

## **General Data Protection Regulation - GDPR**

This Policy and its respective updates must prevail over all policies, proposals, contracts, previous understandings and agreements, oral or written, possibly existing between the parties dealing, directly or indirectly, on the subject of privacy.

The solutions contained in the wavequantum.uk website (or simply "Platform") are made available by Wave Quantum (Trade name), a legal entity governed by private law, registered with CNPJ / MF under nº 13051076, headquartered in WAVE QUANTUM GROUP LTD - 1st Floor 6/7 St. Mary At Hill, London, England, EC3R 8EE.

### **A. Introduction**

1. The privacy of visitors to our website is very important to us, and we are committed to protecting it. This policy explains what we will do with your personal information.
2. Consenting to the use of cookies in accordance with the terms of this policy, when you access our website for the first time allows us to use cookies every time you access our website.

### **B. Collection of personal information**

The following types of personal information can be collected, stored and used:

1. information about your computer, including your IP address, geographic location, browser type and version, and operating system;
2. information about your visits and use of this website, including reference source, visit duration, page views and navigation paths on the website;
3. information, such as your email address, that you enter when registering on our site;
4. information you enter when creating a profile on our website - for example, your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational and employment information;
5. information, such as your name and email address, that you enter to set up subscriptions to our emails and / or newsletters;
6. information you enter while using the services on our website;
7. information generated when using our website, including when, how often and under what circumstances you use it;
8. information related to everything you buy, services you use or transactions you make through our website, including name, address, phone number, email address and credit card details;
9. information that you post on our website with the intention of posting it on the internet, including your username, profile pictures and the content of your publications;
10. information contained in any communications you send to us by email or through our website, including the content and metadata of the communication;
11. any other personal information you send us.

12. Before disclosing another person's personal information to us, you must obtain that person's consent to the disclosure and processing of that personal information in accordance with this policy.

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### **C. Use of your personal information**

Personal information sent to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website. We may use your personal information for the following:

1. administer our website and our business;
2. customize our website for you;
3. enable the use of the services available on our website;
4. send products purchased through our website;
5. provide services acquired through our website;
6. send statements, invoices and payment reminders, as well as collect your payments;
7. send commercial marketing communications;
8. send email notifications specifically requested by you;
9. send our newsletter by email, if you have requested it (you can inform us at any time if you no longer wish to receive the newsletter);
10. send marketing communications related to our business or the carefully selected third-party business that we believe will be of interest to you, by mail or, where you specifically agreed to do so, by email or similar technology (you can inform us at any time if not most want more to receive marketing communications);
11. provide third parties with statistical information about our users (but these third parties will not be able to identify any individual users from that information);
12. deal with questions and complaints made by you or about you regarding our website;
13. keep our website safe and prevent fraud;
14. verify compliance with the terms and conditions governing the use of our website (including monitoring of private messages sent through our website's private messaging service); and
15. other uses.

If you submit personal information for publication on our website, we will publish and use that information in accordance with the license you have granted us.

Your privacy settings can be used to limit the publication of your information on our website and adjusted through the use of privacy controls on the website. Without your express consent, we will not provide your personal information to third parties for the purposes of direct marketing by them or third parties.

### **D. Disclosure of personal information**

We may disclose your personal information to any of our employees, executives, insurance companies, professional consultants, agents, suppliers or subcontractors as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our holding company and all of its subsidiaries) as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information:

1. insofar as we are required to do so by law;
2. in relation to any ongoing or potential lawsuit;
3. to establish, exercise or defend our legal rights (including providing information to third parties for the purposes of fraud prevention and credit risk reduction);
4. to the buyer (or potential buyer) of any business or asset that we are selling (or contemplating selling); and
5. to any person we reasonably believe can ask a court or other competent authority to disclose that personal information, when, in our reasonable opinion, it is likely that such court or authority will order the disclosure of that personal information

Except as provided in this policy, we do not provide your personal information to third parties.

#### **E. International data transfers**

1. The information we collect may be stored, processed and transferred between any of the countries in which we operate, in order to allow us to use the information in accordance with this policy.
2. The information we collect may be transferred to the following countries that do not have data protection laws equivalent to those in force in the European Economic Area: United States of America, Russia, Japan, China and India.
3. Personal information that you post on our site or submit for publication on our site may be available, via the internet, worldwide. We cannot prevent the use or misuse of such information by third parties.
4. You expressly agree to the transfers of personal information described in this section E.

#### **F. Retention of personal information**

1. This section F defines our data retention policies and procedures, designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
2. The personal information we process for any purpose or purposes should not be kept any longer than is necessary for that purpose or purposes.
3. Without prejudice to article F-2, we will generally exclude personal data belonging to the categories defined below on the date / time defined below:
  1. type of personal data will be deleted;
  2. Notwithstanding the other provisions of this section F, we will retain documents (including electronic documents) that contain personal data:
  3. insofar as we are required to do so by law;

4. if we believe that the documents may be relevant to any ongoing or potential litigation; and
5. to establish, exercise or defend our legal rights (including providing information to third parties for the purposes of fraud prevention and credit risk reduction).

## **G. Security of your personal information**

1. We will take appropriate technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.
2. We will store all of your personal information provided on our secure servers (password and firewall protected).
3. All electronic financial transactions carried out through our website will be protected by encryption technology.
4. You acknowledge that the transmission of information over the internet is inherently insecure and that we cannot guarantee the security of data sent over the internet.
5. You are responsible for keeping the password used to access our website confidential; we will not ask for your password (except when you log in to our site).

