

## **PRIVACY AND PERSONAL DATA POLICY ROXO ATELIER BRAND STRATEGY & ANTHROPOLOGY**

### **1. OBJECTIVES**

Inform all participants and professionals at ROXO ATELIER regarding the application of the General Data Protection Law - LGPD.

### **2. SCOPE**

Applies to all participants in processes, including third parties and ROXO ATELIER professionals.

### **3. DESCRIPTION OF THE PROCESS**

ROXO ATELIER treats the personal data of participants in its surveys within the scope of providing services for carrying out its market studies. In this sense, this ROXO ATELIER Privacy and Personal Data Policy (hereinafter "Privacy Policy"), aims to help you understand how we treat the personal data of participants and why we use them and how we protect their privacy when using our services.

### **4. WHY?**

ROXO ATELIER is committed to protecting the security and privacy of research participants. In this context, it has prepared this Privacy Policy, in order to affirm its commitment and respect for the rules of privacy and protection of personal data.

We intend that contractors and participants in our surveys are aware of the general privacy rules and terms of processing the data we collect, in strict compliance with the applicable legislation in this area, namely Law No. Data Protection - LGPD" or simply "LGPD").

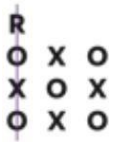
ROXO ATELIER seeks to respect the best practices in terms of security and protection of personal data, promoting/raising awareness of good practices in this area, and improving systems in order to manage data protection, in strict compliance with legal obligations.

The processing of data (performed directly or indirectly) implies knowledge of the conditions of this Policy, and of any other specific terms, policies and conditions regarding the services provided.

### **5. WHAT ARE PERSONAL DATA?**

Personal data is understood to be any information related to an identified or identifiable natural person (data subject), of any nature and regardless of the respective medium. A person is considered identifiable if he can be identified directly or indirectly, namely by reference to an identification number or to more specific elements of his physical, physiological, psychological, economic, cultural or social identity.

Personal data may have a different nature in certain situations, classifying the LGPD as "sensitive data". These may relate to the holder's racial or ethnic origin, their political opinions, their religious or philosophical beliefs, genetic information, biometric identifiers, sex life, sexual orientation or their health.



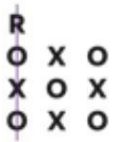
## 6. OTHER IMPORTANT DEFINITIONS

- i. Consent of the data subject** – expression of will, free, specific, informed and explicit, by which the data subject accepts, by means of an unequivocal positive statement or act, that the personal data concerning him are subject to treatment.
- ii. Controller** - natural or legal person, public or private, who is responsible for decisions regarding the processing of personal data; **iii. Profiling** – any form of automated processing of personal data that consists of using such personal data to, in particular, include a natural person in a certain category, regarding their professional performance, their economic situation, health, personal preferences, interests, behavior, location or travel; **iv. Data Protection Officer (DPO)** – person or entity appointed to ensure, in an organization, the compliance of the processing of personal data with the LGPD, ensuring efficient communication with data subjects and cooperation with control authorities, also bridging the gap with the different areas of activity within ROXO ATELIER. The DPO does not receive instructions regarding the exercise of its functions, responding directly to the management bodies of the entity that appointed it; **v. Responsible for processing** – natural or legal person, public authority, agency or other body that, individually or jointly with others, determines the purposes and means of processing personal data; **saw. Third** – natural or legal person, service or body other than the data subject, the Controller, the Operator and the persons who, under the direct authority of the Controller or Operator, are authorized to process personal data; **vii. Data subject** – identified or identifiable natural person to whom the personal data relate; **viii. Processing** – operation or set of operations carried out on personal data or on sets of personal data, by automated or non-automated means, such as collection, registration, organization, structuring, conservation, adaptation or alteration, recovery, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparing or interconnecting, limiting, erasing or destroying; **ix. Operator** - Natural or legal person, public or private, who processes personal data on behalf of the controller; **x. Breach of personal data** – breach of security that causes, accidentally or unlawfully, the destruction, loss, alteration, disclosure or unauthorized access to personal data transmitted, stored or subject to any other type of treatment; **xi. Pseudonymisation** – the processing of personal data in such a way that they can no longer be attributed to a specific data subject without recourse to supplementary information, provided that such supplementary information is kept separately and subject to technical and organizational measures to ensure that personal data cannot be attributed to an identified or identifiable natural person; **xii. Anonymization** – technique resulting from the processing of personal data in order to remove sufficient elements from them so that it is no longer possible to irreversibly identify the data subject. More precisely, the data must be processed in such a way that they can no longer be used to identify a natural person using all the means likely to be reasonably used, either by the controller or by third parties. **xiii. National Data Protection Authority** – Public administration body responsible for ensuring, implementing and supervising compliance with the law;

