# COLETIVO TSURU'S PERSONAL DATA PRIVACY POLICY

## 1. OBJECTIVES

Inform all research participants, employees, customers, business partners and users in general who have a relationship with Coletivo Tsuru about the application of the Brazilian General Data Protection Law (LGPD in Brazilian Portuguese).

This Privacy Policy aims to inform how Coletivo Tsuru collects, uses, stores, protects, and shares the personal data of our research participants, customers, employees, and other individuals with whom we interact, ensuring compliance with current data protection legislation (LGPD).

## 2. SCOPE

It applies to all research participants, employees, customers, business partners and users in general who have a relationship with Coletivo Tsuru.

This policy applies to all personal data processed by Coletivo Tsuru, including data collected through surveys, websites, groups, apps, services, and digital platforms, as well as through direct interactions with our representatives.

## 3. PROCESS DESCRIPTION

Personal data is collected, processed, and stored in accordance with a rigorous process that aims to guarantee the privacy and security of information, from initial collection to deletion.

## 4. WHY?

Coletivo Tsuru is committed to protecting the security and privacy of its research participants. In this context, Coletivo Tsuru has drawn up this Privacy Policy, with the purpose of affirming its commitment and respect for the rules of privacy and personal data protection.

Coletivo Tsuru needs to collect and process personal data of its participants within the scope of providing market research services. In this sense, this Privacy and Personal Data Policy of Coletivo Tsuru (hereinafter "Privacy Policy") aims to help our participants understand what personal data we collect, how and why we use it, to whom we disclose it and how we protect their privacy when they use our services.

Coletivo Tsuru seeks to respect best practices in terms of security and personal data protection, promoting and raising awareness among everyone about good practices in this area. It also seeks to improve systems in order to manage the protection of data made available to it by its participants, in strict compliance with legal obligations.

Completing forms, participating in interviews, and providing data directly or indirectly imply knowledge of the conditions of this Policy, and any other specific terms, policies and conditions relating to the services provided.

## 5. WHAT ARE PERSONAL DATA AND SENSITIVE PERSONAL DATA

Personal data
Personal data is understood to be any information related to a natural person, identified or identifiable (data subject), such as name, address, email, telephone number, behavioral information, and preferences, among others.

Sensitive personal data
Sensitive personal data is information that, due to its nature, requires greater protection, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data relating to health or sex life and sexual orientation, and data relating to criminal convictions and offences.

## 6. OTHER IMPORTANT DEFINITIONS

i. Consent of the data subject – free, specific, informed, and explicit expression of will, by which the data subject accepts, by means of a statement or unequivocal positive act, that personal data concerning him/her may be processed.

ii. Controller: Natural or legal person, under public or private law, responsible for decisions regarding the processing of personal data.

iii. Operator: Natural or legal person, under public or private law, who processes personal data on behalf of the controller.

iv. Data Protection Officer (DPO) – person appointed to ensure that the processing of personal data within an organization complies with the LGPD, ensuring efficient communication with data subjects and cooperation with supervisory authorities, and also acting as a bridge between the different areas of activity within Coletivo Tsuru. The DPO does not receive instructions regarding the exercise of his/her functions and reports directly to the management bodies of the entity that appointed him/her.

v. Data subject – an identified or identifiable natural person to whom the personal data relates.

vi. Processing – operation or set of operations performed on personal data or on sets of personal data, by automated or non-automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison or combination, restriction, erasure or destruction.

vii. Personal data breach – a breach of security that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

viii. Anonymization – a technique that results from the processing of personal data in order to remove sufficient elements from them so that it is no longer possible to identify the data subject, irreversibly. More precisely, the data must be processed in such a way that it can no longer be used to identify a natural person using all the means that could reasonably be used, either by the controller or by third parties.

ix. National Data Protection Authority (ANPD) – Public administration body responsible for overseeing, implementing, and monitoring compliance with the law.

## 7. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

Coletivo Tsuru is responsible for the processing of personal data, defining the purposes and means of processing in accordance with data protection standards.

