

**CENTER FOR RESOLUTION OF DISPUTES, MEDIATION AND ARBITRATION  
 IN INTELLECTUAL PROPERTY OF THE ABPI  
 (CSD-ABPI)**

**POLICY FOR HANDLING PERSONAL DATA OF CSD-ABPI**

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## 1. Introduction

This Policy for Handling Personal Data describes the data processing practices performed by the Center for Settlement of Disputes, Mediation and Arbitration in Intellectual Property of the Brazilian Association of Intellectual Property (CSD-ABPI).

The purpose of this Policy is not to replace any other document or non-disclosure policy and data handling that may be issued in the specific context of CSD-ABPI procedures to which you are bound, and any agreement between the parties and specialists takes precedence.

The CSD-ABPI procedures can be determinant for the rights and interest of the parties, be they private citizens or legal entities, and, therefore, data are handled fairly and impartially.

Conducting procedures requires processing personal data, relating to Specialists, Executive Secretaries, members of CSD-ABPI, Parties, their authorized representatives or legal counsel, witnesses and all other individuals that can be identified or identifiable in any information processed by CSD-ABPI in the context of their procedures.

CSD-ABPI acts as a personal data controller for some of their activities in the context of their procedures. You should be aware that other parties may also act as data controllers during the procedures, such as, for example, the Parties, their authorized representatives or lawyers, Specialists and NIC.br, the latter in the context of CASD-ND. CSD-ABPI is the entity in charge of the data processing activities it carries out as an institution, but not for activities carried out by other data controllers in the context of the procedures, as is the case of NIC.br. The activities of these third parties are not the object of this Privacy Policy.

This Policy contains general provisions, applicable to the three CSD-ABPI Chambers and special provisions applicable only to CASD-ND, in the case of disputes over domain names “.br”, of SACI-Adm. These special provisions are individualized in this policy, you will note special mentions to this Chamber, and to their characteristic abbreviations “CASD-ND”, “SACI-Adm” and “NIC.br”.

It is noted that when, in the context of CSD-ABPI procedures, you furnish any personal data related to an individual with whom we or the party to whom the personal data was sent has no direct relationship, it is your duty to furnish the respective owner of the data suitable notice that the data are being processed for this purpose, provided that it is lawful, and that the notice be provided at an opportune time and that it is not up to the CSD-ABPI, pursuant to its Rules of Order, Regulations and this Policy, and to comply with other applicable data protection obligations.

Further, in using or furnishing information to the website of CSD-ABPI, all visitors understand that said information is being collected, processed and used in Brazil and in any other countries and territories, with the objective of promoting and rendering the related services, as established herein and in the Rules of Order and Regulations of CSD-ABPI. You also recognize and concur to being bound to the CSD-ABPI Policy in effect and to all applicable norms.

### **Center for Settlement of Disputes, Mediation and Arbitration in Intellectual Property**

ABPI - Brazilian Association of Intellectual Property  
Al. dos Maracatins, 1.217 – 6<sup>th</sup> floor – 608 - Moema – São Paulo – SP – 04089-014  
Tel.: 55 (11) 3044-6613 / (11) 93212-2546

Web site: [www.csd-abpi.org.br](http://www.csd-abpi.org.br) – E-mail: [csd-abpi@csd-abpi.org.br](mailto:csd-abpi@csd-abpi.org.br)

The website is generally accessible by any web surfer; however, the subsections of the CSD-ABPI website and systems may only be accessible by certain users who are registered on the website; and other sections are accessible only by members of CSD-ABPI or by a user with special access.

This Privacy Policy enters into effect as of the date specified at the end of this Policy. If we amend this Privacy Policy, we will update it on our website. If you have any queries or request regarding this Privacy Policy or on how we handle your personal data in the context of CSD-ABPI procedures or our website or, further, if you wish to exercise any of your rights over data, contact us via e-mail at [protecaodedado@csd-abpi.org.br](mailto:protecaodedado@csd-abpi.org.br). Note that all the data gathered will be used and maintained in accordance with Law N°. 13,709/2018 (Data Protection Law– *LGPD*).

