

PRIVACY POLICY
(12/07/24 updated)

1. WHAT DO YOU NEED TO KNOW BEFORE READING THE INTELBRAS PRIVACY POLICY?

In the course of this policy, we have adopted the terms listed below with their respective meanings:

National Data Protection Authority (ANPD) - It is the body that will supervise and guide the application of the LGPD, as well as being responsible for applying administrative sanctions in case of violation of the law.

Legal Basis for Processing – The processing of Personal Data is permitted by the LGPD in accordance with the legal bases provided for, such as the consent of the Holder, compliance with legal and/or regulatory obligations by Intelbras, the existence of a contract between Intelbras and the Holder, analysis for credit protection, as well as legitimate interests of Intelbras or the Holder.

Biometrics - A measurable physical characteristic or personal behavioral trait used to recognize or verify a person's identity. Facial images, fingerprints and iris samples are examples of biometrics.

Privacy Commission - Means the Intelbras people commission composed of representatives of the Legal, Information Security and Quality Department, responsible for representing Intelbras before the holders and the ANPD, as well as being responsible for general guidance regarding the processing of Personal Data at Intelbras.

Consent - It is the free, informed and unequivocal manifestation by which the Holder agrees with the processing of his Personal Data for a specific purpose.

Personal Data - Any data related to an identified or identifiable natural person, such as: IP, geolocation, name, RG, CPF, address, telephone, bank account, vehicle data, among others.

Sensitive Personal Data - It is Personal Data that presents racial or ethnic origin, religious conviction, political opinion, union affiliation, data referring to health or sex life, genetic or biometric data.

Purpose - This is the reason or motivation for processing Personal Data.

Legitimate Interest - Processing of data carried out by the Controller, due to his interest, that of other companies or society, without the treatment affecting the individual rights and freedoms of the Holder.

General Data Protection Law (LGPD) - Law No. 13,709, of August 14, 2018.

Opposition - It is the Holder's right not to want their data to be processed. This right can be exercised in certain specific situations.

Security - Means the use of technical and administrative measures able to protect Personal Data from unauthorized access and accidental or illegal situations of destruction, loss, alteration, communication or dissemination.

Treatment - It is every operation carried out with Personal Data, such as: collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation, information control, communication, transfer, diffusion or extraction.

Holder - Natural person to whom the Personal Data that are subject to processing refer.

Transparency - It is the guarantee, to the Holders, of clear, precise and easily accessible information about the performance of the treatment and respective treatment agents, observing the commercial and industrial secrets.

Summary of Privacy Policy Rights

data minimization	Collects only personal data necessary for product functionality
right of holders	Right guaranteed to the user of access, correction and deletion of processed data
retention period	The personal data we process will only be kept for the period necessary for the purpose of the treatment and/or under the appropriate legal basis.
Third-party data collection	The data collection tools are those indicated in this Policy

2. HOW DO WE USE YOUR DATA?

We may process data relating to the use of our websites, products, cloud services and applications and through the use of these ("Services"). Usage Data may include your IP address, geographic location, browser type and version, operating system, time of visit to our websites ("Use Data"), number of uses of the Services, date of visit, among others. The source of Data Usage is Google Analytics . The Use of Data may be carried out for the purpose of analyzing the use of Intelbras Services, products and services. The legal basis for processing such data is the legitimate interest of Intelbras, as a means of guaranteeing the full execution and functionality of the Services.

We may process your registration data on the Services ("Registration Data"). Registrations may include name, email address, address, CPF, telephone, image, photo, audio, among others. Registration Data may be processed for the purposes of operating the Services, providing products and services, guaranteeing the security of our Services, products and services, maintaining backup databases and communicating with our customers, including providing and accessing all functionality of the Services. The legal basis for processing such data is consent.

