

## CONSENT

# FOR PROCESSING PERSONAL DATA FROM APEXBRASIL CUSTOMERS

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### Preamble

The personal data requested by the Customer Relations Division (either through forms, virtual or face-to-face service points, or communication points) is paramount for the identification of stakeholders in their interaction with ApexBrasil. By doing this, we are able to serve clients in a personalized way and according to their profile.

In these interactions, personal data is provided by data subjects willingly. However, in cases where data subjects do not consent to their data being processed by ApexBrasil, it is implied that they will not be able to fill in forms to be part of actions, nor receive communications, opportunities and information.

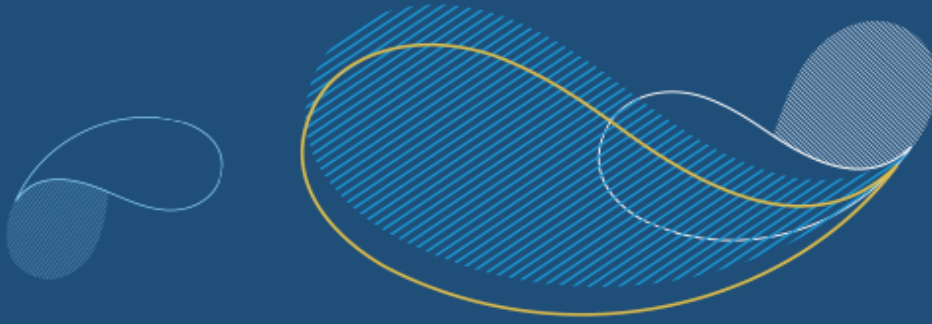
In order to exercise your rights (Art. 18 of Law No. 13,709/2018) or if you have any questions, please contact us by e-mail at [lgpd@apexbrasil.com.br](mailto:lgpd@apexbrasil.com.br). Access the [Terms of use and data protection of Apex- Brazil](#).

### 1. What data do we collect about you and for what purpose?

To enable us to provide services and improve customer experience, we collect and use your personal data in different customer relationship processes.

#### 1.1. Personal data provided spontaneously by the data subject

- Full name - for identification in customer service and strategic journeys
- E-mail (preferably corporate) - for identification and as the main form of contact for sending/receiving communications made by the Agency
- CPF (Brazilian identification number) - only required for some services, generally related to payment data
- Address - only required for some services, usually related to payment data
- Telephones (landline and/or mobile) - for direct contact and/or for sending instant messages by the Agency
- Professional position - for strategic activation journeys for certain actions



## 2. How do we collect this data?

Personal data is collected as follows and for the following reasons:

- Both through registration forms for participation in actions and events, and through administrative procedures directly involved in the participation itself (In events organized by the Agency as well as in events resulting from partnerships).
- At events promoted by the Agency or by partners – in order to confirm participation.
- In customer service interactions (by telephone, e-mail, or face-to-face contact) – in order to identify and respond to the demand.
- On the website, on forms, in “contact us” links - to identify whoever is interested- and in content download links - to identify and record access history, and build a personalized customer relationship journey.
- On platforms used by the Agency or partners to provide their services (such as business roundtables, matchmaking, virtual events, company directories, portals).
- In the personal data management and consent area for ApexBrasil itself.
- In terms of adherence to actions and events organized by the Agency

## 3. Consent

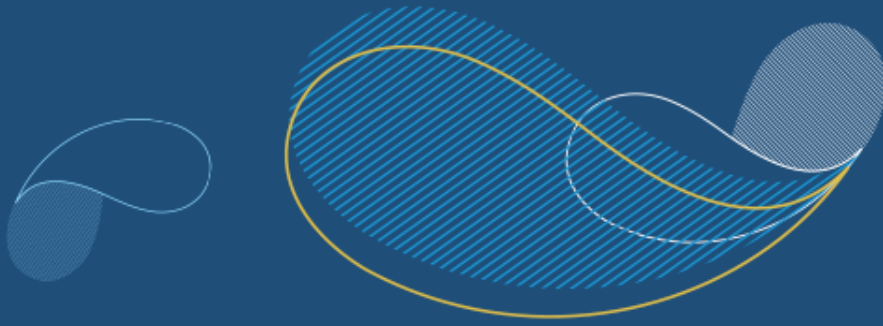
Client consent is the backbone of our data processing policy. It consists in the willing, informed and unequivocal expression by which the person (data subject) authorizes ApexBrasil to process their data.

