

## PRIVACY POLICY

The purpose of this Privacy Policy is to demonstrate the company's commitment ELSYS EQUIPAMENTOS ELETRONICOS LTDA., with headquarters and venue in the City of Valinhos, São Paulo, Rua Doutor Alcides Gomes de Miranda, 251, Vila Pagano CEP: 13277-220 and registered under CNPJ nº 34.484.188 / 0004-55 ("ELSYS") with the privacy and protection of the personal data collected from the USERS of ELSYS devices, establishing the rules on the collection, registration, storage, use, sharing, enrichment and elimination of the data collected from the USERS, within the scope of the services and features available in their devices, according to the laws in force, with transparency and clarity with the USER and the market in general.

For the purposes of this document, ELSYS devices will be called PLATFORM and / or PRODUCTS where the USER will have access to various online content applications and which can only be accessed upon acceptance.

In the PLATFORM to which this Policy Applies, there are several other applications from ELSYS partners, which have their own Terms of Use and Privacy Policies. For the Youtube video curation services platform, developed by ELSYS, this Privacy Policy also applies.

As a condition for accessing and using the PLATFORM and / or PRODUCT functionalities, the USER declares that he has read and fully read this Privacy Policy, being fully aware, thus granting his free and express agreement with the terms stipulated herein.

### 1. DATA COLLECTION AND ACTIVITY LOG

1.1. Data is collected and recorded when sent voluntarily by the USER when using the PLATFORM and / or PRODUCTS, which may include: the creation of the ELSYS Access Account, navigation and the videos they are watching, which receiver is being used. In addition, ELSYS records the activities performed by the USER on the PLATFORM.

1.2. The data ELSYS collects includes, but is not limited to:

- i. Registration data: E-mail, date of birth, gender, state, city and cell phone;
- ii. Navigation data: Date and time of entry and exit on the PLATFORM, receiver used and its operating system and the actions performed on the PLATFORM and / or PRODUCTS.
- iii. Accurate or not accurate location information in real time when using a specific service.

1.3. ELSYS is not responsible for the accuracy, veracity or lack of it in the data provided by the USER or for its outdated, when it is its responsibility to provide them accurately or to update them.

1.4. The activities that ELSYS records include, but are not limited to:

- a) IP Address and Logic Port of Origin of the USER;
- b) Actions performed by the USER on the Platform;
- c) Data on the receiver used by the USER.

1.5. PLATFORM may also make available or make use of technologies such as:

- a) Cookies, the USER is responsible for configuring his Internet browser if he wishes to block them. In this case, some features of the PLATFORM may be limited;
- b) Web Beacons to collect USER behavior data when accessing pages;
- c) Other technologies for obtaining navigation data by the USER.

1.6. All the technologies used will always respect the current legislation and the terms of this Privacy Policy.

1.7. It is important to note that, once on the PLATFORM, the USER may be directed to applications, content or services on other platforms that may collect data and have their own Privacy Policy.

1.7.1. It is the responsibility of the USER to read the Privacy Policy of such platforms, and it is the responsibility of the USER to accept or reject it.

1.8. The data collected by ELSYS will be treated in accordance with the General Data Protection Law, No. 12,965 / 2014.

## 2. CONSENT

2.1. Consent for the purposes of using the data will be collected in a single act.

2.2. If the USER does not grant his consent for the services directly linked to the PLATFORM and / or PRODUCTS, these services will not be made available to him, however, the other services and features provided by the ELSYS Receiver will continue to be performed regularly.

2.3. In any case, the USER may change his consent grants, at any time, by providing or withdrawing acceptance when accessing the ELSYS platform and / or other applications.

## 3. USE OF DATA

3.1. Personal data collected from USERS on the PLATFORM and / or PRODUCTS and activity records can be used for the following purposes:

a) Identify and authenticate them properly, in addition to processing transactions in the Elsys Access Account;

b) Administer, provide the services and comply with the obligations of using the PLATFORM services and / or PRODUCTS;

c) To adequately attend requests and doubts;

d) Establish contact through instant communication applications, electronic mail, direct mail or other means of communication;

e) To improve the use and experience of the PLATFORM services and / or PRODUCTS;

f) Carry out statistics, studies, research and surveys relevant to the activities and behaviors in the use of the PLATFORM and / or PRODUCTS;

g) Promote our services and products, as well as the companies of our Economic Group and Business Partners;

h) Inform about news, features, content, news and other events relevant to maintaining the relationship;

i) Protect from rights and obligations related to the use of the PLATFORM and / or PRODUCTS;

j) Evidence means in cases of illegal acts or contrary to this Privacy Policy or any other legal document made available by ELSYS.

3.2. The collected data and recorded activities can also be shared:

a) With competent judicial, administrative or governmental authorities, whenever there is a request, requisition or court order;

b) Automatically in case of corporate movements, such as mergers, acquisitions and incorporations;

c) With third parties that provide technology to ELSYS.

3.3. ELSYS may, at its sole discretion, confirm the personal data provided by the USER by consulting public bodies, specialized companies or risk centers. In this case, the USER must grant his express authorization. The information that ELSYS obtains from these entities will be treated confidentially.

3.4. The database formed through the collection of personal data on the PLATFORM and / or PRODUCTS is the property and responsibility of ELSYS, and its use, access and sharing, when necessary, will be made within the limits and purposes of ELSYS business, in this sense, it can be made available for consultation and shared with its business partners, suppliers and authorities, as long as it complies with the provisions of this Privacy Policy.