Below are some definitions to assist in understanding the terms used in this policy, namely:

- **Specialists:** refers to the group of Arbitrators, Mediators and Specialists of CASD-ND, those appointed in the procedures of the three Chambers, according to their Regulations, in charge of analysis and independent and impartial conclusion of the procedures.
- **Personal data:** information relative to an identified or identifiable private citizen.
- **Sensitive personal data:** personal data on racial or ethnic origin, religious conviction, political opinion, filiation to labor syndicate or to organization of a religious, philosophical or political character, data relating to health or sex life, genetic or biometric data, when linked to a private citizen.
- **Owner:** private citizen to whom the personal data refer.
- **Controller:** person having the responsibility of taking decisions relating to personal data handling.
- **Operator:** person handling the personal data in the name of the controller.
- **Officer:** person appointed by the controller and operator to act as communication channel between the controller, the owners of the data and the National Data Protection Authority (*ANPD*).
- **Handling:** any operation involving personal data, such as collection, receipt, utilization, access, reproduction, storage and elimination, and others.
- **Blockage:** temporary suspension of handling operation, by safekeeping of the personal data or database.
- **Elimination:** exclusion of data stored in database.
- **National Data Protection Authority:** branch of public administration in charge of safeguarding, implementing and overseeing enforcement of the Data Protection Law (*LGPD*).
- **Cookies:** files or information that may be stored on your devices when you access our portal or our digital channels, helping to identify you and to personalize navigation in accordance with your preferences.

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## 2. Who we are

The Center for Settlement of Disputes, Mediation and Arbitration in Intellectual Property (**CSD-ABPI**) is a branch of the ABPI whose objective is to control and manage the procedures on alternative solutions for disputes, including those relating to internet domain names, alongside the mediation and arbitration procedures.

The **ABPI** (Brazilian Association of Intellectual Property) is a non-profit entity, founded on August 16, 1963 and focused on the study of Intellectual Property, notably industrial property law, copyright law, competition law, the transfer of technology and other similar fields, such as franchising, etc.

The CSD-ABPI is responsible for 3 Chambers: the Dispute Settlement Chamber relating to Domain Names (**CASD-ND**), the Mediation Chamber (**CMed-ABPI**) and the Arbitration Chamber (**CArb-ABPI**).

In view of the need to adjust the SACI-Adm to the provisions of the Data Protection Law (*LGPD*), in February of 2021 NIC.br submitted to CSD-ABPI its Conformity Plan, viewing the implementation of measures and setting up of a communication channel to collaborate in the scope of handling privacy rights and personal data protection.

## 3. Data Gathering

Depending on the circumstances, we may seek the following personal data from you:

### 3.1. Specialists, Executive Secretariat and members of CSD-ABPI

- Your name, contact details, financial information (including banking data), information on personal identification (including information such as photograph, ID (*RG*) and Tax Code (*CPF*)) and other personal data sent to us by you, by a party, by your authorized representative or lawyer, by a Specialist, by the Executive Secretariat or by a CSD-ABPI member, or otherwise disclosed or collected by us, by third parties, or by means available to the public, in connection with CSD-ABPI procedures;
- Data on the possibility of acting in a certain procedure containing certain Parties;
- Information on whether you are subject to legal sanctions or any other legal hindrance.

### 3.2. Parties/Authorized representatives/lawyers

- Your name, contact details, financial information (including banking data), information on personal identification (including information such as photograph, ID (*RG*) and Tax Code (*CPF*)) and other personal data sent to us by you, by a party, by your authorized representative or lawyer, by a Specialist, by the Executive Secretariat or by a CSD-ABPI member, or otherwise disclosed or collected by us, by third parties, or by means available to the public, in connection with CSD-ABPI procedures;
- Information on whether you are subject to legal sanctions or any other legal

