

PRIVACY AND DATA PROTECTION POLICY, COOKIES POLICY

1. Privacy Declaration

This internal Privacy and Data Protection Policy (“Policy”) of Carvalho, Sica, Muszkat, Vidigal e Carneiro Sociedade de Advogados (“CSMV” or “Firm”) aims to provide transparency regarding the way in which CSMV collects, uses, shares, or otherwise processes the Personal Data of its partners and employees, to which it has access in the context of its activities as a law firm, as well as to outline guidelines that must be followed by all those who process Personal Data at CSMV. Thus, this Policy establishes the Firm's internal practices and processes related to such processing, in order to ensure compliance with our Privacy Policy, providing even greater security to the Personal Data processed.

The Processing of Personal Data of CSMV partners and employees may occur (i) during selection processes for work positions at CSMV; (ii) upon the onboarding of new partners and employees; (iv) during the phases of drafting and signing contractual amendments for the entry and exit of partners and employment contracts for employees, as well as for the contracting of benefits (health insurance, meal vouchers, transportation vouchers, and others) having CSMV partners and employees as beneficiaries.

This Policy reaffirms CSMV's commitment to ensuring the privacy and protection of the Personal Data of its partners and employees under its custody, in compliance with Law No. 13,709/18, the General Data Protection Law (“LGPD”), and Law No. 12,965/2014 (“Marco Civil da Internet”).

In case of any questions regarding this Policy, as well as for requests of any nature, please contact our Personal Data Protection Officer (DPO), using any of the communication channels below:

Mailing Address:

CARVALHO, SICA, MUSZKAT, VIDIGAL E CARNEIRO SOCIEDADE DE ADVOGADOS

Av. Brig. Faria Lima, 1.461, South Tower, 10th floor

São Paulo – SP

CEP 01452-002

Attn: Personal Data Protection Officer (DPO)

Mail: dpo@csmv.com.br

2. Definitions

For the purposes of this Policy, the following definitions apply:

Personal Data: Information related to an identified or identifiable natural person, representing any and all data that identify an individual or through which an individual can be identified. Personal Data may be a photo, full name, number of any personal identification documents (CPF, RG, Voter Registration, Professional ID, etc.), information about nationality, profession, address, gender, geographical location, bank details, internet browsing data, and others.

Sensitive Personal Data: Personal Data about racial or ethnic origin, religious conviction, political opinion, affiliation with a union or a religious, philosophical, or political organization, data regarding health, sexuality, genetic or biometric data, when linked to a natural person. Sensitive Personal Data, in addition to identifying an individual, may further reveal other information associated with this individual. For the purpose of this Policy, Sensitive Personal Data is a specific type of Personal Data.

Database: A structured set of Personal Data, established in one or several locations, in electronic or physical support, comprising any and all locations (virtual or physical) in which CSMV stores Personal Data.

Data Subject(s): The natural person(s) to whom the Personal Data undergoing processing refers, considered as every individual who has their data collected by CSMV, as well as every individual who has their Personal Data shared with our Firm.

Controller: The natural or legal person, of public or private law, responsible for decisions regarding the processing of Personal Data, which for the purpose of this Policy will generally be CSMV, except in cases where CSMV acts only as a Data Processor.

Processor: The natural or legal person, of public or private law, who carries out the processing of Personal Data on behalf of the Controller, which in some cases will correspond to CSMV.

Processing: Every operation carried out with Personal Data, such as those related to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination, or extraction, within the scope of CSMV's activities as a law firm.

Personal Data Protection Officer (DPO): The person appointed by the Controller/Processor to act as a communication channel between the Controller/Processor, the Data Subjects, and the National Data Protection Authority ("ANPD").

Consent: A free, informed, and unambiguous manifestation by which the Data Subject agrees to the Processing of their Personal Data for a determined purpose.

3. Compliance with Data Processing Principles

CSMV carries out the Processing of Personal Data only for legitimate, specific, explicit, adequate, and necessary purposes for the provision of legal services, institutional and internal communications, hiring and termination of individuals (admission and dismissal of employees, entry and exit of partners), granting of benefits to employees, partners, and their dependents, people management, financial management, and accounting, without the possibility of subsequent Processing in a manner incompatible with the above purposes.

CSMV guarantees Data Subjects free access to their Personal Data, so that their consultation of said data is carried out in a facilitated manner, further ensuring transparency to Data Subjects in providing accurate and complete information about the form and duration of the Processing of Personal Data.

