

PRIVACY POLICY

JHC DA SILVA NEGOCIOS DIGITAIS LTDA (“Reportana”), a company headquartered in the city of São Bernardo do Campo/SP, Legal Entity Registry (CNPJ) No. 38.369.962/0001-95, based on its Privacy Policy, provides its customers and users of the website <https://reportana.com> and the platform <https://app.reportana.com> marketing services for e-commerces, information producers and local businesses.

This Privacy Policy establishes the manner in which the Personal Data of Users of the website and Platform will be treated. Such data is collected through the website reportana.com, the platform app.reportana.com, the application and other extensions, including the company's social networks, emails, among others.

This Policy also applies to the payment systems used by Reportana. Our Platform relies on third parties to process amounts paid for contracted services and, therefore, the User must also consult the Privacy Policy of partner companies.

Reportana is committed to protecting the privacy of its Users' data. Therefore, this Policy aims to explain and list which data will be collected, the reasons for it and with whom it will be shared.

In return, Users must also comply with the rules described in this document. Data is shared due to the nature of Reportana's activity, and there is no other reason that justifies sharing. Users are required to act in strict compliance with data protection standards. Reportana, at its sole discretion, may exclude Users who do not comply with current legislation on the subject.

Therefore, Users are asked to carefully read the clauses below before contracting services. If Users do not agree with the provisions of this document, we advise that they do not use our Platform and services.

1. DEFINITIONS

Below are the definitions for a better understanding of this Privacy Policy:

1.1 Reportana: legal entity responsible for making the Platform available and providing the services described herein.

- 1.2 **Platform:** online system accessible via browser or other digital means, aimed at e-commerce marketing, information producers and local businesses, using e-mail marketing services, SMS automation, telephone call automation, marketing automation, sales monitoring and tools for WhatsApp.
- 1.3 **User:** all natural persons who will use or visit the Reportana Platform and website, over 18 (eighteen) years of age or emancipated and fully capable of performing acts of civil life or those who are absolutely or relatively incapable and duly represented or assisted.
- 1.4 **Personal Data:** any information provided and collected by Reportana, by any means, even if public, that: (a) identifies, or that, when used in combination with other information processed by Reportana, recognizes an individual, by reason of personal nature; or (b) through which the identification or contact information of a natural person can be derived. Personal Data may be in any media or format, including electronic or computerized records, as well as in paper-based files. Personal Data, however, does not include business telephone number, business address and business email.
- 1.5 **Data Controller:** company responsible for decisions regarding the processing of the Personal Data of Users of the website and Platform. In this case, Reportana acts as the controller of the data entered and processed on its website and Platform, under the terms of this Privacy Policy, except in cases where third parties, such as Payment Service providers, act as independent controllers in accordance with their own policies and legal obligations.
- 1.6 **Purpose:** the purpose that Reportana wishes to achieve through each act of processing personal information.
- 1.7 **Necessity:** justification for which it is strictly necessary to collect Personal Data to achieve the purpose, avoiding excessive collection.
- 1.8 **Consent:** express and unequivocal authorization given by the User who holds the personal data for Reportana to process said information for a previously described purpose, in which the legal basis necessary for the act requires the express authorization of the holder.
- 1.9 **Payment Services:** means made available by Reportana to facilitate financial transactions, including, but not limited to, payment processing, financial

intermediation, issuing of invoices, subscription management and transfer of funds. These services may be provided directly by Reportana or by third-party partners integrated into the Platform.

2. PRIVACY POLICY ENFORCEMENT

- 2.1 This Privacy Policy also extends to the Payment Services used by Reportana to receive amounts related to contracted services, as provided for in the Terms of Use.
- 2.2 The administration and processing of payments for contracted services are carried out by Reportana partner companies. Therefore, the Platform's responsibility is limited to the data entered directly at the time of contracting, and does not cover the processing of data carried out by said payment companies, whose privacy policies must be consulted separately by the User.
- 2.3 Therefore, Users are aware that, when using the Payment Services, they will provide personal information for the payment operation, which will be controlled and processed by Reportana and the payment processing intermediary companies.
- 2.4 It is important to note that Reportana will only be responsible for processing data in the payment receipt system at the time the User enters their data on the payment page. Data processing after insertion will be carried out by legal entities contracted by Reportana for this purpose.

3. WHAT INFORMATION IS COLLECTED?

- 3.1 Reportana reserves the right to block the User's account and, if necessary, adopt the appropriate legal measures, as provided for in current legislation, if fraudulent, suspicious activities or activities that violate the Platform's Terms of Use are identified. Blocking will result in the total or partial impossibility of accessing and using the services offered.
- 3.2 Reportana requests and collects personal information about Users when they use the website and Platform for the first time. This act is essential for the Platform to be able to carry out the first steps of the User's objective, whether it is using

the Platform to manage e-commerce and provide customer service via email and WhatsApp, and also to comply with legal obligations.

