



## PRIVACY POLICY

Version updated on November 16, 2020.

### INTRODUCTION

KLA Advogados (“KLA”) cares about and is committed to respect your privacy, complying with all applicable legislation, including, without limitation, Law No. 13,709 of August 14, 2018 (“LGPD”). Accordingly, we have prepared this policy (“Privacy Policy”) with the objective of demonstrating, in a clear and transparent way, how we may use the Personal Data of users (“Users”) of our website (“Site”), clients (individuals), as well as partners or shareholders (individuals) and representatives of legal entities served by KLA (“Clients”).

For purposes of this Privacy Policy, “Data Subject(s)” or “You” are all individuals who in any way have contact with KLA, including Users and Clients. Personal Data, Processing, Controller, Processor and other terms initiated in capital letters and not otherwise defined in this Privacy Policy will have the meanings assigned to them in the LGPD.

If you have any questions, requests, concerns or comments, please contact us using the channel indicated in the Contact Section. We will be available to answer your questions as promptly as possible.

### INFORMATION ABOUT PERSONAL DATA COLLECTED

KLA collects Personal Data when providing legal services to Clients. We may also collect Personal Data as provided by Users when using our Site or when there is an interaction with us on any social media and we may also automatically collect Personal Data from cookies, as described in the Cookies Section.

We collect information or Personal Data about You or that can be used to identify You, such as your name, company name, Your title, address(es), phone number(s), e-mail address(es), business affiliations, preferences and contact interests.

We may also collect Personal Data about You from other sources, for example, from your business partners, representatives, specialists or from a publicly available source. If You provide us with Personal Data about other individuals (such as one of your employees or a business partner), You acknowledge that You are authorized to disclose this Personal Data to us and that, without taking any further action, we may collect, use,



store and disclose such Personal Data as described in this Privacy Policy as if this person had disclosed such Personal Data to us directly.

## **LAWFUL BASIS AND PURPOSES OF PERSONAL DATA PROCESSING**

KLA respects your privacy and does not use or disclose Personal Data that can identify any Data Subject without an adequate lawful basis under the terms of the LGPD or other applicable law. We may Process the Personal Data collected by KLA for the following purposes:

- **Execution of contract or preliminary procedures:** We will Process your Personal Data in connection with contractual and pre-contractual activities with You to provide you with legal advisory or litigation services, which include, without limitation, the draft, review or negotiation of contracts, draft of responses to consultations, memoranda, legal opinions, the participation in judicial, administrative or arbitration proceedings, the participation in meetings, videoconferences or conference calls, the intermediation of the Client's relationship with government authorities and agencies, obtaining necessary licenses, authorizations and permissions; assistance in bidding; coordination of merger, acquisition or capital market transactions.
- **Legitimate Interest:** We may Process some of your Personal Data to send institutional communications, memos or newsletters with topics of interest, in addition to invitations to events or seminars, and to conduct satisfaction surveys and feedback on our services and initiatives. If you do not wish to receive this type of communication, you can ask to be excluded from our contact list by clicking on the unsubscribe link sent via email. It is also in KLA's legitimate interest to verify, through cookies, the browsing habits of Users on the Site to improve the performance of the Site and measure its audience based on statistical assessments of the accesses and use of the Site, its features and functionalities.
- **Compliance with legal obligations and regular exercise of rights:** We will Process Personal Data as necessary to fulfill a legal or regulatory obligation to which we are subject. This includes the Processing of Personal Data for the regular exercise of rights in judicial, administrative or arbitration proceedings and compliance with any government reporting obligations and requests.



We undertake to disclose only the information minimally necessary for the purposes required by the Processing of your Personal Data to be achieved. Whenever we use or disclose your Personal Data as described in this paragraph, your rights as Data Subject are protected, always observing the other legal provisions and principles involved in the Personal Data Processing described herein.

## COOKIES

To extract information about visits and navigation on our Site, that is, to analyze information such as the frequency of visits, interaction, content accessed, forms of access and other information regarding the visitation of our Site, we may collect information necessary for this purpose, such as IP number, approximate location, version of your browser, date and time of access and session time, from cookies and other identification technologies ("cookies").

Cookies are small text files that store basic information and are saved on the computers of users who visit a website. Once installed and not expired, these cookies are forwarded back to the website each time users visit the website again.

We use on our Site solely and exclusively:

The **necessary cookies** for navigation on the Site that can collect basic information such as: IP, geolocation, date and time of access, access provider, device used and Mac Address;

**Analytical cookies**, which collect information such as IP number, approximate location, version of your browser, date and time of access and session time, by a tool called Google Analytics ("Tool").

