

DEMAREST

Privacy Policy



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1. Statement of Data Privacy

Demarest Advogados, a company referred to as ALMEIDA, ROTENBERG E BOSCOLI - SOCIEDADE DE ADVOGADOS, enrolled with the National Corporate Taxpayers' Register (CNPJ) under No. 61.074.555/0004-15, ("Demarest", "We" or "Ours") is concerned with respecting and protecting Your privacy. Thus, with its inherent commitment and transparency, Demarest publishes this privacy policy ("Privacy Policy" or "Policy") to inform and clarify how and for what purpose the Processing of your Personal Data provided to Demarest may occur, in accordance with the applicable legislation in Brazil, especially with Law 13.709/2018 (Brazilian General Data Protection Law).

Please read this Privacy Policy carefully to be aware of how and for what purpose your Personal Data may be collected by Demarest. It is important that the Privacy Policy be interpreted together and in accordance with any other document, contract, or privacy clause that accompanies it, as the case may be, and without prejudice to the client-attorney privilege applicable to Demarest's relationship with its clients, as set forth in the Code of Ethics and Discipline of the Brazilian Bar Association.

Demarest will act as the controller of your Personal Data, i.e., We will be responsible for decisions regarding Personal Data Processing.

2. Definitions, Collection Methods, and Purpose of Processing

For a better understanding of this Policy, it is necessary to understand the following definitions, which can be read in the plural or singular:

- Brazilian Data Protection Authority (ANPD): the body of the public administration responsible for overseeing, implementing, and inspecting the compliance with this Law throughout the national territory.
- Controller: individual or legal entity, of public or private law, who shall make the decisions referring to the Processing of personal data;
- Personal Data: any information related to the individual, identified or identifiable.
- Sensitive Personal Data: personal data about racial or ethnic origin, religious belief, political opinion, filiation to a union or to an organization of religious, philosophic, or political nature, data referring to health or sexual life, genetic or biometric data, when bound to a natural person.
- Data Protection Officer: the person appointed by the controller and processor to act as a communication channel among the controller, the Subjects, and the Brazilian Data Protection Authority (ANPD);

- Brazilian General Data Protection Law (LGPD): Law No 13.709/2018, which provides for the protection of Personal Data.
- Processor: individual or legal entity, of public or private law, who performs the processing of personal data on behalf of the controller;
- Website: website <http://www.demarest.com.br/> and other platforms hosted on it, as well as other means of communication eventually made available by Demarest.
- Subject: natural person to whom the Personal Data that is the subject of Processing refer.
- Processing: every operation performed with personal data, such as the ones referring to a collection, production, reception, rating, utilization, access, reproduction, transmission, distribution, processing, filing, storage, elimination, assessment or control of information, modification, communication, transfer, diffusion or extraction.

2.1. Agents of Processing

We assume the position of Controller of Your Personal Data when decisions regarding the Processing of Your Personal Data are incumbent upon Us, always observing the LGPD, other applicable rules, and this Policy.

2.2. Purpose of the Personal Data Processing

The Processing of your Personal Data by Demarest may be performed upon your consent, where applicable, in several ways, in view of legal, regulatory, contractual, or other obligations.

Demarest may request that you provide written consent or by any means confirming such consent, whenever necessary.

The Processing of your collected Personal Data is intended to enable and/or improve the provision of the legal services for which Demarest was retained, as well as, to:

- a. Identify and/or offer you relevant content about a particular preference and/or interest expressed by you to Demarest, including, without limitation, newsletters, events, invitations, reminders, thank you notes, among others;
- b. Compose Demarest's database of suppliers and service providers;
- c. Create Demarest's database of job, internship, and service provision applicants at Demarest;
- d. Create a database of employees, Alumni members, committees, and other groups;
- e. Create supplier's record data and execution of related contracts;
- f. Protect, defend and manage Demarest's interests;
- g. Comply with the applicable legislation.
- h. Notify you of any amendments to the current Privacy Policy;
- i. Fulfill any other request you make to Demarest.

2.3. Types of Data Collected on the Website and Registration Methods

Demarest collects Personal Data through online forms or physical means when you, for example, register for an event, submit information to apply for a job, or when you fill out a "contact" form via the Website.

When You register or submit your information to Demarest, we often request information about your name, email, phone number, job title, and company. In addition, other personal information can be received through resumés you attach when you apply for a position, through third parties such as the company where you work, or even from public sources.

