PRIVACY AND PERSONAL DATA PROTECTION POLICY

November 25th, 2026.

QRIAR TECNOLOGIA LTDA., a limited liability company, enrolled with the Brazilian Corporate Taxpayer Identification (CNPJ/ME) under No. 25.080.152/0001-72 ("**QRIAR**"), values privacy, is concerned with the rights of data subjects, and is committed to the protection of personal data and to providing an adequate level of security to its business model.

In the development of its activities, while responsible for the processing of personal data, **QRIAR** carefully complies with the legislation that refers to the protection of personal data, including (always and when applicable) the Brazilian Federal Constitution, the Consumer Defense Code (Law No. 8.078/1990), the Brazilian Civil Code (Law No. 10.406/2002), the Brazilian Civil Rights Framework for the Internet (Law No. 12.965/2014), its regulatory decree (Decree No. 8.771/2016), the General Personal Data Protection Law (Law No. 13.709/2018, "LGPD"), and other sectoral or general standards on the matter.

We made available below the practices related to the collection, use, storage, processing, sharing and transfer of personal data that occur as a result of the access and use of the services made available by **QRIAR** through the website accessible at https://www.qriar.com/ ("Website"), as well as in the provision of services with respect to information technology and licensing of computer programs provided to its customers ("Services").

QRIAR advises you to read this Privacy and Personal Data Protection Policy and its respective updates ("Policy" or "Privacy Policy") carefully. If the Privacy Policy is modified, the date of the last change, available at the top of this page, is also updated.

In this Policy, any individual who uses our Website ("User" or "You") and customer who hires our services ("Customer" or "You") may check how their personal data is processed when (i) they enter it on the Website to subscribe to our newsletter; (ii) they send an e-mail to contact or register for our vacancies and opportunities; (iii) we provide our Services. This Policy contemplates the processing of personal data carried out by **QRIAR** arising from the use of the Website and the hiring of our Services.

According to the LGPD, **QRIAR** is considered, as a rule, the "Operator" of personal data in the context of the provision of information technology and computer program licensing Services. Notwithstanding, in other processing carried out by **QRIAR,** it may be considered as "Controller".

The Website is not intended for use by persons under the age of eighteen (18). It is not **QRIAR**'s policy or intent to intentionally collect or process personal data from minors. Users under the age of eighteen (18) shall not submit information to us through the Website. Any information from individuals under the age of eighteen (18) provided on the Website or directly by the Customer to **QRIAR** will be disregarded and deleted from our databases.

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See below, the contents of our Policy:

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If you remain in any doubt or require any further information regarding the processing of personal data or wish to exercise any of your rights as a data subject, please contact us through the following channels:

E-mail:dpo@qriar.com
Written notification: Av. Brigadeiro Faria Lima, 3200 – 3º Andar, Jardim Paulistano Cep: 01.451-000 - São Paulo - SP
Officer: Fábio de Souza Quinteiro

1. DEFINITIONS

- **Personal data**: Personal data is the information relating to an identified or identifiable natural person, used alone or in combination with other data, that can identify a natural person or subject him/her to a specific processing. It can be a name, an individual taxpayer number (CPF), an address, or even an IP address, for instance.

- **Sensitive personal data**: This is personal data concerning racial or ethnic origin, religious conviction, political opinion, membership to a labor union or religious, philosophical or political organization, data concerning health or sex life, genetic or biometric data, when linked to a natural person. This data has specific, stricter rules for processing.

- **Anonymized data**: This is data that does not allow the identification of its subject, directly or indirectly, and therefore is not within the scope of the LGPD. However, if the anonymization process can be reversed, either by the controller's own means or through reasonable efforts, the LGPD is applicable.

- **Pseudonymized data**: This is data that does not allow its subject to be associated directly or indirectly, but the subject may be identified through the use of additional information kept separately by the controller, in a controlled and secure environment.

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- **NDPA- Brazilian National Data Protection Authority:** This is the federal public administration body responsible for overseeing, regulating, implementing, and supervising the LGPD guidelines throughout the country.

- **Personal data subject**: The natural person to whom the personal data that is being processed belong.

- **Controller**: The natural or legal person, under public or private law, competent to make decisions concerning the processing of personal data. It is the "owner" of the database, who makes decisions about the processing of information and decides how, what, for what purpose and for what reason the data is collected. For purposes of this Policy, **QRIAR** and its Customers, as the case may be, will be considered as controllers.

- **Operator**: It is the natural or legal person, under public or private law, that performs the processing of personal data on behalf of the controller. Collaborators (employees, service providers and other partners) who participate in the processing of personal data within **QRIAR**, as well as any accounting firms, law firms and other advisors hired by **QRIAR**, as the case may be, shall be considered operators.

