

Privacy Policy:

Date of last update: 05/24/2024.

The Privacy Policy adopted by the company **SIBIS LTDA** (“**We**” or “**Contractor**”) visa regulate the way in which the Personal Data of those who access, register or in any way use our product are processed **Valeiot** (“**Service**”), whether while **customer** (“**You**”, “**User**” or “**Contractor**”) or how **the Contractor’s consumer** (“**End Customer**”).

Therefore, we clarify how personal information and data will be collected, used, shared and stored through our website and respective Service.

If you have any questions about this Privacy Policy or the processing of your personal data, please contact us at support@sibis.io

In the event that Users are subject to different protection standards, broader standards may apply to some. In this case, interested parties should contact us via email at support@sibis.io to find out more about such standards.

1. Acceptance of the Policy:

1.1 **By using our Service, you understand that we collect, use and store your personal information in the ways described in this Policy**, under the rules of the Federal Constitution of 1988 (art. 5, LXXIX; and art. 22, XXX – included by EC 115/2022), the Data Protection rules (LGPD, Federal Law 13,709/2018), the provisions consumerists of Federal Law 8078/1990 and other applicable rules of the Brazilian legal system.

1.2 You further declare that you are aware that operations that correspond to the acceptance of this Policy may be recorded in our databases, together with the device identification information, date and time at which they were carried out, and such information may be used as proof for us, regardless of compliance with any other formality.

1.3 If you do not agree with the provisions of this Privacy Policy, you must discontinue your access and/or use of the Service immediately.

2. SIBIS activities:

2.1 Depending on how Personal Data is processed, we may be classified as Data Controller or Data Operator, under the terms defined by the General Data Protection Law.

2.2 When the Processing of Personal Data is carried out by us on behalf and under the exclusive instructions of Users, so that they can make decisions related to the Processing, we will act as Data Operators, while these Users will be the Controllers.

2.2.1 In this case, Users will be responsible for complying with the legislation applicable to data protection and privacy, especially the General Data Protection Law, as well as for guaranteeing Personal Data Holders the exercise of their rights.

2.2.2 In addition, Users will also be responsible for all decisions made as a result of the Processing carried out by them or by Valeiot, as Operator, which will not have any interference over Users' decision-making and, as a result, We are not responsible for any decisions made by Users as Controllers.

2.3 When the Processing of Personal Data is carried out by us as Data Controller, the Processing will be carried out in strict compliance with the legal bases, purposes and other provisions set out in this Privacy Policy, as well as applicable legislation.

3. Specification of personal data collected:

3.1 To offer our Service, we collect various data and information, aiming, above all, to provide an increasingly better experience for you. We recognize that your privacy is very important, therefore we take all possible measures to protect it.

3.2 By subscribing to our Service, you will be agreeing to provide us with some of your personal data, which may include your name, telephone number, email address, postal address and any other information that allows someone to identify you personally.

3.3 Certain non-personally identifiable information may also be collected when you use the Service, including the type of Internet browser and operating system you use, region, and other navigational clickstream data.

3.4 We also obtain Personal Data from, and made available on, social networks, third-party search sites (such as Facebook, Google, Instagram and GitHub, for example), public data sources and service providers.

3.5 During the commercial relationship maintained with you, we may also collect and process non-personal identification and access data to the Service, relating to the identification information of your establishment, such as, but not limited to, business

name, business name , full address of your establishment, email, telephone, banking details (such as bank, branch, current account number, among others), login information on our Service platform, as well as non-personal data relating to the operation of your establishment, such as, but not limited to, opening hours, service options, products available, delivery methods and fees, payment methods, product values, service areas, among other information necessary to provide our Service to you.

3.6 In accordance with the use of the Service, certain personal and sensitive data may be collected by you with the help of specific technical equipment for, without limitation, remote monitoring and control (“**IoT devices**”). You represent and warrant that you have the legal right to such collection, that the owners of this data agree to its collection and that they are aware of and in accordance with the provisions of this Privacy Policy. You are solely responsible for any and all breaches of the personally identifiable information of these End Customers.

4. Treatment of collected data:

4.1 We only request personal information when we truly need it to provide you with the Service. We do so by fair and legal means, with your knowledge and consent. We also tell you why we are collecting it and how it will be used.

4.2 Depending on the case, the processing of collected data will be carried out based on one of the following legal bases: **I)** the provision of consent by the Personal Data Holder; **II)** the execution of contracts or preliminary procedures related to a contract to which the Personal Data Holder is a party, at his or her request; **III)** compliance with legal and/or regulatory obligations; **IV)** the regular exercise of SIBIS's rights in judicial, administrative or arbitration proceedings; **IN)** meeting the legitimate interests of SIBIS and/or third parties; It is **WE)** credit protection.