CSMV uses all necessary technical and administrative measures to protect the Personal Data subject to Processing from (i) unauthorized access and (ii) accidental or unlawful situations of destruction, loss, alteration, communication, or dissemination, also adopting measures to prevent any damage to Data Subjects arising from the Processing of Personal Data, as well as to curb any Processing of Personal Data for discriminatory, unlawful, or abusive purposes.

4. Data Collected, Purpose, and Collection Means

Below are examples of Personal Data that may be collected by CSMV within the scope of its activities, their purpose, and the means of collection:

Personal Data	Purposes	Collection Means
- Name - Personal Documents - Email - Address - Phone Number - Academic Data - Professional Data - Bank Details	- Institutional Communication - Website Monitoring - Compliance with Legal Obligations - IT Security - Recruitment and Selection - Personnel Hiring - Financial Management and Accounting - Institutional Communication	- Website Registration - Conference Calls - Virtual Meetings - In-person Meetings - Emails - Physical Document Copies - Virtual Folders (Cloud Storage)

5. Sensitive Personal Data Collected: Purposes and Means

Considering CSMV's relationship with its partners and employees, including for the offering of certain benefits, the Firm will at times have consensual access to certain Sensitive Personal Data of its partners and employees. In this regard, below are some examples of Sensitive Personal Data that may be collected by CSMV, their purposes, and their collection means:

Personal Sensitive Data	Purposes	Collection Means
• Blood Type • Ethnic Origin • Union Membership • Genetic Data • Biometric Data • Health Data	• Offering of Benefits • Social Security Registration • Registration in Corporate Agreements (PJ)	• Telephone Conferences • Virtual Meetings • In-Person Meetings • E-mails • Physical Copies of Documents • Virtual Folders (Cloud)

6. Personal Data Generated by CSMV

As a result of the processing of Personal Data of partners and employees carried out by CSMV—including, but not limited to, the publication of the names and photos of its partners and, occasionally, its employees on its website—CSMV may generate Personal Data, which will be collected and stored in accordance with this Policy.

Such data may also be generated during the preparation of internal reports for submission to service providers, consisting of the analysis and processing/organization of Personal Data of partners and/or employees, or within the scope of recruitment processes in which tests are conducted through automated tools via the internet.

In all cases, whenever Personal Data is generated by CSMV, this Policy shall apply in full.

7. Legal Bases for the Collection and Processing of Personal Data

CSMV will always rely on one of the legal bases provided for under the Lei Geral de Proteção de Dados (LGPD) for the Processing of Personal Data. Accordingly, among the possible legal bases, in the course of its activities CSMV may rely on:

Consent – the Processing of Personal Data will be based on the Data Subject's explicit Consent, obtained upon the effective hiring of our partners and/or employees, when a candidate registers for open positions on our Website, when partners and/or employees are enrolled to receive benefits offered by CSMV, or when internal reports containing Personal Data are

prepared, always for a previously established and informed Processing purpose, through the execution of a Consent form authorizing the Processing for a specific purpose. With respect to candidates, Consent will also be collected through opt-in checkboxes upon completion of registration on the Website.

Legal or Regulatory Obligation – the Processing of Personal Data will result from applicable law or regulation. In such cases, the Data Subject will be informed by CSMV that their Personal Data will be processed based on this legal basis.

Performance of a Contract – the Processing of Personal Data will derive from obligations set forth in a contract with CSMV, where the Processing of Personal Data forms part of the object of the contract itself or of the preliminary procedures related to the contract maintained with CSMV.

8. Sharing of Personal Data with Third-Party Providers

CSMV may share Personal Data of partners and/or employees contained in its database with third-party providers, specifically in the cases provided for in this Policy and always within the applicable legal and regulatory limits. Below are the circumstances in which Personal Data may be shared with third parties:

Shared Personal Data	Third-Party Providers
Personal Data of Partners – Database	Legal Services – Correspondent Counsel
Personal Data of Employees – Database	Services – Paralegal
Personal Data of Candidates – Database	Services – Accounting
	Services – Experts and Technical Assistants
	Services – IT Support
	Services – IT Security
	Services – IT Maintenance
	Services – IT Storage
	Services – IT Customized Solutions
	Services – IT Document Management
	Services – IT Printing Systems
	Services – IT Website Hosting
	Services – IT Recruitment
	Services – Recruitment
	Services – Physical Records Storage
	Services – Benefits for Partners and/or Employees
	Services – Institutional Communications

In any case of sharing Personal Data with third parties, such third parties will be informed that such Personal Data must always be used in accordance with this Policy.