2.4. Internet Browsing Data

When you visit our website, we collect standard internet log data and details of visitor behavior patterns. Demarest performs this action to gather information, such as the number of visitors to the various parts of the Demarest website. Information is collected in a way that does not identify an individual. Furthermore, we make no attempt to discover the identities of those who visit our site.

We use analytics tools to help analyze access to, and use of, our website. The tool uses "cookies", which are text files located on your computer, to collect standard internet log information and visitor behavior information anonymously, always for purposes of evaluating the visitors' use on the website and to compile statistical reports about the activity on Demarest's website.

You will be able to disable or remove cookies with tools that are available on most commercial browsers. The preferences of each browser You use will need to be selected separately and different browsers offer different functions and options. If you are interested in learning more about cookies, including how to control them, please see the website: <https://www.allaboutcookies.org/>

3. Data Storage and Retention

Demarest may store Your Personal Data for the time necessary to fulfill the purposes mentioned in this Policy, as well as to comply with any legal or regulatory obligation; the regular exercise of rights in judicial, administrative, or arbitration proceedings; or for other purposes provided for in the LGPD, such as, for example, for its exclusive use, anonymously or in situations that justify its legitimate interest.

For determination of the method and duration of your Personal Data Processing by Demarest, the nature of your Personal Data provided to Demarest as well as the purpose of the Processing shall be taken into account.

During the entire period in which we keep Your Personal Data stored, all reasonable measures will be taken to keep them protected, in safe and controlled environments, in compliance with current legislation. For this reason, Your Personal Data shall be stored using high levels of security, including access control practices.

For further information on where and how long your Personal Data shall be stored, as well as further information about your rights of deletion and portability, please contact dpo@demarest.com.br.

4. Personal Data Sharing

Demarest shall not trade your Personal Data. However, your Personal Data may be shared or transferred to third parties in Brazil or abroad, in order to properly fulfill the purposes listed in this policy, as well as to comply with a court order or decision by any other competent authority, according to the applicable law. Thus, Demarest may share or transfer your Personal Data with third parties, within or outside Brazil, in the following cases:

- (i) Service providers engaged to act on Demarest's behalf to provide a service according to our instructions, to help improve or facilitate our services, such as IT systems providers, cloud service providers, payroll and human resources related services, among others;
- (ii) Business partners with whom Demarest keeps a cooperation or alliance relationship; and
- (iii) Administrative and judicial authorities that, in the exercise of their authority, require information.

In case Demarest needs to share your Personal Data with third parties other than those mentioned, we shall update this Policy.

In all events, Demarest undertakes to strictly share the Personal Data that is necessary for the fulfillment of the respective purpose or compliance with the respective specific order, as the case may be.

5. Cross-Border Processing

The services provided by Demarest require the support of a technological infrastructure that may be established outside Brazil, such as servers and cloud services, which may be owned or provided by third parties. In addition, to perform its activities, Demarest may have to share your Personal Data with third parties outside Brazil, such as with its office located in New York, United States of America.

In such events, Demarest ensures only to engage third parties that meet the highest security standards, at least with the same level of Personal Data protection that is adequate to the Brazilian legislation.

6. Safety Provisions

Demarest and the third parties with which your Personal Data may be shared shall comply with the security standards required to prevent and remedy unauthorized access to Personal Data, using the applicable means and recommended security standards to protect them, as far as technically and operationally feasible.

Demarest values Your confidence in providing us with Your Personal Data and, therefore, adopts security, technical and administrative measures capable of protecting Your Personal Data from unauthorized access and from accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate, or unlawful Processing.

We always seek to implement physical, electronic, and managerial procedures to monitor the security of Your Personal Data and any other information we collect. Although we adopt the best security practices existing in the market and make efforts to protect Your Personal Data, it should be considered that no Personal Data Processing is completely secure.

Demarest shall not be liable, under any circumstances, to You or to third parties, for damages of any kind, including, but not limited to, those arising from the disclosure of Your Personal Data to third parties or the loss of such information arising directly or indirectly from the bad use of the Internet by the User.

Demarest is not liable for any damages resulting from the misuse of the Site, by You and/or any third parties authorized by it, or resulting from an accident, modification, or any other conduct and/or conditions not controlled by Demarest.

7. Third-Party Links

Demarest may offer links for rerouting to third-party websites in order to improve your browsing experience, information, or service provision. Demarest clarifies that this Privacy Policy does not apply to Personal Data provided by you to any companies, individuals, and/or organizations other than Demarest. Such persons, whether natural or legal entities, may have different policies regarding privacy and information with respect to the Personal Data collected and otherwise processed by them.