We may process data captured in the environment ("Environment Data"). Data may include facial images, recordings, audio, which may be classified as personal data, protected by law. Responsibility for the protection of third-party data, captured from Intelbras products, is the responsibility of the User, being within its competence, to apply all necessary means for the effective protection of data, in particular, the configuration and network products for which standards security minimums are

guaranteed. Intelbras is not responsible for the illegal use of data collected through its products, as they are not accessible to its administration.

We may process data from inquiries sent to us in relation to customer service (“Consumer Relationship Data”). Consumer Inquiry Data may include details about your questions and problems with products and/or services and may be processed for the purposes of offering new products and/or services, marketing, updating response processes and improving customer service. The legal basis for processing such data is the legitimate interest of Intelbras and its customers and compliance with legal obligations.

We may process your data obtained from financial transactions carried out through our Services, including the purchase of products and/or services (“Transaction Data”). Transaction Data may include your address, CPF, financial and bank details and credit card number, among others, and are processed for the provision of products and/or services, file maintenance, compliance with tax obligations. The legal basis for processing such data is compliance with legal obligations, specifically tax legislation.

We may process your Personal Data to send advertisements, for the purposes of registration and participation in the selection process, advertisements and direct marketing, related to the customer's interests according to their preferences. The legal basis for the processing of such data is the consent, as well as the legitimate interest of the controller.

We may process your Personal Data based on authorized remote access to the holder's device, by registering a service with our Call Center or After Sales. For access, Intelbras uses the Anydesk tool , which meets the legal requirements for data protection, as defined on the institutional website: www.anydesk.com. The data accessed are of exclusive need to solve the problem, and no unnecessary data is treated beyond the fulfillment of the solution. The legal basis for data processing is consent through prior acceptance of Remote Access and also compliance with a legal obligation, since Intelbras provides technical assistance during the warranty period of Intelbras products.

We may process your Personal Data, such as name, email, telephone, from accessing our customer service channels, via CHATBOT, through third-party platforms, such as WhatsApp, which meets the legal requirements for the protection of data, as defined on the institutional website: <https://www.whatsapp.com/legal/>. The legal basis for data processing is consent upon prior acceptance of this Policy by the user and also compliance with a legal obligation, since Intelbras provides technical assistance during the warranty period of Intelbras products via these service channels.

In some cases, the Intelbras Product may collect data from third parties from the environment (“Third Party Data”). Data may include facial images, recordings, audio, which may be classified as personal data, protected by law. Responsibility for the protection of third-party data captured from Intelbras products is the sole responsibility of the User, and it is up to the User to apply all necessary means for the effective protection of data, especially the configuration of products and network to that minimum safety standards are guaranteed. Intelbras is not responsible for the illegal use of data collected through its products, as their management is inaccessible.

In some cases, we may use a third-party platform to manage the consent of the holder of personal data, such as WSO2, which meets the legal requirements for data protection, as defined on the institutional website: <https://wso2.com/privacy-policy>. The legal basis for processing data from the use of the consent management tool is the fulfillment of a legal obligation, pursuant to Law No. 13,709/2018.

3. WITH WHOM DO WE SHARE YOUR DATA?

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our controllers and all of their controlled companies), to the extent reasonably necessary for the stated purposes and in accordance with applicable law, as well as observing the bases treatment laws informed in this policy.

We may disclose your personal data to our insurers and/or professional advisors, to the extent reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice or entering, exercising or defending administrative, arbitration and/or cool. Furthermore, we may disclose your data to our suppliers to the extent reasonably necessary to provide you with our products and/or services and to ensure security in the use of our Services and in the use of your personal data, such as suppliers, marketing services and customer service. consumer, network and cloud service providers.

Financial transactions related to our Services and the purchase of our products and/or services are handled by our payment service providers, and we share transaction data with our payment service providers only to the extent necessary for the purposes of processing your payments, refund amounts, and handle complaints and queries related to these matters.

In addition to the specific disclosures of personal data established in this Clause 4, we may disclose your personal data whenever such disclosure is necessary to comply with a legal and/or regulatory obligation to which Intelbras is subject, as well as to protect its vital interests or the vital interests of another data subject.

