



SECURITY AND PRIVACY STANDARD SCALA DATA CENTERS

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This document aims to establish the rules for data processing, which includes, for example, the operations of collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of the information, modification, communication, transfer, dissemination or extraction of data collected from users, in addition to recording their activities, in accordance with applicable laws.

When the user accepts this Privacy Policy, they give their free and express agreement with the terms stipulated herein.

1. Glossary

1.1. For a better understanding and interpretation of the terms of these standards, the following definitions will be adopted, used in the singular or plural, namely:

Account: is the way in which the user is represented when accessing certain restricted areas, exclusive features of the websites, applications and services offered by SCALA DATA CENTERS, generally corresponding to a set of data that represents the user only, plus other relevant data for ensure a more appropriate and complete relationship between SCALA DATA CENTERS and the user.

Cookies: small files or data packets sent by SCALA DATA CENTERS to the user's device to identify it and collect information that will help SCALA DATA CENTERS to improve the services provided to users.

Credentials: is the set of data that the user uses to authenticate themselves in order to access certain restricted areas and/or exclusive features of the websites, applications and services offered by SCALA DATA CENTERS, usually represented by a login and password, but may rely on other additional data that help in the authentication process.

Data: the set of Anonymized Data and Personal Data.



Anonymized Data: information that, alone or together with other Anonymized Data, does not allow the identification of a person, considering the use of reasonable technical means and available at the time of its treatment.

Personal Data: information relating to the identified or identifiable natural person. They may include, for example, name, address, email, telephone, IP address and geolocation data.

Person in Charge or Data Protection Officer (DPO): person (natural or legal) appointed by SCALA DATA CENTERS responsible for acting as a communication channel between SCALA DATA CENTERS, the user and government authorities in matters related to this Privacy Policy and the use, collection and processing of Data by SCALA DATA CENTERS.

IP Address: Internet Protocol address associated with the device used by the user. Each IP Address corresponds to an alphanumeric set that, together with other information, helps to uniquely identify the device that the user is using to access the internet and, therefore, to access websites, applications and services provided by SCALA DATA CENTERS.

Applicable Law: means the legislation applicable to the relationship between SCALA DATA CENTERS and the user, which may vary due to (i) the place where the services are provided; (ii) place of residence of one of the Parties, including the user themselves; (iii) other factors mentioned in specific legislation.

Logs: records of user activities carried out on the websites, applications and services provided by SCALA DATA CENTERS.

Privacy Policy: collectively means this Global Privacy Policy - SCALA DATA CENTERS and its attachments, as well as other documents expressly referenced in this Global Privacy Policy - SCALA DATA CENTERS.



Users: people who access or interact with the features offered by the websites, applications and services provided by SCALA DATA CENTERS. The user must have the legal capacity to accept and consent to this Privacy Policy and other documents of SCALA DATA CENTERS. If you do not have such capacity, you declare that you have previously obtained all the necessary authorizations to accept this Privacy Policy and other documents presented by SCALA DATA CENTERS.

2. Data Collection

ABSTRACT

We collect User Data as the User provides us, directly or indirectly, in accessing and using the websites, applications and services provided by SCALA DATA CENTERS or by partners who have been duly authorized by SCALA DATA CENTERS (and who follow the guidelines of SCALA DATA CENTERS Data Privacy in accordance with this policy).

2.1. Data will be collected:

- i. when entered or submitted voluntarily by users on the websites, applications and services offered by SCALA DATA CENTERS, such as creating an account, browsing, interacting with content and purchasing services;
- ii. of partners who have obtained authorization to share them with SCALA DATA CENTERS.

2.2. The information that SCALA DATA CENTERS collects may include, but are not limited to:

- i. name;
- ii. email address;

2.3. SCALA DATA CENTERS is not responsible for the veracity, untruth or outdatedness of the information and Data provided by the user, being the user's responsibility to provide them accurately and update them.

2.4. There will be no collection of cookies during browsing.



2.5. Other technologies may be used to obtain user navigation data. However, they will always respect the terms of this Privacy Policy and the user's options regarding its collection and storage, and the user will be informed in advance in case of any changes. If data other than those listed above are collected, the user will be informed in advance.

3. Use of Data

ABSTRACT

The Data may be accessed by SCALA DATA CENTERS for the purposes described herein.

3.1. Data collected from users may be used for the following purposes:

- i. Identification, authentication and authorization;
- ii. Respond properly to requests and questions, as well as provide support to users;
- iii. Keep up-to-date records for contact purposes by telephone, electronic mail, SMS, direct mail or other means of communication;
- iv. Promote the services of SCALA DATA CENTERS, in addition to informing about news, features, content, daily news and other relevant information for maintaining the relationship with SCALA DATA CENTERS;
- v. To protect SCALA DATA CENTERS from rights and obligations related to the use of the websites, applications and services provided by SCALA DATA CENTERS;
- vi. Sending newsletters and emails that the user has expressly agreed to receive;
- vii. Manage risk and detect, prevent and/or remediate fraud or other potentially illegal or prohibited activities, and violations of applicable policies or terms of use.

