

INSTITUTIONAL DOCUMENT

PRIVACY POLICY

Version 2

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## I. Introduction and Objective

The purpose of this Privacy and Data Protection Policy ("Policy") is to provide guidance on the guidelines applicable to the privacy and protection of the data of customers, employees, third parties, service providers, suppliers and partners, to which NTConsult Tecnologia e Consultoria Ltda. and NTConsult US, Inc. have access in the exercise of their activities. This policy covers any and all data that is processed by NTConsult, including documents, codes, data or other artifacts, whether referring to legal entities or individuals.

In cases involving data of individuals (personal data), specific rules and precautions also apply to ensure the protection and privacy of this data, as established by laws, regulations and good market practices. In this way, the policy is comprehensive and ensures the protection of all types of data, with special processes for the processing of personal and sensitive data.

The Policy establishes the rules for collecting, using, storing, sharing, and deleting data, ensuring compliance with applicable legislation, such as the General Data Protection Law (LGPD) in Brazil, the General Data Protection Regulation (GDPR) in the European Union, among other relevant standards, and follows the best market practices to ensure the security and privacy of the information processed.

## II. Scope

This policy applies to all members of the Board of Executive Directors ("Administrators"); employees, including outsourced workers, subcontractors, interns and young apprentices ("employees"); and service providers and/or suppliers who have access to NTConsult's personal data.

All professionals who perform services for NTConsult must follow this policy. In the case of professionals allocated to clients, whether in person or remotely, a hierarchy of rules applies. In these cases, the client must provide its privacy and data protection policy, and as a priority, the professionals will follow the rules established by the client.

When there is an overlap of rules, what was defined by the client prevails. In cases where the client's policy does not contemplate a certain rule, the professional will be guided by NTConsult's rules.

If the client does not have or does not share a privacy and data protection policy, the professionals will follow the model established by NTConsult, always ensuring the protection and privacy of the data processed.

## III. Guidelines

### 1. Initial provisions

1.1. This Policy demonstrates NTConsult's commitment to:

1.1.1. Protect the privacy and security of data accessed from customers, employees, third parties, service providers, suppliers and partners during the execution of its activities.

1.1.2. Adopt guidelines that ensure comprehensive compliance with laws, regulations and good practices regarding the protection of personal data.

1.1.3. Promote transparency for personal data subjects and other interested parties about how NTConsult processes such data.

1.1.4. Implement preventive and effective measures to protect personal data against the risks of security incidents.

### 2. Information Subject to the Policy

2.1. This Policy covers:

2.1.1. All personal data provided or collected in the context of the provision of services by NTConsult to its clients.

2.1.2. All personal data of employees, third parties, service providers, suppliers and partners provided or collected in compliance with contractual, legal or regulatory obligations, or any other relevant personal data.

### 3. Data Collected

3.1. The personal data collected varies according to the relationship with NTConsult and is classified into the following groups:

3.1.1. Personal data provided by the data subject: Includes, but is not limited to, full name, tax id, date of birth, marital status, nationality, place of birth, parents names, beneficiaries, profession, company data, full address, bank details, e-mail, telephone number and biometric data.

3.1.2. Personal data collected from the use of services: Related to the services provided by NTConsult and shared with third parties as necessary.

3.1.3. Personal data collected from the use of websites and applications: Includes access and navigation information, device identification (date, time and IP) and geolocation.

3.1.4. Personal data collected in media and social networks: Arising from interactions in NTConsult's media and social networks.

3.1.5. Personal data of minors under 18 years of age: Collected and processed in accordance with article 14 of Brazilian Law 13,709/2018 and pertinent legislation.

3.1.6. Sensitive data: Includes information on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data regarding health or sex life, genetic or biometric data, when linked to a natural person. NTConsult processes sensitive data only when strictly necessary, arising from the nature of the work and in accordance with applicable legislation. We prefer, whenever possible, to avoid access to this data, keeping the processing restricted and secure, and ensuring the protection and privacy of the holders.

#### **4. Form and Purpose of Collection**

4.1. The data is collected in an ethical and legal manner, stored in secure and controlled environments for the period required by law. NTConsult undertakes to maintain the secrecy and confidentiality of all personal data, except in the cases provided for in this Policy or by law.

4.2. The information collected is used to: (i) provide services; (ii) expand product and service offerings; (iii) personalize and improve products and services; and (iv) prevent fraud and financial loss.

4.3. NTConsult may process personal data to comply with legal or regulatory obligations, or for the regular exercise of rights in judicial, administrative or arbitration proceedings.

4.4. Personal data may be processed on the basis of legitimate interest, within the expectations of the data subject and without prejudice to his/her fundamental rights and freedoms.

4.5. Sensitive personal data may be processed to prevent fraud or carry out research, ensuring anonymization when possible, and always with the consent of the data subject.

4.6. Information collected may be used for advertising purposes, respecting the prior consent of the data subjects.

4.7. Information may be used for profile analysis and risk management in the offer and contracting of products and services.

4.8. Information is used to comply with legal and regulatory obligations, such as auditing, compliance, prevention of money laundering and terrorist financing, reporting to the Federal Revenue Service and other competent bodies.

#### **5. Relationship with third parties**

5.1. Third parties' access to the information collected by NTConsult occurs exclusively for the purposes informed in this Policy and within the limit necessary for their activities. Such access may include, but is not limited to:

5.1.1. Clients who hire information technology professional allocation services.

5.1.2. Providers of technological infrastructure and data hosting services.

5.1.3. Information security and data protection companies.

5.1.4. Service providers subcontracted by NTConsult.

5.1.5. Strategic Partners and Technology Providers.

5.1.6. Independent auditors and specialized consultancies.

5.1.7. Financial institutions and payment processors, where necessary.

5.1.8. Collection agencies and credit protection services, when necessary.

5.1.9. Competent regulatory bodies.

5.2. The use of the information collected is made exclusively for the purposes informed in this Policy.

5.3. NTConsult may share information in aggregate form with its partners, as long as it is not personally identifiable.

5.4. New purposes of use of collected information will be communicated directly to the data subjects, and new consent will be obtained when necessary.

