



PRIVACY POLICY

Last updated on September 11, 2024

Videolar-Innova ("Innova" or "We") values and respects the privacy and protection of the Personal Data of its employees, customers, and partners. All information collected by Innova is processed and stored with ethical commitment, upholding best practices and governance standards, and in compliance with applicable laws and regulations, including Law 13.709/2018 - General Law for the Protection of Personal Data (the "LGPD"). Committed to the transparency of our activities and the maintenance of our relationship of trust, this Privacy Policy (the "Policy") aims to clarify our practices related to the Processing of Personal Data in the context of using our website (the "Innova Website").

1. Definitions and General Provisions

For the purposes of this Policy, terms beginning with capital letters, unless otherwise expressly defined, shall have the meanings assigned below:

- (i) Personal Data: any data that identifies or may identify a natural person.
- (ii) Sensitive Personal Data. Personal Data regarding racial or ethnic origin, religious beliefs, political opinions, union membership or membership in an organization of a religious, philosophical, or political nature, data related to health or sexual life, genetic or biometric data.
- (iii) Applicable Data Protection Laws. LGPD and other laws and regulations concerning Personal Data that are applicable to Innova, as periodically published.
- (iv) You or User. Refers to any natural person whose Personal Data may be Processed by Innova in the context of browsing on the Innova Website, in accordance with the purposes indicated in Item 2 below.

The concepts of "Processing," "Controller," "Processor," "ANPD," and "Data Subject" are used in accordance with the definitions of the LGPD and other Applicable Data Protection Laws.

2. Why We Process Your Personal Data

Innova Processes Personal Data (i) actively and directly provided by You in the forms available on the Innova Website, contact channels, whistleblower channel, or to connect to the Intranet, or (ii) resulting from browsing on the Innova Website.

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The table below indicates the purposes for which We process Personal Data.

Personal Data Category	Purpose
Browsing Data	To (i) comply with applicable legislation, especially Law 12.965/2014 - "Civil Rights Framework for the Internet," and (ii) enhance the functionalities of the Innova Website, We process server log information which may include details like device IP (Internet Protocol) address, access dates and times, Innova Website features or pages viewed, among other system activities, operating system, browser type, and interactions with the Innova Website.
Cookies and Similar Technologies Data	We use cookies as indicated in section 3 of this Policy.
Contact Data	To allow You to contact us through Contact tabs: "Press Office," "Ombudsman," "Contact Us," and "Supplier Channel," including to request the exercise of your rights as provided in Chapter 6 of this Policy, We may process the following Personal Data: name, email, phone, company You are affiliated with, as well as any Personal Data You include in the message content.
Job Applicant Data	<p>To allow You to participate in selection processes, We may process the information included in your resume. Initial selection process management is conducted by our partner "Gupy," which acts as the Data Controller in this process. Please note that when You register in the Innova database, it automatically becomes part of Gupy's general database, which is responsible for storing your Personal Data. By proceeding, You must be aware of and agree to the Terms of Use and Privacy Policy of Gupy.</p> <p>Notwithstanding other information contained in your resume, We process your name, gender, nationality, birth date, email, address, as well as your academic and professional history.</p> <p>Please refrain from providing Sensitive Personal Data in resumes, unless necessary for the nature of the position advertised.</p>
Whistleblower Channel Data	To allow You to report concerns or events that, in your view, violate Innova's principles, code of conduct, or applicable law, allowing Innova to assess the report and proceed with investigations, as deemed appropriate. To submit your report, if You choose to identify yourself in the report, We will process your name, email, phone, and any Personal Data included in your report, with full confidentiality as required by the procedure.

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3. Cookies

3.1. What are cookies?

Cookies are small files that can be stored on your device (computer, smartphone, or other Internet-connected device) when You visit the Innova Website. Cookies are useful because they allow a website to recognize a user's device.

3.2. What types of cookies do We use and for what purposes?

Cookie Type	Description	Cookie Name
Functional	The pll_language cookie is used to remember the language selected by the user upon returning to the website and to retrieve language information when otherwise unavailable.	pll_language
Necessary	CookieYes is used to remember user consent preferences for compliance on subsequent visits to this website. No collection or storage of visitor personal information.	CookieYes-consent

3.3. Browser Cookie Settings

To manage cookies, one option is browser configuration. Tutorials on cookies for specific browsers can be found at the links below:

If using Internet Explorer:

<https://support.microsoft.com/pt-br/help/17442/windows-internet-explorer-delete-manage-cookies>

If using Firefox:

<https://support.mozilla.org/pt-BR/kb/gerencie-configuracoes-de-armazenamento-local-de-s>

If using Safari:

<https://support.apple.com/pt-br/guide/safari/sfri11471/mac>

If using Google Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&oco=1&hl=pt-BR>

If using Microsoft Edge:

<https://support.microsoft.com/pt-br/help/4027947/microsoft-edge-delete-cookies>

If using Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

You may change permissions, delete, block, or refuse Cookies in your browser at any time, except for those strictly necessary as explained above.



The Innova Website may contain links to third-party sites not covered by this Policy. We recommend reviewing third-party privacy policies before interacting with their sites.

