



Data Processing Policy

Data Protection and Privacy
Governance Program

Summary

4	_____	Why does Neoway process personal data??
	6	_____ Introduction: what is this policy and what is it for?
7	_____	Basic concepts: what is important to know to understand this policy?
	8	_____ In what situations does Neoway process personal data and what types of personal data are processed?
	10	_____ Who does Neoway share personal data with?
	12	_____ Does Neoway transfer personal data to other countries?
	13	_____ What are data subjects' right and how do they exercise them?
	17	_____ How long will personal data be stored?
	17	_____ What are our responsibilities and how can we protect personal data?
	19	_____ How can we talk about personal data with Neoway?
	19	_____ Data Processing Policy changes

We at **Neoway Tecnologia Integrada, Assessoria e Negócios S/A** (“Neoway” or “We”), Corporate Taxpayer Registry (CNPJ/ME) no. 05.337.875.0001-05, headquartered at Rua Patrício Farias, 131, Sala 201, Florianópolis/SC, are one of the major companies in big data analytics, artificial intelligence, machine learning, and technology applied to business in Latin America. In the development and application of our solutions, such as sales & marketing, risk & compliance, digital, legal analysis, among others, we are committed to safeguarding your privacy and protecting your personal data.

WHY DOES NEOWAY process personal data?

Summary

We are a technology applied to business company. We use data as a source of intelligence to serve our customers and help them make informed decisions. To achieve our goals, we use technology to aggregate data from several publicly accessible sources and allow the performance of analysis in order to improve our customers' understanding of complex scenarios that enable more assertive decision making.

Neoway's mission is the development and continuous delivery of information empowerment solutions to society, allowing everyone to always do more, moving the economy and fostering innovation. To create relevant corporate intelligence, the solutions offered by Neoway depend on the collection and use of personal data and that of legal entities by consulting several publicly accessible sources and through legally guaranteed strategic partnerships and, for this reason, Neoway has always devoted special attention and care to the management and protection of any kind of information within its operation.

When we speak of personal data, we consider not only the respect and commitment to the security and privacy of the data subjects, but also our commitment to ensure the right of choice to everyone concerning the use of their personal data.

To develop our solutions, we use information made public by the different entities comprising the direct and indirect government bodies of the Brazilian federative entities, especially the information disclosed pursuant to the Law of Access to Information (Law No. 12,527/2011) and other

regulations that integrate the Federal Government's open data policy, as well as other publicly accessible data from non-governmental sources. In some cases, we may also receive data from our partners/suppliers and customers for specific projects, always resorting to contractual clauses and reports capable of establishing a high level of protection and security for the processed data, supported by the authorizations that our partners and customers have to process personal data, ensuring transparency regarding Neoway's data processing to data subjects.

In addition, we use public and open data by government bodies to fulfill the driving purpose of its publication: to foster economic and technological development and to encourage competition and innovation. This assumption guides our activities and the way we process personal data. We take compliance with laws that protect the privacy and this policy (“Policy”) seriously. This Policy describes how your personal information and data is collected, used, shared and stored.

If, after reading this Policy, you still have any questions, please feel free to contact us by sending a message to privacidade@neoway.com.br.

1 Introduction: what is this policy and what is it for?

This Policy is the document for compiling the main information about the way in which personal data is processed by Neoway.

As Neoway is responsible for several personal data processing activities, it has always applied high levels of care to the security controls and practices and protection of information that is part of your business. Since data processing is such a key element of its activities, Neoway has edited this and several other policies in order to set the internal rules that define the standards for the processing of personal data in the context of its activities, and thus manage to maintain effective governance over its internal processes and meet the applicable legal requirements.

The editing, publication, and compliance with this Policy are measures adopted by Neoway to abide by Law No. 13.709/2018 (the “LGPD”). To learn more about how Neoway interprets and applies the provisions of the LGPD, please access our [Basic LGPD Manual](#).