Thus, according to the General Law on Data Protection, client’s data will only be collected, processed and stored after their prior express consent.

In compliance with the applicable legal requirements, consent will be sought expressly for each of the aforementioned purposes, highlighting ApexBrasil's dedication to openness and good faith with its clients.

You acknowledge and agree to the terms of this Policy and ApexBrasil's Terms of Use and Data Protection by using ApexBrasil's services and submitting your personal information. Thereby, you also understand your rights and how to exercise them. ApexBrasil Privacy Policy will replace and supplement this document when issued, covering the topics described below. The Policy will be posted on ApexBrasil website and widely disseminated.

The client is free to withdraw their consent at any moment and without any cost.



It is relevant to remember that revoking consent for data processing may indicate that the operation that depends on the service cannot be adequately provided. You will be made aware of these repercussions beforehand.

### 3.1 How and when is consent collected?

- In the following situations, ApexBrasil requests permission to process the personal data of its clients:
- In forms pertaining to the registration for a given event or action, or to access a downloaded file.
- Through direct phone or email communication with the Customer Service Division.
- On the website, namely in the “Contact Us” area.
- in the dedicated space for managing and accessing personal information kept in the Customer Relations Management database.

## 4. What is the scope and duration of consent?

### 4.1 Regarding scope

Given the processes that involve communication and other forms of relations with clients carried out by ApexBrasil technical personnel and by other areas responsible for communication, the basic consent described in the previous topics include:

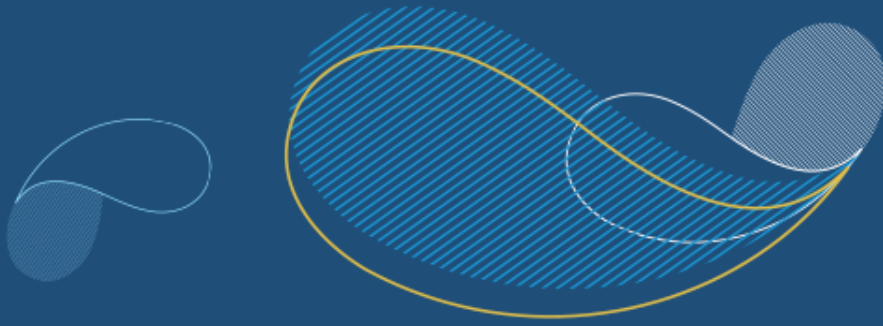
- communication and research vis-à-vis the client, which circumscribes to activities/information concerning the agreed object and/or other products/services provided by ApexBrasil according to the client's profile (strategic segmentation);
- administration, management, execution, and coordination vis-à-vis partners in the relevant action wherein consent and personal data are being collected.

### 4.2 Regarding the term of validity

The term of validity is divided according to the level of engagement based on the procedural deadlines for relations between the Agency and its clients, such as adhering to sectoral projects with a predetermined duration, the length of training procedures, and the journeys of clients who have communicated and interacted with the Agency.

#### 4.2.1 Engaged customers:

- Customers that have signed a membership agreement and are users of ApexBrasil products and services. Customers who have already signed a term and are still using goods and services but have not signed a formal term are among them, as are terms signed between now and four years ago.
- Customers who purchase ApexBrasil goods and services—such as webinars, lectures, study materials, etc.—without a formal membership contract.