Demarest suggests consulting the privacy policy applicable to such persons and/or third-party websites before providing your Personal Data.

8. Subject's Rights

Demarest respects Your privacy and cares about providing the necessary channels that allow you to exercise your rights and have adequate, clear, and transparent information about the use and processing of your Personal Data. Thus, the request for changing incomplete, inaccurate, or outdated Personal Data and/or the deletion of data provided to Demarest, including Personal Data, should be made by email to dpo@demarest.com.br.

Such request will be analyzed and, in case it does not imply an interruption in the services provided by Demarest nor involves any data conservation events, it will be proceeded with. In case it entails an interruption in the service provision, your relationship with Demarest will be terminated, however, the obligations arising from the provision of the services shall remain valid and, in such event, your information and Personal Data shall continue to be used and processed by Demarest and/or authorized third parties until the need or purposes set forth in this Policy cease.

Further to the change and deletion of Personal Data, You may also exercise the following rights upon request to Demarest, through email to dpo@demarest.com.br:

Right to confirmation

You may request confirmation of the existence or not of Personal Data Processing activities related to You. The following information about Personal Data Processing activities may be requested:

- which Personal Data is being processed;
- the origin of the Personal Data processed;
- the purpose of the Personal Data Processing activities;

Right to access

You have the right to ask us to access Your Personal Data processed by Us. A complete statement about the Processing activities and additional information about the activities performed may be requested.

Right to rectification

You have the right to request correction, amendment, or updating of Your Personal Data when it is incorrect or incomplete.

Right to opposition

You have the right to object to the Personal Data Processing carried out, in case of non-compliance with the provisions of the LGPD.

Right to portability

You may request the portability of Your Personal Data to third parties. This means that You may request a copy of Your Personal Data in electronic form and transmit it for use in a third-party service. If You so request and it is technically possible, we shall transfer Your personal information to You. However, we shall only carry out the portability in relation to Your Personal Data and not third parties.

Right to removal

You have the right to ask us to remove Personal Data we store about You if it is no longer necessary or if it is excessive for the purposes for which it was originally collected.

Right to petition

You have the right to file a complaint with the Brazilian Data Protection Authority. However, we strongly recommend that You contact us first so that we can find the best solution, always taking into account Your privacy and the protection of Your Personal Data.

Right to request a review of solely automated decisions

You have the right not to submit to decisions made solely by automated means that affect Your interests, including decisions designed to define Your personal, professional, consumer, and credit profile or aspects of Your personality. In such cases, You may request that these decisions be reviewed.

9. Communication: Changes, Cancellation, or Queries about this Privacy Policy

If you wish to access, change, or delete your Personal Data provided to Demarest, or exercise any of your Rights as a Subject, please contact us by email at dpo@demarest.com.br, and we will take the necessary steps and/or send a reply within a reasonable period of time, according to Demarest's technical and operational feasibility. Demarest may also ask you to update your Personal Data periodically.

If you do not agree with this Privacy Policy, wish to delete any Personal Data processed by Demarest, or obtain further clarifications on the application of this Privacy Policy as well as on your rights, please contact us through email at dpo@demarest.com.br. We shall be glad to clarify any doubts and/or attend to your request.

Lastly, if you have received a communication from Demarest and would rather not have received it, please let us know through the "Unsubscribe" link mentioned in the respective email, or send us an email at

dpo@demarest.com.br.

Demarest's purpose is to answer all the above demands as soon as possible.

10. Data Protection Officer

Demarest is headquartered in São Paulo - Brazil. The contact of Demarest's Data Protection Officer is:

Av. Pedroso de Moraes 1201
São Paulo, SP - 05419-001
dpo@demarest.com.br

11. Changes to this Privacy Policy

All Personal Data processed by Demarest will be in accordance with this Privacy Policy and the purposes mentioned above.

Demarest reserves the right to change all or part of this Privacy Policy at any time, inserting the last update date as indicated below.

Please check this Privacy Policy periodically for any changes. The use of Demarest's website or the provision of Personal Data by any other means implies your agreement with this Privacy Policy.

12. Revision and Approval of this Policy

This policy must be revised every 2 years or at any time if so desired by Demarest or, if necessary, following the approval cycle of the areas and scopes involved. The updated version of this policy will be duly made available on this page when it occurs.

Date of publication of this Privacy Policy on the website: July 30, 2021.