Intelbras and other companies in its group have offices and facilities in other countries, as well as suppliers in other countries (website hosting, cloud services, payment gateways, technical support, development, modeling, customization, among others). In this way, we may transmit your data outside Brazil for the purposes indicated above. Intelbras adopts all appropriate measures and enters into the necessary contracts with its suppliers and foreign offices to ensure that the processing of personal data outside Brazil is carried out in accordance with the LGPD and in compliance with Intelbras policies.

You acknowledge that the personal data you provide to Intelbras through the Services or our products and/or services may be available to operators worldwide.

You acknowledge that the personal data you provide to Intelbras through the Services or our products and/or services may be available to operators around the world.

4. HOW LONG DO WE RETAIN AND WHEN DO WE DELETE YOUR DATA?

The personal data we process will only be kept for the period necessary for the purpose of the treatment and/or under the appropriate legal basis.

We take appropriate steps to ensure that we process and retain information, including personal information, for as long as any of the following circumstances apply:

- A. The duration for which the information is used to provide a support or service;
- B. As required by law, contract or regulatory obligations;
- C. As long as an account or subscription is active;
- D. On products, to ensure required functionality and performance, including responsibilities under warranties;
- E. To comply with applicable laws, including for tax and audit purposes;
- F. To enforce our rights, including litigation and collections;

5. WHEN CAN WE CHANGE THE PRIVACY POLICY?

Intelbras may change this policy at any time, and such updates are published on our Services and can be checked at any time.

We recommend that you periodically check our Services for any changes to this Privacy Policy.

In case of significant changes to this privacy policy, if necessary, we can notify you by e-mail about such changes or by means of specific messages in our Services, and the updated version will appear on the official website of Intelbras.

6. WHAT ARE YOUR RIGHTS REGARDING DATA PROTECTION?

Your main rights under data protection legislation are:

- a) right of access;
- b) right of rectification;
- c) right to object to processing;
- d) right to data portability;

- e) right of claim before the competent authorities;
- f) right to withdraw consent.

You have the right to confirm whether or not we process your personal data and where we do, and you have the right to access such personal data together with certain additional information. This additional information includes details of the processing purposes, the categories of personal data concerned and the recipients of the personal data. If the rights and freedoms of third parties are not affected, we will provide you with a copy of your personal data.

In some circumstances, you have the right to have your personal data erased without undue delay. These circumstances include: (i) the personal data is no longer necessary in relation to the purposes for which it was collected or processed; (ii) you withdraw consent to consent-based processing; (iii) you object to the processing; (iv) processing is for marketing purposes; and (v) the personal data was processed illegally. However, there are exclusions to your right to object to processing, such as when it is necessary to exercise the right to freedom of expression and information, to comply with legal and/or regulatory obligations, to exercise rights in proceedings, or even for the legitimate interest of Intelbras.

The holder has the right to object to the processing of his personal data, except for situations in which the legal basis of the treatment is necessary to meet the public interest or the exercise of any official authority vested in Intelbras, or even, in the face of interests legitimate third parties. Furthermore, Intelbras is careful to process data to meet its legitimate interest, to exercise the defense of administrative, legal or arbitration claims, safeguarding the interest of the holder, rights and freedoms.

You have the right to object to the processing of your personal data for direct marketing purposes. If you make such an objection, we will no longer process your personal data for this purpose.

If you consider that the treatment of your personal information violates data protection legislation, you have the right to request that Intelbras immediately stop the treatment in question.

Insofar as the legal basis for the processing of your personal data is consent, you have the right to withdraw this consent at any time. The withdrawal will not affect the legality of the treatment before such withdrawal.

In accordance with the Services you have contracted with Intelbras, you may, at your own expense, audit Intelbras' compliance with the terms of this Privacy Policy, by sending Intelbras a written request, including a detailed audit plan, at least six weeks before the proposed audit. You and Intelbras will work cooperatively to reach a final agreement on the audit plan.