- Clients who applied to participate in an event or action but were denied access (due to a lack of vacancies or other objective criteria) within the one-year period before the consent form collection began.

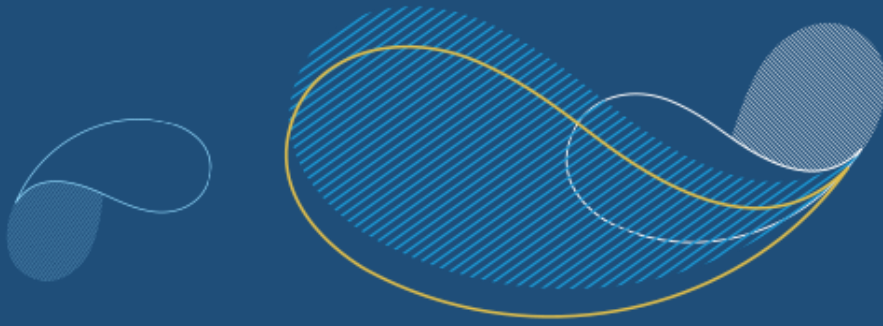
**Table 1**

Object: Personal information of any individual covered by ApexBrasil's customer relations management system (CRM) database as part of its operations related to business events and actions, and who either use or have already signed up to use the agency's goods and services.

TERM OF CONSENT AND DATA STORAGE		FINAL DESTINATION
Current Phase	Intermediate Phase	
Consent is valid for 5 years from the most recent "agreement".	<p><b>1 year or less, until the date of consent.</b></p> <p>ApexBrasil will run campaigns to update client data and obtain consent during this time. If the client's data is updated, the cycle will resume in its current phase.</p> <p>This data will no longer show up in the database as enabled once the Agency has attempted to update the client's data for no more than a year without success. They will therefore stop receiving emails and switch to a parallel database that is only available to the audit function for a duration of five years.</p> <p>The customer may request to be withdrawn from the base at any time, and this request will be fulfilled (unless otherwise allowed by law).</p>	<p><b>Permanent storage for 5 years for historical and monitoring purposes, which is followed by permanent elimination.</b></p>

**4.2.2 Customers with low or no engagement**

- Potential customers: those who applied for help through ApexBrasil's channels and were registered in the database, even if they had not yet granted consent for data processing, up to six months after the date of registration, and those who did not fall into the previous categories and who received marketing emails from ApexBrasil during that time and clicked or opened them (as determined by the email marketing management systems).



- People who are not in the aforementioned categories and who have registered in the database as a result of an ApexBrasil or partner institution activity, action, or event in which the Agency has taken part or offered some assistance, with the appropriate authorization to share the data. An initial email will be sent to you upon database registration to confirm your permission to data processing, along with options for contact information and content preferences..

**Table 2**

TERM OF CONSENT AND DATA STORAGE		FINAL DESTINATION
Current Phase	Intermediate Phase	
<p><b>Consent is valid for 5 years from the most recent "agreement".</b></p>	<p><b>1 year or less, until the date of consent</b></p> <p>ApexBrasil will run campaigns to update client data and obtain consent during this time. If the client's data is updated, the cycle will resume in its current phase.</p> <p>If the client is unable to update their data within a maximum of one year after the Agency requests it, the data will be removed from the database.</p> <p>The customer may request to be withdrawn from the base at any time, and this request will be fulfilled (unless otherwise allowed by law).</p>	<p><b>Exclusion from the base</b></p>

