



## PRIVACY POLICY

This privacy policy is designed to inform the Data subjects who have their personal data processed by **FACILITA INSTITUIÇÃO DE PAGAMENTO S/A**, ("We", "us" or "FacilitaPay") in connection with the use of its Services.

FacilitaPay has a robust compliance program that, in addition to other objectives, is committed to adopting rules and guidelines for the processing of personal data of its customers, suppliers or third parties, in accordance with the applicable legislation, in this case more specifically the Brazilian General Data Protection Regulation (Brazilian Law No. 13,709/2018 or "LGPD").

It should be noted that all collection, treatment, and storage of personal data made by FacilitaPay always observes the purposes informed in the collection, as well as the principles of minimization of data collection, transparency, and confidentiality.

This policy should be read carefully, since, when hiring the services of FacilitaPay, or accessing its virtual portal, it is authorized to treat your personal data as described herein.

After reading this Privacy Policy, if doubts persist, in case of complaints, request for information, or if you want to exercise your rights related to your personal data, the appropriate service channel is by e-mail [hello@facilitapay.com](mailto:hello@facilitapay.com).

## DATA COLLECTED AND PURPOSE

In order for FacilitaPay to operate its services in compliance with legal requirements, it is necessary to process the personal data of its customers / business partners, and third parties. The data collected depends on the type of relationship that the Data subject will have with FacilitaPay and in all cases we guarantee that only the data necessary for compliance with the Brazilian law will be collected.

FacilitaPay may collect personal data from the following Data subjects in the following situations:

DATA SUBJECT	DATA	PURPOSES
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Potential clients	Name and e-mail.	Preliminary procedures related to a contract to which the data subject is a party, at the request of the data subject.
Business Partners	Name, official document with photo, address, telephone, e-mail, profession, date of birth, bank details, among other data related to the provision of the services to be contracted.	Execution of contract or preliminary procedures related to a contract to which the holder is a party, at the request of the data subject;  for compliance with legal obligation;  guarantee of fraud prevention and security of the holder, in the processes of identification and authentication of registration in electronic systems.
Potential customers, business partners or third parties that may access the company's website	Location; Browser type; pages viewed; registration and login data; Internet protocol (IP) address, average time spent, date and city of access to the platform.	Improvement of site operation, functionality and performance measurement;  Content targeting;  Performing statistical analyses regarding the use of our site.



It should be noted that FacilitaPay may receive data from its customers through software that performs checks such as fraud prevention, identity and other "Know Your Client" practices that we need to perform on our clients' representatives to comply with legal obligations inherent to the activities of the company.

## **PERSONAL DATA SHARING**

FacilitaPay, due to its services, may share personal data with its business partners, especially financial institutions, fraud prevention companies, government authorities/agencies, auditors, and others, always keeping in mind the legal limits established by the Brazilian General Data Protection Law (LGPD) and other legislation applicable to the treatment.

We may also share your personal data to comply with a legal obligation, to guarantee the rights of the company, customers or third parties and to protect legitimate interests.

It should be noted that FacilitaPay requires those who receive personal data to comply with Brazilian laws.

## **INTERNATIONAL TRANSFER**

FacilitaPay may also transfer personal data internationally due to the nature of its services. All transfers, regardless of where the data will be transferred, will be made in accordance with this policy, respecting applicable laws.

We are concerned to transfer only to commercial partners / third parties located in countries that have an adequate degree of data protection or that agree to comply with applicable Brazilian laws through contracts.

## **RETENTION PERIOD AND TERMINATION OF DATA PROCESSING**

FacilitaPay keeps the personal data only for the time necessary for the fulfillment of the purposes for which the data were collected, as well as for the fulfillment of the contractual obligations, as agreed in each specific case, and the obligations established in the law/rules applicable to the activities of the company.



The retention period of the personal data will depend on the nature and sensitivity of the personal data, the potential risk of damage resulting from the unauthorized use or disclosure of the personal data. When certain data is no longer necessary for the performance of a particular purpose, it will be deleted or subject to anonymization.

## **RIGHTS OF THE DATA SUBJECT**

The Data subject has the right to obtain from FacilitaPay, regarding the data processed by it, at any time and upon request through the company's communication channels:

I - Confirmation of the existence of treatment and access to your data processed by FacilitaPay. The Data subject may request information about the processing and sharing of their personal data.