The audit must be performed no more than once during a twelve-month period, during normal business hours, subject to Intelbras' local policies and regulations, and may not interfere with Intelbras' activities. If you wish to use a third party to conduct the audit, such third party must be mutually approved by you and Intelbras, subject to the execution of a confidentiality agreement approved by Intelbras. Upon completion of the audit, you will provide Intelbras with a copy of the audit report, which is classified as confidential information under the terms of your contract with Intelbras.

7. COOKIES, IDENTIFIERS, TRACKERS AND THIRD-PARTY INFORMATION

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser.

The identifier is then sent back to the server every time the browser requests a page from that server.

Cookies can be either “persistent” cookies or “session” cookies. A persistent cookie will be stored by a web browser and will remain valid until the defined expiration date, unless deleted by the user before the expiration date. A session cookie, on the other hand, will expire at the end of the user's session, when the web browser is closed.

Cookies typically do not contain any information that personally identifies a user, but the personal information we store about you may be linked to information stored in and obtained from cookies.

We use cookies for the following purposes:

- a) authentication - we use cookies to identify you when you use our Services;
- b) status - we use cookies to help us determine whether you are logged in to our Services;
- c) personalization - we use cookies to store information about your preferences and customize Services for you;
- d) security - we use cookies as an element of security measures used to protect user accounts, including preventing fraudulent use of login credentials and to protect our Services and services generally;
- e) advertising - we use cookies to help us display advertisements that will be relevant to you;
- f) analytics - we use cookies to help us analyze the use and performance of our website and services;
- g) Cookie Consent - We use cookies to store your preferences regarding the use of cookies more generally.

Our service providers use cookies and these cookies may be stored on your computer when you use the Services.

We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website usage through cookies. Information collected in connection with our website is used to create reports on the use of our website. Google's privacy policy is available at: <https://policies.google.com/privacy>.

We serve interest-based ads from Google AdSense on our Services. They are personalized by Google to reflect your interests. To determine your interests, Google will track your behavior on our Services and on other websites using cookies.

We use Google Tag Manager on our Sites to create and update Google tags . You can view this service provider's privacy policy at <https://policies.google.com/privacy>.

Most browsers allow you to refuse to accept cookies and to delete cookies. Methods for doing this vary from browser to browser and versions.

Blocking all cookies will have a negative impact on the usability of many websites. If you block cookies, you may not be able to use all features on our Services.

We also use mobile device identifiers that are stored on your mobile device and track certain data and activities that occur on or through your device. Mobile device identifiers allow the collection of personal data (such as media access controls) as well as non-personally identifiable information (such as usage and traffic data).

In addition to identifiers, we also use Web Beacons that help us better manage the content on our Sites by letting you know what content is effective. Web Beacons are embedded in or associated with certain emails or other communications you receive from Intelbras or Our partners. Web Beacons help us track your responses and interests and provide content and services that are relevant to you. For example, they may let us know when you take action based on emails we send them. Web Beacons also allow us to enhance our behavioral advertising (defined below).

Some parts of our Services may include social media features, such as the Facebook “like” button, and widgets, such as the “share” button. These social media features are either hosted by a third party or hosted directly on our Services. When you use these tools, the party providing the tool, the third party operating the social media services and/or Intelbras may receive personal data about you. By using these tools, you recognize that some information, including personal data, from your social media services will be transmitted to Intelbras and, therefore, this information is covered by this Privacy Policy, and also by the privacy policies of third parties.

We may use third-party services, such as open search tools and social media, to obtain information about you (such as your name or company) and enrich your personal data by obtaining publicly available information about you, such as your title, employment history and contact.