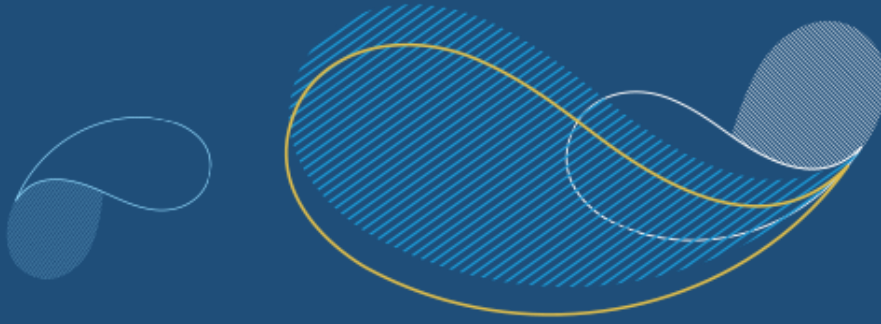
Generally speaking, personal information will be retained for as long as the client and ApexBrasil are associated. Unless specifically permitted by law in Article 16 of the General Data Protection Act, personal data will be anonymized or removed from our databases at the conclusion of the storage period.

I - the controller's adherence to a legal or regulatory requirement;

II-a study conducted by a research institution that ensures the anonymization of personal data whenever feasible;

III-transfer to a third party, subject to compliance with the data processing standards outlined in this law; or

As long as the data is anonymized, it is solely for the controller's use and cannot be accessed by outside parties.



Stated differently, even if other data is deleted, personal information that is necessary to comply with legal, judicial, and administrative decisions and/or to exercise the right of defense in judicial and administrative processes shall be retained.

Our dedication to the security and privacy of your data is reflected in the way Apex-Brasil stores the information it collects. To ensure the confidentiality, integrity, and inviolability of your data, we use technological protection methods and techniques. We also regulate access to stored data and have security measures that are suitable for the dangers.

### **5. How is consent renewed and what happens if it is not renewed within the established period?**

The personal data gathered by ApexBrasil will be used and retained for as long as required to offer the service or to achieve the goals specified in this document, taking into account the rights of the data subjects and controllers.

With each new submission of one of the completed forms that includes the option to "agree" to the processing of data, as well as through the exclusive personal data management area where the client consents to the processing of their data by ApexBrasil, the consent is renewed and, as a result, a new cycle of validity begins.

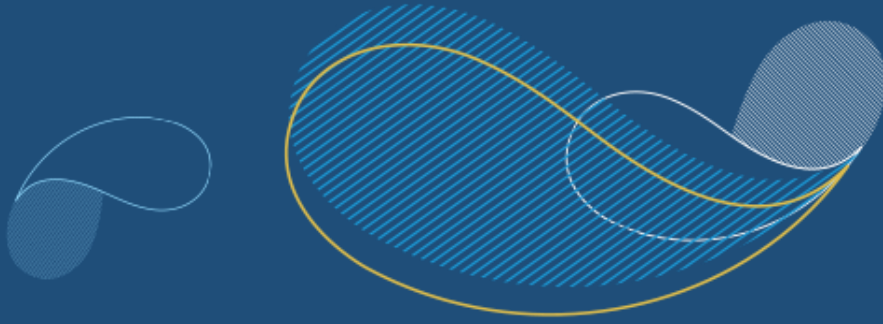
The holder's database registration will be dormant for up to a year if they do not renew their consent, as indicated in the tables in the previous section. The holder will no longer be able to access studies on the site, stop receiving marketing emails, register for any action without permission, or get in touch with the ApexBrasil team. For the purposes of auditing and creating anonymization and removal procedures, the data is stored in a separate, private, dormant database that is only accessed by authorized individuals during this time.

### **6. What are the rights of the holder?**

According to article 18 of the General Data Protection Law, ApexBrasil guarantees its customers their ownership rights. In this manner, the client can, at any moment, and without charge:

- Verify the existence of data processing, either in a comprehensive and understandable manner or in a simplified form.
- Gain access to your data, which you can request in a readable paper copy or via an appropriate, safe, and electronic method.
- Update, change, or rectify your data by submitting a correction request.
- Use anonymization, blocking, or deletion to reduce your data when it is superfluous, excessive, or processed illegally.
- Through a registration data report that ApexBrasil generates on you, you can request the portability of your data..