II- Correction of your incomplete, inaccurate or outdated personal data;

III – Anonymization, blocking or elimination of unnecessary, excessive or processed data in non-compliance with the provisions of the LGPD;

IV - Portability of data, upon express request and observed the commercial and industrial secrets;

V - Deletion of your personal data processed with your consent, which are no longer necessary or relevant for the provision of the services. In this case, we will verify if FacilitaPay has no other purpose for storing this data;

VI- The Data subject may not provide his consent when it is required, being aware that it is possible that FacilitaPay may not offer certain services adequately;

VI - The Data subject may also oppose the treatment carried out on the basis of one of the cases of waiver of consent, in case of non-compliance with the provisions of the Brazilian General Data Protection Law (LGPD). In this case, FacilitaPay shall demonstrate legitimate reasons for processing your personal data.

VII - The Data subject has the right to request the review of decisions taken solely on the basis of automated processing of personal data affecting their interests, including decisions aimed at defining their personal, professional, consumer and credit profile or aspects of their personality.



FacilitaPay undertakes to provide, whenever requested, information in a clear, detailed, quick, and free of charge to the Data subject regarding personal data processed by us. If the request of the Data subject is excessive, we may not comply with the request, indicating the reasons in a reasoned way for this, living up to the guidelines of the Brazilian National Data Protection Authority, upon prior communication.

## **DATA STORAGE AND SECURITY MEASURES**

FacilitaPay has security, technical and organizational measures necessary to protect the personal data. These measures are accurately seen in our Cybersecurity policy which can be accessed in the Compliance Program part of our website.

In short, FacilitaPay's Cybersecurity policy aims to mitigate risks of destruction, accidental or unlawful loss, alteration, unauthorized disclosure or access or any other form of illegal or unauthorized treatment.

## **COOKIES**

Cookies are small text files used by websites to store, on a temporary basis, the User's browsing information, such as the pages visited by the User, Internet protocol (IP), their location, and other internet related to browsing information.

Cookies have a few types of classifications. Firstly, we can classify them in two:

- a) **Proprietary Cookies**, meaning that they are used by FacilitaPay's website or by third parties on our behalf; or
- b) **Third Party Cookies**, which are cookies used by third parties on the FacilitaPay Site, such as those used by Google. These cookies collect information from the User to later disclose advertising materials.

In addition, depending on their purpose, cookies can be classified as:

**Necessary Cookies:** that are necessary for the proper functioning of FacilitaPay's website and do not identify the User. These cookies cannot be disabled since they may even make it impossible to use the site.



**Functionality Cookies:** are responsible for enabling the customized functionalities of the site. These cookies identify the user and can be deactivated, with prejudice to some functionalities.

**Advertising cookies:** are responsible for delivering customized content. These cookies identify the user and may be disabled.

**Performance Cookies:** for collect and store anonymous information, for example, about the pages accessed; volume of visits; among other useful information for improvements in our site. These cookies identify the user and can be deactivated, with impairing the operation of the site.

## **COOKIE MANAGEMENT**

As a user of our site, you have the right to accept or not accept the cookies on our page and even configure your browser to accept or refuse cookies. As cookie management may vary depending on your browser, we have provided below the cookie management link of some browsers:

[Google Chrome](#)

[Safari \(iPhone\)](#)

[Safari \(Mac\)](#)

[Mozilla Firefox](#)

[Samsung Internet \(Mobile\)](#)

[Microsoft Edge](#)

[Internet Explorer](#)

[Opera](#)

Note that the addresses may vary depending on your browser version, but you can go to your browser's "help" page for more information.



## **REPORTING CHANNEL**

In case of doubt or to exercise your right as Data subject there are two contact options:

e-mail to: [legal@facilitapay.com](mailto:legal@facilitapay.com)

Form on our website:

<https://i3dvdja9a3o.typeform.com/fpay-denuncia?typeformsource=www.facilitapay.com>

We are always available to provide information and clarify doubts!

## **APPLICABLE LAWS**

Brazilian Law No. 13.709/2018

## **UPDATES**

We may, from time to time, make changes to this Policy. Eachtime this Privacy Policy is changed, these changes will be valid, effective, and binding after the new version is disclosed on the FacilitaPay website.

Last updated: May 3<sup>rd</sup>, 2023.