2 Basic concepts: what do you need to know to understand this policy?

To facilitate your reading, here are some useful definitions to better interpret this Policy:

- 1 **“Legal Basis”** is the foundation that authorizes Neoway and its customers to process Personal Data. Any and all processing of Personal Data is considered valid if it is based on a legal basis.
- 2 **“Personal Data”** is any information related to an identified or identifiable individual, including identification numbers, location data, electronic identifiers, or any data that, when combined with other information, is capable of identifying someone, making them identifiable or, otherwise individualize them.
- 3 **“Processing”** or **“To process”** are the uses that Neoway makes of Personal Data, including, for instance, the following activities: collection, registration, storage, organization, consultation, use, disclosure, sharing, transmission, classification, reproduction, processing, and evaluation. **These terms will not be used in capital letters.**
- 4 **“You”** or **“Data subject”** is the person to whom the Personal Data is related.

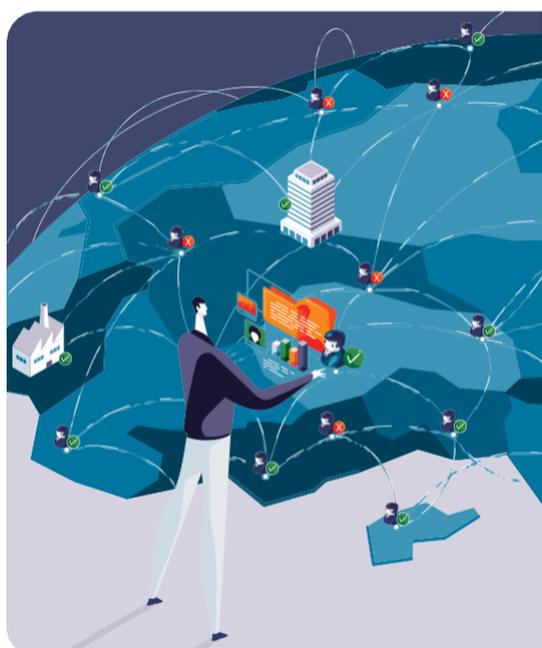
3 In what situations does Neoway process personal data and what types of personal data are processed?

Neoway processes Personal Data according to their respective categories, through different sources:

- ✓ through access to the platforms of direct and indirect government bodies that disseminate data in accordance with public authorities' open data policies, as well as through access to other platforms containing publicly accessible data, always using Neoway's own technologies and methodologies;
- ✓ through the receipt of data sets from Neoway's business partners, with which Neoway has a continuous relationship (“**Partners**”), always with legal guarantees for the processing of Personal Data and use of the necessary technical and organizational safeguards;
- ✓ through the receipt of data sets from Neoway's suppliers, responsible for the prompt supply of data (“**Suppliers**”), always with legal guarantees for the processing of Personal Data and use of the necessary technical and organizational safeguards; and
- ✓ when customers share data controlled by them, so that Neoway may process it and create intelligence to support decision making by customers. In such cases, Neoway customers are responsible for defining the purposes, the way and duration of Personal Data processing, as they are the controllers of that data.

In general, from the sources mentioned above, Neoway can collect and proceed with the treatment of the following categories of Personal Data:

- ✓ Registration data: such as name, social security number (CPF), date of birth and addresses.
- ✓ Professional data: as professional registration numbers.
- ✓ Corporate data: such as shareholdings and information related to the company.
- ✓ Data from legal proceedings: such as data on proceedings in progress, their nature and other information contained in the case file.
- ✓ Asset data: such as aircraft properties.
- ✓ Among other data. The data processed by Neoway is always used, but not limited to the purposes specified below, related to our main products and solutions offered to our customers:



