



Compliance Program

CONFIDENTIALITY AND SECURITY POLICY FOR SUPPLIERS AND THIRD PARTIES



1. OBJECTIVE



1.1 Confidentiality and security are fundamental elements of our service. Thus, we at Seal Telecom are always aware and attentive to the privacy and confidentiality of the representatives of our suppliers and third parties, herein called "You". This confidentiality policy describes how we collect and handle your Personal Data.

2. GUIDELINES

2.1 Terms and Definitions

For the purposes of the present Confidentiality Policy, the following are considered:

- **Holder:** Natural person to whom the personal data that are being processed refer. In this Term referred to as "User".
- **Personal data:** Information related to identified or identifiable natural person.
- **Sensitive personal data:** Personal data on racial or ethnic origin, religious belief, political opinion, union membership or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data, when linked to a natural person.
- **Anonymized data:** Data related to a holder that cannot be identified, considering the use of reasonable and available technical means at the time of its handling.
- **Database:** Structured set of personal data, established in one or several locations, in electronic or physical support.
- **Handling:** Any operation performed with personal data, such as those referring to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction.
- **Anonymization:** Use of reasonable and available technical means at the time of handling, whereby a data loses the possibility of association, directly or indirectly, with an individual.
- **Elimination:** Exclusion of data or set of data stored in a database, regardless of the procedure used.

2.2 Information you provide to us

In general, we collect information for contact, such as name, email and business phone number or any other information that you optionally would like to provide, which will allow us to identify you in our environments (physical and virtual) and communicate with you.

Other data can also be requested such as personal identification document number (ID or CPF), registration of class, position, profession, education, license plate, among others. And even a copy of these documents.

You can choose not to provide personal information by not entering it on the Site or by not providing it if requested.



2.3 Information we collect automatically

We can also automatically collect video images captured by CCTV, if you are in person in our physical environment, according to our Confidentiality Policy, available at www.helloethics.com/sealtelecom

2.4 Why do we collect your data

- The purpose of registering personal data is:
 - Communicate with you during any period that we have a commercial or contractual relationship, to discuss proposals, contracts, requests for products or services, request guidance, among other activities related to the delivery of the product or execution of the contracted service.
 - Ensure compliance with obligations related to the delivery of the product or rendering of the contracted service.
 - Handle, evaluate and impose obligations or responsibilities related to the delivery of the product or rendering of the contracted service.
 - Exercise the rights of Seal Telecom.
 - Preserve and develop relationships with suppliers.
 - Manage estimate requests and budgets, as well as other binding or non-binding documents.
 - Inform them of new functionality, new products or launches, and special promotions.
 - Manage and deal with any matters of responsibility regarding products or services. develop the products and services of the supplier or Seal Telecom.

2.5 With whom we share your information

Seal Telecom may share or transfer information that you provide to that or us we collect in the following cases:

- Transfers related to business. Seal Telecom may share your information with other companies that we acquired, are acquired, or those that we merge with or with partners.
- Transfer to Service Providers. We may transfer information to third parties (legal entities) with whom we contract for the purpose of executing the contract or complying with the law.
- Compliance with Laws. Seal Telecom may determine that we need to share your information with the police or other governmental entities in order to comply with the law or the legal process.
- Protection of our rights. Seal Telecom may share your information to protect our rights and property. For example, we may share information if we believe it will prevent undue or unauthorized use of the website, protect the personal safety or property of our users or the public, or in the event of a legal requirement.
- To third parties that we hire to support in the execution of our marketing activities, with whom Seal Telecom maintains a formal contract and requires in a contractual clause the security of personal information in accordance with what is established in the information security laws in Brazil and Europe.
- With our clients when a third party is acting at a client and there is a need to provide data for access to locations, proof of employment, or any other need defined in bids or legislation.

Also, in the case of suppliers or third parties that process personal information on behalf of Seal Telecom, these should perform in a manner compatible with the law. Seal Telecom will be responsible, unless Seal Telecom proves that it is not responsible for the event that generates the damage.

Therefore, Seal Telecom may share personal information with third parties in connection with the operation of our business and consistent with the purpose for which the personal information was collected. Except as allowed or required by applicable law.

2.6 Location and data safeguards

How long we keep your information depends on a number of factors, including the type of information. In general, we retain personal information as long as we have an ongoing business need to retain it. After that period, we will delete it.

Seal Telecom is concerned with information security and implements physical, administrative and security measures designed to prevent unauthorized access. However, as no security measure is perfect or impenetrable, we cannot guarantee the security of the information you submit to us.

2.7 Data incidents

If Seal Telecom becomes aware of any unauthorized access, unauthorized use or disclosure of Visitor Data (a "Data Violation"), Seal shall analyze the facts of the Data Violation in the context of applicable laws, regulations, policies and contractual obligations to define the appropriate notification process. Seal Telecom shall provide timely notifications after becoming aware of a Data Violation and shall take reasonable technical measures to minimize damage and mitigate additional risks.

2.8 Confidentiality Commitment

Seal Telecom declares itself in compliance with the General Personal Data Protection Law.

2.9 Your Rights and Duties and Dispute Resolution

A Lei Geral de Proteção de Dados Pessoais concede a você determinados direitos no que diz respeito ao tratamento dos seus dados pessoais. São eles:

- **Access** - the right to be informed and to have access to your personal data.
- **Correction** - the right to request updating or change of your outdated, incomplete or incorrect personal data.
- **Portability** - the right to request that the personal data under our responsibility be transferred to another service provider.
- **Elimination** - the right to have your personal data deleted from our databases, except in cases where storage is required by law.
- **Anonymization or blocking** - the right to request that excessive personal data to be processed are subject to anonymization or that this excessive handling is excluded by us.
- **Revocation** - the right to revoke your consent for the purposes of processing personal data attached to it.

- **Information on the consequences of the revocation** - the right to be informed about the breakdown of the relationship with us and the execution of a specific purpose if you wish to revoke your consent.
- **Opposition** - your right to object to the processing of personal data that is out of line with the provisions of the General Personal Data Protection Law

You are responsible for the precision, accuracy and veracity of the personal data provided. Keep them always updated.

2.10 Dispute Resolution

In compliance with the General Personal Data Protection Law, **Seal Telecom** is committed to resolve complaints about the collection or use of your personal information. Individuals who wish to consult or complain about our policy should first contact the link available on our channel www.helloethics.com/sealtelecom

2.11 Other international users

Our website is hosted in Washington (United States). If you are a consumer accessing the website from any other location with laws or regulations governing the collection, use and disclosure of personal data that differ from the laws of Brazil, your continued use of the website, which is governed by the law of Brazil and these terms, indicates your consent to transfer your information to Brazil.

2.12 Child confidentiality

We do not allow child labor, so we do not collect data related to children.

2.13 Contact Information

If you have questions about this **Confidentiality Policy** or if you need to request access to, or update, change or remove, the personal information we control, you can do so by contacting us through the Seal Ethics available on the website at: www.helloethics.com/sealtelecom

2.14 Changes in this Confidentiality and Security Policy

Seal Telecom reserves the right to change this Confidentiality Policy whenever necessary, and it is up to you to check it whenever possible through our website, always checking the date of the last update.

We may also provide you with advance notice prior to the update taking effect, such as posting a visible notice on our Site or contacting you using the email address you have provided. We call attention to the use of information provided.



www.sealtelecom.com



Certification



Social Media

