



## EXTERNAL PRIVACY POLICY

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Last updated [08.25.2022]

This Privacy Policy was prepared by **Stan Incorporadora S.A.**, a legal entity headquartered at Avenida das Nações Unidas, nº 11541, Brooklin Novo, CEP 04.578-000, in the city of São Paulo, State of São Paulo, registered with the CNPJ/MF (National Registry of Legal Entities) under No. 11.589.764/0001-80 (“Stan” or “We/Us”).

**Stan Incorporadora S.A.** is committed to the protection of your Personal Data and will always be transparent regarding the processes performed on your information. In this way, we created this Privacy Policy (“Policy”) so that You can get to know the Processing of your Personal Data.

We recommend that You read this policy carefully, especially before starting your relationship with **Stan Incorporadora S.A.** If You have any questions about the content of this Policy, please contact us directly at the e-mail address indicated at the end of this document.

### 1. PURPOSE

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The purpose of this Policy is to present, in a clear and transparent way, our guidelines for the Processing of your Personal Data. Here You will find information about what Personal Data we collect, why we collect it, with whom we can share it, how long we store it, in addition to important information for the transparency of our operations.

### 2. DEFINITIONS

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You can find below some concepts that will be applied throughout this Policy:

<b>Personal Data</b>	All information related to the individual - identified or identifiable person.
<b>Sensitive Personal Data</b>	Personal Data related to racial or ethnic origin, religious faith, political opinion, membership to a union or organization of a religious, philosophical or political nature, data related to health or sexual life, genetic or biometric data when linked to an individual.
<b>Processing</b>	Every operation performed with Personal Data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, storage, archiving, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction of Personal Data.

<b>Data Subject</b>	Individual to whom the Personal Data undergoing Processing refers, including You.
<b>Controller</b>	Individual or legal entity responsible for the decisions regarding the Processing of Personal Data. With the exception of some specific cases, the Controller of your Personal Data will be Stan, for the purposes of this Privacy Policy.
<b>Data Officer</b>	Individual or legal entity appointed by <b>Stan Incorporadora S.A</b> , who acts as a communication channel between <b>Stan</b> , Data Subjects, collaborators and Personal Data authorities.
<b>Service Provider</b>	Individual that processes Personal Data on behalf of the Controller.
<b>LGPD</b>	This is the General Data Protection Law (Federal Law No. 13.709/2018), which regulates the Processing of Personal Data and Sensitive Personal Data.
<b>National Data Protection Authority</b>	ANPD, a federal public administration body responsible for ensuring, implementing and supervising compliance with the LGPD (General Data Protection Law).

### 3. WHAT PERSONAL INFORMATION DO WE COLLECT - AND WHAT FOR?

It is essential to collect some of your Personal Data so that we can better perform our activities. However, it is known that the form and purpose of Personal Data Processing activities may vary according to the context for which your information was initially collected. Below, You will find a table that we have prepared so that You can see what personal data we may process:

<b>Data Subject</b>	<b>Personal Data Processed</b>
<b>Creditors</b>	First and last name, CPF (SSN), RG (Id), home address, signatures, data from title protested; phone number, email; letter of attorney; legal representative; company name.
<b>Debtors</b>	First and last name, CPF (SSN), RG (Id), home address, signatures, data from title protested; phone number, email; data on goods and services provided.
<b>Applicants</b>	First and last name, CPF (SSN), RG (Id), home address, signatures, data from title protested; phone number, email; letter of attorney; legal representative; company name.
<b>Service Providers</b>	First and last name, CPF (SSN), Bank data; amount to be paid.

### 4. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

We process your personal data only for legitimate, specific and informed purposes in this Policy, as exemplified below:

Legal Basis	Processing example
<b>Execution of preliminary contracts or procedures</b>	Management of accounts with pending payment or receipt; “Notify Me About Protest” Service.
<b>Fulfillment of a legal or regulatory obligation</b>	Technical support; file backup; customer demand service; delivery of subpoenas; customer service at the counter; issuance of certificate requested by the Applicant; transfer of security values; publication of the debt protested by public notice; Scanning and checking of documents.
<b>Legitimate interest</b>	Supervision of email accounts; service performed by employees.