5.5. Some data transfers may take place outside Brazil, to countries that provide an adequate degree of protection or with the adoption of guarantees and safeguards.

5.6. All third parties shall maintain the confidentiality of the information and use it exclusively for the permitted purposes.

5.7. Contracted third parties must comply with all obligations of this Policy.

## 6. Information Security

6.1. NTConsult adopts security processes compatible with the sensitivity of the information collected.

6.2. New procedures and technological improvements are continuously implemented to protect data.

6.3. Personal data is encrypted and anonymized when necessary.

6.4. Access to personal information is restricted to specific and essential persons.

6.5. Employees and third parties must maintain the absolute confidentiality of the information accessed.

6.6. NTConsult adopts institutional measures for the protection of personal data.

6.7. Access to the collected information is restricted and misuse subjects those responsible to sanctions.

6.8. Systems are structured to meet requirements for security, transparency and good practices.

## 7. Rights of Data Subjects

7.1. NTConsult guarantees data subjects the following rights:

- Confirmation of the existence of treatment;
- Access to data;
- Correction of incomplete, inaccurate or outdated data;
- Anonymization, blocking or deletion of unnecessary or excessive data;
- Data portability upon request;
- Deletion of data processed with consent;
- Information about entities with which the data has been shared;
- Information about the possibility of not providing consent and the consequences of refusal;
- Revocation of consent.

7.2. Part of the rights may be exercised directly by the data subject, while another part requires a request to the Privacy and Data Protection area.

7.3. The channel for requests is e-mail: [infra@ntconsult.com.br](mailto:infra@ntconsult.com.br). The DPO can be contacted via email: [diogo.furtado@ntconsult.com.br](mailto:diogo.furtado@ntconsult.com.br).

## 8. Cooperation with regulatory authorities

8.1. Personal data may be disclosed in compliance with laws or court orders, notifying the data subjects when possible.

## 9. Data Disposal

9.1. NTConsult adopts a rigorous and responsible approach to data disposal, ensuring that the entire process takes place in a secure manner and in accordance with the authorizations received and the established purposes. Below, we highlight the principles that guide data disposal:

- **Access and Treatment with Authorization:** We only access data for which we have received explicit authorization. The processing of this data is carried out strictly in accordance with the purposes previously agreed with the data subject.

- **Sharing with Authorization:** Data is only shared with third parties with the express authorization of the data subject, ensuring that all parties involved are aware of and agree with the sharing.
- **Retention for the Authorized Period:** Data is kept only for as long as necessary to fulfill the purpose for which it was collected. Once this purpose has been achieved, or the authorized period has expired, we begin the disposal process.
- **Safe and Effective Disposal:** When data loses its purpose, we dispose of it safely and effectively. This includes the use of methods that ensure the complete erasure of the data, making it impossible to recover.
- **Auditable Logs:** We keep detailed and auditable records of all data deletions performed. These records serve to preserve legal interests and provide transparency and traceability of the disposal process.
- **Preservation of Legal Interests:** Even after disposal, we ensure that legal interests are preserved by complying with all applicable regulatory and compliance obligations.

These practices aim to ensure that the data lifecycle is managed ethically and responsibly, protecting the privacy of data subjects and ensuring compliance with current legislation.

## 10. Changes

10.1. This Policy may be amended at any time to adapt to laws, regulations or NTConsult's needs, with disclosure on the <https://www.ntconsult.com.br/> website. Continued use of the services after changes will be deemed acceptance of the new terms.

## IV. Consequence Management

Employees, suppliers or stakeholders may report deviations from the Policy to the Ethics Channel in <https://ntconsult.com.br/denuncias/>. Failure to comply with the guidelines will result in accountability measures in accordance with the severity and internal regulations, including the leadership and Executive Board. Incidents involving personal data must be reported to the DPO.

## V. Responsibilities

### 1. Administrators, Employees and Third Parties:

- Observe and comply with this Policy, calling the DPO when necessary.
- Act ethically and report security incidents involving personal data in a timely manner to the responsible areas.

- Understand the importance of information security and privacy in their daily activities and participate in awareness and education programs, contributing to the implementation, maintenance and continuous improvement of privacy practices.

## 2. Compliance, Prevention and Security:

- Comply with the guidelines established in this Policy, keep it updated in accordance with legal and regulatory changes or new directions from NTConsult, and clarify doubts regarding its content and application.

## 3. Privacy and Data Protection Forum:

- Advising the Executive Board on privacy and data protection matters, aiming at compliance with applicable laws and regulations, especially Law No. 13,709/2018 (LGPD).
- Promote the relevance of privacy at NTConsult, acting as ambassadors of the topic in their areas and conducting periodic critical analysis of the system and related activities.

## 4. Executive Board:

- To resolve on the resources necessary for the implementation, maintenance and improvement of the Information Security and Privacy Management System, as recommended by the Privacy and Data Protection Forum.
- Perform periodic critical analysis of the system, appreciating results, metrics and indicators, and promote the relevance of privacy for all employees.

## 5. Suppliers:

- Observe and comply with the best practices of information security and privacy contractually required during the relationship with NTConsult.
- Act ethically and responsibly, informing the responsible areas in a timely manner about any security incident involving personal data and which may entail relevant risks to the data subjects.

## 6. Technical Board and Governance Sector:

- Clarify doubts regarding the legislation and regulations relevant to the topic described in this Policy.