



PRIVACY POLICE

 www.s4e.tech

 Av. Altamiro Avelino Soares, 245 – Castelo – Belo Horizonte/MG

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Welcome!

We are very happy to welcome you to S4E Tech!

To help you understand how we will handle the data we collect, we provide a brief summary below.

RIGHTS OF PERSONAL DATA HOLDERS

You are the holders (natural persons) of personal data referred to by the personal data that will be collected by **us**.

Brazilian law grants certain rights to the natural person regarding their personal data. Thus, **we** guarantee transparency and access control to personal data holders, providing them with the best possible experience while using the platform. The rights of the personal data holder are:

a) Right to confirmation of the existence of processing - right to request confirmation of the existence of processing of your personal data through clear information about the origin of the data, the non-existence of a record, the criteria used, and the purpose of the processing;

b) Right of access - right to be informed and to request access to the personal data processed by **us**;

c) Right to rectification - right to request that **we** change or update your personal data when they are incorrect or incomplete;

d) Right to deletion - right to request the deletion of your personal data collected by **us**;

e) Right to restriction - right to request that **we** temporarily or permanently stop processing all or some of your personal data;

f) Right to object - right to object at any time (i) to the processing of your personal data for reasons related to your particular situation and (ii) to the handling of your personal data for purposes of communication and direct marketing;

g) Right to a copy - right to request a copy of your personal data in electronic format.

COLLECTED INFORMATION / PERSONAL DATA AND ITS PURPOSE

The following data may be collected for the purpose of registration and identification for commercial and advertising use:

1. Full name;
2. Phone/Cell;

3. Corporate or personal WhatsApp;
4. Personal or corporate email;
5. Interests, preferences, and needs.

To ensure all information is correctly understood, we present our Privacy Policy in a transparent and accessible manner as seen below.

WE EMPHASIZE THAT IT IS EXTREMELY IMPORTANT TO FULLY UNDERSTAND AND READ THIS DOCUMENT IN ITS ENTIRETY

1. GENERAL TERMS

1.1. General

This **Privacy Policy** is designed to communicate our practices regarding the processing (including collection, storage, use, processing, and sharing) of your personal data by us in all our products and processes such as communication, commercial contact, conferences, and immersion programs. S4E Tech is owned by S4E Tech LTDA, registered with the CNPJ under No. 41.158.369/0001-04, headquartered in the city of Belo Horizonte, State of Minas Gerais, at Av. Altamiro Avelino Soares 245 Castelo, CEP 31330-000, which for all purposes will be considered the data controller.

1.2. What are Personal Data

Personal data are the information that can be used to identify **you** individually.

1.3. Information Collection Authorization

When registering on **our** sites, **you** must accept and authorize the collection of information through the "I have read and agree to the terms" or "I agree to receive communications" button under the terms of this privacy policy.

1.4. Withdrawal

You may withdraw your consent to the provisions of this Privacy Policy at any time by notifying **S4E Tech** via email at protecao.dados@normandia.group

1.5. Regulation

We operate in accordance with Brazilian law, including and especially the terms of [Law No. 12.965/2014](#) (the Internet Civil Framework) and [Law No. 13.709/2018](#) (General Data Protection Law), and other applicable laws.

1.6. Contact

If you have any questions or suggestions about the Privacy Policy or any other information, you can contact **S4E Tech** via e-mail at protecao.dados@normandia.group

1.7. Information Control

This Policy describes what personal data can be collected from you when registering on our sites, how this information can be used, and the precautions taken against unauthorized access or use of this information.

2. COLLECTED PERSONAL DATA

2.1. Data Collection

We may collect, store, and use the following information and/or data from you:

- a) Full name;
- b) Phone/Cell;
- c) Corporate or personal WhatsApp;
- d) Personal or corporate email;
- e) Interests, preferences, and needs.