## 5. PERSONAL DATA SHARING

In order for us to perform our activities with quality and even offer certain benefits, we will need, in some situations, to rely on the help of commercial partners and third parties, with whom we may share your Personal Data for the performance of contracts and legal compliance. Please note that these business partners and third parties are carefully selected and have relevant security standards in place to ensure the protection of your information in the legal relationship between the client and **Stan**. **Stan** will not share to offer third party products and services. For transparency purposes, please find below which third parties currently may access your Personal Data and why:

Third Party	Reason
<b>Creditors</b>	We may share some Personal Data from protests with credit bureaus in order to comply with a legal or regulatory obligation.
<b>Protest Notaries</b>	We may share some protest Personal Data with other Protest Notaries in order to comply with a legal or regulatory obligation.
<b>CENPROT (National Protest Center)</b>	We may share Personal Data through our own system to complete or substantiate protests, due to compliance with a legal or regulatory obligation.
<b>Judicial Power</b>	We may share Personal Data through responses to Legal Offices, due to compliance with a legal or regulatory obligation.
<b>Saf Informática</b>	We may share Personal Data for the purpose of providing technical support.
<b>IT (Information Technology)</b>	We may share Personal Data for the purpose of providing a public service delegated from the protest of titles.
<b>CRA (Institute of Protest Studies of the State of São Paulo)</b>	We may share Personal Data for the purpose of providing a public service delegated from the protest of titles.

<b>Credify</b>	We may share Personal Data for the purpose of providing a public service delegated from the protest of titles.
<b>Banservice</b>	We may share Personal Data for the purpose of valuing data in the process of providing public service delegated to protest titles.
<b>Pitiwink</b>	We may share Personal Data for the purpose of sending SMS's in the process of providing public service delegated to protest titles.

## 6. INTERNATIONAL TRANSFER OF PERSONAL DATA

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Within the scope of our activities, we do not carry out operations involving the international transfer of Personal Data. However, should a transfer be necessary at any time, we will ensure that appropriate measures are in place to ensure adequate protection of Personal Data, as well as require protection from our partners.

## 7. PERSONAL DATA STORAGE

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We keep your data stored with us only for the period necessary to fulfill the legitimate purposes, including deadlines for complying with legal or regulatory obligations and exercising our rights in judicial, administrative or arbitration proceedings. Some of the criteria used to assess appropriate retention periods include: (i) the nature of the personal data and the activities involved, (ii) when and for how long the individual data subject interacts with us, and (iii) our legal obligations.

## 8. EXERCISE OF THE RIGHTS OF THE DATA SUBJECT

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You may contact us directly to exercise any of your statutory rights, including the rights set out below. To do so, it is necessary to print, fill in the blanks and sign the form below (or access the [link](#)), submitting it to our Personal Data Protection Officer, or even contacting him, whose contact details are at the end of this document. If your request is not possible, our Supervisor will contact You to clarify the situation.

Right	How to exercise it
<b>Processing confirmation</b>	You can confirm with us the existence or not of the Processing of your data.
<b>Data Access</b>	You can request a free and facilitated consultation on the form and duration of the Processing of your data.
<b>Correction of Personal Data</b>	You can request the correction of incomplete, inaccurate or outdated Personal Data. To proceed with the correction, we may request the presentation of a document to prove the veracity of the new information and avoid fraud.
<b>Anonymization, blocking or deletion</b>	If it is proven that your data is treated excessively for the stated purpose or in violation of the provisions of current legislation, You can request the anonymization, blocking or deletion of this data.

<b>Data Portability</b>	If this right is regulated by the National Data Protection Authority, You can request the portability of your Personal Data to another provider of educational services.
<b>Information on the possibility of opposition to consent and the consequences of refusal</b>	If your consent becomes indispensable for carrying out any Personal Data Processing activity, You will be informed about the possibility of opposing and the consequences arising from this refusal.
<b>Revocation of consent</b>	If You have provided your consent for any Data Processing activity, You can withdraw it at any time. However, this does not necessarily mean that we will no longer be able to process your data if there is another authoritative legal hypothesis that supports the Processing.
<b>Right to information</b>	You can request information about which public and private entities we share your Personal Data with.
<b>Data Deletion</b>	You can request the deletion of your Personal Data processed with your consent.

## **9. PERSONAL DATA OF CHILDREN AND ADOLESCENTS**

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Given the nature of our activities, it is possible that we process personal data of minors under 18 years of age with the consent of their parents or legal guardians and/or in the provision of their services – such as, for example, in meeting customer demands. We will take reasonable steps to delete improperly collected personal data of individuals under the age of 18.

## **10. SECURITY OF PERSONAL DATA**

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Protecting your Personal Data is very important to us. Therefore, we invest in implementation of technical, administrative and organizational security measures. However, we are all subject to some kind of security incident. If this occurs, we will take the necessary steps quickly and effectively, informing You immediately.

## **11. UPDATES**

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As we are always looking to improve and update our Personal Data protection practices, this Policy may be updated in order to provide more security, convenience and increasingly improve your experience.

## **12. CONTACT US**

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In case of any doubts regarding the way we treat your Personal Data, or for questions and requests, You can contact our Data Officer, who will try to assist You as quickly as possible: [lgpd@stan.com.br](mailto:lgpd@stan.com.br)