- **Officer:** The person indicated by the controller and operator, who will act as a communication channel between the controller, the operator, the data subjects and the NDPA.

- **Data Processing**: Every operation/action carried out with personal data. For instance: collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction, among other operations performed with data.

2. WHAT PERSONAL DATA IS COLLECTED BY QRIAR?

Personal data is any information relating to an identified or identifiable natural person. Personal data subjects are the natural persons to whom the data refer.

QRIAR processes the following personal data:

(i) Identification data (e.g.: full name, date of birth, gender, address, email and telephone contacts, ID and CPF number);
(ii) Education and work experience data (e.g., education, qualifications, certifications, languages, CV and former employer information); and
(iii) Billing and expense data (e.g., fees, invoices, travel expenses, and communications with Customers).

The categories of data we process, listed above, may pertain to different natures of data subjects, such as Users, Customers, Customer collaborators, business partners, general contractors, or **QRIAR** applicants.

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QRIAR will process your personal data for the performance of a contract, in pursuit of a legitimate interest, with your consent and/or in what is necessary to comply with legal obligations or court orders.

QRIAR collects personal data by various means and at various times, notably during the provision of its Services, through the use of our Website, in meetings, telephone or email contacts, events or seminars held by **QRIAR**, for recruitment and selections or when contacting or requesting information with collaborators or Customers. Personal data may also be provided by Customers or third parties, when necessary for the provision of the Services.

Financial: In order to manage payments and receipts, make payments to suppliers and partners, issue invoices, the following data from our Customers and suppliers and/or their collaborators will be collected and processed: full name, e-mail and CPF.

Commercial: In order to carry out commercial negotiations, such as sending proposals and contracts for services, negotiations with suppliers and Customers, the following data from our Customers and suppliers and/or their collaborators will be collected and processed: full name, CPF, e-mail, telephone, position/function.

Marketing: In order to register for events or seminars held by **QRIAR**, as well as send advertising communication by e-mail, phone calls, SMS, social communities or any other present and future physical and electronic means that enable commercial communication, the following data from Users, Customers and/or Customers' collaborators will be collected and processed: full name, e-mail, telephone, position/function, and company.

Customer and User Support: For Customer and User support services, with the clarification of doubts, support, provision of contracted services, the following data from our Users, Customers and/or their collaborators will be collected and processed: full name, identity card number, CPF, e-mail, and telephone.

Newsletter: When you sign up for our Newsletter, we will collect your e-mail. Whenever possible, give preference to your corporate e-mail. In this case, your data will be used only for sending advertising communication by e-mail regarding products or services offered by **QRIAR**, as well as by its collaborators or partners with whom a commercial promotion partnership has been established.

Contact on the Website: **QRIAR** provides on its Website a contact channel, enabling the User to contact it to send or request information by means of texts, upon information of name, e-mail address and telephone number. Whenever possible, give preference to your corporate e-mail and phone number. The User agrees that he/she is solely responsible for all messages transmitted by this means. **QRIAR** will not consider such messages as confidential or secret, but, in any case, this Privacy Policy also applies to them.

Website Access: When accessing the Website, the following data may also be collected: (i) date and time of access; (ii) Internet Protocol (IP) address; (iii) origin of access; (iv) browser data (browser name and version, manufacturer and language); (v) access device data (device type - desktop, mobile, tablet -, operating system and version, screen resolution and

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language); and (vi) geolocation data (latitude, longitude, City, State). Such data will be stored by **QRIAR** for a period of not less than 6 (six) months.

Information Update: It is the responsibility of the User and the Customer to keep their personal information and that of their collaborators, as the case may be, updated. Whenever a change occurs in such data, such fact shall be promptly changed by the User or Customer through the Website or communicated to **QRIAR**. **QRIAR** is not responsible for the veracity of the information provided by the User or Customer, who is solely responsible for the accuracy of the information.

3. FOR WHAT PURPOSES IS PERSONAL DATA PROCESSED?

A data processing is an operation or set of operations performed on personal data by manual or automated means, including collection, storage, use, copying and transfer, among others.

The party responsible for personal data processing for the purposes set out below is **QRIAR**. Should you have any questions about how the processing of the personal data provided is carried out, wish any clarification on this document or wish to exercise any of the rights mentioned in this document, you should contact us by e-mail or physical notification to our address, both informed in item 12 below.