We may also collect, store, and use the following information:

- a) Details of access to **S4E Tech** and the resources **you** accessed;
- b) Access device information, including, for example, hardware model, operating system, and version, file names and versions, preferred language, unique device identifier, advertising identifiers, serial number, information related to device movement, and network information;
- c) Server log information, which may include information such as the device's IP address;
- d) Browser click mapping, statistical, demographic, and other navigation data;
- e) Click mapping on applications and navigation data.

Native Applications

Native applications may store usage data, images, videos, texts, access system password, which are not shared with us.

3. COOKIES AND AUTOMATED DATA COLLECTION

3.1. What are Cookies?

As is common practice with almost all professional websites, this site uses cookies, which are small files downloaded to the computer to improve your experience. This page describes what information they collect, how we use them, and why we sometimes need to store these cookies.

Cookies help us understand your interests and how you navigate our site to provide you with a personalized experience.

It is recommended that you enable all cookies if you are unsure whether you need them or not to avoid loss of service you use.

3.2. Information Collection

The information we can collect through cookies – in addition to those provided in item 2.1. – are IP address, browsing preferences, and demographic data such as:

- a) Name;
- b) Nickname or pseudonym;
- c) Contact information (phone number, address, email, etc.);
- d) Access device information and IP address;
- e) Transactional movements information within our platforms;
- f) Location information;
- g) Device information;
- h) Information about the activity, interests, and preferences of users and visitors on our site and in the applications of our services.

3.3. Types of Cookies We Use

- a) **Security Essentials:** we use cookies to help detect and prevent fraudulent activities to increase security, avoiding abuse or violations of the group's terms of use.
- b) **Functionality:** they allow us to maintain the proper functioning of our site.
- c) **Performance:** they allow us to optimize some functions of our site.

d) **Advertising:** they enable us to understand your preferences to show you interesting products and sponsored ads.

e) **Analysis:** they allow us to analyze your navigation on the site to improve our services.

3.4. Collection and Sharing of Data and Information Obtained in Forms

The data and information collected via form will not be shared with third parties, except in cases of exception provided in item 4.1.

3.5. Configuration

You can prevent the activation of cookies by adjusting your browser settings. Disabling cookies will generally result in disabling certain functionalities and features of this site. Therefore, it is recommended that you do not disable cookies.

4. SHARING OF COLLECTED PERSONAL DATA

4.1. Exceptions for Sharing Personal Data

We do not disclose to third parties any personal data provided by you through our platform, except:

a) Cases where **we** are required to disclose or share the collected data to comply with a court order or for the purposes of fraud prevention or other crimes, as well as in response to a request for information presented by a competent authority if we understand that the disclosure is in accordance with or is required by applicable laws, regulations, or legal procedures;

b) To protect the rights, property, or safety of our Platform;

c) With law enforcement agents and/or government authorities if we believe that your actions are inconsistent with our terms of use or to protect the rights, property, or safety of us, you, or others;

d) By your own action;

e) In cases of partial or total sale of the business or its assets or as part of any business reorganization or restructuring, merger, division, or incorporation, so we may share your information with third parties who are part of the respective businesses, taking the necessary measures to ensure that privacy rights continue to be protected as per this Policy;

f) With the companies of the Normandia Holding: composed of the companies S4E Tech LTDA and holds participation in the company FIDEN Gestão e Inteligência em Negócios LTDA.

4.2. Contact and Disclosure Authorizations

You authorize S4E Tech to contact you using any of the contact means provided at the time of registration.

5. ACCESS AND CORRECTION OF PERSONAL DATA

5.1. Access and Rectification of Personal Data

You have the right to access your personal data in **our** possession by contacting S4E Tech via email at info@s4e.tech, which will be responded to during business hours within 15 (fifteen) days, including a description of the form, purpose, and duration of the processing of personal data, which may be sent by email or letter, in accordance with the provisions of Article 9 of the LGPD.

5.2. Deletion

You have the right to request the deletion of your personal data stored by S4E Tech at any time, except in cases where there is a legal obligation or court decision to maintain the storage of the data, in accordance with the provisions of Articles 18 XVI and 16 of the LGPD.

