

PRIVACY AND PERSONAL DATA PROTECTION POLICY

1. Purpose

netLex is committed to keeping Personal Data safe, respecting and ensuring the fundamental rights to privacy and informational self-determination. The purpose of this Privacy and Personal Data Protection Policy (Privacy Policy) is to establish, objectively and transparently, how netLex collects, stores, uses, shares, deletes and processes Personal Data.

2. Target audience

NetLex clients.

3. Introduction

This Policy applies to all information collected on our Platform worldwide. Some provisions may address specific and additional services that may not apply to all Users. By accessing our Platform, the User acknowledges the Data Processing practices set forth in this Policy.

In this Policy, we will use the terms as described in the box below, unless the context provides otherwise:

<u>Legal basis</u>	Legal hypothesis that justifies the processing of personal data.
<u>Customers</u>	Legal entities that hired the implementation services and the licensing for using the Platform.
<u>Cookies</u>	Small text files stored in your browser or device, which allow identification of a browser or device and of pages visited.
<u>Employee</u>	All natural people or legal entities that provide services to netLex, whether through a labor contract or through occasional service provision. .
<u>Personal Data</u>	All information related to an identified or identifiable natural person.
<u>netLex</u>	netLex Tecnologia Ltda., registered atCNPJ under No. 20.127.575/0001-87, with headquarters at Pernambuco Street, 554, 9th floor, Funcionários, Belo Horizonte/MG, Zip Code 30130-156, Brazil.
<u>Plataform</u>	netLex online ecosystems.
<u>Sub-processors</u>	Third party service providers used by netLex to offer services to Customers and Users.
<u>Data Subjects</u>	Individual to whom the Personal Data refers, whether as a User of the Platform or as a third party whose data are stored in the Platform.
<u>Data Processing</u>	Any operation carried out with Personal Data, such as those related to collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of the information, modification, communication, transfer, dissemination or extraction.
<u>Users</u>	Individuals over the age of 18, connected by any means to the Customer, who perform actions directly on the Platform.

4. What data we can collect

netLex performs Personal Data Processing necessary for its activities, and the amount and type of data collected by netLex varies according to the use of our services. Still, most of the Personal Data processed by us is provided directly by the Data Subjects or by the Customer.

For the sake of transparency, below is a list of the Personal Data we handle.

Source	Purpose	Type of Data Collected
Registration Forms	Grant access to the Platform.	User Data: name; e-mail, profile picture; and any information defined by the Customer (e.g.: position held).
Use of the Platform's functionalities.	Answering questionnaires, preparing documents, sending documents for review and/or sending documents for signature. Such Data may relate to Users and/or third parties.	Usage data: name; e-mail; CPF; address; and any information defined by the Client.
Platform Navigation.	Enable the operation of the Platform.	Navigation Data: Data collected through cookies or device IDs, including IP, date and time of access, geographic location, browser type, duration of visit, pages visited, actions performed on the platform and general device information (such as screen resolution).
Support and Onboarding.	Provide support and onboarding services.	Contact data: name; e-mail; telephone; and any information provided by the Customer and/or User.
Send communications and meeting invitations.	To invite Clients, Users and third parties to demonstrations and to send information about the Platform.	Business contact information: name; e-mail; phone.
Marketing.	Targeting of content and advertising, from us and our partners', according to your profile and preferences.	<p>Business contact information: name; e-mail; phone.</p> <p>Data about the access device: model, manufacturer, operating system, telephone operator, browser type, connection type and speed.</p> <p>Cookies: Cookies and other similar technologies for automatically collecting information about browsing habits.</p>

5. Cookies

Cookies are small text files stored on your browser or device. Cookies allow us to recognize your

preferences, for instance, to understand, diagnose, solve and correct Platform problems. The gathering of this information aims to improve the User experience and provide support service for the use of the Platform, as well to allow the activities and the history management on the Platform.

Cookies usually also have an expiration date. For example, some cookies are automatically deleted when you close your browser (so-called session cookies), while others may be stored on your computer until manually deleted (so-called persistent cookies).

If you do not want to provide this information, disable the use of cookies in your browser. To do this, just follow the instructions from your preferred browser. Further details can be found in the Cookie Policy available here.

6. Legal basis

Personal Data may be processed in the following cases:

- a) upon consent provided by the Users;
- b) to comply with a legal or regulatory obligation;
- c) when necessary for the performance of the Contract;
- d) regular exercise of rights;
- e) when necessary to serve the legitimate interests of netLex or a third party.