3.4.1. Our USER is responsible for the confidentiality of his personal data and password. The sharing of access data violates this Privacy Policy and the PLATFORM and / or PRODUCTS Terms and Conditions of Use.

3.5. The USER is now aware that the database may be enriched, adding data from other legitimate sources - including those from databases of other companies that relate to ELSYS, expressing their free and express consent in agree with the terms of this Privacy Policy when using the PLATFORM and / or PRODUCTS.

3.6. Internally, USERS' data is accessed only by professionals duly authorized by ELSYS, respecting the principles of proportionality, necessity and relevance to ELSYS objectives, in addition to the commitment to confidentiality and preservation of privacy under the terms of this Privacy Policy.

#### 4. DATA STORAGE

4.1. The collected data will be stored in a safe and controlled environment for a minimum period of 6 (six) months, under the terms of the "Marco Civil da Internet" as well as in accordance with the guidelines of the General Data Protection Law, observing the state of the art available. However, considering that no security system is foolproof, ELSYS disclaims any liability for any damages and / or losses arising from failures, viruses or invasions of the ELSYS database, except in cases where it is intentional or at fault.

4.2. The data obtained from USERS can be stored on our own servers or from a third party hired for this purpose, whether they are located in Brazil or abroad, and can also be stored by means of cloud computing technology and / or others that arise in the future, always aiming improving and perfecting our activities.

#### 5. DISPLAY, RECTIFICATION, RATIFICATION AND EXCLUSION OF DATA

5.1. The USER may request the display, rectification or ratification of his personal data, through his Access Account or the service tools provided by ELSYS.

5.2. Using the same service tools, the USER may request the deletion of his personal data, provided that the contract between the USER and ELSYS has ended, any Access Accounts canceled and the minimum legal term has elapsed.

5.3. We can, for the purposes of auditing, security, fraud control and preservation of rights, remain with the history of recording USERS' data for a longer period, in the event that the law or regulatory norm so establishes or for the preservation of rights. However, we have the option of permanently excluding them at their convenience in a shorter period.

#### 6. E-MAIL COMMUNICATIONS

6.1. E-mails sent by ELSYS may request confirmation of the user account, but never ask for confirmation of personal data, bank passwords or personal registration data; in addition, our communications do not have any download or executable attachments (files with .exe, .com, .scr, .bat, .zip, .rar, .clp extensions, for example).

6.2. All of our promotional emails are sent to [lojaonline@elsys.com.br](mailto:lojaonline@elsys.com.br), and their links lead directly to ELSYS environments.

6.3. Only relationship emails will be sent to USERS who choose to receive them. And if, at any time, the USER wishes to cancel the receipt of these correspondences, his request will be promptly fulfilled.

## 7. GENERAL PROVISIONS

7.1. ELSYS may change the content of this Privacy Policy at any time, according to the purpose or need, such as for adequacy and legal compliance with the provision of a law or rule that has equivalent legal force, and the USER must check it whenever accessing to the PLATFORM and / or PRODUCTS.

7.1.1. In the event of significant updates to this document, ELSYS will notify the USER through the tools available and / or by the means of contact provided by him.

7.2. In case of any doubt regarding the provisions contained in this Privacy Policy, the USER may contact ELSYS through the service channel indicated below, whose opening hours are from Monday to Friday, from 9 am to 6pm except National holidays: [sac@elsys.com.br](mailto:sac@elsys.com.br)

7.3. If outsourced companies process any data collected by ELSYS, they will comply with the conditions here stipulated and the ELSYS Information Security rules, mandatorily.

7.4. If any provision of this Privacy Policy is considered illegal or illegitimate by the authority of the location where the USER resides, the other conditions will remain in full force and effect.

7.5. The USER acknowledges that all communication carried out by e-mail (to the addresses informed in his registration), instant communication applications or any other digital form are valid, effective and sufficient for the disclosure of any matter that refers to the services provided by ELSYS, as well as the conditions of its provision or any other matter addressed therein, except for the expressly diverse provisions set forth in this Privacy Policy.

## 8. GLOSSARY

8.1. For the purposes of this document, the following definitions and descriptions should be considered for your better understanding:

**Beacons:** They are small devices that use Bluetooth Low Energy (BLE) technology, which emit signals that can be captured by technological resources, allowing the interaction between the USER and the technological resource. Web Beacons are programs that have the purpose of monitoring the navigation of a USER on a page on the Internet.

**CLOUD COMPUTING:** Or cloud computing, is a service virtualization technology built from the interconnection of more than one server through a common information network (eg the Internet), in order to reduce costs and increase availability sustained services.

**Cookies:** Files sent by the Platform server to the USERS' computer, with the purpose of identifying the computer and obtaining access data, such as pages browsed or links accessed, thus allowing users to personalize the navigation of the USERS on the Platform, in accordance with your profile.

**Access Account:** Credential of a USER that may be required to use or access restricted area and exclusive features of the PLATFORM and / or ELSYS PRODUCTS.

**IP:** Abbreviation for Internet Protocol. It is an alphanumeric set that identifies USERS' devices on the Internet.

**USERS:** People who access the PLATFORM and / or use ELSYS PRODUCTS.

**PLATFORM:** Remote Management Service and Applications of Elsys equipment.

**PRODUCTS:** ELSYS products for which it is necessary to express agreement with the provisions of this Term.

## 9. APPLICABLE LAW AND JURISDICTION

9.1. This Privacy Policy will be governed and interpreted in accordance with Brazilian law, in the English language, and the USER's home jurisdiction will be chosen to settle any litigation or controversy involving this document, unless specific proviso of personal, territorial or functional competence by the applicable legislation.

Update: July 27, 2020.