We extract the following information from the Tool:

- Number of Users who accessed the Site
- Number of Sessions (visits to the Site made by Users)
- Bounce rate (when the Users enter and leave the Site shortly thereafter, without any interaction)
- Time Session duration



- Active Users
- Origin (when Users enter by typing the KLA address and when enter via third party links)
- References (source site that brought Users to our Site)
- Pages of our Site that Users access
- Devices used for access (PC, mobile, tablet, etc.)
- Users Location (limited to the city where Users are located)
- Time when Users access the site
- Visit frequency when the Users have previously visited the Site

### **THIRD PARTY LINKS AND EXTERNAL TOOL**

We may make links to external domains of third parties available on our Site, such as, for example, links to our LinkedIn page ("[Third-Party Links](#)"). We do not determine the Personal Data Processing activities carried out on the Third-Party Links, and, therefore, we are not responsible, if you choose to access any of these Third Party Links, for the Personal Data Processing carried out in such Third Party Links. Thus, we advise, whenever You decide to access a Third-Party Link, that You consult the respective privacy policies applicable to such sites.

In view of the use of the Google Analytics Tool on our Site, we have chosen to facilitate the consultation of Users and we have made available links here that may be useful for information about the use of Your Personal Data by the Tool, emphasizing that any Personal Data Processing performed in a manner different from that set forth in the Section "Information about Personal Data Collected" is of the exclusive responsibility of the Tool.

Information about the use of Personal Data by Google Analytics may be obtained at:  
<https://policies.google.com/technologies/partner-sites?hl=en>  
<https://support.google.com/analytics/answer/6004245>

### **SHARING PERSONAL DATA WITH THIRD PARTIES**

The Personal Data collected may be shared with the following third parties:



- Providers of software and other information technologies for the purposes of registration management, documentation and other measures necessary for the operation of KLA;
- Correspondent law firms, experts, reviewers, partner offices (national and international), auditors, accountants, translators and financial institutions to assist in the provision of legal services, depending on demand;
- Non-governmental organizations in the case of pro bono work;
- National or international legal publications.

KLA may also share Personal Data with public or private organizations to comply with legal obligations or exercise its rights against third parties, pursuant to Article 7, items II and VI of the LGPD.

#### **INTERNATIONAL TRANSFER OF PERSONAL DATA**

KLA may transfer your Personal Data to service providers located abroad, including cloud service providers. In addition, KLA may share your Personal Data with other partner offices located abroad. When your Personal Data is transferred outside of Brazil by KLA, we will take appropriate measures to ensure adequate protection of your Personal Data in accordance with the requirements of applicable data protection legislation, including by entering into appropriate data transfer contracts with third parties, when necessary.

#### **STORAGE AND SECURITY OF PERSONAL DATA**

With respect to your privacy and the security of your Personal Data, we have adopted reasonable parameters for protecting the security of information to safeguard your Personal Data.

In addition to adopting good security practices in relation to your Personal Data, we are available to help you in case you identify or become aware of something that compromises the security of Personal Data. In this case, please contact us through the channel indicated at the end of this Privacy Policy

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

Whenever necessary, we can modify this Privacy Policy and You can always check the updated version on our Site.



It is important that, when using our Site, You are aware of the updated terms of this Privacy Policy.

### **PERSONAL DATA RETENTION PERIOD**

Personal Data collected by KLA will be subject to Processing only for as long as is necessary to comply with the purposes for which we have collect such Personal Data, including for purposes of complying with any legal, contractual, accountability, defense in administrative or judicial proceedings or request from competent authorities.

### **RIGHTS OF DATA SUBJECTS**

You have the right to (a) know what Personal Data we collect about You, (b) update or correct your Personal Data if You believe there is an inaccuracy, (c) request the anonymization, blocking or deletion of your Personal Data, subject to the legal limitations, (d) request the deletion of your Personal Data, subject to the legal limitations (e) request the transmission of your Personal Data to another Personal Data Controller. We will not discriminate against You for exercising any of these rights, but we emphasize that the deletion of your Personal Data may prevent us from providing You with content, invitations or benefits that depend on your Personal Data Processing.

If necessary, You may contact us through the channel indicated at the end of this Privacy Policy for the exercise of Your prerogatives provided for in this Privacy Policy.

### **CONTACT**

If you have any doubts, comments, suggestions and/or complaints regarding the use of your Personal Data and our Privacy Policy, feel free to contact us through the e-mail [privacidade@klalaw.com.br](mailto:privacidade@klalaw.com.br)