5. Purpose of Processing Personal Data:

5.1 The Processing of Personal Data will have the purpose of enabling the provision of our Service, through prospecting potential customers and registering Users on the platform, sending communications and providing support to Users, among other purposes.

5.2 We use personally identifiable information to provide public information about us and our Service, to share news, updates and reports in response to your queries, to understand your needs, to perform statistical analysis or analysis of global Service usage, for security and legal compliance , to notify you of any changes to this Service, for billing and for other purposes.

5.3 We may maintain and compile, using Anonymization techniques, statistical information related to Users, with the purpose of improving the Service, provided that such information does not imply the identification of Users' Personal Data.

5.4 Personal Data collected and processed by us may be used for credit analysis, identity verification and other activities to verify and prevent fraud, and such information may be enriched from other sources, public or private, as well as cross-referenced with information from third parties, such as credit protection agencies and companies, for example.

5.5 The Personal Data collected may also be used to comply with legal obligations set out in law, regulations and government bodies, especially the National Data Protection Authority, tax authorities, the Judiciary and/or any other competent authority.

6. Data Storage:

6.1 The Personal Data collected will be stored in forms filled out by Users, on third-party platforms, and/or in cloud databases, owned or by third-party providers of this service, whose servers may be located in Brazil or abroad, provided that We will always seek to hire suppliers that guarantee a high level of security, are committed to the privacy of the data entrusted and that are in compliance with the General Data Protection Law.

6.2 We currently use AWS and Google Cloud Platform as third-party data hosting service providers.

6.3 The personal data we process will only be kept for the period necessary for the purpose of the processing. We will retain your personal data as follows:

6.3.1 Any personal data such as e-mail, address, telephone number collected will be kept for a maximum period of 5 (five) years after data collection;

6.3.2 In case of account deletion at the User's request, we may also retain them for a maximum period of 12 (twelve) months;

6.3.3 In some cases, it is not possible to specify in advance the periods for which your personal data will be retained. In these cases, we will determine the retention period based on the following criteria, without prejudice to others: **I)** existence of specific law or regulation requiring a specific period for data retention; **II)** our internal policies; **III)** existence of judicial, administrative or arbitration proceedings; It is **IV)** requests for information made by government authorities.

7. Data Sharing:

7.1 In order to enable the provision of the Service, we maintain relationships with third-party service providers, who may have access to Users' Personal Data, when authorized by us, for specific purposes requested by them, based on their instructions and provisions. contractually adjusted.

7.2 We may share your Personal Data with third-party bodies and companies to verify your credit status or to collect overdue bills, in compliance with current legislation, as well as in the event of a judicial or administrative request from the competent authority for this purpose.

7.3 In the event of a corporate reorganization of SIBIS, Users' Personal Data may be shared with other related parties due to changes in the corporate and/or control structure.

7.3.1 In these cases, the person who accesses Users' Personal Data or takes control of SIBIS will also be bound by this Privacy Policy, in order to continue protecting Users' Personal Data, as provided herein.

7.4 In other situations in which there is a need to share Users' Personal Data, we will first request your consent.

7.5 As a company operating globally, when using our Service, your personal data may be transferred to locations outside of Brazil. When transferring your personal data outside the national territory, we apply appropriate security to protect your personal data, as required by applicable legislation.

7.6 In these cases, we reinforce our total commitment to maintaining relationships only with companies that adopt security measures and good practices compatible with the level of protection established by Brazilian legislation, as regulated by the ANPD. Therefore, in the absence of regulation, we ensure that we will only carry out international transfers in accordance with art. 33, IX, of the LGPD, and only with companies that adhere to other data protection standards, such as the European GDPR, the American CCPA and CDPA and the Australian Privacy Act.

8. Rights of Personal Data Holders:

8.1 You may request Valeiot: **I)** Correction of your data, if it is incomplete, inaccurate or out of date; **II)** Blocking or deleting unnecessary, excessive or processed data that does not comply with applicable Brazilian legislation; **III)** The deletion of personal data processed with your consent, as long as there is no legal determination to keep them registered with Valeiot; **IV)** Information about the possibility of not providing your consent, as well as being informed about the consequences if you do not.

8.2 In this sense, for you to exercise your rights, simply contact us with your questions and/or requirements related to your personal data, and we will make every effort to assist you in the shortest possible time.

