



**TITAN
CLARITY**
SOFTWARE  TITANS

Privacy Policy

Titan Clarity is a technology company that provides several services and technological solutions with the aim of helping companies in the digital transformation and generation of value and innovation. Titan Clarity is constantly developing big data , data analysis and artificial intelligence solutions that allow its customers to optimize internal processes and improve data governance in a more assertive and secure way for its customers and for other individuals who may have their own personal data and information processed in this context (“ Services ”).

Titan Clarity values transparency and takes privacy seriously. Therefore, in this Privacy Policy (“Privacy Policy” or just “ Policy ”) we explain the ways in which we collect, use, store or otherwise handle personal data collected from our Services and from visiting our website . We also indicate how data subjects who have their personal data processed by Titan Clarity can exercise their rights under applicable law. Specific Privacy Policies may apply for some of our Services.

I. CONTEXT OF DATA PROCESSING

The personal data we process depends on the context of your interactions with Titan Clarity or the Services as a result of which the personal data was collected. To facilitate your understanding, we explain in this Policy how we treat the data of **(a)** users of our website (“ Users ”), who are any individuals who access, contact us or use in any way the functionality and content available through the website ; **(B)** potential customers or customers who contract the Services provided by Titan Clarity, when an individual, or individuals who represent such customers (for example, a partner, legal representative or business contact of a company that acquires or demonstrates interest in acquiring the Services) (“ Customers ”); and **(c)** other individuals who, as a rule, do not have direct contact with Titan Clarity, the data being processed as a result of the Services provided to Customers (“ Third Parties ”) (collectively referred to as “ Holders ”). Titan Clarity may be the controller or operator of your personal data, as detailed below.

When personal data is provided directly to Titan Clarity through the use of the website (ie, personal data of Users) or by other means in which Titan Clarity determines how such personal data will be used (eg, Customer data), Titan Clarity will be the controller of the data. For the purposes of data

protection legislation, the controller is responsible for decisions regarding the processing of personal data. In this case, Titan Clarity is responsible for defining which personal data will be processed, for which purposes, for which period, among other decisions on processing.

However, when personal data are provided to Titan Clarity or collected by Titan Clarity as a result of the provision of Services to Customers, Titan Clarity will, as a rule, operate the personal data, processing such data in accordance with the instructions of our customers. For the purposes of data protection legislation, the operator is the one who processes personal data on behalf of the controller. In this case, Titan Clarity will process the data only within the limits allowed by the Clients, being the Client responsible for the decisions regarding the treatment of personal data.

This Privacy Policy aims to objectively present the characteristics and hypotheses of the treatment of your personal data in each of the above scenarios. For more information about the processing of personal data, contact the Person in Charge by phone/e-mail dpo@titanclarity.com.br. If Titan Clarity acts as an operator in relation to your personal data, we may direct you to the controller.

II. PERSONAL DATA AND PURPOSE OF TREATMENT

1. Users Personal Data

This section applies to personal data that we collect in relation to Users (or, for the purposes of this section, “you”), who are the individuals who access and/or contact us through the website.

1.1 Personal data we collect

- Data you provide us. Our website has several ways in which you can contact us. You can provide us with personal data, for example, when you express interest in our newsletter and sign up to receive it, when you register to participate in an event organized by Titan Clarity or when you contact us in some other way. This data includes registration and contact information, such as your name and email address.
- Data We Collect Automatically. When you use our website, we may automatically collect and store data. This data includes browsing data, ie data about how you use and interact with our Services, which may include the dates you used the Services and

your browsing activities and the IP address of the device by which you accessed our website.

1.2 Personal Data We Collect How We Use This Personal Data

We may use the data collected or received from using our website for the following purposes:

- Provide, customize and improve our website;
- Strengthen our safety and security procedures, aiming to provide a safer and more effective environment;
- Perform internal operations, troubleshooting, data analysis, testing, research and statistics;
- Send communications about Titan Clarity, its Services or other initiatives, such as materials, newsletters and events;
- Comply with legal or regulatory obligations, or as required in a court proceeding, by any law enforcement or government agency having jurisdiction, or claiming to have jurisdiction, over Titan Clarity;
- For other purposes for which we provide a specific notice at the time of collection, or otherwise as authorized or required by law.