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- In order to qualify a legal representative of a Legal Entity, besides the company name and Corporate Tax Code (*CNPJ*) of the Legal Entity it represents, it is crucially necessary to collect the name and Individual Tax Code (*CPF*) of its legal representative, accompanied by document that qualifies him or her as representative, for example, the articles of organization whereby said powers are granted;
- The lawyer attorney of the Parties must prove the powers granted thereto and the scope of such powers by means of a power-of-attorney. Therefore, this power-of-attorney must be accompanied by the Request form, in addition to document in the case of Corporate Claimants (e.g. bylaws) proving the powers of whoever granted the power-of-attorney. Yet it must be emphasized that the other personal data appearing in the power-of-attorney will not be collected in individualized form, and the use of the power-of-attorney is strictly for analyzing the powers granted to the legal representative;
- Data of the Claimants and Respondents of SACI-Adm procedures, limited to name, qualification (Individual (*CPF*) or Corporate (*CNPJ*) Tax Code) and e-mails, as well as physical address and telephone number, if necessary, for issuance of invoices to pay costs. The Parties to CASD-ND procedures are hereby informed that our forms have been revised to request only what is necessary, and the Parties should avoid sending additional data, except when strictly necessary. Should the Parties opt for representation by lawyer, CASD-ND will collect his or her full name, Brazilian Bar Association (*OAB*) registration number and e-mail;
- Viewing notification of the Respondent in SACI-Adm, NIC.br shares with CASD-ND the data on the name, Individual Tax Code (*CPF*) and e-mail(s) of the Owner Contact(s) (ID);
- NIC.br may share with CASD-ND and the Specialist the list of domain names under a certain owner (Individual (*CPF*) / Corporate (*CNPJ*) Tax Code) appearing as Respondent in a SACI-Adm procedure, provided that the Chamber and the Specialist respect certain limits agreed upon by ABPI and NIC.br, commensurate with the Data Protection Law (*LGPD*).

### 3.3 Other individuals / witnesses / expert examiners

- Your personal data sent to us by a party, your authorized representative, lawyer, Specialist, Executive Secretariat or member of CSD-ABPI, or otherwise disclosed or collected by us, by third parties or by means available to the public, in connection with CSD-ABPI procedures.

Web surfers and users of our services understand and concur that CSD-ABPI may collect, maintain and process the information furnished thereby, including collecting information on personal identification that they may furnish in filling out the forms; requesting receipt of information from CSD-ABPI or interacting with our website and system; and/or interacting with CSD-ABPI by telephone, e-mail, or in person, at events, or in any other way.

This information may include, for example, name; qualification; address; the name of the company where the person works; telephone number; e-mail address; country of origin; banking information

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(if furnished for processing requests); photographs (such as those sent by specialists to accompany their biographies or in ID documents for certification and validation of participation at meetings and hearings); and information collected by CSD-ABPI on these web surfers and users through the site and system.

Moreover, the CSD-ABPI may register and collect information on how the visitors use the website and system. These data may include the domain name of a visitor; access status; language; type of browser and operating system; internet provider; IP address; the website from where they came to our website; the time spent surfing the website; and the ways in which they use the website (collectively, "Use or access data").

We may collect information in the following ways:

- **Information that you furnish us:** For example, when contacting us, if you register on our database via website, system or e-mails, begin a procedure with us, become a specialist or otherwise furnish us personal information. When you register or register your case/procedure, for example, we will request personal information, such as your name, e-mail address and telephone number to store in your access and profile, additionally, for issuance of an invoice to pay the costs of a certain procedure, we will request data such as Individual (*CPF*) / Corporate (*CNPJ*) Tax Code and physical address.
- **Information we obtain from your use of our website and services:** We collect information on the services that you use and how you use them, such as when you visit our websites or view and interact with our content.
- **Information on third parties:** We may also receive information on you from third parties. This may include information such as your name, postal address, e-mail address and telephone number. We, like all companies, may check which browser you are using, IP address and computer operating systems that are being used, and this information may be used to improve the services we offer.
- **Research information:** We will notify you when we receive your data in the hypothesis that it is used for promotional/marketing purposes, if these involve contact e-mail, and you will have the chance of opting not to receive all communications and remove your data immediately.

### 3.4. Sensitive Personal Data

The Data Protection Law (*LGPD*) recognizes that certain categories of personal information are more sensitive. This is known as sensitive personal data and covers information on health, race, religious beliefs and political opinions. We do not normally collect sensitive personal data about you, unless there is a clear reason to do so, such as a dietary requirement when attending a conference in person (which may infer religious beliefs) or when we need this information to assure we furnish suitable installations or support to enable you to take part at a meeting, hearing, event, or any other occasion requiring our services.

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#### 4. Use of personal data

We process the personal data collected through the website, CSD-ABPI system and its Executive Secretariat e-mail for the purpose of:

- Providing and personalizing our services;
- Interacting with your queries and requests;
- Managing orders and procedures relating to our suppliers, members, Specialists, Parties and NIC.br;
- Managing registrations by parties, attorneys, specialists and procedures;
- Furnishing information on services;
- Rendering services related to conflict solving, mediation, arbitration and Domain Name disputes under SACI-Adm;
- Exchange of personal information with third parties, e.g. NIC.br, Specialists, Parties, system and internet access suppliers;
- Generating funds, such as generating invoices for payment of procedural costs managed by us;
- Organizing campaigns, advertising our services and market research;
- General administration for social benefit within the legal limits.