8. ONLINE BEHAVIORAL ADVERTISING

Some of our advertising (“Behavioral Advertising”) involves the use of Tracking Tools to collect information about a user's online activities over time and across unaffiliated websites and applications, and to provide advertisements to the user based on such user's interests (as inferred from the user's online activity) or use of our Services. Behavioral advertising may appear on our Services. We work with third parties to deliver behavioral advertising, such as advertising networks, data exchanges, traffic measurement service providers, marketing analytics service providers and other third party service providers. Such advertising service providers perform services such as

facilitating ad targeting and measuring and analyzing the effectiveness of advertising on the Services. Such targeting services help us to display behavioral advertising tailored to your profile and prevent you from showing repeated advertisements, as well as allowing you to research the usefulness of advertisements.

9. ONLINE SUPPORT

The CHATBOT service is available to all users of INTELBRAS devices and accessories and only while the channel is active, according to defined times, on weekdays: 8:00 am to 7:30 pm and Saturday: 8:00 am to 2:00 pm. INTELBRAS reserves the right to change the opening hours without prior notice.

The registration required to use the CHATBOT aims to identify the people to provide the requested service and the information collected will be treated in accordance with this Privacy Policy.

The CHAT service has the purpose of providing USERS with more information about INTELBRAS products and services, clarifying doubts related to repair, characteristics and functions of devices.

The USER undertakes not to transmit or make available to the CHAT service operator content that:

- a. Contain data, texts, photographs, files, links, software or other contents, which according to the assessment of INTELBRAS are considered in any way illegal, harmful, threatening, inappropriate, abusive, harassing, defamatory, vulgar, racist or that in any way otherwise give rise to hate speech;
- b. In any way they contradict or violate fundamental rights and public freedoms, as well as contrary to the legal system;
- c. Are inaccurate, false, ambiguous or out of time, so that they may mislead about their object or about the purposes of the person who communicates;
- d. Violate any intellectual property rights, industrial or business secrets or communications belonging to third parties, unless the user has control rights or all necessary consents for this purpose;
- e. Incorporate viruses or other physical or electronic elements that may cause damage or prevent the normal functioning of the network, system or computer equipment and third-party programs or that may cause damage to electronic documents and files stored in these computer equipment;
- f. Consist of the use of offensive, coarse, racist language or publication of libelous, abusive or privacy-invading material;
- g. Contains information about illegal or criminal activity, such as: Posting, posting, uploading, distributing or disseminating inappropriate, profane, obscene, indecent or illegal topics, names, materials or information;

- h. Disrupt the technical procedures of the Chat service, interrupt the normal functioning of the CHAT service;
- i. Harass, threaten, defame, put into difficulties, cause embarrassment or cause inconvenience in any way to any individual, whether natural or legal person.

INTELBRAS does not control the contents transmitted, disseminated or made available by the USER through the CHATBOT. However, INTELBRAS reserves the right to revise, at its sole discretion, at any time and without prior notice, on its own initiative or at the request of a third party, contents transmitted, disseminated or made available by the USER through the CHATBOT and even prevent its transmission, diffusion or availability to third parties in the event that they are contrary to the provisions of these Terms of Use.

In order to ensure compliance with the above rules, INTELBRAS reserves the right to restrict or eliminate access to the CHATBOT service if improper access, hazing, use of profanity, false identification of the USER, among others, is identified.

10. PRIVACY COMMITTEE

You can exercise any of your rights in relation to your personal data [here](#) or for clarification and questioning about this Privacy Policy by email privacy@intelbras.com.br.

Data Protection Officer: Maciel Gesser

11. INCIDENTS

Intelbras promptly evaluates and responds to the occurrence of incidents that may compromise your Personal Data.

If Intelbras becomes aware of any incident involving the Personal Data of users of the Services, Intelbras will notify you and the competent authorities.

12. OUR DATA

The Services are owned and operated by Intelbras.

Intelbras is registered with the CNPJ/MF under nº 82.901.000/0001-27, having its headquarters in the City of São José, State of Santa Catarina, at Rodovia BR 101, KM 210, Área Industrial, CEP 88104-800.