2. Customers Personal Data

2.1 Personal data we collect

In general, when a Customer (or for the purposes of this section, “you”) or your company expresses interest in, contracts, uses or interacts with the Services, we may collect the following personal data:

- Data you (or your company) provide to us. When you (or your company) express interest in, hire, use or interact with the Services or communicate with us in any way, you (or your company) may provide us with certain data. These data include:
 - Professional contact details such as your name, title, company, telephone number and email address;
 - Additional information for qualification, such as your marital status, nationality and profession.

2.2 How We Use This Personal Data

We may use the data collected or received from using our website for the following purposes:

- Fulfill our contractual obligations to you or your company. This includes creating and managing the accounts you may have with us, verifying your identity, charging you or your company fees, providing, customizing and improving our services;
- Notify you of any changes to our Services;
- Strengthen our security and protection procedures, aiming to provide a safer and more effective Service;
- Perform internal operations, including support, troubleshooting, data analysis, testing, research and statistics;

- Provide information about other Services we offer, similar to those already contracted by you;
- As necessary, to establish, exercise and defend rights in judicial, administrative or arbitration proceedings;
- Comply with legal or regulatory obligations, or as required in a court proceeding, by any law enforcement or government agency having jurisdiction, or claiming to have jurisdiction, over Titan Clarity;
- For other purposes for which we provide a specific notice at the time of collection, or otherwise as authorized or required by law.

3. Third Party Personal Data

Titan Clarity may process personal data of individuals with whom it has no direct relationship (herein called “Third Parties ” or “ you ”) as a result of the Services provided to Clients. As a rule, these Third Parties are candidates for job vacancies or employees of Titan Clarity Clients or users, potential consumers or consumers of products or services provided by Titan Clarity Clients.

In this scenario, we may receive or collect data about you or your interactions with Titan Clarity Clients, which will vary depending on the Services contracted by the Client. Such data may include, but not be limited to registration data, copy of documentation or photo, location data or data related to the use of services or products provided by Titan Clarity's Clients. According to the Service provided by Titan Clarity, this data may be processed from fraud prevention purposes and identity confirmation to just the organization of the Customer's database in accordance with certain parameters. We treat this data strictly in accordance with the instructions of our Clients and for the purposes indicated or permitted by them. Titan Clarity is not responsible for the data protection practices of its Clients.

III. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share personal data collected with third parties and business partners that are relevant to achieving the purposes listed above and/or for purposes of enabling the provision of the Services. Such sharing takes place especially on the basis of the following criteria and for the purposes described below.

- Customers. Titan Clarity may receive or share personal data with Clients for the purpose of providing the Services. Personal data will always be processed in compliance with the provisions of this Privacy Policy and the terms of use of the Titan Clarity Services.
- Third-party service providers or partners. We may work with third party service providers to help us operate, perform, improve, understand, customize and support our Services. When we share data with third-party service providers, we require them to use your data in accordance with our instructions and terms. Titan Clarity may

also share personal data on behalf of and under the instructions of its Clients, as permitted by applicable law.

- Public databases. We may consult public databases (for example, Internal Revenue Service or Court of Justice) in order to confirm or supplement your data, as permitted by law and, when we act as operators, as instructed by our Clients.
- Regulatory bodies, judicial or administrative authorities. We may share your personal information in order to provide the appropriate authorities with any information that is requested regarding you. Furthermore, we may share your personal data with public authorities or private entities to combat fraud and abuse in the use of the Services, to investigate suspected violations of the law, or to combat any other suspicion of non-compliance with our policies and contracts.
- Transfer of assets. If Titan Clarity is reorganized or sold and all or substantially all assets are transferred to a new owner, your personal information may be transferred to the buyer regardless of your authorization to ensure continuity of services.
- With your permission . In other cases not provided for above, having the purpose of sharing personal data and information, we will send you a notification with information regarding such sharing to request your consent, for a specified purpose. If Titan Clarity acts as operator in this process, the Customer must obtain its authorization.