This Privacy Policy aims to inform participants about the terms of processing of their personal data used by Coletivo Tsuru, determining the purposes and means used in the context of the provision of services. Therefore, under the terms of the LGPD, Coletivo Tsuru must be considered as Controller.

Therefore, when contacted by an independent third party, on behalf of and by order of Coletivo Tsuru, this third party will be considered an Operator, under the terms of the LGPD.

If there is any type of question regarding the privacy of the participant's data, the third party must be indicated for the purpose of investigating any possible infraction, willful misconduct, negligence, imprudence, or incompetence.

Information received through reports, interviews, videos, experiences, testimonials, and other methods of collecting information for research purposes are processed by Coletivo Tsuru and reported to its contractors, who may not use or transfer any personal data received, other than the results established in the research and interviews with participants, which are usually sent anonymously, that is, without personal identification.

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

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

We collect data such as name, email, telephone number, demographic, behavioral, browsing data, opinions, and evaluations. This data is collected through questionnaires, online forms, interactions on social networks, website visits, interviews, and other forms of direct interaction.

Coletivo Tsuru collects personal information provided by the participant, information capable of identifying him/her. This information collected may vary according to the need for the research, as well as the type of information that the participant chooses to provide us.

## 9. CATEGORY OF DATA PROCESSED, MEANS AND FORMS OF COLLECTION

Any personal data of the participant may be collected, processed, and stored for the purposes of the services provided by Coletivo Tsuru, including data presented during interview or group sessions, such as:

- Identification Data: Name, email, telephone, address.
- Demographic Data: Age, gender, location, social classification.
- Behavioral Data: Preferences, purchasing and consumption habits.
- Attitudinal Data: Opinions, Motivations, Expectations
- Browsing Data: History of visits and online interactions.

## 10. WHAT ARE THE PURPOSES OF COLLECTING YOUR PERSONAL DATA?

Participants' personal data is processed to provide content and materials of interest to Coletivo Tsuru's contractors. For this to happen, it is often necessary to cross-reference the data collected so that marketing actions are directed to what the contractor expects to receive from Coletivo Tsuru.

In this sense, Coletivo Tsuru uses personal data to communicate and manage the relationship with the participant. Thus, we may contact the participant by letter, email, social media, or SMS, for administrative or operational reasons, for example, in order to send them news that may be of interest to them. We will also use your personal data to respond to your requests, suggestions, or contacts, to improve our services and your experience as a Coletivo Tsuru participant.

## 11. ON WHAT BASIS DO WE PROCESS YOUR PERSONAL DATA?

The LGPD requires, for the processing of personal data to be lawful, that there be an adequate lawful basis for each specific processing.

We process personal data based on the following grounds:

- Consent of the data subject.
- Execution of contracts.
- Compliance with legal obligations.
- Legitimate interests of Coletivo Tsuru.

Regarding the processing of participants' data carried out by Coletivo Tsuru to improve our services and meet our administrative and quality objectives, the appropriate lawful basis will be the pursuit of the Controller's legitimate interests, as well as Contractual Compliance, when applicable, in addition to the participant's own consent. This implies that data subjects may object to the processing of their data for the aforementioned purposes, if they present valid reasons related to their particular situation. In such an event, the Controller may present legitimate reasons that justify the continuation of such processing, in which case it reserves the right to continue processing your data for such purposes, such as in cases where such processing is necessary for the purposes of declaring, exercising or defending a right in legal proceedings.

Regarding the data processing carried out by Coletivo Tsuru in the context of compliance with legal obligations, the lawful basis for carrying out such processing

– mostly data communications to external entities – will be the need for the processing for the purpose of complying with the Controller's legal obligations.

## 12. WHICH COLETIVO TSURU PROFESSIONALS HAVE ACCESS TO YOUR DATA?

Personal data is only accessed by authorized and trained professionals from Coletivo Tsuru, who need this information to perform their duties.

