

Privacy Policy

1. Objective

The External Privacy Policy of the COMPANY ("Policy") was created to demonstrate our commitment to the privacy and security of information collected from Users of interactive services offered on the website.

2. What personal data will be processed by our COMPANY?

We may collect information actively provided by you, the "User," at the time of contact or registration, through the completion of contact forms and/or newsletters, as well as information collected automatically when using our services. Thus, two types of personal data are processed: (i) those provided by the User and (ii) those collected automatically by the COMPANY.

2.1. Personal Data Provided by the User

The COMPANY collects all personal data actively provided by the User when contacting or registering on our website. These may include: Full name, email address, telephone number, mobile number, date of birth, city, position, company, message, and files. Regardless of which personal data the User actively provides to our COMPANY, we will only use those that are effectively relevant and necessary to achieve the purposes declared to the User at the time of data collection.

2.2. Data Collected Automatically by our Website

The COMPANY collects a series of information automatically on the user interaction portals, such as: characteristics of the access device, browser, IP address (with date and time), IP origin, information about clicks, accessed pages, search terms entered in our portals, among others. For such collection, the COMPANY will use some standard technologies such as cookies, pixels, and tags, which are used to improve your browsing experience on our services according to your habits and preferences.

The COMPANY does not process data defined as sensitive, understood as those related to racial or ethnic origin, religious beliefs, political opinions, membership in a trade union or religious, philosophical, or political organization, health or sexual life data, genetic or biometric data, nor data of children, understood as individuals under the age of 12, for the general purposes stated here. In the unlikely event that it is necessary to process such data, we will request specific and separate consent from the User or their legal guardians, based on the authorizing provisions of the General Data Protection Law.

3. For what purposes will our COMPANY process your data?

The personal data processed by our COMPANY has the main purposes of enabling the User to become aware of the product and service offerings through the website, providing information through contact forms or newsletter subscriptions, identifying Users who browse the website, and keeping User data up to date.

Our COMPANY may use your information in other services provided directly by us, respecting the stated purposes and the consent you have previously given us, when there is a legal requirement for such collection.

In some cases, we may process your personal data when necessary to comply with a legal obligation or exercise our rights in a judicial, administrative, or arbitral process.

Furthermore, we may also process personal data based on our legitimate interests, always within the limits of your expectations and never to the detriment of your interests, rights, and fundamental freedoms.

Additionally, the collected information may, upon acceptance of our Policy, be used for advertising purposes, such as sending marketing emails to the user or contacting them via phone, SMS, mail, and messaging applications like WhatsApp. If you feel uncomfortable and no longer wish to receive any advertising materials from our COMPANY, you can request to unsubscribe at any time by expressing your opposition.

4. Who will the COMPANY share your personal data with?

The COMPANY utilizes partnerships with marketing platforms and ERPs to operate its services. Therefore, the COMPANY may share your personal information in the following circumstances:

- A. With partner companies and suppliers involved in the development and provision of services to you.
- B. With authorities, government entities, or other institutional third parties to protect the interests of the COMPANY in any type of conflict, including legal actions and administrative processes.
- C. In the case of corporate transactions and changes involving the COMPANY, where the transfer of information is necessary for the continuity of services.
- D. Upon court order or at the request of administrative authorities with the legal competence to make such a request.
- E. With financial institutions for credit analysis and protection purposes.

5. How does the COMPANY keep your personal data secure?

Any information provided by the User will be collected and stored according to the strictest security standards. To achieve this, the COMPANY adopts various precautions in compliance with the guidelines on security standards established by laws and its Information Security Policy, including:

- A. Utilizing the latest methods and equipment available in the market to encrypt and anonymize your personal data when necessary.
- B. Having protection against unauthorized access to its systems.
- C. Only authorizing specific individuals' access to the location where your personal information is stored, provided that such access is essential to the intended activity.
- D. Ensuring that any agents, internal employees, or external partners involved in the processing of personal data are committed to maintaining absolute confidentiality of the accessed information and adopting best practices for handling such information, as determined in the policies and procedures.

Access to the collected information is restricted to employees and authorized individuals. Those who misuse this information in violation of this Privacy Policy and Information Security Policy may be subject to appropriate disciplinary and legal sanctions.