9. Sharing of Personal Data with Public Authorities

CSMV may share Personal Data stored in its database with public authorities in specific situations, where such sharing arises from a legal or regulatory obligation, or where the sharing of Personal Data is necessary for: (i) the preparation of data protection impact assessments; (ii) the conduct of investigations; (iii) compliance with court orders; and (iv) the prevention of and/or taking measures to prevent suspicious or illegal activities.

In such cases, the order or directive for the sharing of Personal Data will be issued directly by the public authority.

10. Data Storage and Security

Personal Data collected by CSMV may be stored: (i) in physical form at CSMV's office; (ii) in physical form at facilities contracted from third-party providers for document storage; (iii) in electronic form on local servers located at CSMV's office; or (iv) in electronic form on virtual servers (cloud) contracted from third-party providers.

In any storage scenario, CSMV hereby represents and assures its partners and employees who share their Personal Data with the firm that appropriate physical and technical security measures are adopted to preserve the confidentiality, security, and integrity of the Personal Data collected, as well as to prevent any type of unauthorized access, disclosure, alteration, loss, and/or other potential data security incidents.

In this context, we employ technological security solutions within our database, including firewalls, inspection, scanning, and filtering of internet browsing and email content, antivirus software, malware protection, intrusion detection and prevention systems, and application control.

With regard to access to Personal Data, we restrict both physical and electronic access to the smallest possible number of staff members, suppliers, and third parties engaged to handle a specific matter or provide a particular legal service.

It is important to note that there are currently no technological means capable of guaranteeing the absolute invulnerability of systems. Although we believe that the measures described above are sufficient to protect the Personal Data collected, we cannot provide absolute guarantees that our database will not be breached and that, in the event of a breach, Personal Data will not be accessed, disclosed, altered, or destroyed.

11. Personal Data Retention Periods

According to the Lei Geral de Proteção de Dados (LGPD), there is no specific minimum or maximum period for the retention of Personal Data by the Controller. The legal framework establishes only a "processing period," after which the Personal Data collected may be retained by the Controller for specific purposes.

Given the nature of CSMV's activities, we understand that the Personal Data collected from our partners and employees must be retained in our database for the period necessary to fulfill our professional, legal, and/or regulatory obligations.

Accordingly, below are the categories of Data Subjects whose Personal Data we collect, as well as the applicable legal retention periods, the start date, and the legal basis:

Titular	Retention Period	Start Date	Legal Basis*
Partners and Employees	5 years	Date of Entry into the CSMV Articles of Association Start Date of the Employment Agreement with CSMV	Art. 206, §5º, II CC Art. 202, I CC Art. 240, §1º CPC Art. 6, III LGPD Art. 15, II LGPD Art. 11, CLT

(*) CC – Law No. 10,406/2002 – Civil Code
CPC – Law No. 13,105/2015 – Code of Civil Procedure
CLT – Decree-Law No. 5,452/1943 – Consolidation of Labor Laws

12. Data Subjects' Rights

Data Subjects are entitled to rights guaranteed by the Lei Geral de Proteção de Dados (LGPD) in relation to their collected Personal Data, as listed below:

Processing Confirmation – the right to request confirmation of whether Personal Data processing activities exist. Data Subjects may request the following information regarding processing activities: (i) which Personal Data is being processed; (ii) the source of the Personal Data processed; and (iii) the purpose of the processing activities.

Access – the right to request access to Personal Data stored in our database, including a complete statement regarding processing activities and additional information about such activities.

Correction – the right to request the correction, amendment, or update of Personal Data in our database when it is incorrect or incomplete.

Anonymization, Blocking, or Deletion of Unnecessary Data – the right to request the anonymization, blocking, or deletion of unnecessary, excessive data or data processed in non-compliance with the LGPD.

Deletion of Data Processed without Consent or Legal Basis – the right to request the deletion of Personal Data stored without Consent and without a legitimate legal basis for its use.

Portability – the right to request that collected Personal Data be transferred to another service provider.