## 7. WHO IS RESPONSIBLE FOR PROCESSING PARTICIPANTS' PERSONAL DATA?

This Privacy Policy aims to inform contracting parties and research participants regarding the terms of processing of personal data by ROXO ATELIER, determining the purposes and means of processing their data in the context of the provision of services, so this must be considered as a Controller, pursuant to the LGPD.

Thus, when serviced by an independent third party, on behalf of ROXO ATELIER, this third party will be considered an Operator, under the terms of the LGPD. Thus, if there is any question regarding the privacy of the participant's data, we ask that you also indicate who this third



party is, when applicable, for the purpose of investigating any infringement, deceit, negligence, imprudence or malpractice.

The information received through reports, groups, interviews, ethnographies, videos, experiences, testimonials, among other methods of collecting information for research are treated by ROXO ATELIER and reported to its contractors, who may not use or transfer any personal data received, in addition to the results established in the survey of participants, which are usually sent anonymously, that is, without personal identification.

Under the terms of this Policy, ROXO ATELIER's contractors are aware of their responsibility in handling personal data and sensitive personal data of the participants, which they receive from ROXO ATELIER for the services provided in the preparation of market research reports.

## **8. WHAT PERSONAL DATA DO WE PROCESS AND BY WHAT MEANS?**

ROXO ATELIER treats personal information provided by the participant (directly or indirectly), information capable of identifying him. The treatment of this information may vary according to the use of ROXO ATELIER, as well as the type of information that the participant chooses to provide us.

For the smooth running of the service, the participant provides some information, such as name, age, profession, telephone, e-mail. ROXO ATELIER may use a specific system, through which other information may also be collected and processed.

All this information collected by ROXO ATELIER is cumulative, so that ROXO ATELIER and its Operators can provide a better service.

## **9. CATEGORY OF DATA WORKED, MEANS AND FORMS OF COLLECTION**

Any personal data of the participant can be collected, processed and stored, for the purposes of the services provided by ROXO ATELIER, including those data presented during the interview sessions or groups.

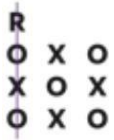
## **10. ON WHAT BASIS DO WE PROCESS PERSONAL DATA?**

ROXO ATELIER will process the personal data of participants only when duly authorized. The LGPD requires, for the processing of personal data to be lawful, that there is an adequate legal basis for each specific treatment.

About the processing of participants' data carried out by ROXO ATELIER to improve our services and meet our administrative and quality objectives, the appropriate legal basis will be the pursuit of the

Controller's legitimate interests, as well as Contractual Compliance, when applicable, in addition to participant's own consent.

This fact implies that data subjects may object to the processing of their data for the purposes, under the LGPD, if they present valid reasons related to their situation. In such an event, the Controller may present legitimate reasons that justify the continuation of that treatment, in which case it reserves the right to continue processing your data for these purposes, as well as in cases where such treatment is necessary for the purposes of declaration, exercise or defense of a right in legal proceedings.



Regarding the processing of data carried out by ROXO ATELIER in the context of compliance with legal obligations, the lawful basis for carrying out such treatments - mostly data communications to external entities - will be the need for processing for the purpose of compliance of legal obligations of the Controller.

### **11. WHICH ROXO ATELIER PROFESSIONALS HAVE ACCESS TO YOUR DATA?**

In the context of processing the participant's personal data, ROXO ATELIER observes, always, the principles of data protection from conception.