7. Sharing of personal data

netLex only shares Data in the cases permitted by law and/or with consent. The following are hypotheses for sharing Personal Data:

- a) Data Sharing with service providers to enable netLex services and activities (i.e. Zendesk, a platform used to perform support activities);
- b) In order to comply with Customer contractual obligations applied to netLex;
- c) In specific cases provided by law or determined by judicial decisions.

netLex can use Sub-Processors listed here, over which netLex has no liability whatsoever.

8. Data Subject Rights

NetLex ensures to the Data Subject the following rights:

Right of Data Access	The right to request information about whether your data is processed by netLex and how this is done, as well as access to and confirmation of the Personal Data that are Processed by us;
Correction	Right to request the correction or alteration of Personal Data that is incorrect, incomplete, inaccurate or outdated;
Right to Opposition	The right to object to processing on the legal basis of one of the exemptions from consent;
Elimination of Data	Data Subject has the right to request the removal of all personal information from our servers;
Right to be Informed	The right to request information about the processing of Personal Data in a clear and accurate manner;

Portability of Data (Data Transfer)	The right to request portability of Personal Data to another service or product provider;
Cancel Subscription	Right to request exclusion (unsubscribe) from our communication or marketing lists and to stop receiving our e-mail messages.

Requests to exercise any of the rights listed above will be responded to as promptly as possible. In case of any impediment, we will communicate the reasons that prevent us from promptly answering your request or, if applicable, inform you that we are not the data processing agent you are looking for.

netLex does not make use of automated decision mechanisms.

9. Data Retention and Data Exclusion

Personal Data is stored on servers located in the USA, Ireland and/or Brazil, depending on the Customer's choice. Personal Data will only be kept as long as necessary, in accordance with the listed purposes and legal provisions. The Personal Data of Users will be deleted when the User is deleted from the Platform or at the end of the contract with the Customer. Only email and name of deleted users may be kept for historical purposes, as long as they are compatible with the data processing required by the Customer.

Personal Data of third parties, processed on the Platform by Customers in documents or contacts, will be deleted upon Customer's request. If the Data Subject makes contact directly with netLex, netLex must notify the respective Customer so that there is specific instruction from the Data Controller regarding the exclusion.

10. Artificial Intelligence

netLex has integration with the OpenAI API to enhance and expand the services we offer our users. The OpenAI API is a natural language processing tool that allows us to create advanced functionalities such as drafting and revising contractual clauses in a document.

The use of the OpenAI API on our platform is strictly controlled, so that it will only be made available after prior approval and configuration by the environment administrator in the platform's settings menu. This means that the specific and authorized functionalities that use the API will only be made available to users after approval by the administrator, and their use will be in accordance with the guidelines and policies established by the client.

The input data entered into netLex AI is used to generate a response through the artificial intelligence model and provide it to the user. For this reason, any personal data entered into this functionality will be processed for this purpose. The data provided will not be used to train the model.

11. International Data Transfer

The collected Data may be stored and/or processed in servers located in the USA, Ireland and/or Brazil (defined according to agreement with the Customer), which may imply Data Transfer or processing outside of Brazil by netLex. In addition, netLex may subcontract the Processing and/or share your Personal Data with third parties located in other countries.

12. Final provisions

This Policy is global. Our goal is to meet the requirements and expectations in each country where our Users are located. Because we operate globally, we may transfer your information outside your country, including to the United States. This is necessary for the provision of our services and for the purposes described in this Policy. netLex will take actions necessary to ensure that the international transfer of personal data is carried out in accordance with applicable laws.

netLex has appointed Ms. Lara Jardim as the Data Protection Officer (DPO), responsible for overseeing the company's privacy and data protection practices. If you have any questions or specific requests, you may contact the DPO through:

- Compliance email: compliance@netlex.com.br
- DPO email: dpo@netlex.com.br
- Phone: +55 3003-0618
- Address: R. Pernambuco, 554 - 9th floor - Funcionários, Belo Horizonte - MG, 30130-156, Brazil

netLex reserves itself the right to update this Policy whenever necessary. When this occurs, we will send a notice on the site, by e-mail and/or other means, according to the applicable law.

This Privacy and Personal Data Protection Policy was approved by the Officers on 04/30/2021.

History of changes	
Date	Changes to this Privacy Policy
Sept, 22, 2021	Change in the Final Provisions
Sept, 29, 2022	Annual review of Policies and Guides. Adjusting text formatting.
Oct, 09, 2023	Annual review of Policies and Guides. Inclusion of the Artificial Intelligence section.
Sept, 30, 2024	Annual review of Policies and Guides. Change of the zip code of the address from 30130-151 to 30130-156 in section 3 and 12.
Nov, 12, 2024	Update of item 12 with the appointment of the DPO, Ms. Lara Jardim, and inclusion of the DPO's contact email.