#### 5. Data, information and materials for managing cases

The terms of privacy related to confidential data and information and materials that the Parties or specialists (Specialists, Mediators and Arbitrators) send us during the course of an arbitration process or other dispute settlement process, such as SACI-Adm, can be established in the various rules and CSD-ABPI procedures, set out in specific Rules of Order and Regulations, and/or in any other agreement between the Parties and the Specialists.

#### 6. Service providers

To manage our services efficiently and improve and streamline our website and services, the CSD-ABPI may use third parties to provide or perform certain services and functions. The CSD-ABPI will provide information on the web surfers/users and their use of the website and system to these service providers and partners, as necessary, to carry out these functions and services. The service providers may be located across the world, chiefly during this global pandemic where “home office” is king; therefore, the information related to the web surfers/users may circulate around the world, even in countries with a different level of privacy protection, or, moreover, the country of residency of this web surfer/user. Being aware of these issues, the CSD-ABPI undertakes the commitment to abide by the Data Protection Law (*LGPD*) with all its service providers.

#### 7. Website users

The CSD-ABPI websites may use cookies to help our websites work better and to track information on the people using them.

Furthermore, if you register on our websites, the following shall also apply:

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- All CSD-ABPI websites collect personal information when you register with us;
- The site where you register will collect information, such as your name, e-mail address and postal. After registering, you will no longer be anonymous when logging on afterwards;
- As part of the registration process and ongoing use of the CSD-ABPI services, you concur that all registration information furnished to us will always be precise, correct and updated. If you need to alter any of your personal information, log in or contact the Executive Secretariat at [protecaodedados@csd-abpi.org.br](mailto:protecaodedados@csd-abpi.org.br);
- We collect and retain information on its interactions with us, so we can process your interactions and handle future consultations;
- We might use cookies to furnish a good experience in browsing on our website such as, for example, so that people have automatic log-ins and password completion.

Parts of the CSD-ABPI website are restricted to their members only (Secretariat, Directors and Specialists) or to users with individualized accesses.

#### **8. Banking, debit or credit card information**

If you use your credit or debit card or furnish us any information on bank accounts, viewing the receipt of values or payment of costs, we will guarantee that this is carried out with security and in accordance with the laws and best practices we know.

We do not store the details of your credit or debit card, as all transactions are carried out through bank invoice.

If we receive an e-mail with details of the credit or debit card, it will be immediately excluded, no payment will be made and you will be notified of such. All payments must be concluded through bank invoice or via bank transfer.

#### **9. Purposes for processing personal data**

Depending on the circumstances in which we process your personal data, we may use your data, always centered around the principles above, in the following ways:

Acting as Specialists, members of CSD-ABPI or your Executive Secretariat(s):

- To evaluate your availability and suitability at being appointed as Specialists, and continue to act in CSD-ABPI procedures (including in response to certain questions presented by the parties), as necessary to promote our legitimate interest and those of the Parties, in guaranteeing that only suitable candidates are appointed and so that no conflict of interests arise that might adversely affect the integrity of the CSD-ABPI procedures;
- Maintain a database of possible Specialists and Executive Secretaries, and their acceptances and refusals to act in a certain procedure containing a certain party, as necessary, to promote our activities in identifying and appointing suitable Specialists and Executive Secretaries;

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- Considering the volume of personal data to which CASD-ND Specialists have access to be recommended for SACI-Adm procedures, we revised our contracts signed with them to include obligations relative to data protection, non-disclosure, information security, among other duties introduced by the Data Protection Law (*LGPD*), with mechanisms of assigning liability in cases of infringement of the legal provisions;
- Viewing the possibility that interested parties obtain information on recurrently appearing as respondent in SACI-Adm procedures, to check practices of cybersquatting, for example, NIC.br organizes its own decision database and may inform data related to potential interested parties provided that some requirements are met;
- To make payments/reimbursements or furnish administrative information on your action, potential appointment or on the way Procedures are conducted, as necessary, to enforce our agreements and duties to you;
- Facilitate the general course of CSD-ABPI procedures, including communicating with you, facilitate communication among participants of CSD-ABPI procedures, and comply with other administrative tasks relating to procedures, as necessary to settle the dispute and guarantee that the processes operate efficiently and swiftly and that the rights of the parties are respected;
- When necessary, to meet our obligations of legal and regulatory compliance, including those relating to taxes, economic sanctions and crime-fighting, such as corruption, money laundering, etc.

