



## **PRIVACY POLICY AND LGPD COMPLIANCE**

### **SPHP EMPREENDIMENTOS E PRODUÇÃO DIGITAL LTDA**

Updated on January 31, 2026

SPHP Empreendimentos e Produção Digital LTDA ("SPHP", "company", "we", "us", "our"), registered with CNPJ 63.614.792/0001-04, is committed to protecting the privacy and personal data of all data subjects, whether customers, partners, employees or visitors to our services. This corporate Privacy Policy establishes how we collect, use, share, and protect personal data in all our operational activities, including all service brands and products controlled by the company, in accordance with Law No. 13,709/2018 (General Law for the Protection of Personal Data - LGPD) and other applicable regulations.

#### **SCOPE AND PURPOSES**

This Policy applies to all SPHP operations, covering the collection, processing, storage and disposal of personal data in all our services operated by the various brands in our portfolio. The data is processed exclusively for legitimate purposes and informed to the holders, such as the provision of contracted services, compliance with legal obligations, improvement of internal processes and relevant institutional communication.

#### **DATA COLLECTED AND PROCESSING**

We may collect personal data that is essential to the performance of our services, including, but not limited to:

- Identification data (name, CPF, date of birth);
- Contact data (email, telephone, address);
- Financial data (income, debts, investments, credit cards);
- Behavioral data (service preferences, interaction history).

This data is obtained through forms, virtual meetings, electronic communications and documents provided by the holders. We do not collect sensitive data that is unnecessary for specific purposes, and the processing is always based on informed consent, performance of contract or legal obligation.

#### **LEGAL BASES AND SPECIFIC PURPOSES**

Data processing takes place under the following legal bases of the LGPD:

- Contract execution: To provide personalized services;
- Consent: For additional communications or optional sharing;
- Legal obligation: For tax, accounting and regulatory purposes;
- Legitimate interest: For service improvement and fraud prevention.

Purposes, depending on the brand providing the service or product, may include financial analysis, strategic reporting, customer support, and legal compliance. Anonymized data may be used for aggregated statistical analysis.

#### **DATA SHARING**

Personal data is not sold or shared for commercial purposes. Sharing occurs only:

- With data processors (e.g., cloud providers) under confidentiality agreements;
- When required by law or court order;
- For protection of the rights of SPHP or others.

Any international sharing is preceded by an assessment of adequacy according to the LGPD.

#### **SECURITY AND STORAGE**

We have adopted robust technical and administrative measures, including the use of services that use AES-256 encryption, multi-factor authentication, firewalls, and continuous monitoring. Data is stored on globally recognized security servers for a period necessary for the purpose (as defined in a specific contract for each service and product), excluding sensitive data after 90 days from the end of the relationship.

#### **RIGHTS OF DATA SUBJECTS**

The data subject has the right to:



- Confirmation of the existence of processing;
- Access to data;
- Correction of inaccurate data;
- Anonymization, blocking, or unnecessary deletion;
- Data portability;
- Opposition to processing;
- Revocation of consent;
- Sharing Information.

To exercise rights, please contact us through the communication channels available in our service agreements. Requests are processed within 15 business days.

#### **COOKIES AND SIMILAR TECHNOLOGIES**

Our websites use essential cookies for operation and anonymized analytics to improve the experience. You can manage them via browser settings. We do not use cookies for behavioural advertising.

#### **SECURITY INCIDENTS**

In the event of an incident affecting your data, we will notify you within 3 business days, according to the LGPD, informing you of causes, impacts, and corrective measures.

#### **CHANGES TO THE POLICY**

This Policy may be updated. Revised versions will be communicated by email 30 days in advance. Continued use of the services after notice implies acceptance.

#### **APPLICABLE LAW**

This Policy is governed by Brazilian law, with jurisdiction in the District of Rio de Janeiro/RJ.