



Privacy Police

PP2025

PRIVACY POLICY

The Privacy Policy of **TELAR ENGENHARIA E COMÉRCIO LTDA.** ("TELAR"), a private legal entity registered under CNPJ No. 62.570.320/0001-34, headquartered at Avenida Angélica, No. 2.510, 2nd floor, suite 22, in the city and state of São Paulo, ZIP code: 01228-200, and applicable to all companies in its group, emphasizes its commitment to and respect for the security and privacy of its users' information.

The New General Data Protection Law – LGPD (Law No. 13.709/2018 – “Legal Basis” or “Law”), to fully carry out its activities, **TELAR** - directly or through its representatives, employees, or suppliers - must perform numerous operations involving the processing of personal data. **TELAR** is committed to ensuring that these data processing operations are aligned with best market practices and legal requirements.

Therefore, with the aim of reinforcing this institutional commitment to the fundamental right to privacy - and its implementation through the right to personal data protection - and considering the enactment of Law No. 13.709/2018 (General Data Protection Law – "LGPD"), TELAR presents below its **Privacy Policy**.

OUR POLICY

1. What data may be collected?

◆ **Contact and interest forms:** collection of basic information (name, email, phone number, company, project of interest, etc.) to respond to inquiries, send proposals, and provide clarifications. **Legal basis:** performance of contract / pre-contractual measures; legitimate interest (Art. 7).

◆ **Newsletter and communications:** distribution of content and updates. **Legal basis:** consent, with the possibility of revocation at any time.

◆ **Events, technical visits, and commercial service:** organization, registration, and attendance/visit tracking. **Legal basis:** contract / pre-contractual measures; legal obligation, when applicable.

◆ **Job applications (careers):** for recruitment and selection processes. **Legal basis:** execution of preliminary contractual procedures; compliance with legal obligations.

◆ **Technical and browsing data (IP, cookies, device, browser):** for website functionality, security, statistics, and advertising (when authorized). **Legal basis:** legitimate interest (essential security/analytics); consent (non-essential cookies).

2. Information Security

◆ **TELAR** adopts measures to protect your data against unauthorized access. In the event of a relevant incident, the National Data Protection Authority (ANPD) and the data subject will be notified, as provided by law.

3. What are the collected data used for?

- ◆ Compliance with legal and regulatory obligations;
- ◆ Communication regarding construction projects, developments, and contract updates;
- ◆ International data transfer: in some cases, your data may be stored on servers abroad, always in accordance with specific contractual clauses and protection guarantees compatible with the LGPD;
- ◆ Customer service through our communication channels; and
- ◆ Sending of information, updates, and offers (with an unsubscribe option).

4. Data Sharing

The respective data may be shared with:

- ◆ Notary offices, public agencies, and competent authorities;
- ◆ Digital marketing companies (when applicable); and
- ◆ Technology providers and partners involved in construction projects and developments.

5. Data Subject Rights

The data subject may, at any time, request:

- ◆ Access to and confirmation of the processing of their data;
- ◆ Correction of information;

- ◆ Deletion or blocking of unnecessary data;
- ◆ Data portability; and
- ◆ Withdrawal of consent.

6. Security

- ◆ **TELAR** adopts technical and organizational measures to protect your data against unauthorized access, loss, or alteration.

7. Data Retention

- ◆ Data is retained for the period necessary to fulfill contractual and legal obligations.

8. Changes

- ◆ This policy may be updated at any time. TELAR recommends periodic consultation.

9. Children and Adolescents

- ◆ Our activities are not intended for children and adolescents. In exceptional cases (such as the purchase of property in the name of minors), data processing will be carried out based on specific and prominent consent from at least one parent or legal guardian. **Legal basis:** Article 14 (specific and prominent consent by at least one parent or guardian).

10. Contact

- ◆ Questions or requests must be sent to our Data Protection Officer (DPO) at the following email address: falecom@telar.com.br