Acting as Parties, legal representatives or lawyers connected to any process being heard before CSD-ABPI or, further, witnesses, expert examiners or other individuals, of whatever kind, participating in the processes:

- Provide services in relation to CSD-ABPI procedures (including payments/reimbursements) and to communicate with you as party to procedures or an authorized representative or a lawyer of one of the parties, as necessary, to promote the settlement of the dispute between them and the interests of the parties and of CSD-ABPI in assuring that the processes act efficiently and expeditely and that the rights of the parties are respected;
- When entering into a contract to provide services to you in connection with CSD-ABPI procedures (for example, Complaints and requests submitted), we can process your personal data as necessary to meet our obligations and duties under this contract and according to the terms of the Rules of Order and Regulations applicable;
- As required, to promote the settlement of the dispute between the parties and their interests, as well as those of CSD-ABPI in assuring that the procedures operate efficiently and swiftly and that the rights of the parties are respected;

Publish CASD-ND decisions / awards on our website or other information, as necessary, limited to identifying the Respondent, containing just the abbreviations of the names

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of the private citizens and the Tax Code (*CPF*), in the form of a pseudonym, changing the 6 digits in the middle for some character, such as, for example “\*”. Where representation is by way of duly-qualified attorney, with the consent of the lawyer or industrial property agent, the decision should contain their name, Brazilian Bar Association (*OAB*) registration number, if applicable, or their Tax Code (*CPF*), and firm where they work. If no such consent is given, the data of the lawyer/industrial property agent will be suppressed in the publication of the decision/award on the CASD-ND and NIC.br websites.

- SACI-Adm celebrated ten years of existence in 2020, and over four hundred decisions/awards have already been served and published both on the website of the accredited institutions, and of Registro.br. CASD-ND has amended their past decisions/awards already published, introducing pseudonyms, in light of the rules mentioned previously. The personal data of the lawyer/industrial property agent have been suppressed as standard in past decisions/awards, as a protective measure and also since getting consent for retroactive cases would be hard to operationalize.

Further, in general, the CSD-ABPI gathers and uses your personal identification information for the following purposes:

- **Commercial or administrative use:** to furnish information or services requested or to meet our obligations arising from agreements and pacts, establish and manage registrations; and analyze and develop our services and our website; all non-profit;
- **Provide support:** to respond to requests, questions and comments; to notify you on alterations; and gauge our efficiency in handling your concerns;
- **Experience on the website:** for the technical administration of our website; for in-house operations; for administration of members and users; for problem solving; for purposes of data analysis; test analysis, and research and development; guarantee that the content of our website is presented efficiently to you and to your computer; and as part of our efforts to protect the security and the integrity of the information collected through this site;
- **Protect our rights and property:** protect our rights or property of our members or others when we have reasonable grounds for believing that said rights or properties have been or may be affected; recover debts; prevent, detect, identify, investigate, answer and protect against claims, liabilities and potential unlawful behavior or activities;
- **Marketing:** communicate and manage participation at special events, programs, research and other offers and promotions; and send updates relating to ADR – Alternative Dispute Resolution and other informative or promotional e-mail messages that you may opt not to receive, as described in this policy;
- **Disclosure according to the law:** the CSD-ABPI may provide proper entities information on its users, the website and their uses, available by law, and may disclose this information if so required by the law or by a court order. Where so permitted by the law, the CSD-ABPI may also disclose this information to the proper entity, such as the ANPD and NIC.br, or use it as part of a legal process, in order to protect your property or promote an investigation on any infringement of Policies, Rules of Order and Regulations of CSD-ABPI or any unauthorized access

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- or use of the site, or any legal activities relating to a certain web surfer/user.
- **Publication of the CASD-ND Decisions/Awards:** according to CASD-ND Regulations, we understand that in most cases it is not possible to meet requests to remove the decision/award date published on our website, as the SACI-Adm procedure is not *in camera* and all decisions/awards are published on the website, under the terms of Art. 10.15 of CASD-ND Regulations and Art. 24 of SACI-Adm Regulations. However, your request will be analyzed and may be forwarded to [protecaodedados@csd-abpi.org.br](mailto:protecaodedados@csd-abpi.org.br).