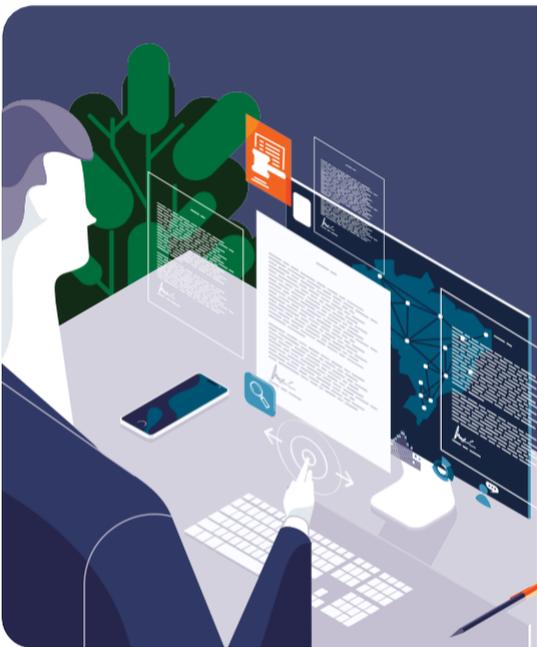
Risk & Compliance

Validation of information by Neoway customers in an effort to prevent fraud, assist in compliance investigations, and assess business risks.



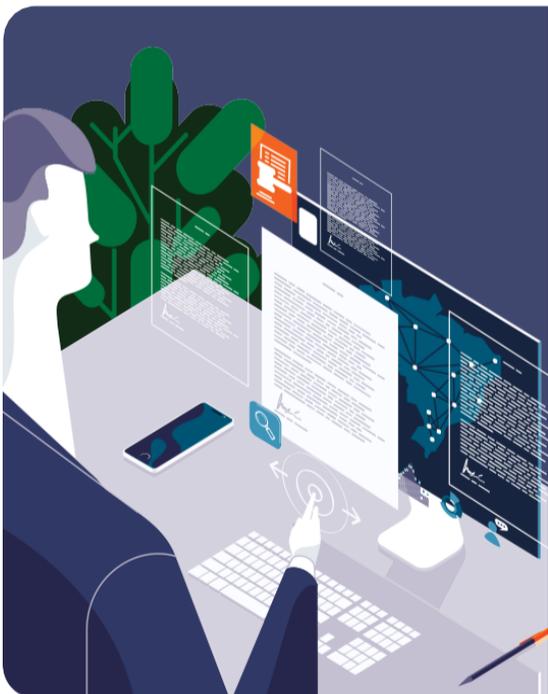
Sales & Marketing

Identification of companies and people located in a given geographic space or in a group pre-defined by our customers; data analysis of customers that are already served by Neoway's customers so as to strengthen existing relationships; and the processing of information about Neoway's customers and customer prospects in order to identify opportunities and thus expand the services/products offered.



Legal Analysis

Analysis of lawsuits based on statistical data; search of decisions and court theses according to personalized searches; assistance in the development of procedural strategies; prospects of success in litigation; identification of trends in legal theories used in the courts; and the drawing up of standardized procedural documents.



Score Compliance

Analytical model based on risk and compliance data, identifying possible evidence for prioritizing internal anti-fraud and compliance processes for Neoway customers.

4 Who does Neoway share personal data with?

Like any large company, Neoway operates in partnership with a number of other companies in order to offer its products and services.

By doing so, we can share your Personal Data with these Neoway partner companies, always maintaining the highest security standards, seeking to preserve your privacy as far as possible and, whenever possible, anonymously. We describe below the situations in which we are going to share Personal Data and their respective sharing purposes:

- 1 Our service providers and technology suppliers.** We have a number of suppliers that we need to hire to operate our services, and some of them can process the Personal Data that we collect, for example, companies that provide data hosting, property security, registration and authentication services, to name a few. To the extent possible, we always seek to carefully evaluate our suppliers and enter into contractual obligations related to information security and protection of Personal Data, with the purpose of minimizing risks for Data Subjects.
- 2 Our customers.** The provision of information and intelligence generated from data analysis is at the core of what we do. For this reason, we share Personal Data collected on the platforms of the entities of the direct and indirect government bodies, as well as other data received from our Suppliers and Partners with our customers, so that they can carry out risk, fraud and marketing planning analyses.