While our COMPANY makes its best efforts to preserve your privacy and protect your personal data, no transmission of information is completely secure. Therefore, our COMPANY cannot guarantee full protection against unauthorized access, which may occur through methods developed to obtain information improperly, such as technical failures, viruses, or website database breaches.

In the unlikely event of such incidents occurring, our COMPANY ensures its full efforts to remediate the consequences of the event.

6. How long will our COMPANY store your data?

Your personal data will be automatically deleted by the COMPANY when they are no longer useful for the purposes for which they were collected and are no longer necessary to fulfill any legal obligations directed to the COMPANY, or when you request their deletion, unless data retention is expressly authorized by law.

User information may be retained to comply with legal or regulatory obligations, transfer to a third party - provided that data processing requirements are respected - and for the exclusive use of the COMPANY, including for the exercise of its rights in judicial or administrative processes.

7. What are the rights as a data subject?

The COMPANY respects and guarantees to the User the possibility of submitting requests regarding the processing of their personal data, based on the following rights:

- A. Confirmation of the existence of data processing;
- B. Access to personal data;
- C. Correction of incomplete, inaccurate, or outdated data;
- D. Anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- E. Portability of data to another service or product provider, upon explicit request by the User;
- F. Deletion of data processed with the User's consent;
- G. Obtaining information about the entities with whom the User's data has been shared;
- H. Information about the possibility for the User to refuse consent and to be informed about the consequences of such refusal;
- I. Revocation of consent.

8. How to exercise your rights as a data subject?

Your rights as a data subject can be exercised directly by you through the management of your registration information. Some requests may require sending an email to [teste@smarpavers.com](mailto:test@smarpavers.com), for evaluation and necessary actions to be taken.

Please note that if you request the deletion of essential information for the management of your registration with the COMPANY, it may result in the termination of your relationship and the cancellation of the services provided.

The COMPANY will make every reasonable effort to respond to User requests as quickly as possible. However, justifiable factors such as the complexity of the requested action may delay or prevent a prompt response. In such cases, the COMPANY will provide the reasons for any delay.

Please be aware that your request may be legally rejected due to formal reasons (such as an inability to verify your identity) or legal reasons (such as a request to delete data whose retention is within the lawful exercise of the COMPANY's rights). If it is not possible to fulfill your request, the COMPANY will provide reasonable justifications for its decision.

9. What are cookies and how does the COMPANY use them?

Cookies are files or information that can be stored on your devices when you visit websites or use online services. Generally, a cookie contains the name of the originating website, its lifespan, and a randomly generated value.

Our COMPANY uses cookies to facilitate the use of its website and applications, and to better adapt them to the interests and needs of its users. Cookies are also used to assist and improve the website's structure and content. They can be used to speed up your future activities and experiences on our services.

Through cookies, the website stores information about browser activities, including the IP address and accessed page. These activity logs are used only for statistical and metrics purposes of the provided services, or for investigating fraud or unauthorized changes to systems and registrations. They are not intended to provide data to third parties without the express authorization of the User.

These logs may include data such as the User's IP address, actions performed on the website, pages accessed, dates and times of each action and page access, information about the device used, operating system version, browser, and other installed applications.

Cookies can be categorized based on the information they store and their purpose, as follows:

A. Necessary Cookies: These are essential for the website to load properly and enable you to navigate and use all available functionalities.

B. Performance Cookies: They help understand how visitors interact with the COMPANY's webpage by providing information about the areas visited, the time spent on the site, and any encountered issues, such as error messages.

C. Functional Cookies: These enable the webpage to remember your choices in order to provide a personalized experience. They allow users to watch videos, use social tools, comment fields, forums, and more.

D. Marketing Cookies: They are used to provide more relevant content of interest to users. They can be used to deliver targeted advertisements or limit the frequency of their display on the website pages. They also allow for the measurement of the effectiveness of a launched advertising campaign.

You can revoke your consent regarding the use of cookies at any time by adjusting the settings in your preferred browser.

10. Contact

If you have any questions or concerns regarding your privacy or the processing of your personal data by the COMPANY, please email us at teste@smartpavers.com.

11. Applicable legislation

This Policy has been developed to comply with and adhere to Federal Law No. 13,709/2018 (General Data Protection Law), Federal Law No. 12,965/2014 (Brazilian Civil Rights Framework for the Internet), and Federal Law No. 8,078/1990 (Consumer Protection Code), without prejudice to compliance with other applicable laws for our COMPANY.