4. With whom We share your Personal Data

Innova may provide your Personal Data to third parties in the cases indicated below. Note that We will only share your information if strictly necessary.

Third Parties with whom We may share User Personal Data	Purposes
Service providers	To enable the proper functioning of the Innova Website and the database, as well as to manage Innova's internal procedures derived from Personal Data collected from the Innova Website, such as legal, accounting, and IT advisors, background check companies (for suppliers), crisis management, and investigation companies.
Authorities	To comply with a legal obligation under applicable law, or to respond to a judicial decision, such as a search warrant, court order, or subpoena.
Third Parties (counterparties, accountants, auditors, financial consultants, attorneys, and the like)	To facilitate the sale, partial or total, of our business or assets or shares, or as part of any corporate reorganization or restructuring, consolidation, spin-off, or merger, allowing us to share your Personal Data with business-related third parties such as accountants, auditors, financial consultants, and attorneys. In this case, We will take necessary measures to ensure privacy rights continue to be protected, as set forth in this Privacy Policy.
Other	In cases of (i) legitimate interest of ours or third parties, provided that We consider that such interest does not infringe your fundamental rights and freedoms and requires the protection of your Personal Data; (ii) legal compliance; (iii) regular exercise of rights in judicial, administrative, or arbitration proceedings; (iv) criminal investigation; (v) to maintain the safety of any person, and/or (vi) to prevent imminent death or physical harm.

5. International Transfer

Innova may transfer your Personal Data to servers located outside Brazil, for instance, servers located in the United States of America. Any international transfer will be made in accordance with the LGPD. Innova will require its overseas business partners to adopt legal measures to protect your Personal Data with at least a level of protection similar to that provided by Brazilian law and this Policy.

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6. Your Rights as the Data Subject

In relation to your Personal Data and Processing carried out by Innova, You have the rights indicated in the table below. You may exercise your rights by submitting the required documents and/or information via email to proteção.dados@innova.com.br.

Rights	
Access	At any time, You may request a copy of your Personal Data stored in our systems. You may request a copy of: (1) the categories and specific Personal Data collected about You; (2) the categories and specific sources from which Personal Data is collected; (3) the purpose of the collection of your Personal Data; and (4) the categories and specific third parties with whom We share your Personal Data.
Correction and Update	Request the correction and updating of your Personal Data. Where applicable, We will inform third parties with whom your Personal Data has been shared of the correction and update.
Portability	Request the transfer of your Personal Data from Innova's database to a third party.
Consent Revocation	Revoke consent You have granted. If You request the revocation of your consent, You may be unable to use certain functionalities of the Innova Website.
Restriction, Objection, or Deletion	(i) request the blocking of your Personal Data, temporarily suspending Processing; (ii) object to the Processing of your Personal Data, if You suspect it is being processed contrary to this Policy; and (iii) request the deletion of your Personal Data, in which case We will erase all your Personal Data without possibility of recovery, except as provided by law. We may retain your Personal Data if necessary to (i) comply with applicable law; or (ii) perform a contract or exercise our rights in judicial, administrative, or arbitration proceedings. Except as mentioned, We will delete or anonymize your data (using the technique available at the time).

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Review of Automated Decisions	Request the review of a solely automated decision that affects your interests.
Complaint to ANPD	File complaints to ANPD regarding Personal Data Processing carried out by Innova. You may contact ANPD through the means indicated on the authority's website: ANPD – Portuguese (Brazil) (www.gov.br)

It is necessary to prove your identity and/or your representative's to ensure the exercise of your rights. This is a security measure to ensure that Personal Data is not disclosed to anyone who does not have the right to receive it, or to prevent unauthorized requests on your behalf.

7. Information Security

Innova adopts security, technical, and administrative measures to protect Personal Data from unauthorized access and accidental or unlawful destruction, loss, alteration, disclosure, or any form of inappropriate or unlawful Processing. We respect privacy and protect the Personal Data of Data Subjects in our internal processes in accordance with legally established principles. We handle Personal Data with a high level of security, implementing best practices for its protection, including but not limited to encryption techniques, data backup, access segregation, internal information security policies and procedures, periodic security monitoring and testing, and security software usage.

It is important to note that no information or Personal Data Processing is completely secure and may be subject to exploitation of breaches and vulnerabilities by third parties. If You suspect any violation of the rules of this Policy, please contact us immediately through the contact channel provided in item 10 below.

8. Personal Data Retention Period

We will retain your Personal Data only as long as it is necessary or relevant for the purposes described in this Policy, respecting legal retention periods for Personal Data thereafter, as needed for Innova to fulfill its contractual or legal obligations or defend itself in a judicial or administrative proceeding.

To determine the appropriate retention period for Personal Data, We consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purpose of Processing your Personal Data, and whether We can achieve those purposes through other means, in compliance with applicable legal requirements.

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9. Updates

As We continuously strive to improve our products and processes, this Policy may be subject to regular updates to reflect best practices. Therefore, We recommend that You regularly access the Innova Website to view and stay informed of the most updated version of this document.

10. Contact Data

If You have any questions regarding our Policy or how We Process your Personal Data, please contact us at the email address protecao.dados@innova.com.br

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