3 Public Authorities. We must comply with the law. Therefore, if a judge or an authority with jurisdiction requires Neoway to share certain Personal Data an investigation, for example, we will share it. We are against any abuse of authority and, if Neoway believes that a particular order is abusive, we will always protect the privacy of the Data Subjects.

Also, we reserve the right to share any Personal Data that we believe is necessary to meet a legal obligation or, otherwise, to protect Neoway's rights, property, or security, as well as those of our employees and customers.

5 Does Neoway transfer personal data to other countries?

Yes. Although Neoway is headquartered in Brazil and most of our products and services are intended for people located in Brazil –the Brazilian laws related to the protection of Personal Data therefore being applicable –, the Personal Data that we collect can be transferred to other countries, such as the United States of America. These transfers can be made to service providers and technology suppliers used by Neoway located abroad to ensure a higher level of security in the conservation of the data processed by Neoway, which is made possible through techniques that ensure the redundancy of Neoway's data assets, avoiding, for example, highly damaging consequences resulting from catastrophes that may destroy or affect specific data centers, and due to Neoway's relationship with specific service providers and suppliers, such as providers of technological data storage structures, which may be physically located in those regions. In addition, Personal Data processed by Neoway can also be shared with Neoway customers located abroad, always in accordance with the security and legal standards in data processing applied to any and all Neoway operations in Brazil, and with the requirements set forth in the legislation to ensure the proper performance of international transfers of Personal Data.

These transfers involve only companies that demonstrate they are compliant or in the process of complying with applicable privacy and data protection laws, and that maintain a level of similar or even stricter compliance than that provided for in the applicable Brazilian laws.

6 What are the rights of data subjects and how can they exercise them

Your Personal Data is yours and Brazilian laws ensure you a number of rights related thereto. We are committed to the fulfillment of these rights and, in this section, we will explain how you can exercise them with Neoway.

To exercise the rights of personal data subjects under the Law 13.709/2018, the data subject or his legal representative can perform the request accessing the tab "Exercise Your Rights", available on Neoway website. This tab has features that securely guarantee the identification of the data subject and non-sharing with unauthorized third parties.

Notes

As Neoway obtains data from other controllers (usually entities from the direct and indirect government bodies, Suppliers, Partners, as well as from Neoway customers), it is not possible to guarantee that all requests for the exercise of rights addressed to Neoway will be fully met. However, in the event that Neoway is the controller of the data to which a request to exercise rights is related, all steps will be taken to comply with such a request, including with Neoway's contractors and subcontractors.

For example: if you request the correction of part of your Personal Data, it is possible for Neoway to update the databases that it controls, but that does not mean that the original databases from which your Personal Data was collected (such as, for example, an open data platform of some government entity) are also affected by the request to exercise the right of correction. In such cases, it will be up to the Data Subject to submit a request to the original controller of their Personal Data to allow their rights to be fully exercised.

How to know if Neoway has Personal Data about you, and how to access it?

Neoway has tools that allow you to confirm whether we have Personal Data about you, and to have access to Personal Data upon request. You can request this information in the “Exercise Your Rights” tab, available on the Neoway website.

How to correct the Personal Data that Neoway has about you?

Upon verifying that any of your Personal Data is incorrect or out of date, you can request Neoway to make corrections to your Personal Data in the “Exercise Your Rights” tab, available on the Neoway website. However, it is worth noting that, as Neoway collects certain types of data on platforms of government entities, it is possible that, in addition to the version of your Personal Data corrected upon your request, records may also be kept on the original version of your data, as made available by government entities. The maintenance of this type of data will occur to ensure the integrity and traceability of all data processed by Neoway, and you will be guaranteed the right to correct your Personal Data when its bases are controlled by Neoway – this means that Neoway also will not be able to make any changes to your Personal Data contained in the databases made available by government bodies.