- 3.3 Reportana only collects data that is essential for the operation of the service offered, so that any and all additional data, including sensitive data in accordance with the General Data Protection Law, is offered optionally by the User. It is recommended that only essential data for the use of the services be entered on the website and Platform.
- 3.4 Please note that in all registration forms there will be a mandatory checkbox for acceptance of these terms of the Privacy Policy. In case of refusal of any item of this document, the User will be prevented from completing the registration and, consequently, from using the Platform.
- 3.5 It is expressly stated that the website and Platform are not suitable for minors under the age of 18, nor are they intended to collect personal information directly from people under the age of 18. If Reportana suspects that a minor's personal information has been processed and provided inappropriately, it will be brought to the attention of the competent police or judicial authorities.
- 3.6 When Users register on the website and Platform, they provide their complete and accurate Personal Data. Within the list of data, the user's name may be requested to operate on the website and Platform, as well as contact information such as: telephone number and email, personal documents and products of interest. This means that, at the time of registration, it is possible for Users to provide third-party data and that, to do so, they must have authorization to provide it. Reportana may confirm the Personal Data notified and also has the right to consult public entities, professional companies or databases about this data, as already expressed in the Terms of Use. The information obtained on the website will be kept confidential.
- 3.7 Users must provide data that they legitimately hold, with the due consent of the holders when necessary, respecting this Privacy Policy and the applicable legislation, including the General Data Protection Law. This data may include information related to orders, abandoned carts, among others.
- 3.8 In order to create and maintain a safe and reliable environment, Reportana may collect information to verify the identity and authentication of Users, including

personal documents such as Individual Taxpayer Registry (CPF), ID (RG), Driver's License (CNH), as well as other necessary information. During registration and use of the Platform, the following may also be collected: full name, nickname or pseudonym, telephone number, physical and email address, payment data, information from the device used for access (such as IP address), geolocation data, contact list, connections between accounts and Users, social network profiles and links, as well as information about browsing activity and preferences. This information is used exclusively for identification, security, personalization of the experience and compliance with legal obligations.

- 3.9 For transactions involving payment of amounts, the User will be required to provide certain financial information, such as credit card, to facilitate payment processing, in addition to the CPF, RG or CNH and address of the payer.
- 3.10 When the User communicates with Reportana or uses the website and Platform to communicate with other members and their customers, information is collected about that communication and any information that the User chooses to provide.
- 3.11 The User is responsible for providing Personal Data in order to improve the experience on the website and Platform. Such data includes gender, city, languages, personal description and experiences. In addition, Reportana may conduct satisfaction surveys and identify the audience profile, which are optional surveys, and may collect data considered sensitive. Please note that participation and submission of this information are not mandatory for any User.
- 3.12 This Policy also applies to the User's customer data. Given that the Platform's purpose is to provide marketing, communication, sales, customer service and related automation solutions, it is essential that the User's business consumer data be entered and processed within the Platform. Therefore, it is the Users' responsibility to inform their own customers about the sharing of data with integrated third parties, as well as to obtain the appropriate consents, when required by law. Failure to comply with this obligation may make it impossible to use the services offered by Reportana.
- 3.13 Upon the Users' consent to share their data with Reportana, our company may process them in accordance with the General Data Protection Law (LGPD),

including, but not limited to, sending electronic communications of an informative or promotional nature, as configured by the User. The use of this data will be restricted to the purposes determined by the User, within the functionalities and services made available by Reportana. The User declares to be aware of and in agreement with this Privacy Policy, as well as with the respective Terms of Use.

4. INFORMATION USED IN PAYMENT SERVICES

- 4.1 Payment for contracted services is intermediated by two Reportana partner companies, Stripe and PayPal, both acting as data controllers in the context of financial transactions. These companies are responsible for collecting necessary information, such as credit card details and other personal data, essential for the execution of the contract and for compliance with legal obligations, including anti-money laundering regulations. Failure to provide this information prevents the use of the Payment Services.
- 4.2 In the event that the User is a legal entity, the Payment Service Data Controller may request information to verify the identity of the declarant and person responsible for the payment (such as images of the declarant's official identification document, passport, CPF, RG or CNH) or other authentication information, such as date of birth, address, email address, telephone number and other information to verify identity, to provide the user with the Payment Services and comply with applicable legislation.

5. JUSTIFICATION FOR COLLECTING INFORMATION

Reportana collects and uses information for the following purposes:

- 5.1 Comply with legislation requiring such disclosure.
- 5.2 Allow access to and use of Reportana and its services, including marketing automation, communication, sales, customer service and features related to the management and growth of online businesses.
- 5.3 Send messages, updates, security alerts and account notifications.
- 5.4 Investigate and defend against any third party claims or allegations.

- 5.5 Investigate, prevent or take action regarding suspected or actual illegal activities; to cooperate with government agencies and to protect national security.
- 5.6 Perform checks on databases and other sources of information.
- 5.7 Keep the services provided secure.
- 5.8 Apply payment terms and other payment policies.
- 5.9 Exercise or protect the rights, property and security of Reportana.
- 5.10 Protect the rights and personal safety of its employees, Users or the public.
- 5.11 Comply with the terms of use.
- 5.12 Provide, personalize, evaluate and improve advertising and marketing.
- 5.13 The Data Controller responsible for the Payment Services collects information for the purpose of enabling the processing and execution of payments made by the User to Reportana, complying with applicable legal and regulatory obligations, executing the contract entered into between the parties and, where applicable, improving the quality and security of the services offered.