Withdrawal of Consent – the right to withdraw Consent for the processing of Personal Data at any time.

Objection to Processing – the right to object to the processing of Personal Data in cases of non-compliance with the LGPD or for reasons related to the Data Subject's particular situation.

Data Subjects' rights may be exercised at any time by submitting a request via email to our Data Protection Officer at dpo@csmv.com.br.

13. Changes to this Privacy Policy

CSMV reserves the right to amend this internal Policy, in whole or in part, at any time (always in compliance with applicable law), indicating the date of its latest update.

We recommend periodically reviewing this internal Policy to check for any changes. The provision of Personal Data by partners and/or employees to CSMV by any means implies the Data Subject's acceptance of this Internal Privacy and Data Protection Policy.

COOKIE POLICY

(In compliance with Article 9 of Law No. 13,709/19 – Lei Geral de Proteção de Dados (LGPD))

1. Introduction

This Cookie Policy of the website of Carvalho, Sica, Muszkat, Vidigal e Carneiro Sociedade de Advogados ("CSMV" or "Firm"), available at "www.csmv.com.br" ("Website"), is complementary to CSMV's Privacy and Data Protection Policy.

2. What are Cookies and what are they used for?

The term “cookies” refers to small text files or pieces of information that are downloaded to your device for a short period and used to monitor a user’s internet access when visiting any website (“Cookies”).

By accepting Cookies, users are not transferring any type of virus or malware to their devices, as Cookies merely consist of records of non-identified user activities and preferences when browsing a given website, being updated each time there are new user accesses.

Cookies are sent simultaneously with your browsing on our Website. They are stored in a folder within your internet browser, allowing our Website to retrieve certain non-identified browsing information on future visits, such as preferred language, access region, and others.

Cookies are important because they enable the generation of user access metrics and behavior analysis when accessing our Website, allowing us to monitor and improve its performance and functionality, as well as to provide a better browsing experience by “remembering” your preferences on future visits.

Cookies may also be used to authenticate users and prevent fraud, as the data obtained through Cookies may be cross-referenced with data provided by the user during a registration process on our Website.

For example, through Cookies, CSMV can identify how users reach our Website (e.g., via social media or search engines), which pages are most and least visited, and the geographic regions of our user base.

3. Types of Cookies Used

Cookies can be classified as follows:

Session Cookies

Temporary Cookies used to record your preferences only during your visit to the website. These Cookies are not stored on the hard drive (they are stored in RAM memory) and are automatically deleted when the browser is closed.

Persistent Cookies

Used to record your browsing preferences and remain on your device even after the browser is closed or the device is restarted. These Cookies are used to monitor user behavior patterns, mainly for authentication and navigation tracking purposes.

To enable certain Website functionalities, such as résumé submissions or sharing content via social media, we may rely on third-party providers. Therefore, whenever third-party links are

involved, we recommend that users carefully review the privacy policies and cookie usage information of such third parties.

4. Cookie Settings and Preferences

You may reject or block Cookies in your browser while browsing our Website. You can also modify your browser settings to automatically accept or reject Cookies.

It is important to note that most internet browsers accept Cookies by default. Therefore, if you do not wish Cookies to be used to monitor your internet activity, you must actively delete or block them.

If Cookies are blocked on our Website, some functionalities may not work properly.

Cookie management can be performed directly in your browser, in the section dedicated to Cookie settings, which can be accessed through the links below:

Internet Explorer: <https://support.microsoft.com/pt-br/windows/excluir-e-gerenciar-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=pt-BR>

Safari: <https://support.apple.com/pt-br/guide/safari/sfri11471/mac>

Firefox: <https://support.mozilla.org/pt-BR/kb/protecao-aprimorada-contrarastreamento-firefox-desktop?redirectslug=ative-e-desative-os-cookies-que-os-sites-usam&redirectlocale=pt-BR>

Microsoft Edge: <https://support.microsoft.com/pt-br/windows/microsoft-edge-dados-de-navega%C3%A7%C3%A3o-e-privacidade-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd>

Opera: <https://help.opera.com/en/latest/web-preferences/>

5. Periodic Updates

CSMV is committed to the privacy and security of all data to which it has access, in accordance with Brazilian law and its internal policies, which may be updated at any time at the Firm's discretion. Accordingly, we recommend periodically reviewing this Cookie Policy, as well as our Privacy and Data Protection Policy.