

Privacy Policy and Personal Data Protection FIELO

Company focused on software as a service "FIELO" that manages incentives for employees/partners/customers, whether B2B or B2C.

FIELO handles personal data with security and ethics, and through this, as a requirement of its activities, **reinforces the importance and calls upon all employees, partners, suppliers, and customer-partners** to adhere to and disseminate this policy, with the main objective of regulating the processing of personal data within the company, in alignment with applicable personal data protection laws, especially the Brazilian General Data Protection Law - LGPD.

Personal data includes all data that relates to a natural person, in other words, all information that identifies or can identify an individual, such as: name, CPF (Brazilian identification number), work permit number, email with name, computer IP address, among others.

Treatment of Personal Data, Privacy, and Confidentiality

In the exercise of activities and business related to the contract signed between the data subject and FIELO, and/or that involve personal data, the processing, by FIELO as well as by our partners, **must be carried out in accordance with the LGPD and this policy, in a secure and confidential manner.**

Processing, as defined by the law, encompasses all operations performed with personal data, including but not limited to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation, or control of information, modification, communication, transfer, dissemination, or extraction. Processing involves the entire life cycle of the data.

In summary, when dealing with personal data, **it is essential that you assess the real need for processing, using it restrictively, securely, transparently, and appropriately - respecting the mapped objective. The use must always be associated with a previously identified and known purpose by all. The processing of personal data requires a legal basis. If in doubt, contact the data protection officer.**

It should be emphasized that, for security reasons and within its supervisory power, there is no privacy in the use of any of FIELO's equipment, including internet browsing, specifically in the use of any corporate tool or company email, and that these may be monitored and collected at any time, with a commitment to information security and compliance with the law.

The sharing of personal data with individuals or legal entities, authorities, or any external entities to FIELO will be restricted to the minimum necessary, always respecting the legal basis and inherent purpose. Storage is done in the cloud and using platforms involved in FIELO's activities, always with the premise of respecting personal data protection laws.

Guiding Principles of Personal Data Protection

The processing of personal data must be done in good faith and in accordance with the following principles:

Purpose: To provide reasonable, specific, explicit, and informed purposes that are communicated to the data subject (the individual to whom the information refers - the owner of the personal data), which will become binding and should guide the processing.

Adequacy: Ensure that the processing is compatible with the defined purposes.

Necessity: Limit the processing to the minimum necessary to fulfill the purposes, avoiding excessive collection and/or scope of personal data processing.

Free access: Preserve the data subject's right to access information easily and freely about the processing, including its manner and duration, as well as the entirety of their personal data.

Data quality: Ensure accuracy, clarity, relevance, and up to date of the data to fulfill the purpose of its processing.

Transparency: Process information in a clear, precise, and easily available manner - provide clarity about the processing activities and the entities involved while maintaining commercial and industrial secrets' confidentiality.

Security: Commitment to using technical and administrative measures capable of protecting personal data from unauthorized access and accidental or

unlawful situations of destruction, loss, alteration, communication, or dissemination.

Prevention: Implement measures to prevent damages resulting from the processing of personal data.

Non-discrimination: Under no circumstances engage in processing for unlawful or abusive discriminatory purposes.

Accountability and transparency: Demonstrate the adoption of effective measures and provide evidence of compliance with personal data protection regulations, including the effectiveness of these measures.

Any processing of personal data must adhere to these principles, both by our employees and executives, as well as our partners.

In case of doubt, before proceeding with any processing, immediately contact your manager or business contact, or even the data protection officer of FIELO, to ensure compliance with this policy and the law.

Legal Basis for Personal Data Processing

The processing of personal data must be carried out in accordance with the legal basis and purposes defined in the LGPD, in strict compliance with the principles.

In relation to FIELO employees:

In the employment and internship relationship, personal data is processed for the execution of the contract and compliance with legal and regulatory obligations associated with it. This includes sharing data with authorities as well as contracted companies, both to facilitate the operationalization of payment activities and human resources management, and to provide benefits.

Due to the contractual agreement, sharing data with clients and partners is also necessary for fulfilling obligations, and it is based on legal compliance.

Personal data processing may also be used to serve Fielo's legitimate interests, such as granting access to third-party websites and enforcing third-party policies. It is important to remember that it is everyone's responsibility to focus on the prevention, detection, and investigation of illegal or illegal activities, in order to allow the company's operations to run smoothly while maintaining confidentiality and information security, or to exercise rights on a regular basis in judicial, administrative, or arbitral proceedings.

In relation to FIELO partners:

Regarding commercial relationships, the parties should clearly define the roles of each company in the contract to be entered into, without prejudice to the commitment of partners to comply with the LGPD and any other laws related to data protection and privacy. This includes, but is not limited to, the adoption of suitable and effective technical and administrative security measures for the protection of personal data.

Furthermore, all those who work in partnership with FIELO, acting as data processors, must comply with the law and ensure the security of all personal data to which they have access. In this regard, article 42 and subsequent articles of the LGPD state that a data processor who fails to comply with lawful guidelines imposed by FIELO (the Data Controller) will be held accountable in the same way as the controller, and may be subject to civil, administrative, and criminal liability for improper handling of the data.

