

# Privacy Policy

## INTRODUCTION AND OBJECTIVES:

Through this **Privacy Policy**, the Arquivar network describes how it collects, accesses, and processes the information made available by our clients, suppliers, partners, and the general public who have access to our services or who, in any way, maintain or request a relationship with Arquivar, in accordance with the General Data Protection Law (Law No. 13.709/2018 – “LGPD”) and other applicable sector-specific legal standards, such as Federal Law No. 12.965/2014 (Brazilian Internet Civil Framework).

The purpose of this data processing is to enable the provision of services, compliance with legal obligations, and adherence to other regulations related to privacy and data protection.

This Policy sets out the technical, operational, and procedural standards employed with respect to privacy and the protection of Personal Data, as well as clarifies the purposes for which Arquivar processes the information shared with it. In addition, Arquivar maintains **internal procedures and specific policies** that detail data processing, information security, incident management, and the data lifecycle. These documents are for internal and institutional use and are aligned with best governance and compliance practices.

By browsing this Website or interacting with Arquivar in any way, you agree to the processing of Personal Data as set forth in this Privacy Policy.

Recognizing the importance of ensuring the privacy and protection of data and information, Arquivar adopts best institutional practices, including periodic training for its employees and franchise network, to achieve the highest levels of compliance with applicable legislation, protecting the fundamental right to personal data protection provided for in the Brazilian Federal Constitution and reinforced by Law No. 13.709/2018 (LGPD).

## SCOPE:

This Policy applies to the entire Arquivar network, third parties, clients, suppliers, employees, trainees and interns, and franchisees, all of whom must be fully aware of the provisions herein. Arquivar provides in this Policy the essential and relevant details regarding the measures used in the processing of personal data, not only in relation to digital platforms and websites, but also in any form of communication and

commercialization of its products and services, including the collection, storage, use, or any other data processing operation carried out.

## TRAINING:

Arquivar maintains an Institutional Data Protection Awareness and Training Program applicable to employees, interns, franchisees, and partners involved in data processing.

- This training is conducted through the Arquivar University Platform and provides users with a certificate of completion.

Frequency and Content:

- **Annual Training:** Covers LGPD principles, best practices, security procedures, and legal updates.
- **Onboarding Training:** Introduction to the privacy policy and role-based responsibilities.
- **Specific Training:** For teams that handle sensitive data or interact directly with data subjects.

Assessment and Records:

- Participation in training is recorded, and effectiveness is monitored through compliance indicators and internal audits.

## FRANCHISES:

Arquivar franchises must strictly follow the guidelines defined by Arquivar Franchising regarding the adequacy of their internal processes, institutional training of teams, commercialization of Arquivar Products and Services, and consumer protection. Each franchisee is responsible for full compliance with the LGPD and applicable legislation.

## DEFINITIONS:

- **Controller:** A natural or legal person, public or private, responsible for decisions regarding the processing of personal data.
- **Processor:** A natural or legal person, public or private, who processes personal data on behalf of the Controller.

- **Data Protection Officer (DPO):** A person appointed by the Controller or Processor to act as a communication channel between the Controller, data subjects, and the National Data Protection Authority (ANPD).
- **Personal Data:** Information relating to an identified or identifiable natural person.
- **Sensitive Personal Data:** Personal data concerning racial or ethnic origin, religious belief, political opinion, trade union membership or affiliation with religious, philosophical, or political organizations, health or sex life data, genetic or biometric data when linked to a natural person.
- **Data Subject:** A natural person to whom the personal data being processed refers.
- **International Data Transfer:** Transfer of personal data to a foreign country or international organization of which the country is a member.
- **Processing:** Any operation performed on personal data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.
- **Shared Use of Data:** Communication, dissemination, international transfer, interconnection of personal data, or shared processing of personal data databases by public bodies and entities in the performance of their legal duties, or between public and private entities, with specific authorization.

## **PURPOSE OF PROCESSING:**

In general, Arquivar may collect data and information as Clients purchase or subscribe to Products (licenses for use of Arquivar software) and Services, or to communicate with Clients, provide support, and conduct business operations legitimately with the general public that contacts us through our website and other communication channels. Arquivar strictly complies with legal requirements on Data Protection, observing necessity, proportionality, adequacy, purpose limitation, confidentiality, and data retention provisions.

Any sharing of information is carried out strictly to the extent necessary, in accordance with pre-established provisions, and follows privacy and confidentiality standards in compliance with applicable Data Protection laws and regulations.

Arquivar uses the collected information for the following purposes:

- Continuous improvement of products and services;
- Compliance with legal requirements;
- Customer service and support;

- Communication and marketing activities;
- Promotion of campaigns;
- As a Processor, to use data in accordance with the Controller's instructions (Clients);
- As a Controller, to collect data provided directly by the Data Subject.

## **HOW DO WE PROTECT YOUR PERSONAL DATA?**

Arquivar implements protection against unauthorized access in its systems, as well as physical and logical security measures aligned with best data protection practices.

As a Controller, Arquivar ensures the availability, integrity, and confidentiality of Personal Data. The Arquivar network complies with all contractual guidelines defined by Controllers (Clients), with clear allocation of responsibilities.

Arquivar also ensures that data processing agents, employees, franchisees, and external partners are aware of this Privacy Policy and commit to strict confidentiality regarding accessed information, adopting best practices for handling such data.

Finally, Arquivar maintains an institutionalized and continuously updated data governance and protection policy for its employees, franchise units, and partners.