You expressly and unequivocally accept that the data provided by you on the Website or directly to **QRIAR** may be processed by **QRIAR**, and its main purpose in collecting personal information is to provide You with a safe, calm and efficient experience. To this end, personal data may be processed for the following purposes:

(i) Delivery of advertising communication by e-mail, phone calls, SMS, social communities or any other physical and electronic means, whether present and future, that enable commercial communication. Such commercial communication concerns products or services offered by **QRIAR**, as well as by its collaborators or partners with whom a commercial promotion partnership has been established. In this case, third parties will never have access to the User's or Customer's data, being certain that commercial communications will be made directly by **QRIAR** and will be about products and services related to the market niche explored by **QRIAR**.
(ii) Process orders, requests or any requirements that may be made by the User and the Customer, by any contact form made available by **QRIAR**.
(iii) Provide information technology and computer program licensing services to the Customer.
(iv) Assist the User and the Customer with information about the newsletter, services and opportunities advertised, as well as to provide details about the services provided by **QRIAR**.
(v) Notify the User and the Customer about maintenance or updates to the Website or Privacy Policy.
(vi) Perform analysis of user behavior in general and other important measurements in order to always provide a quality service.
(vii) Develop ways to anonymize data, which may be used for economic purposes, including onerous transmission to third parties.
(viii) Compliance with legal obligations, including court orders.

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4. WHAT ARE THE RIGHTS OF DATA SUBJECTS?

Under the terms of the applicable legislation on personal data protection, **QRIAR** guarantees the data subject the right to access, rectification, cancellation, portability and opposition of his/her personal data, upon written request addressed to **QRIAR**. The request may be made by means of e-mail or physical notification to our address, both informed in item 12 below.

When the data subject's right of access impairs fundamental rights and legitimate interests of natural persons, it will be limited.

The supply of copies requested by the data subject may result in administrative costs.

5. IS PERSONAL DATA SHARED WITH THIRD PARTIES?

We may share your personal data with third parties in accordance with the contractual provisions in force, including third parties involved in the development of the services we provide to Customers.

QRIAR may share data:

(i) to enable the provision and delivery of its Services in an appropriate manner;
(ii) with agencies, authorities and other government entities in order to comply with the laws and regulations applicable to the Services offered by **QRIAR**;
(iii) with agencies, authorities and other government entities, as well as private individuals or legal entities, in compliance with legal obligations or court orders;
(iv) to defend the interests and rights of **QRIAR** or third parties, including in judicial and administrative proceedings;
(v) with business partners and collaborators who provide services to **QRIAR**, who shall follow **QRIAR**'s guidelines and comply with the information confidentiality; and
(vi) with the police authority or members of the Public Prosecution Service, even if not under a specific legal obligation or court order, to protect the rights, property or safety of **QRIAR**, its Customers, Users, collaborators or third parties.

Access to the information collected is restricted to collaborators and authorized persons involved in the provision of services. Collaborators and/or authorized persons who unduly use such information will infringe our Privacy Policy and will be subject to the penalties provided by our disciplinary process, without excluding other applicable legal measures.

The following are the types of **QRIAR** Business Partners with whom your information may be shared under this Policy:

(i) Advertising and marketing agencies;
(ii) Law and accounting firms;
(iii) Digital marketing management and automation platforms;
(iv) **QRIAR**'s internal collaborators;
(v) Business partners.

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6. WHAT IS THE TERM FOR KEEPING PERSONAL DATA?

QRIAR stores and keeps your personal data for the period that is necessary to fulfill the purposes set forth in this Privacy Policy or for the period that is required by legal standards or applicable legislation.

Should the subject wish, he/she may request **QRIAR**, via e-mail, to delete the information collected from its database.

In compliance with the applicable legislation or compliance with a court order, **QRIAR** may keep certain data stored for a period of no less than 06 (six) months after his/her request for deletion. Such data will not be anonymized or destroyed by **QRIAR** before the end of such period.

QRIAR reserves the right to analyze the request and, observing the legal term of mandatory storage, will provide the elimination or anonymization of the data, at its sole discretion.

7. HOW DOES QRIAR PROTECT PERSONAL DATA?

QRIAR adopts the best practices and technical and organizational measures to protect your personal data against destruction, loss, alteration, unauthorized disclosure and access, as well as any form of inappropriate or unlawful treatment.

To this end, **QRIAR** uses information security techniques, with regular acceptance in the business environment, such as firewalls, privacy management solutions, access control procedures and encrypted mechanisms.

In any case, if you have any concern or suspicion that your personal data is at risk, please contact us immediately.

QRIAR advises that the User, when accessing the Internet, always look for the privacy policy of the website he/she is browsing, check if the page is secure and not pass his/her data to third parties.