It is established as a contractual premise that partners must comply with the applicable legislation on the protection of personal data and the provisions contained in this policy. The contracting party is responsible for informing the supplier/partner of this policy.

Consent

In cases where the legal basis is consent, FIELO will clearly and unequivocally request the approval, in writing, from the data subject for the processing of their personal data, while ensuring the right to revoke consent.

Preservation of Life and Health

Personal data may be processed for the protection of the life, health, or physical integrity of the data subject or third parties, such as in cases of atypical situations caused by the COVID-19 pandemic.

Sensitive Personal Data

The processing of sensitive personal data will be done with even greater rigor and caution. This refers to a type of personal data that involves racial or ethnic origin, religious beliefs, political opinions, union membership, or data related to health, sexual life, genetic or biometric data when linked to a natural person.

In case of sensitive personal data, the processing will be conducted in accordance with the legal basis, with even greater transparency and restricted access to such data, reinforcing the principle of non-discrimination.

Rights of Data Subjects

As a data subject, you have several rights, with a particular emphasis on the duty of transparency of the Data Processing Agents - those responsible for the processing of personal data.

The data subjects have the right to know how the processing is carried out and can request the following:

- I - Confirmation of the existence of processing.
- II - Access to the data.
- III - Correction of incomplete, inaccurate, or outdated data.
- IV - Anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data.
- V - Portability of data to another service or product provider, upon express request, in accordance with the regulations of the national authority, while respecting commercial and industrial secrets.
- VI - Personal data deletion carried out with the agreement of the data subject.
- VII - Obtaining information about public or private entities with which FIELO has shared the data.
- VIII - Information about the possibility of not providing consent and the consequences of refusal.
- IX - Revocation of consent.

The data subject can also request confirmation of the processing, and a simplified report can be provided in a more expedited manner. If the individual is interested in a comprehensive statement, it will be issued clearly, indicating the origin of the data, the absence of a record, the criteria used, and the purpose of the processing, while respecting commercial and industrial secrets. The requested information will be provided within fifteen days or within the timeframe regulated by the National Data Protection Authority - ANPD, starting from the date of the request.

Such information can be provided, as chosen by the data subject, either electronically, securely, and reliably or in printed form.

To exercise these rights, the individual can send an email to the privacy team, coordinated by the data protection officer. All processing of personal data is regulated and overseen by the National Data Protection Authority - ANPD.

As there are no infallible or inviolable security systems, FIELO will act in compliance with the law, seeking the security of personal data. FIELO is not responsible for any damage, loss, or information loss to the data subject caused by third-party actions, as well as in cases of fortuitous events or force majeure.

Storage of Personal Data

The storage of personal data will be done after the contract period, and revocation will be respected, WITHOUT PREJUDICE to FIELO's right to retain the data due to any administrative, judicial, or arbitration proceedings, as well as legal and regulatory obligations and rights preservation.

Subsequent processing will always be carried out in compliance with the law.

Responsibility of Data Subjects

The data subject agrees and guarantees that the personal data provided is true, accurate, complete, and up to date, and assumes responsibility for any false, excessive, or inaccurate information provided, as well as for any direct or indirect damages caused to FIELO or third parties as a result.

It is hereby understood that failure to provide accurate personal data and/or incomplete provision may prevent FIELO from providing all benefits related to such data to the respective data subject.

In the event of any deviations from compliance with this policy, it is the duty of all individuals to report such incidents or suspicions to FIELO, whether or not they choose to identify themselves.

Regarding direct employees of FIELO, failure to comply with the guidelines outlined in this document may result in disciplinary measures against those who fail to comply, in accordance with the severity of the violation. Similarly, partners will be duly held responsible and subject to punishment, including in cases of failure to fulfill their duty to report.

The commitment of partner employees of FIELO is fundamental to the sustainability of our business.

Data Protection Officer of FIELO

The Data Protection Officer will act as the focal point for the National Data Protection Agency (ANPD) and Data Subjects and will provide assistance in implementing a culture of privacy and data protection within the company.

In case of any doubts regarding this policy or any topic related to privacy and data protection, including out-of-court matters and the creation of new products and/or processes, please contact the Data Protection Officer of FIELO:

- E-mail: privacy@fielo.com
- Local: Rua Visconde de Pirajá, 66, Sobreloja A, Ipanema, Rio de Janeiro – RJ, 22410-000 – Brazil
- 10000 Highway 55 – Minneapolis, MN 55441 – EUA

Changes to the Privacy Policy

FIELO may change the content of this policy at any time, according to its purpose or necessity, including for the adaptation and legal compliance with applicable laws or regulations. It is your responsibility to review this policy whenever you access our platforms. If there are updates that require a new consent collection, you will be notified through the contact channels you provided.

If any provision of this policy is deemed inapplicable by a data authority or court, the remaining conditions will remain in full force and effect.

Applicable law and jurisdiction. This policy will be interpreted according to Brazilian legislation, in the Portuguese language, and the courts of your domicile will be elected to resolve any disputes related to this document, except for specific jurisdiction provisions, personal, territorial, or functional, established by applicable law.