized it), by our employees or authorized agents, provided that they need to have access to such information, depending on the specific purposes for which your Personal Data were collected.
- **Measures taken in operating environments:** We store your Personal Data in operating environments that use security measures, both technical and administrative, to prevent any type of unauthorized access and accidental or illicit situations of destruction, loss, alteration, communication or any form of improper or illicit treatment.
- **Transfer of your Personal Data:** Given the nature of our business, it is possible that we may have to transfer your Personal Data stored within Samaia IT to third-parties. However, such transfer will only take place to countries that provide adequate personal data protection level to the legislation foreseen in Brazil.

Samaia IT adopts the efforts at its disposal, based on the technical resources currently available, in order to preserve the privacy of the data processed. However, it is essential to consider that no website is completely secure and cannot fully guarantee that all information will not be accessed by unauthorized, deliberately developed methods to obtain information in an improper manner. Thus, it is



also up to the holder to adopt protective measures for his data, such as, for example, the non-disclosure of passwords, among others.

9. About your rights regarding Personal Data

Samaia IT aims to ensure you the best treatment of your Personal Data, guaranteeing the fundamental rights of freedom, privacy and intimacy.

Thus, You have the right to confirm the existence, access, review, modify and/or request an electronic copy of the information of your Personal Data that are processed by Samaia IT.

You also have the right to request details about the origin of your Personal Data or the sharing of these with third-parties.

You may also at any time limit the use, disclosure or even revoke consent to any of our processing activities of your Personal Data, always observing the exceptions provided for in current legislation.

Access and rectification/modification of Personal Data may be made through our websites, applications and online services, when these are available. However, Samaia IT will request validation of your identity through a login and password system or similar resource, thus ensuring that there is no unauthorized access.

The other rights described herein may be exercised through the communication channels detailed in this policy, and express application and validation of your identity by providing a copy of a document with photo or equivalent means of identification is required.

Where an application is submitted without the provision of evidence necessary to establish the legitimacy of the data subject, the application shall be automatically rejected. We point out that information about your identity is processed in accordance with current laws.

Please note that, in certain cases, it will not be possible to delete your Personal Data without the deletion of your user account. Also, we emphasize that Samaia IT will be able to keep the data, in the cases foreseen in the current legislation.

10. What are your choices about how we use and disclose your Personal Data

Samaia IT does its best to give You freedom of choice about the treatment of Your Personal Data. To this end, we bring down the following control mechanisms:



- **Cookies/Similar Technologies:** You can manage your consent by using:
 - Our consent management solutions;
 - Your browser settings to refuse some or all Cookies and similar technologies, or to alert you when they are being used.

In order to obtain further information about the management or cancellation of your participation, you may contact us using the communication channels detailed in this policy.

11. Changes to our Privacy Policy

Samaia IT reserves the right to make changes, at any time, in its practices and this Privacy and Personal Data Protection Policy, provided that compliance with current legislation is maintained.

Therefore, we recommend that You access our Privacy and Personal Data Protection Policy frequently, or whenever You have questions.

12. How to contact us

You can get in touch to:

- Ask questions or comments about this Privacy and Personal Data Protection Policy;
- Make a complaint;
- Request confirmation of the existence of treatment of your Personal Data;
- Obtain information on how to access your Personal Data;
- Perform the correction of incomplete, inaccurate or outdated personal data;
- Obtain information on the anonymization, blocking or deletion of unnecessary, excessive or processed data that does not comply with current legislation;
- Obtain information on the portability of your personal data to another service or product provider, upon express request, in accordance with current legislation;
- Request the deletion of personal data processed with your consent, except in the cases provided for in current legislation;
- Request details of the public and private entities with which we carry out, with your prior consent, the sharing of your Personal Data;
- Obtain information on the possibility of not giving consent and what the consequences of doing so would be;
- Perform the revocation of consent for the treatment of your Personal Data, except in the cases provided for in current legislation;



- Other rights of the holder of the personal data, according to the legislation in force.

To do so, we ask you to contact us using the following channels:

- **In charge of Personal Data Processing:**

- Diego Harsteln de Souza
- dpo@samaiait.com.br

- **By phone:**

- 55 48 4104.0770

- **By regular mail:**

- Rua Cristóvão Nunes Pires, 110, sala 902, Centro - Florianópolis/SC - Brazil - Zip Code 88010-120

Samaia IT will receive, investigate and respond, within a reasonable time or established by law, to any request or complaint regarding the treatment of your Personal Data, including allegations of violation of rights under the General Personal Data Protection Act (LGPD).