## **ARQUIVAR CLIENTS:**

The Products (licenses for use of Arquivar software) and Services offered to Clients are governed by a contract between Arquivar and the Client. Arquivar processes Personal Data solely for the purpose of offering and providing Products and Services, based on clear consent and lawful purposes established for Personal Data Protection, observing the principles of purpose, adequacy, necessity, free access, data quality, security, non-discrimination, accountability, and diligence.

The Client acts as the Personal Data Controller under the LGPD and is solely responsible for the lawfulness of the processing, including data collection and obtaining any necessary authorizations from Data Subjects, as well as transparency regarding data sharing with Arquivar.

Arquivar acts as a Data Processor, except where the Client is the Processor, in which case Arquivar acts as a sub-processor.

## **DATA PROTECTION OFFICER (DPO):**

Internal controls, oversight, and contact with competent authorities and regulatory bodies are the responsibility of the DPO appointed by Arquivar pursuant to Article 5 of the LGPD.

The Arquivar DPO can be contacted at: [juridico@arquivar.com](mailto:juridico@arquivar.com)

Arquivar will make its best efforts to remain continuously available and transparent regarding data processing within the scope of its Products, Services, and this Website.

## **HOW LONG ARE YOUR PERSONAL DATA RETAINED?**

Arquivar retains personal data only for as long as necessary to fulfill the purposes for which they were collected, in accordance with the principles of necessity, adequacy, and minimization under the LGPD. Processing will end in the following legal situations:

- When the purpose has been achieved or the data are no longer necessary or relevant;
- End of the processing period;
- Request by the data subject, including withdrawal of consent, subject to public interest; or
- Determination by the national authority.

After processing ends, Arquivar may retain Personal Data to: **(a)** comply with legal or regulatory obligations; **(b)** transfer to third parties in compliance with legal requirements; **(c)** conduct studies by research bodies; **(d)** use exclusively by Arquivar, with no third-party access, provided the data are anonymized.

## **Deletion Procedures:**

After the retention period, data will be:

- Securely and irreversibly deleted; or
- Anonymized to prevent identification of the data subject.

Anonymization will follow recognized technical standards, and access to anonymized databases will be restricted to specific purposes, such as internal studies or research.

## **PERIODIC REVIEW AND UPDATE:**

This Policy is effective for an indefinite term and will be periodically reviewed to ensure security and compliance, considering legislative changes, adoption of new technologies, product improvements, and advancements in internal control and compliance practices. It becomes effective upon publication on the website [www.arquivar.com.br](http://www.arquivar.com.br).

### INFORMATION SHARING:

Arquivar may share personal data with third parties only when necessary and based on legal grounds provided by the LGPD, such as consent, legal obligation, contract performance, or legitimate interest.

Your data may be shared with:

- **Partners and suppliers** (for payment processing, email delivery, data hosting);
- Legal authorities (to comply with court orders or applicable laws).
- Arquivar does not sell personal data to third parties.
- Even though Arquivar operates outside Brazilian territory (such as in Bolivia), it does not transfer personal data collected in Brazil outside national territory.

### WHAT ARE MY RIGHTS AS A DATA SUBJECT?

Data subjects have facilitated access to information regarding data processing, which will be provided clearly and transparently, ensuring ownership of their data and fundamental rights to freedom, intimacy, and privacy.

Data subjects may request at any time:

- Confirmation of processing;
- Access to processed data;
- Correction of incomplete, inaccurate, or outdated data;
- Anonymization, blocking, or deletion of unnecessary or excessive data or data processed in non-compliance with the law or this Policy;
- Data portability to another service or product provider, subject to ANPD regulations and protection of trade and industrial secrets;
- Deletion of data processed with consent, except as required by law;

- Information about public and private entities with whom Arquivar has shared data;
- Information about the possibility of denying consent and the consequences thereof;
- Withdrawal of consent.

For security reasons, requests will be processed only after verification of identity, and additional information may be requested for authentication.

**Request Channels:**

Email: [juridico@arquivar.com](mailto:juridico@arquivar.com)

**Response Time:**

Arquivar will confirm receipt within 48 hours and provide a definitive response within the LGPD and ANPD deadlines, typically 15 days, extendable if necessary.

**COOKIE POLICY:**

Information provided by individuals who wish to receive Arquivar advertisements, promotional materials, and news is limited to what is necessary for such communications, in line with adequacy and necessity principles.

Marketing emails include opt-out mechanisms, such as unsubscribe links.

Even after opting out of marketing communications, you may continue to receive important administrative communications related to your relationship with Arquivar.

**PROCEDURES FOR JUDICIAL REQUESTS:**

Judicial requests for records and information will be processed in accordance with Law No. 13,709/2018 (LGPD).

## **PROCEDIMENTOS REFERENTES A SOLICITAÇÕES JUDICIAIS:**

As solicitações judiciais de registros e informações serão processadas nos termos da **Lei 13.709/2018** (LGPD).

## **CONTACT:**

For questions regarding this Privacy Policy, please contact:

**[comunicacao@arquivar.com](mailto:comunicacao@arquivar.com)**

## **LEGISLATION:**

This Policy is governed and interpreted in accordance with Brazilian law, especially Law No. 13.709/2018, regardless of the laws of other states or countries.

## **JURISDICTION:**

The jurisdiction of the data subject's domicile shall be competent to resolve any disputes arising from this document.

## **EFFECTIVE DATE:**

This Privacy Policy has been effective and valid since May 6, 2023, and applies to all personal data processing carried out by Arquivar from that date onward. This version replaces any previously published versions and is fully updated in compliance with the LGPD and applicable regulations.