We also respect the confidentiality of your information. As such, we do not sell, distribute or otherwise make your information commercially available to any third party. **QRIAR** is committed to keeping your information protected in accordance with this Privacy Policy and applicable law.

8. DOES QRIAR USE COOKIES?

“Cookies” are small text files that identify a User’s device when accessing our Website. The cookies themselves do not identify the individual User, only the device used. Cookies are not used to collect personal data.

Furthermore, cookies are used to help Users browse the Website efficiently and perform certain functions. Because of their primary role in improving the Website's usability or processes, disabling cookies may prevent Users from using certain features of the Website.

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By accessing the Website, Users consent to the use of cookies and similar technologies, such as pixels and tags, in accordance with this Policy. If You do not consent to the use of cookies in this manner, You must adjust your browser settings to disallow their use. Disabling cookies may make the Website less functional, but should not prevent your browsing.

Type of Cookies Used:

The type of cookies that **QRIAR** uses are Session Cookies. Session Cookies are temporary cookies that will remain in the cookie file of the browser until the User leaves the Website. The information obtained by these cookies is used to analyze web traffic patterns, allowing us to identify problems and provide a better browsing experience.

QRIAR also uses [Google Analytics, Facebook Pixel and LinkedIn Pixel] in order to measure the interaction of Users with the content of the Website.

9. INTERNATIONAL TRANSFER OF PERSONAL DATA

The data processing carried out by **QRIAR** does not directly involve international transfers of personal information between different subsidiaries. However, personal data may be transferred abroad when stored by **QRIAR** in cloud computing servers located outside Brazil. For such purpose, **QRIAR** complies with and adopts the best security and privacy practices to ensure the protection of the personal data subjects, as well as pays attention to the local legislations in force on the matter.

Guaranteeing the protection of the data subjects, in case of international transfer, **QRIAR** undertakes to ensure that it will comply with the applicable legal provisions, namely with regard to the determination of the suitability of such country concerning data protection and the requirements applicable to such transfers.

10. CONSENT AND ACCEPTANCE ON DATA PROCESSING

By registering on the Website and clicking on the link “I accept the Privacy Policy”, the User expressly and unreservedly declares his/her agreement with this Privacy Policy, declaring, for all purposes, that he/she is over eighteen (18) years of age, legally capable, and responsible for all acts he/she performs and data he/she provides on the Website.

We clarify that the LGPD establishes several legal bases for the processing of personal data. The so-called “legal bases” set forth in the law would be the grounds, justifications, hypotheses for which certain processing of personal data is considered lawful, permitted.

The consent of the data subject is not the only legal basis for processing personal data. This means that **QRIAR** may process personal data, even without the data subject’s consent, if there is a legal basis set forth by law that permits such processing, for instance, to comply with legal orders.

11. UPDATE OF THIS PRIVACY POLICY

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In order to always improve our services and our relationship with third parties, this Policy may be subject to updates by **QRIAR**, at any time, aiming at its improvement. The amended Privacy Policy will be effective as of its posting on the Website.

QRIAR will notify Customers and Users of any material changes to this Policy through the e-mail address provided and will make the latest version of the Privacy Policy available on the Website, with the date of the last update.

You will remain bound by any changes to the Privacy Policy, following its posting, if you continue to use the Website and/or the Services provided by **QRIAR** and do not show an interest in opting out.

You agree to regularly review the Privacy Policy available on the Website to update yourself on its terms and conditions.

In case of conflict between this Privacy Policy and any amendments, the latter shall prevail.

12. QUESTIONS AND CONTACT WITH QRIAR

If you have any questions or need any further information regarding the processing of personal data or wish to exercise any of your rights as a data subject, please contact us through the following channels:

E-mail: contato@qriar.com
Address: Rua Bandeira Paulista, 726 - Ed. The Flag, Conjunto 71, Itaim Bibi, São Paulo/SP Postal Code (CEP): 04532-002
Telephone: (11) 2386-7515

The answer to requests will be provided, as a rule, within 15 (fifteen) days at most, unless it is a particularly complex request or a multiplicity of requests. We kindly ask you, when writing to us, to put in the subject field “Notification about use of personal data.”

We clarify that eventually, before we respond to a request, we may ask you to provide us with some information to confirm your identity.

13. APPLICABLE LAW AND JURISDICTION

This **Policy** will be governed and construed in accordance with the laws of the Federative Republic of Brazil and any disputes arising from this Policy, which cannot be amicably resolved by the parties, shall be submitted to the court of the City of [Barueri, State of São Paulo].

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