If the date is published in CASD-ND decisions/awards, relating to the procedure SACI-Adm, besides the measures and regulatory provisions referred to above, we collect and use the information also based on satisfying the public interest, comprising public safety, activities of investigation and repression of infringements, thus based on the hypothesis of legitimate interest prescribed in the Data Protection Law (LGPD).

In fact, the purpose of publicizing the decisions/awards served under the aegis of SACI-Adm lies in the principles of good faith and the public interest that justify the provision, through compliance with specific legislation, of due process and the general principles of protection of data owner rights, pursuant to Articles 3, 6, 7 and 10 of Law 13,709/2018. This handling of personal data also arises from compliance with legal or regulatory obligation, resolutions and regulations, supported in contracts, pacts and similar instruments, and, chiefly for due exercise of rights in a lawsuit, administrative process or arbitration proceeding, commensurate with Law 13,709/2018, Art. 7, items I, II, III, analogously, V, VI, IX and §§ 3 and 4.

It is further emphasized that the owner of domain names that are the object of procedures heard before CASD-ND, have adhered to SACI-Adm, by signing the Domain Name Registration Contract under “.br”.

We also clarify that in observance of due process, the SACI-Adm procedure does not prevent any parties from filing a lawsuit or seeking arbitration, under the terms of the law.

It is underlined that the rights of anonymity, blockage and elimination of data, requested by their owners, cannot be carried out before prior communication to NIC.br, for due validation of the administrative procedure. Additionally, opposition to certain data handling, when such is necessary for the proceduring or validity of the administrative procedure cannot be met.

## 10. Security

The CSD-ABPI takes the security of your personal information seriously. Therefore, we have implemented technology and security policies and procedures designed to reduce the risk of destruction or accidental loss or the disclosure or unauthorized access to this information, reasonably suited to the level of the data in question and to our possibilities as non-profit entity.

### Center for Settlement of Disputes, Mediation and Arbitration in Intellectual Property

ABPI – Brazilian Association of Intellectual Property  
Al. dos Maracatins, 1.217 – 6<sup>th</sup> floor – 608 - Moema – São Paulo – SP – 04089-014  
Tel.: 55 (11) 3044-6613 / (11) 93212-2546

Web site: [www.csd-abpi.org.br](http://www.csd-abpi.org.br) – E-mail: [csd-abpi@csd-abpi.org.br](mailto:csd-abpi@csd-abpi.org.br)

Nevertheless, owing to the nature of open communication on the Internet, we cannot guarantee that the communications between you and the website, or data stored on the CSD-ABPI and CASD-ND systems are free from unauthorized access by third parties, though we are making every effort in this sense.

We therefore recommend that you, too, should take measures to protect yourselves, such as, for example, do not share log-in credentials, do not send confidential information using insecure methods and protect your devices, such as computers and smartphones with passwords and anti-virus software packages.

## 11. Data Retention

We will retain your personal information for the length of time required to satisfy the purposes described in this Privacy Policy, unless a different retention is required or allowed under applicable Law. From such time at which we no longer need your personal information for commercial, administrative or legal purposes, it will be excluded.

The CSD-ABPI retains the personal information it processes in the name of its users, provided we have an agreement with them or lawful interest in processing these data, always subject to applicable legal requirements.

In compliance with accounting legislation, we will keep records of all individuals using CSD-ABPI services (for example, record of payments) for 5 (five) years.

If you register your interest in a procedure or service of ours, but have not yet initiated it, we will keep your contact data for up to three years and we may send you information on these services.

We will only keep your personal data for the time that is reasonably necessary in the circumstances described in this Policy. The retention periods vary according to the category of data, taking into consideration the legal and regulatory requirements, the prescriptive terms for the lawsuit, good practices and the legal basis on which we process your personal data.

You may opt not to receive advertisements or request data exclusion at any time by sending an e-mail to [secretariaexecutiva@csd-abpi.org.br](mailto:secretariaexecutiva@csd-abpi.org.br).

## 12. Your rights to your personal data

You may request information relating to the items below by sending an e-mail to [protecaodedados@csd-abpi.org.br](mailto:protecaodedados@csd-abpi.org.br), containing your name, e-mail and the nature of your request. We guarantee a reply to the requests below, though we may check your identity beforehand. In some cases, the rights described may be subject to legal limitations.