- **Delete your data that has been processed with your consent, unless the law specifies otherwise.**
- **Deauthorize the processing of your data by withdrawing your consent.**
- **To learn about the repercussions of refusing to give consent and the possibility of doing so.**

### **7. How can you exercise your rights as a holder?**

Part of the data subject's rights are accessible by self-service through the exclusive online area for managing personal data and consent, via [this link](#):

For other rights, the holder should contact ApexBrasil through the following available means:

- Telephone: +55 61 2027-0202
- E-mail: [lgpd@apexbrasil.com.br](mailto:lgpd@apexbrasil.com.br)

In order to ensure that you are correctly identified as the owner of the personal data that is the subject of the request, we may ask for documents or other evidence that can prove your identity. In this case, the customer will be informed in advance.

### **8. On data security and sharing**

We employ administrative, electronic, and physical tools designed to preserve our customers' privacy in order to safeguard their personal information.

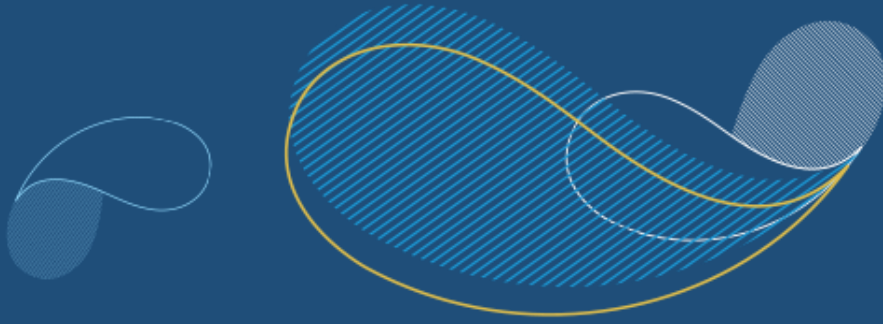
We use these technologies with consideration for the type of personal information gathered, the context and intent of the processing, and the potential dangers to the rights and liberties of the data subject gathered and processed.

The following are some of the actions we have taken:

- Your personal information is only accessible to those who are authorized.
- Only once you have provided a confidentiality agreement can your personal information be accessed.
- Your personal information is kept in a trustworthy and safe atmosphere.

ApexBrasil won't give your personal information to any unapproved third party in order to protect its customers' privacy.

The document contains more details on the aforementioned problems with ApexBrasil's client relations procedures. [Terms of Use and Data Protection](#).



### 8.1 Responsibility

ApexBrasil provides for the responsibility of agents who act in data processing processes, in accordance with articles 42 to 45 of the General Data Protection Law.

In the event that the National Data Protection Authority requires the adoption of measures in relation to the processing of data carried out by ApexBrasil, we undertake to follow them.

## 9. Cookies or browsing data

ApexBrasil uses cookies, which are text files with navigational data that are delivered by the platform to your computer and stored there. In brief, cookies are employed to improve user experience.

The customer acknowledges that they are aware of, and agree to the use of a system for gathering browsing data on their device through the use of Cookies by visiting our website and giving their approval.

You can block or reject cookies, modify permissions, and do so at any time and for free. However, certain of the platform's features might not function properly if you remove your consent for specific cookies.

You can easily manage your browser's cookies by going to the Cookies management section of your browser's settings. The following links will take you directly to tutorials on the topic:

If you use [Internet Explorer](#); [Firefox](#); [Safari](#); [Google Chrome](#); [Microsoft Edge](#); [Opera](#).

ApexBrasil's Privacy Policy, which will be widely distributed and posted on the Agency's website, will contain complementary information to this document.

If you have any queries or would like to exercise your rights under Article 18 of Law No. 13,709/2018, please email us at [lgpd@apexbrasil.com.br](mailto:lgpd@apexbrasil.com.br).

This document was prepared in Portuguese and English. In the event of any discrepancy in interpretation between the versions, the Portuguese version will prevail.