- 3.2. The use, access and sharing of the database formed under the terms of this Privacy Policy will be made within the limits and purposes of the activities of SCALA DATA CENTERS, and may be provided and made available for access and/or consultation to the companies that are part of SCALA DATA CENTERS provided that the provisions of this Privacy Policy, Applicable Legislation or by court order are complied with.
- 3.3. SCALA DATA CENTERS undertakes to protect the financial and banking secrecy of its customers and users by not sharing this information. The user acknowledges that SCALA DATA CENTERS is obliged to comply with a series of legal obligations arising from the Applicable Legislation related to the identity of its customers and the origin of the funds it operates. In this way, SCALA DATA CENTERS will be able to obtain additional documents and information, including to carry out 'know-your-customer' procedures and prevention of money laundering. The information obtained by SCALA DATA CENTERS in response to the questions raised will be treated as confidential information. SCALA DATA CENTERS is authorized to share data required by the Applicable Legislation with the competent authorities that need to have such access, to prepare/validate reports on the activities of SCALA DATA CENTERS under said legislation.
- 3.4. The user is responsible for the confidentiality, use and all acts in the use of the Credentials (such as, but not limited to login, password and authentication token). If the user identifies or suspects that a third party has access to their password, they must change it directly in the systems or services. Sharing Credentials as a result of user action constitutes a violation of this Privacy Policy.
- 3.5. Internally, data will only be accessed by professionals duly authorized by SCALA DATA CENTERS, respecting the principles of purpose, adequacy, necessity, among others provided for in the Applicable Legislation for the purposes of SCALA DATA CENTERS, in addition to the commitment to confidentiality and preservation of privacy under the terms of this Privacy Policy.
- 3.6. If, through authentication tests, SCALA DATA CENTERS finds that the user's credentials have been compromised (made accessible to third parties), SCALA DATA CENTERS - for security purposes and in order to prevent inappropriate access by third parties to the User's Account and Data - will preemptively block the user's credentials. In case of any doubts - including how to unlock credentials - the user can consult the terms of use on the websites, applications and services provided by SCALA DATA CENTERS, or contact the SCALA DATA CENTERS call center.

4. Data Storage



ABSTRACT

The Data collected is stored in a secure location. At any time, the user may request the display, correction or deletion of their Data. Except in specific cases, we may keep the Data collected for legal compliance, auditing and preservation of rights, for the period necessary to fulfill these responsibilities.

- 4.1. Data collected will be stored in a secure and controlled environment. However, considering that no security system is infallible, SCALA DATA CENTERS disclaims any liability for any damages and/or losses resulting from failures, viruses or invasions of the database of the websites, applications and services provided by SCALA DATA CENTERS, except in cases where there is intent or negligence. However, if SCALA DATA CENTERS identifies that any of these situations have occurred, it will notify the affected users, informing them that their Data has been breached and indicating that they take the appropriate measures.
- 4.2. Data obtained from the user may be stored on SCALA DATA CENTERS' own server, and may also be stored using cloud computing technology and/or others that may arise in the future, always aiming at the improvement of the activities of SCALA DATA CENTERS. SCALA DATA CENTERS will ensure that third parties that eventually maintain the servers on which the Data is stored maintain security and control standards in accordance with applicable legal standards.
- 4.3. Through the service tools available on the websites, applications and services provided by SCALA DATA CENTERS, the user is provided (and may be subject to proving its identity):
 - i. request access to the Data, including its display, rectification with the correction of incomplete, inaccurate or outdated data or elimination/deletion of Personal Data concerning you;
 - ii. request the elimination/deletion of all your Personal Data collected and recorded by SCALA DATA CENTERS, provided that the contract between the user and SCALA DATA CENTERS has ended, the account canceled and the minimum legal term for the purposes of legal obligations of SCALA DATA CENTERS has elapsed;
 - iii. revoke consent for the future collection, treatment, use and processing of Personal Data concerning you or restrict the processing of Personal Data. This will not affect the lawfulness of the processing of Personal Data carried out before the revocation, based on your consent or the legitimate interest of SCALA DATA CENTERS. Revoking consent may prevent the user from fully



using or even making the use of the websites, applications and services provided by SCALA DATA CENTERS unfeasible.

- 4.4. SCALA DATA CENTERS may, for purposes of auditing and preservation of rights, retain the registration history of User Data, allowing SCALA DATA CENTERS to permanently delete them at its convenience or in cases where law or regulatory rule requires. SCALA DATA CENTERS may also keep the Anonymized Data and anonymized version of the Data for statistical and study purposes, even after the user's request for deletion.

5. General Provisions

ABSTRACT

We reserve the right to update this document at any time, so please consult it frequently. If we outsource any activity, we will ensure that the contracted companies comply with all provisions of this document.

- 5.1. The content of this Privacy Policy may be updated or modified at any time, according to the purpose or convenience of SCALA DATA CENTERS, such as for legal adequacy and compliance with a provision of a law or standard that has equivalent legal force, and it is up to the user to verify it whenever they access the websites, applications or services provided by SCALA DATA CENTERS.
- 5.2. If you consider that SCALA DATA CENTERS has violated any legal provision or this Privacy Policy, the user has the right to file a complaint with the appropriate supervisory authority, in addition to contacting SCALA DATA CENTERS directly.
- 5.3. If outsourced companies carry out the processing of any Data collected by SCALA DATA CENTERS, they must comply with the conditions stipulated herein and the SCALA DATA CENTERS Information Security standards, obligatorily.

6. Applicable Law and Jurisdiction

ABSTRACT



In any lawsuits, Brazilian law and the jurisdiction of the city of São Paulo apply, except for specific exceptions by the Applicable Legislation (such as the user's domicile).

- 6.1. This Privacy Policy will be interpreted in accordance with Brazilian legislation, in the Portuguese language, and the forum of the city of São Paulo will be elected to settle any dispute or controversy involving this document, except for the specific exception of personal, territorial or functional competence by the Applicable Legislation.

To exercise any of your rights in relation to your personal data, contact us via email: tratadadedados@scaladatacenters.com

In charge or Data Protection Officer (DPO): João Paulo de Aguiar.