Such a commitment implies, among other things, that access to your personal data will be limited to people who need to know them in the exercise of their functions, to the strict extent necessary for the pursuit of the processing purposes that we have already listed above.

### **12. WHAT IS THE PERIOD OF CONSERVATION OF YOUR PERSONAL DATA?**

The participants' personal data, which may include videos and images, are treated in strict compliance with the applicable legislation, being stored in a specific database. Such data are kept in a format that allows the identification of data subjects only for the period necessary for the purposes for which they are processed.

The period during which the data is stored and maintained varies according to the purpose for which the information is used. There are, however, legal requirements that require the retention of data for a certain period.

We take as a reference for determining the adequate conservation period the various deliberations of the data protection control authorities, namely the National Authority for Data Protection - ANPD, as well as in the terms of the Code of Ethics of ABEP (Brazilian Association of Research Companies).

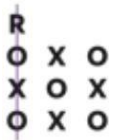
### **13. WHAT ARE THE DATA HOLDERS' RIGHTS?**

Under the terms of the applicable legislation, the data subject may request, at any time, access to personal data concerning him, as well as its rectification, the portability of his data, directly through the e-mail: [dpo@roxoatelier.com.br](mailto:dpo@roxoatelier.com.br).

Without prejudice to any other administrative or judicial means of appeal, the data subject is entitled to file a complaint with the ANPD or another competent control authority under the terms of the law, if he considers that his data are not being subject to legitimate treatment by part of ROXO ATELIER, pursuant to the applicable legislation and this Policy.

### **14. WHAT ARE THE SAFETY MEASURES ADOPTED BY ROXO ATELIER?**

ROXO ATELIER is committed to ensuring the confidentiality, protection and security of the personal data of its participants, through the implementation of appropriate technical and organizational measures to protect their data against any form of undue or illegitimate treatment and against any accidental loss or destruction of these Data. For this purpose, we have systems and teams designed to guarantee the security of the personal data processed,



creating and updating procedures that prevent unauthorized access, accidental loss and/or destruction of personal data, committing to respect the legislation regarding the protection of participants' personal data and to treat this data only for

the purposes for which it was collected, as well as to ensure that this data is treated with adequate levels of security and confidentiality.

ROXO ATELIER may, in some cases, transmit your personal data to third parties. ROXO ATELIER has defined clear contractual rules for the processing of personal data with its operators and requires that they adopt appropriate technical and organizational measures to protect their personal data. However, in some cases, we may be required by law to disclose your personal data to third parties (such as supervisory authorities) over whom we have limited control regarding the protection of personal data.

The information database formed by ROXO ATELIER can be made available to strategic business partners aiming at the benefit and generation of mutual results, such as the supply or improvement of our products, services and advertising.

ROXO ATELIER is not responsible for the use and treatment given by business partners and contractors of ROXO ATELIER to the collected and shared user data, being the responsibility of the company or partner that uses them to give the due treatment and use.

It may be necessary - by law, legal process, litigation and/or requests from public and governmental authorities within or outside your country of residence - for ROXO ATELIER to disclose your personal information. We may also disclose your information if we determine that, for purposes of national security, law enforcement or other matters of public importance, disclosure is necessary or appropriate.

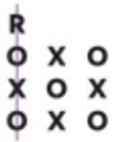
We may also disclose your information if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger or sale, we may transfer any and all personal information we collect to relevant third parties.

## **15. CONTACT US IF NECESSARY**

You can contact the Data Protection Officer ("DPO") of ROXO ATELIER for more information about the processing of your personal data, as well as any questions related to the exercise of the rights attributed to you by law applicable and, in particular, those referred to in this Privacy Policy, via email: [dpo@roxoatelier.com.br](mailto:dpo@roxoatelier.com.br)

## **16. HOW DO I FIND OUT ABOUT ANY CHANGES TO THE ROXO ATELIER PRIVACY POLICY?**

ROXO ATELIER reserves the right, at any time, to make changes or updates to this Privacy Policy, these changes being duly updated on our Platforms. We suggest that you consult them regularly to be aware of any changes.



São Paulo, January 6, 2023

DocuSigned by:  
*Carolina Roxo Nolin Barreira*

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