How to delete your Personal Data, entirely or partially

Neoway allows you to request the deletion, in whole or in part, of your Personal Data. For that, all you have to do is send the request in the “Exercise Your Rights” tab, available on the Neoway website.

It is important to know that not all Personal Data that we have in our databases can be deleted, especially in cases where compliance with legal obligations is required, but not limited thereto.

Even in those cases, we will maintain our commitment to secrecy and protection of that data, and will keep it only for the specific purposes related to the fulfillment of existing obligations.

If Neoway is using your Personal Data for a purpose you do not agree with, can you object?

Yes! Since, as a rule, we do not make direct contact with data subjects on a day-to-day basis, it is normal for us to be able to use legal bases that allow the processing of Personal Data without depending on your consent, as is the case of Neoway's legitimate interest or that of third parties. We always exercise this right with responsibility and considering the least possible impact on processed data subjects.

At any rate, if you believe that a specific processing purpose negatively impacts your rights, you can submit a request through the “Exercise Your Rights” tab available on the Neoway website, presenting an objection to the processing of your Personal Data for the purpose you believe is excessive. In some cases, we can demonstrate that we have legitimate reasons to still process your Personal Data (for example, to prevent fraud), but we will always justify this to you in the best possible way, giving you broad information about our reasons to keep the Personal Data.

Upon the consent given for Neoway to process your Personal Data, can you change your mind?

Yes! Although Neoway resorts to the cases provided by law to process Personal Data without obtaining the specific consent from the Data Subject, which occurs only in cases where such a situation is allowed, it may be possible, depending on how you interact with our products and services, and only in certain specific situations, for you to provide your consent so that Neoway may handle your Personal Data. Therefore, if at any time you provide your consent for Neoway to process your Personal Data, you can revoke your consent with a request through the “Exercise Your Rights” tab available on the Neoway website specifying the situation. At the time, we will also inform you of any consequences of withdrawing your consent (such as restrictions on the use of a particular service or functionality of any of our solutions).

If I want a copy of all my Personal Data, can I request it to Neoway?

Yes! Just send a request through the “Exercise Your Rights” tab available on the Neoway website and, after verifying your identity, we will provide you with such Personal Data.

Is it possible to obtain a list of entities, public or private, with which Neoway has shared your Personal Data?

Yes! You can request this information by sending with a request through the “Exercise Your Rights” tab available on the Neoway website . Remember that Neoway can choose not to share this sort of information if there is any legitimate reason for the duty of confidentiality, as in the cases in which the Personal Data has been shared with a public authority confidentially or even when it is necessary to protect Neoway's trade or industrial secrets, to the extent guaranteed by law.

Commitment

Whenever we receive a request for the exercise of rights, we may request some additional information so that we can prove the identity of those requesting it, in order to prevent fraud and particularly to make sure that we will only deliver information to the right people. We do this to ensure the security and privacy of everyone. Moreover, although some requests are not answered immediately, Neoway is committed to responding to all requests within a reasonable timeframe and always in compliance with applicable law.

7 For how long will the personal data be stored?

Neoway has developed and applies a Personal Data retention policy in accordance with applicable laws. Personal Data is stored only for as long as is necessary to meet the purposes for which it was collected, unless there is any other reason for its maintenance, for example, compliance with legal, regulatory or contractual obligations, among others, provided that they are based on an adequate legal basis.

8 What are our responsibilities and how do we protect personal data?

Our responsibility is to take care of all Personal Data that we process and use it for the purposes described in this Policy only. To ensure the privacy of everyone and the protection of the Personal Data we process, we have adopted the best security practices appropriate to our activities, with the use of role-based access control (RBAC), least privileged policy, encryption, advanced threat monitoring, data leak prevention (DLP), and other information security systems and procedures. ISO 27001 security management practices and ISO 27002 controls are incorporated into Neoway's operations through specialized teams, systems, and tools complying with highest available standards. Furthermore, employees participate in a consistent information security awareness program called “NeoSecWay”, which promotes lectures, training, tests, and ongoing monitoring. In addition, Neoway is certified to ISO 27001

Neoway also requires that all of its employees engaged in data processing sign Confidentiality Agreements, promotes training in Information Security and Privacy & Data Protection, implements the appropriate measures to ensure the integrity of the data, and also ensures its availability through backup and incident response plans, among other damage mitigation actions.

