



**SAMMARCO**  
— ADVOGADOS —



# PRIVACY POLICY



# Introduction

SAMMARCO E ASSOCIADOS ADVOCACIA., a legal entity governed by private law registered in the National Register of Corporate Taxpayers (CNPJ/MF) under No. 54.348.747/0001-86, headquartered at Alameda Armênio Mendes, 66 conj 2101 – Aparecida - Santos - SP, ZIP CODE 11035-260, takes your privacy and the protection of your data seriously. This document explains how your personal data is handled, what your rights are and how you can exercise them.

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# 1.

## BASIC CONCEPTS: WHAT DO YOU NEED TO KNOW TO UNDERSTAND THIS POLICY?

To facilitate the reading of this document, we present some useful definitions for your interpretation.

Up next...

TERM	MEANING
<b>PERSONAL DATA</b>	Information related to an individual and that can identify or allow their identification. Examples of personal data that may allow their identification: name, CPF number, telephone number, email, license plate of their vehicle, etc.
<b>PROCESSING</b>	Any form of use of your personal data, including, but not limited to collection, storage, consultation, use, sharing, transmission, classification, reproduction, deletion and evaluation.
<b>DATA SUBJECT</b>	You, the natural person to whom the personal data refers, the owner of the personal data.
<b>COMPANY</b>	SAMMARCO E ASSOCIADOS ADVOCACIA.
<b>POLICY</b>	This Privacy Policy

# 2.

## WHAT TYPE OF PERSONAL DATA DO WE PROCESS?



The type of Personal Data and how we collect it depends on **how you relate to SAMMARCO E ASSOCIADOS ADVOCACIA.** and why.

For example, the Personal Data collected will be different if you are a customer who buys our products, a user of our website or a business partner.

We list below some situations in which we may process your Personal Data in the context of your relationship with the Company:



Processing Purpose	Type of Personal Data Used
Identification and performance of contracts and/or powers of attorney	Name, ID, CPF number
Data required to complete powers of attorney	Nationality – Marital Status
Payment of fees	Bank Account
Functional identification to complete the power of attorney	OAB

# 3.

## WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We operate in partnership with several other organizations to enable our activities. In addition, as we provide a public utility service, we have a duty to transmit some information to law enforcement and government authorities, in accordance with the law. Here are some situations where we may share Personal Data:

**MSC – Mediterranean Shipping do Brasil** - performance of contracts or procedure related to contract and or power of attorney.

**Compliance with Legal and Regulatory Obligations** - Users' personal data will be shared to comply with a legal obligation, or to respond to judicial or administrative proceedings, or in matters of national security, criminal investigation, fraud prevention, or to prevent death or imminent physical damage, safeguarding the user's fundamental rights and freedoms.

# 4.

## WHAT ARE YOUR RIGHTS AS A PERSONAL DATA SUBJECT?

**Personal Data is yours**, and Brazilian law grants you several rights related to it. We are committed to complying with these rights and, in this section, we will explain what these rights are and how you can exercise them.

See below:

Your rights	Explanation
<b>Confirmation and Access</b>	You can ask the Company to confirm the processing of your Personal Data so that, if so, you can access it, including by requesting copies of the records we have about you.
<b>Correction</b>	You can request the correction of your Personal Data if it is incomplete, inaccurate or outdated.
<b>Anonimização, bloqueio ou eliminação</b>	You can request: (a) the anonymization of your Personal Data, so that it can no longer be related to you and, therefore, is no longer Personal Data; (b) the blocking of your Personal Data, temporarily suspending our ability to process it for certain purposes; and (c) the deletion of your Personal Data, in which case we must delete all your Personal Data without the possibility of reversal.
<b>Portability</b>	You may request that the Company provide your Personal Data in a structured and interoperable format for transfer to a third party, provided that such transfer does not infringe the intellectual property or secrecy of the Company's business.
<b>Sharing information</b>	We will maintain, in item 3 of this Policy, an indication of our relationships with third parties that may involve the sharing of Personal Data. In any case, if you have questions or want more details, you have the right to ask us for this information. Depending on the case, we may limit the information provided to you if disclosure thereof may infringe the intellectual property or secrecy of the Company's business.

# 4.

## WHAT ARE YOUR RIGHTS AS A PERSONAL DATA SUBJECT?



Your Rights	Explanation
<b>Information about the possibility of not consenting</b>	You have the right to receive clear and complete information about the possibility and consequences of not providing consent, when it is requested by the Company. Your consent, where necessary, must be free and informed. Therefore, whenever we ask for your consent, you will be free to deny it – in such cases, it is possible that some services cannot be provided.
<b>Revocation of consent</b>	If you have consented to any purpose of processing your Personal Data, you can always choose to withdraw your consent. However, this will not affect the legality of any processing carried out before the revocation. If you withdraw your consent, we may be unable to provide certain services to you, but we will let you know when we do.
<b>Objection</b>	The law authorizes the processing of Personal Data even without your consent or a contract with us. In these situations, we will only process your Personal Data if we have legitimate reasons to do so, such as when it is necessary to ensure the safety of our highways. If you do not agree with any purpose of processing your Personal Data, you may object to it by requesting its interruption.



# 5.

## HOW LONG WILL PERSONAL DATA BE STORED?

Personal Data is only stored for as long as necessary to comply with the purposes for which it was collected, unless there is any other reason for keeping it, for example, compliance with any legal, regulatory, contractual obligations, among other obligations under the law.

We always carry out a technical analysis to determine the appropriate retention period for each type of Personal Data collected, considering its nature, need for collection and purpose for which it will be processed, as well as any retention needs for the fulfillment of obligations or the protection of rights.





# 6.

## HOW DOES SAMMARCO E ASSOCIADOS ADVOCACIA PROTECT YOUR PERSONAL DATA?

**Our responsibility is to take care of your Personal Data and use it only for the purposes described in this Policy.** To ensure your privacy and the protection of your Personal Data, we have adopted advanced technological features to ensure the security of all data processed by the Company.

**We strive to protect the privacy of your Personal Data, but, unfortunately, we cannot guarantee complete security.** Unauthorized entry or use by third parties of your information, hardware or software failures that are not under the control of the Company, and other external factors may compromise the security of your Personal Data. Therefore, your participation is essential for maintaining a safe environment for all. If you identify or become aware of any factor that compromises the security of your data in your relationship with the Company, please contact us through the contact information indicated below.

# 7.

## HOW TO TALK ABOUT YOUR PERSONAL DATA WITH SAMMARCO E ASSOCIADOS ADVOCACIA?

If you believe that your Personal Data has been processed in a manner incompatible with this Policy or with your choices as a Personal Data Subject, or if you have questions, comments or suggestions related to this Policy and the way we process your Personal Data, please contact us. We have a Supervisor who is available at the following contact address:

[sammarco@sammarco.com.br](mailto:sanmarco@sammarco.com.br)

# 8.

## CHANGES TO OUR PRIVACY POLICY

Thus, we recommend inquiries with the company from time to time so that you are aware of the changes made.

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**Version History: 01**