5.3. Incorrect Information

It is **your** responsibility to keep your information up to date, and in case of incorrectness, **we** may update or delete it, except in cases of the need for maintenance for legitimate commercial or legal purposes.

5.4. Necessary Protection Measures

We take necessary security measures to protect your personal data against loss, misuse, unauthorized access, disclosure, alteration, or destruction.

5.5. Password Protection

You are also responsible for taking appropriate measures to protect your passwords, usernames, and other access features to your personal registration on **S4E Tech**.

6. NOTIFICATION OF PRIVACY POLICY CHANGES

6.1. Changes to the Privacy Policy

We may change the Platform's Privacy Policy from time to time. The use of information collected now is subject to the Privacy Policy in effect. If we make changes to how we use personal information, we will notify you by sending an email.

6.2. Unnotified Adjustments

Minor adjustments to this Privacy Policy may occur without significantly affecting the ways we handle collected information, so these will not need to be notified.

7. COMMUNICATION

7.1. Sending Communications

By registering, you agree to receive emails, WhatsApp messages, or SMS with notifications, advertisements, news about services, and important information about the use of S4E Tech products and its business partners.

7.2. Opt-Out

When receiving an email on behalf of S4E Tech, there will be the option to opt-out using the opt-out option or by request via email.

7.3. AntiSpam Policy

S4E Tech takes the necessary precautions to avoid the unsolicited sending of emails.

7.4. Confidentiality

Maximum confidentiality in handling phone and email lists is ensured during our regular administration tasks.

8. PERSONAL DATA SECURITY

8.1. Storage

Your account's personal data and all platform information are securely stored and transmitted. Only employees authorized by us can access your personal information and are subject to confidentiality duties and strict respect for your privacy under this Policy.

8.2. Information Security

All transactions to S4E Tech are encrypted, subject to data backup, monitoring tools, security policies, access controls for employees, with updated security software.

8.3. Notification

If **we** become aware of any security breaches, including intrusions, data leaks, or any other information security incidents affecting us or our hosting companies, we will notify the national authorities and **you** if affected about the breach, providing maximum details regarding the nature, extent of the breach, and the compromised data within a reasonable time as per the provisions of Articles 48 § 1 of the LGPD.

8.4. Storage Period

We will store your data throughout the period your registration is active.

9. GENERAL PROVISIONS

9.1. User Responsibility

You will be responsible for indemnifying us for all costs and damages that this may incur as a result of violating this Privacy Policy caused by you.

9.2. Cooperation with Authorities

We fully cooperate with any authorities or courts requesting the disclosure of the identity or location of any person who has inserted any material on the Platform that violates the Clauses set out in this Policy.

9.3. Limitation of Liability

This Privacy Policy only addresses the use and disclosure of information collected by our Platform. If you disclose your information to third-party websites, **different rules may apply to the use of your information.**

10. APPLICABLE LAW AND JURISDICTION

10.1. Terms of Use

These Terms of Use are governed by Brazilian laws, having the Central District of Belo Horizonte as the competent forum to resolve any disputes arising from them, prioritizing conciliation or mediation attempts.

11. INTELLECTUAL PROPERTY

11.1. Use Limitation

The acquisition of our products does not involve obtaining any Intellectual Property rights over the product or technology itself but rather a limited, temporary, non-exclusive, non-transferable, and non-sublicensable license granted through commercial agreements and contracts.

11.2. Use of Intellectual Property

All copyrights on the contents made available on the Platform, as well as rights eligible for industrial property protection - registered or unregistered trademarks, patents, and industrial designs - remain under the ownership of S4E Tech.

11.3. Prohibitions

It is not permitted to reproduce, duplicate, copy, sell, resell, or otherwise exploit for personal or commercial purposes the content and materials available on the Platform by any means.

11.4. Penalties for Violation

Violation of S4E Tech's intellectual property rights will result in the immediate exclusion of the offender from the Platform, without prejudice to other legal and contractual liabilities.

Belo Horizonte, July 2, 2024