8.3 It is also important to highlight that the **Your rights are not absolute**, therefore, there may be situations in which we will have legitimate reasons for failing to respond to a certain request, such as: **I)** cases in which the disclosure of specific information violates our intellectual property rights or business secrets or those of third parties; **II)** cases in which there is a violation of the privacy of third parties; **III)** cases in which there is a limitation on sharing aggregated or varied data; **IV)** cases in which it is not possible to comply with data deletion requests due to the obligation to retain this data, whether to comply with legal, regulatory obligations or to enable us (or third parties) to regularly exercise rights in judicial, administrative or arbitration proceedings.

8.4 If you wish, you can revoke your consent to this Privacy Policy at any time by contacting us via email support@sibis.io

8.5 However, when withdrawing consent, you understand that this may restrict, suspend or cancel some of the services offered by Valeiot. Even so, the moment we receive your request, your personal data will be deleted, unless the storage of this data is a legal obligation.

9. Data Protection:

9.1 We use appropriate security measures to keep Users' Personal Data confidential and secure, only storing it in operational environments that use security measures to prevent unauthorized access and incidents.

9.2 However, we emphasize that these protections do not apply to information that Users have chosen to share with third parties, and Users are responsible for keeping their registration data and access to our websites and Services secret and confidential, and in case data leakage occurs due to an operation carried out by the User without our knowledge and consent.

9.3 We also cannot guarantee that the security measures are free from any type of violation or that they are not subject to interference from third parties (hackers, among others). By its nature, any security measure may fail and any data may become public due to leakage, so we cannot provide any guarantee that any and all unauthorized access will be prevented. Therefore, by consenting to this Privacy Policy and/or using the Valeiot service, you expressly acknowledge and consent to this risk and agree that we cannot be held responsible in the event of a data leak in

which reasonable protocols for data protection data, although strictly followed, are not sufficient to guarantee security against the leak in question.

10. Browsing Data (Cookies):

10.1 If there is any interaction between Users with the website and/or the Valeiot platform, as well as with publications made by it, whether through mobile devices or not, information collected through cookies, pixel tags and others will automatically be stored data storage and user identification technologies, whether owned by us or third parties (for example, Facebook Pixel, Google Analytics, Google Ads, Mautic, among others).

10.1.1 We may also use other tracking technologies, including IP addresses, access data, log files and web beacons, to assist you in adapting your website and/or platform to meet your specific preferences of its Users.

10.2 Cookies and other storage technologies are intended to help us recognize the User when accessing the website and/or platform, better understand your usage profile of our Service and offer you a better browsing experience, so personalized, recommending products and presenting advertisements and other items that may be of interest to you.

10.3 The User, when accessing the website and/or using our Service, will provide their consent to the use of cookies and other storage technologies, through acceptance upon first accessing the website and/or first using the Valeiot platform .

10.4 Some of the purposes for which Cookies are used may also require your consent, depending on applicable legislation.

10.5 It is always good to remember that you can manage or disable Cookies in your browser settings. However, we remind you that, as some of them are necessary to enable you to use our website, if you disable all Cookies you may not be able to fully access it.

11. Changes to the Privacy Policy:

11.1 We may update this Privacy Policy from time to time to reflect changes and improvements to our privacy practices. The latest version will always be available on our website. We make it clear that it is your sole responsibility to terminate any relationship you have with us if you no longer comply with the updates.

11.2 You must consult this document regularly to verify that you continue to comply with its terms before continuing to browse or complete any resource on our website.

12. General Provisions:

12.1 All communications you forward to us will be considered fully valid when sent by email support@sibis.io. On the other hand, all communications that we send will be considered valid when made using any of the contact information provided by you.

12.2 Our website may have links to external websites that are not operated by us. Please be aware that we have no control over the content and practices of these sites and cannot accept responsibility for their respective privacy policies.

13. Legislation and Forum:

13.1 This Policy will be governed, interpreted and executed in accordance with the laws of the Federative Republic of Brazil, regardless of the conflicts of these laws with the laws of other States or countries, with the Court of the District of Santa Rita do Sapucaí-MG being competent to resolve any doubt arising from this instrument. By continuing to browse and/or contract the Service, the User expressly agrees with the jurisdiction of this court, and hereby waives the jurisdiction of any other forum, however privileged it may be or may become.

Attention!

In any case of receiving emails sent by us, especially those intended to request data or payment of bills, you must carefully analyze the sender of such message in order to avoid fraudulent actions! If you are suspicious of the forwarded message, you should contact us via the email indicated on the website.