## **H. Amendments**

We may update this policy periodically by posting a new version on our website. You should check this page occasionally to ensure that you understand any changes to this policy. We can notify you of changes to this policy by email or via the private messaging system on our website.

## **I. Your rights**

You can instruct us to provide any personal information we hold about you; provision of such information will be subject to the following:

1. providing appropriate evidence of your identity (for this purpose; we will generally accept a certified copy of your passport plus an original copy of a service invoice showing your current address).

We may retain the requested personal information to the extent permitted by law.

You can instruct us at any time not to process your personal information for marketing purposes.

In practice, you will generally expressly agree in advance with the use of your personal information for marketing purposes, or we will offer you the opportunity to not allow the use of your personal information for marketing purposes.

## **J. Third-party sites**

Our website includes links to details of third party websites. We have no control over and are not responsible for the privacy policies and practices of third parties.

## **K. Updating information**

Please let us know if the personal information we hold about you needs to be corrected or updated.

## **L. Cookies**

Our website uses cookies. A cookie is a file that contains an identifier (a sequence of letters and numbers) that is sent by a web server to a browser and stored by the browser. The identifier is then sent back to the server every time the browser requests a page from the server. Cookies can be “persistent” cookies or “session” cookies: a persistent cookie will be stored by a browser and will remain valid until the defined expiration date, unless it is deleted by the user before the expiration date; a session cookie, on the other hand, will expire at the end of the user's session, when the browser is closed. Cookies do not normally contain any information that personally identifies a user, but the personal information we store about you may be linked to information stored and obtained from cookies. We use session cookies / persistent cookies / persistent and session cookies on our website.

1. The names of the cookies we use on our website and the purposes for which they are used are described below:
  1. we use Google Analytics and Adwords on our website to {INCLUDE ALL COOKIE USE CASES ON YOUR SITE recognize a computer when a user accesses the site / track users while they browse the site / allow the use of a shopping cart on site / improve site usability / analyze site usage / administer the site / prevent fraud and improve site security / personalize the site for each user / target ads that may be of particular interest to specific users / describe objective (s) }};
2. Most browsers allow you to refuse to accept cookies - for example:
  1. in Internet Explorer (version 10), you can block cookies using the available cookie manipulation cancellation settings by clicking on "Tools", "Internet Options" "Privacy" and "Advanced";
  2. in Firefox (version 24), you can block all cookies by clicking on "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu and deselecting "Accept cookies from websites"; and
  3. in Chrome (version 29), you can block all cookies by accessing the "Customize and control" menu and clicking "Settings", "Advanced" and "Site settings" and then selecting "Block third-party cookies" in "Cookies and site data" section.

Blocking all cookies will have a negative impact on the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

1. You can delete cookies that are already stored on your computer - for example:
  1. in Internet Explorer (version 10), you must delete the cookie files manually (see instructions for doing so at <http://support.microsoft.com/kb/278835>);
  2. in Firefox (version 24), you can delete cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history", clicking "Show cookies" and then "Remove all cookies "; and
  3. in Chrome (version 29), you can delete all cookies by accessing the "Customize and control" menu and clicking "Settings", "Advanced", "Clear

browsing data” and then selecting “Delete cookies and other data of sites and plugins ”before clicking on“ Clear browsing data ”.

2. Deleting cookies will have a negative impact on the usability of many websites.

## **N. RIGHTS REGARDING YOUR PERSONAL DATA**

**Rights and Warranties:** the User has rights and guarantees in relation to his personal data. We provide mechanisms, detailed below, so that Users have clarity and transparency in the exercise of their rights. Whenever necessary, our team will be ready to evaluate any requests.

**Rights Provided for in the LGPD:** under the General Data Protection Act (Law 13,709 / 2018 -) (“LGPD”), you are entitled to:

1. confirm that we have processed your personal data;
2. access your personal data;
3. require the correction of personal data that is incomplete, inaccurate or out of date;
4. require the anonymization, blocking or deletion of unnecessary, excessive or treated personal data in disagreement with the provisions of the LGPD;
5. require the portability of your personal data to another service or product provider, subject to our commercial and industrial secrets, after regulation by the National Data Protection Authority;
6. request the elimination of the personal data processed based on your consent, except in the cases of conservation of personal data provided for in the LGPD;
7. request information about who we share your personal data with;
8. request information about the possibility of not providing your consent and the consequences;
9. revoke your consent for the processing of your personal data, when there is treatment carried out on the basis of your consent;
10. express opposition to treatment that violates the LGPD.

**Additional Information:** before we respond to a request to exercise the rights mentioned above, we may ask you to provide us with some information to confirm your identity.

## **O. SPAM PRACTICES**

**Positioning:** We are against any and all practices that promote SPAM of any kind and we are committed to ensuring that messages sent by the Platform are always of interest or importance to the respective recipients. In addition, at any time you can choose to stop receiving emails, adjusting your preferences for receiving emails or canceling your account.

**Particular guidelines:** likewise, we charge our Users who do not practice SPAM, to make sure that the messages sent are always of interest to the recipient, being aware from the outset that non-observance of the good practices of using the Internet may result in the cancellation of the user's account. Infringing user, as defined in the Terms of Use, as well as the disclosure of personal registration data, under the terms of this Privacy Policy.

## **P. INFORMATION AND QUESTIONS**

**14.1. Questions about the Policy or Your Personal Data:** If, after reading this Policy, you have any doubts or wish to submit a request regarding your personal data, you can contact our privacy team or our Supervisor through this contact:  
[wavequantum@wavequantum-uk.awsapps.com](mailto:wavequantum@wavequantum-uk.awsapps.com).