When processing participants' personal data, Coletivo Tsuru observes, at all times, the principles of data protection from conception (privacy by design). This commitment implies, among other aspects, that your personal data will be limited to those people who need to know it in the exercise of their functions, strictly to the extent necessary to pursue the processing purposes that we have already listed above.

## 13. HOW LONG WILL YOUR PERSONAL DATA BE KEPT?

The personal data of participants, which may include videos and images, that Coletivo Tsuru collects are processed in strict compliance with applicable legislation and are stored in specific databases. 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 retained varies according to the purpose for which the information is used. There are, however, legal requirements that require data to be retained for a certain period. We use the various decisions of data protection control authorities, namely the National Data Protection Authority (ANPD), as a reference for determining the appropriate retention period, as well as the terms of the ABEP Code of Ethics.

## 14. WHAT ARE THE RIGHTS OF DATA SUBJECTS?

Under applicable legislation, the data subject may request, at any time, access to personal data, correction of incomplete, inaccurate, or outdated data, deletion, restriction, and opposition to the processing/handling of data concerning him/her, directly via email dpo@coletivotsuru.com.br

## 15. WHAT SAFETY MEASURES HAVE BEEN ADOPTED BY COLETIVO TSURU?

Coletivo Tsuru is committed to ensuring the confidentiality, protection, and security of its participants' personal data, through the implementation of appropriate technical and organizational measures to protect their data against any form of improper or illegitimate processing and against any accidental loss or destruction of such data. To this end, 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 on the protection of participants' personal data and to process such data only for the purposes for which it was collected, as well as to ensure that such data is processed with adequate levels of security and confidentiality.

Coletivo Tsuru may, in some cases, transmit your personal data to third parties. Coletivo Tsuru has established clear contractual rules on the processing of personal data with its operators and requires them to adopt appropriate technical

and organizational measures to protect your 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 Coletivo Tsuru may be made available to strategic business partners for the purpose of mutual benefit and generation of results, such as the provision or improvement of our products, services, and advertising.

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 Coletivo Tsuru to disclose your personal information. We may also disclose your information if we determine that, for purposes of national security, law enforcement or other issues 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. In addition, in the event of a reorganization, merger or sale, we may transfer any and all personal information we have collected to the relevant third party.

## 16. UNDER WHAT CIRCUMSTANCES IS DATA SENT TO OTHER ENTITIES?

Personal data may be shared with third parties only in the following circumstances:

- With service providers acting on behalf of Coletivo Tsuru
- To comply with legal obligations or respond to legal proceedings.
- With the consent of the data subject.

Coletivo Tsuru uses other entities to provide certain services. Occasionally, this provision of services may imply access by these entities to the personal data of its participants. This will be the case of entities that provide support services to Coletivo Tsuru.

Therefore, any entity that characterizes itself as an Operator of Coletivo Tsuru will process the personal data of our participants, in our name and on our behalf, with the strict obligation to follow our instructions. Coletivo Tsuru ensures that such entities that characterize themselves as Operators offer sufficient guarantees of implementation of appropriate technical and organizational measures so that the processing meets the requirements of the applicable law and ensures the security and protection of the rights of data subjects, under the terms of the subcontracting agreement entered into with said Operators.

Coletivo Tsuru may transmit your personal data to any Public Entity, to the Courts, Solicitors, to criminal police bodies or to the Public Prosecutor's Office when notified to do so or when this is necessary for compliance with legal obligations, as provided for by law.

In any of the above-mentioned situations, Coletivo Tsuru undertakes to take all reasonable measures to ensure the effective protection of the personal data it processes.

## 17. CONTACT US

You may contact Coletivo Tsuru's Data Protection Officer ("DPO") for more information about the processing of your personal data, as well as any questions related to the exercise of the rights granted to you by applicable legislation and, in

particular, those referred to in this Privacy Policy, through the following contacts:
e-mail: dpo@coletivotsuru.com.br .

## 18. HOW WILL I BE AWARE OF ANY CHANGES TO THE COLETIVO TSURU PRIVACY POLICY?

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