

## Privacy Policy

Your privacy is important to INVILLIA; we respect your privacy regarding any information we may collect from our website.

### Information we collect

#### Data record

When you visit our website, our servers may automatically register the standard data used by your browser; these data are considered “non-identifiable information”, as they do not enable your personal identification. They may include the IP address of the computer, type and version of the browser, pages you visit, time and date of your visit, time spent on each page and other details.

We may also collect data about the device you are using to access our website; these data may include the type of device, operational system, unique device identifiers, device settings and location data giving the geographic position. What we may collect depends on the individual settings of your device and software; we recommend checking your device manufacturer’s or your software provider’s policy to knowing what information is disclosed to us.

#### Personal Information

We may request personal information, such as:

- Name
- Email
- Social media profiles

These data are considered “identification information” as they can identify you personally. We only request relevant personal information to ensure a quality experience.

#### How we collect information

We collect information through fair legal means, with your consent and knowledge. We inform why we are collecting it and how it will be used; you are free to deny our information request, be aware that we cannot ensure you a whole experience without it.

#### Purpose

Invillia, as the Head of Data Processing, will deal with your personal data for the following purposes:

- Contacting via email about updates or information related to features, products or services and upgrades, as long as necessary or reasonable;
- Responding to any request or inquiry made through the channels of customer service available on our platform;
- Using your information to generate non-identifiable aggregated data, for example, generating statistics about users, their jobs, or areas of specialization, number of impressions or clicks on a specific project or visitor demographics.

#### Data Usage

We may use a combination of identifying and non-identifying information to understand who our visitors are, how they use our services and how we can improve their experience on our site in the future.

We do not publicly disclose the details of this information, but we may share aggregated and anonymous versions of this information, for example, in site usage trend reports.

We may use your personal data to contact you about updates about our site and services, as well as about commercial content we believe may be of your interest.

### **Data Processing and Storage**

The personal information we collect is stored and processed in Brazil (or where we or our partners, affiliates and third parties maintain installations). We only transfer data within jurisdictions subject to data protection laws, which reflects our commitment to protecting our users' privacy.

We only retain personal information for as long as necessary to ensure a service or improve our services in the future. While we keep these data, we will protect them in accordance to commercially acceptable means to prevent loss and theft, as well as access, disclosure, copying, use or unauthorized modification. Nonetheless, we should mention that no electronic storage is 100% secure and can guarantee absolute data security.

If you request your personal information to be deleted, or when your personal information is no longer relevant to our operations, we will delete it from our system within a reasonable time.

### **Cookies**

We use cookies on our website to collect information about you and your activity on our website. A cookie is a small piece of data that our site stores on your computer, and which our website accesses each time you visit us, in order to understand how you use it, helping us deliver content based on the preferences you specified.

### **Third party access to information**

We use third party services to:

- User authentication;
- Advertising and promotion;
- Content marketing;
- Email marketing.

Those services may access our data only for the purpose of performing specific tasks, we do not share any personally identifiable information with them without your explicit consent, and we do not give them permission to disclose or to use any of our data for any other purpose.

From time to time, we may allow limited access to our data by outside consultants and agencies for the purpose of reviewing and improving the service, such access is permitted only for the time needed to perform a specific function. We only work with agencies whose privacy policies are aligned with ours.

We will decline governmental and police data requests if we believe that the request is too broad or unrelated to its stated purpose. However, we may cooperate if we believe the information requested is necessary and appropriate to comply with legal processes, protect our own rights and property, protect the safety of the public or a given individual,

prevent a crime or prevent what is reasonably believed to be an illegal activity, liable to civil or criminal law proceedings or unethical.

Otherwise, we do not share or provide personal information to third parties and do not sell or rent your personal information to professionals.

### Privacy of children under 18 years old

This site does not knowingly target users under 18 years old nor collects personal information from children. As a parent, if you believe your child is participating in an activity involving personal information on our website, and you have not received a notification or request for consent, please contact us at [admin@invillia.com](mailto:admin@invillia.com).

### Limits of our policy

This privacy policy only covers the collection and handling of data from invillia.com and we only work with partners, affiliates and third party providers whose privacy policies are aligned with ours, however we cannot take responsibility for their respective privacy practices.

Our site may link to external websites not operated by us, please be aware that we have no control over the content and policies of those sites and cannot take responsibility for their respective privacy practices.

### Changes to this policy

We update this Privacy Policy from time to time, as required by legal, regulatory or operational modifications. We notify such changes, (including the effective date) as required by law.

### Your rights and obligations

As our user, you have the right to be informed about how your data are collected and used, to know what data are collected about you and how they are processed.

You have the right to correct and update personal information about you and to request that such information be deleted. You can change or remove your account information at any time.

You have **the right to restrict** or to oppose the use of your data while maintaining the right to use your personal information for your own purposes.

Right to Oppose: You have the right to object to the handling of your data when it is used for direct marketing purposes or when processing is terminated due to personal circumstances, except when there is a legitimate interest or a necessity for the exercise or defense of claims.

Right not to be subject to personalized decisions: You have the right not to be subjected to a decision based solely on the automatic processing of your data, including profiles, with binding legal effects or by legal effects that may affect you, except as necessary for the performance of a contract, as permitted by law or if you have expressly authorized it.

## Anonymous Browsing

Please note that you are still able to browse anonymously on Invillia.com, and therefore your actions as a user will not be identified by cookies or beacons.

Should you have any questions about how we handle your personal information and data and how to exercise these rights, please email us at:

administrative@invillia.com indicating your (I) identity, sharing your full name and email address used to register, an ID to establish your identity and (II) the right (or rights) you are exercising.

The exercise of such rights is free.

**This policy takes effect on December 18th, 2019.**