- **Existence:** confirmation of the existence of handling your personal data;
- **Access:** access to your personal data;
- **Correction:** correction of your personal data that is incomplete, inaccurate or outdated;

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- **Anonymization, blockage or elimination:** anonymization, blockage or elimination of your personal data that is unnecessary, excessive or not handled in conformity with the Data Protection Law (*LGPD*) and elimination of your personal data handled with your consent;
- **Portability:** portability of your personal data to another service provider;
- **Information:** information from public and private entities with which we share your personal data; and
- **Revocation:** revocation of consent given for us to handle your personal data.

Note that if you are an employee, appointee, contractor, affiliate, or in any other way connected to a party to a CSD-ABPI process, we suggest that you first check your concerns with this party before contacting us on the processing of your personal data in the context of CSD-ABPI procedures.

### 13. Addressees – Data and Disclosure

We do not sell, rent or share your personal information to or with third parties in any other way than the one described in this Policy. The CSD-ABPI may disclose your data and personal information under the following circumstances:

- The suppliers or service providers only to provide the services that you requested from us, such as, for example, a data provider to make data available to you over the internet.
- To third parties who provide us a service and are data processors. This would include our trusted partners who work with us and other entities that operate with us, such as ABPI and NIC.br. We demand that these third parties strictly comply with our instructions and data protection laws and we guarantee that suitable controls are in effect. We enter into contracts with all our data processors and regularly monitor their activities to guarantee that they are in conformity with the policies and CSD-ABPI procedures.
- When we are obliged to disclose your personal information to meet any legal obligation (for example, for government branches and law enforcement agencies) or to assure compliance with or apply our rights (including in relation to our website) or other applicable terms and conditions, or to protect the CSD-ABPI, for example, in cases of suspected fraud.
- To members and secretariats of CSD-ABPI to assure the functioning of services, under the terms of the Rules of Order and applicable Regulations.

### 14. International data transfers

As CSD-ABPI is an agency that attends to national and international cases and is linked to ABPI, a national association, we have regional offices in São Paulo and in Rio de Janeiro. They may transfer, process and store the data hosted at other sites to provide services at a more local level. We have data sharing agreements with each office.

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There may potentially be a transfer of personal data to third party countries in connection with the provision of services relating to CSD-ABPI procedures in which you are involved, or otherwise necessary in the course of our operations. We make these transfers when there is a legal basis for doing so. If the addressee is not based on a jurisdiction that provides an adequate level of protection for personal data, as determined by the proper regulatory agency, then we will perform these transfers in accordance with our legal obligations, for example, when the transfers are necessary to establish, exercise or defend legal claims in the context of CSD-ABPI processes, or when there is another legal basis for doing so.

We also use suppliers (as system and places for conference/hearing/meeting) outside the São Paulo/Rio de Janeiro axis. This means that your personal information may be transferred, processed and stored outside this axis. This may include countries where the authorities are not considered to provide a suitable level of protection for personal data. However, we take measures to implement adequate safeguards to protect your personal information when processed by the provider, like signing contracts to comply with the Data Protection Law (*LGPD*). If you wish to receive further specific information on our safeguards, contact us at [protecaodados@csd-abpi.org.br](mailto:protecaodados@csd-abpi.org.br).

#### **15. Amendments to this Privacy Policy**

We may update the terms of this policy at any moment. Check it periodically. We will notify you of significant alterations in the way we handle the personal information, sending notice to the main e-mail address that you provided us or placing a featured notice on our website. The continued use of our website or services will be construed as your acceptance of these alterations.

Therefore, at its sole discretion, the CSD-ABPI may update this Policy at any moment, and from time to time publish the amended Policy on the website. The revised or amended Policy will enter into effect when it is published. Any access or use of the site after this update will be considered consent for said update. All visitors are, therefore, encouraged to return to this page on a regular basis. This Policy cannot be altered otherwise without the written consent of CSD-ABPI, provided it has been approved by the Steering Committee of the ABPI.

#### **16. Complaints, compliments or comments**

If you are discontented with our work or with something we did or failed to do, we would like to know. We would also appreciate your opinion on what we do well. As a non-profit organization, your comments will help us learn and continuously improve our services. Please e-mail us at: [secretariaexecutiva@csd-abpi.org.br](mailto:secretariaexecutiva@csd-abpi.org.br).

São Paulo, September 28, 2021.

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