



PRIVACY POLICY

INTRODUCTION

Your privacy matters to KLA and we are committed to protect it. For such reason, we have created this policy ("Privacy Policy") aiming to demonstrate, in a clear and transparent way, how we may use your personal data and information ("Personal Data") when You access our website ("Site").

For purposes of this Privacy Policy, "Users" or "You" are all the individuals that, somehow, have contact with KLA's Site.

In the section below we describe how we may use your Personal Data. In case You have any doubts, concerns, requests or comments, please, contact us through one of the channels available in the "Contact" Section. We will be at your disposal to better clarify any doubts.

This Privacy Policy will become effective on September 1st, 2019.

COLLECTED INFORMATION AND USE

For purposes of extracting information about navigation and visitation in our Site, that is, information about frequency, interaction, accessed content, sources of access and other specific information about visitation of our Site, we may collect certain necessary Personal Data, such as IP number, approximated location, browser's version, date and time of access and duration of the session.

In addition to the **essential cookies** (see Cookies' Section), we also use a tool known as Google Analytics ("Tool"). We extract from this tool:

- Number of Users that accessed the Site



- Number of Sessions (Site's visits by the Users)
- Rejection's rate (when Users access and quickly leave the Site without any interactions)
- Duration of the session
- Active Users
- Source (when the User access the Site by typing the Site's address or through third-party links)
- References (source website that brought the User to our Site)
- Site's webpages accessed by the Users
- Devices used to the access the Site (computer, mobile phones, tablet, etc.)
- Users' location (limited to the city)
- Time of access
- Frequency (if that User already accessed our Site previously)

KLA respects your privacy and does not use or share Personal Data that may identify a User without its consent or without a proper legal ground, according to the applicable law, including the following: (i) legal or judicial requirement for processing the Personal Data; (ii) KLA's exercise of its rights; and (iii) KLA's legitimate interest to process the Personal Data.

We commit ourselves to disclose only the minimally necessary information to attend the purposes of the processing of the Personal Data. In any situations involving the use or sharing of your Personal Data herein described, your rights as a data subject will always be respected in accordance with the legal provisions and principles involved in the processing of the Personal Data.

THIRD PARTIES' LINKS AND OUTSOURCED TOOL



We may include, in our Site, links for external domains of third parties, as an example, links to our LinkedIn profile ("Third Parties' Links"). We do not have any control on the processing of Personal Data performed through Third Parties' Links, thus, we may not assume any responsibility in case You opt to access some of these Third Parties' Links. Therefore, we recommend that, when deciding to access any Third Parties' Links, You always consult their respective privacy policies.

In view of the use of the Google Analytics Tool in our Site, to provide an easy access to You on information about the use of your Personal Data performed by the Tool, please see below certain links that will direct you to the policies applied by the Tool. Note that the Tool is accountable for any data processing activities related to your Personal Data performed differently from what is established in the Section "Collected Information and Use".

Useful information about the processing of Personal Data by Google Analytics:

<https://policies.google.com/technologies/partner-sites?hl=pt-BR>

<https://support.google.com/analytics/answer/6004245>

COOKIES

Cookies are small text files that store basic information and that are installed in Users' computers when visiting a website. Once installed and not expired, these cookies are sent back to the website when the User visits it again.

We use in our Site exclusively:

Essential cookies for Site navigation, that may collect basic information, such as: localization, date and time of access, access provider, device used to access and MAC address.



Analytical cookies, related to the Tool that collects the information, as informed in the Section “Collected Information and Use”.

SECURITY

In respect to your privacy and considering the safety of your Personal Data, we adopt reasonable standards of information protection and security.

PRIVACY POLICY MODIFICATION

We may, whenever necessary, modify this Privacy Policy and You can always access any updated version in our Site.

It is important for You to have knowledge of the terms herein established when using our Site.

CONTACT

In case You wish to clarify any doubts, to discuss any issue or send us any suggestion and/or complaint related to the use of your Personal Data and/or to our Privacy Policy, feel free to contact us through the e-mail address tliberman@klalaw.com.br or the phone number +55 11-37998114.