6. JUSTIFICATION FOR COLLECTING INFORMATION

- 6.1 In the event of sharing User data on the Data Controller's social networks, that is, Reportana's, this will only occur with the User's prior authorization.
- 6.2 The User agrees to share certain information, including general personal information, such as social media links and other data that are relevant to compliance with the Terms of Use.
- 6.3 The User hereby authorizes Reportana to use, free of charge, irrevocably and for an indefinite period, their testimonials and respective images, including photographs, for institutional or promotional purposes on the website, Platform, social networks and other official channels of the company, without this generating any obligation of payment, royalties, prior request or additional recognition.
- 6.4 The social media platforms with which personal information may be shared are not controlled or supervised by Reportana. Therefore, any questions regarding how the social media platform service provider handles your personal information should be addressed directly to the manager of the linked social network or website.

7. LEGAL BASIS FOR PROCESSING

- 7.1 Reportana processes Personal Data only when legally authorized or with the express and explicit consent of the User, as stated in this Policy.
- 7.2 Reportana has the ability to collect, generate, receive, classify, use, access, copy, transmit, distribute, process, archive, store, eliminate, evaluate or control information, modify, communicate, transfer, disseminate or extract Users related to data. The legal basis includes consent (clearly collected in the consent form), contracts and preliminary contract procedures (processed when signing the contract with the User) and legal rights and interests, provided that such processing does not violate rights and freedoms.
- 7.3 However, Reportana and the companies responsible for the Payment Services may disclose User data, including personal information, to the judiciary or law enforcement or government authorities, or authorized third parties, if the measure is necessary or permitted to comply with the law or, if such disclosure is reasonably necessary, for strict legal compliance, to respond to judicial investigations of any nature, to enforce and administer the Terms of Use, the Payment Services or other contracts, and to protect the rights, property or personal safety of Reportana, its employees, members or the general public.
- 7.4 If necessary, Reportana may notify its Users so that they provide the necessary data.

8. INFORMATION DISCLOSURE

- 8.1 In the event that Reportana undertakes any merger, acquisition, restructuring, sale of assets, bankruptcy or insolvency, it is possible that some or all of the company's assets, including User information related to or contemplated by such transactions, may be sold, transferred or shared. In this case, the User will be notified before their personal information is transferred and becomes subject to a different Privacy Policy.

9. SECURITY

- 9.1 All Personal Data will be stored in Reportana's database or in databases maintained "in the cloud" (hosted on Google Cloud Platform, Amazon Web

Services, Cloudflare and Hostgator servers), by service providers contracted by Reportana, which are duly in accordance with current data legislation.

9.2 Reportana and its suppliers use a variety of security procedures to protect the confidentiality, security and integrity of User Personal Data, thus preventing any damage caused by the processing of such data. In addition, Reportana guarantees that only qualified professionals will have access to Users' Personal Data, committing to provide the highest level of training and knowledge to said employees.

9.3 Although Reportana uses security measures and monitors its systems to check for vulnerabilities and attacks and to protect User Personal Data against disclosure, abuse or tampering, Users understand and agree that there are no guarantees that the information may not be accessed, disclosed, altered or destroyed by breach of any of the physical, technical or administrative protections.

10. RIGHT TO ACCESS AND DATA CONTROL

10.1 Reportana, in compliance with the General Data Protection Law (Law No. 13709/2018), will allow Users to delete their Personal Data from the Platform, if there is no continued use of the website and Platform; if Users change or correct Personal Data that is changeable, such as address, telephone number, etc.; place objections, limits or restrictions on the use of data; and Users have the right to request a copy of their Personal Data in electronic format.

10.2 In all cases, the User will need to send an email to the Data Protection Officer, at help@reportana.com, who will analyze the request and take the necessary measures in accordance with applicable laws.

10.3 This contact may also be used to clarify other questions regarding data processing.

10.4 In the event of termination of the contract with Reportana, the User's data will be deleted from the Platform within 45 (forty-five) days, in accordance with current legislation. This rule also applies in cases where the User remains in default for the same period, without paying for the contracted services.

11. PRIVACY POLICY REVISIONS

- 11.1 Reportana reserves the right to modify this Privacy Policy at any time, according to its needs. In the event of changes, the revised Privacy Policy will be published on the website and Platform and marked with the identification that the document has been revised.
- 11.2 Users will be notified by email of any changes to this Privacy Policy at least 7 (seven) days in advance of the date of its entry into force. If Users do not agree with the revised terms, they may cancel their subscription and request the deletion of their personal data, as provided for in this Policy and in applicable legislation.
- 11.3 If Users do not cancel their subscription or continue to use the Platform's services after the new Privacy Policy comes into effect, this will be considered as express agreement and acceptance of the new terms.

12. CONTACT US

- 12.1 If you have any questions or complaints about this Privacy Policy or Reportana's information handling practices, please send an email to help@reportana.com.

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