Although we always strive to protect the Personal Data we process, unfortunately we cannot ensure total security, mainly in relation to malicious acts committed by third parties. Hardware or software failures that beyond Neoway's control and other factors can compromise the security of the Personal Data we treat. In case you identify or become aware of anything that compromises the security of your data, please contact us at privacidade@neoway.com.br.

To learn more about how we handle information security, please check our Information Security Policy, available [here](#).

9 Children and teenagers

Neoway takes seriously the requirements applicable to the processing of Personal Data of children and teenagers and respects the current legislation that guarantees the special protection of these individuals. Any treatment of Personal Data of children and teenagers eventually carried out by Neoway considers their best interests.

- **CHILDREN** (individuals up to 12 years old incomplete): As our activities include the automated collection of Personal Data from several publicly accessible sources, especially platforms of direct and indirect public administration entities, we have implemented a series of technical and organizational measures to prevent children's Personal Data from being processed by our products and made available to our customers. Whenever a Data Subject is identified as a child by Neoway's systems, his Personal Data is no longer collected and further processed for the commercial purposes of our products. This means that, in practice, whenever the provision of Children's Personal Data is required by one of our customers using our solutions, such as, for example, by consulting a Corporate Board and Directors of a specific company in which a child is part of, our solutions will be limited to presenting the information "Minor Partner" in the place where your Personal Data would appear.

- **TEENAGERS** (individuals between 12 and 18 years of age): The processing of Personal Data of teenagers is restricted to Neoway's Risk & Compliance applications, aiming the identification and prevention of situations that expose adolescents to illegal acts, such as those referring to money laundering, concealment of assets and use of undue resources. Personal data of teenagers treated in our Risk & Compliance solutions are minimized when strictly necessary (such as, for example,

full name, social security number, date of birth, information about shareholdings, eventual death records and employees related to the society of which the teenager is a member). For all other purposes of Neoway, no personal data of teenagers is treated, and in practice, whenever the availability of Personal Data of teenagers is required by one of our clients through the use of our solutions (other than Risk & Compliance), such as, for example, by consulting a Corporate Board and Directors of a certain society in which a teenager is a member of that board, our solutions will be limited to presenting the information "Minor Partner" in the place where your Data would appear Personal.

Neoway is committed to carefully plan the processing of Personal Data for children and teenagers. So all planning for the use of Personal Data of these individuals goes through a rigorous process of analysis of legal and regulatory compliance, including the elaboration of Data Protection Impact Assessments. In addition, our customers are committed to obligations and restrictions on the use of Personal Data to contract with us, ensuring a high level of diligence and compliance with the legislation applicable in the treatment of Personal Data with Neoway.

10 How to talk about personal data with Neoway?

If you believe that your Personal Data was used in a manner incompatible with this Policy or with your choices as the holder of that Personal Data, or, if you have any questions, comments, or suggestions related to this Policy, please feel free to contact us. We have a team that specializes in such matters and is available to contact you in the following ways:



Mailing address:

Rua Patrício Farias, 131, Sala 201, Florianópolis/SC.



Contact e-mail:

privacidade@neoway.com.br – Privacy Office | NeoPrivacy

'Exercise Your Rights' Platform:
<https://privacyportal.onetrust.com/webform/02ac84a7-09aa-4536-8e56-42e4d3c6f987/b3f9ab67-4dfd-435d-a798-9e268a668bf5>

11

Data processing policy changes

Since we are always looking to improve the way we deliver our solutions, this Data Processing Policy may be updated in order to reflect any improvements made. Therefore, we recommend that you visit this page periodically to be informed of the changes made.

Last update date: 21/05/2021.

