



## PRIVACY POLICY

We at BEFEKTIVE BRASIL LTDA, a legal entity governed by private law, registered number 24.506.926/0001-11, headquartered in Brazil in Florianópolis/SC, simply called “BEFEKTIVE”, attach great importance to your data, ensuring that the protection of your data and respect for your privacy is a major factor in our business.

As a result, BEFEKTIVE understands the importance of handling personal information with prudence and establishes in this Privacy Statement the commitment to guarantee the right of each user to the effective protection of personal data and information security.

### 1 TERMS AND DEFINITIONS

BEFEKTIVE is a software that provides automated information about the actual performance, efficiency and productivity of work teams in organizations;

**Users:** are those who, linked to the CONTRACTOR, use BEFEKTIVE software, due to the contract between the companies (Employees);

**Personal Data:** information related to identified or identifiable natural person;

**Sensitive Personal Data:** personal data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, given regarding health or sexual life, genetic or biometric data, when linked to a natural person;

**Data Subject:** natural person to whom the personal data that are processed refer;

**Controller:** natural or legal person, under public or private law, to whom decisions concerning the processing of personal data are responsible;

**Operator:** natural or legal person, under public or private law, who carries out the processing of personal data on behalf of the controller;

**Data Officer Protection (DOP):** person appointed by the controller and operator to act as a communication channel between the controller, data subjects and the Data Protection Authority (DPA);

**Processing of personal data:** every operation carried out with personal data, such as those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

### 2 TREATMENT AGENTS

When we provide the BEFEKTIVE platform to a company, the CONTRACTOR is the Controller of the users' personal data and who has the decisions regarding the processing of the same;



BEFECTIVE is the Operator of users' personal data, and must strictly comply with the Parent Company's instructions, in particular regarding the purpose of processing personal data;

The person responsible for acting as a communication channel between BEFECTIVE, data subjects and the National Data Protection Authority is the engineer Daniel Raizer Heller.

E-mail: [daniel@lgpdnacional.com.br](mailto:daniel@lgpdnacional.com.br)

Phone: (48) 99119-0033

### **3 WHAT INFORMATION IS COLLECTED AND FOR WHAT PURPOSE**

When using the Software made available owned by BEFECTIVE BRASIL LTDA, personal information are collected when you become our customer, employee, partner or supplier; subscribe to our newsletter; fill out our forms; requests technical support; or talk to us through our service channels and instant messaging applications, with full respect for the precepts brought by the General Data Protection Law (GDPL);

When you wish to receive information about our products and services, we ask you to provide your email address, name, phone number, company and position. When contracting our services, you must also provide financial data, billing address, telephone number or other information relevant to the issuance of the collection, as well as essential data for the preparation of contract and issuance of invoice;

To provide the best service and fulfill our purpose as performance management software, BEFECTIVE collects from users statistical and usage information of URLs, software name, programs used, start and end time of work;

BEFECTIVE is a service provider, so we may have in our database information that was collected by our customers. In this case, we have no decision-making power over this data, where we act as an Operator and process at the request of the CONTRACTOR, which in this case assumes the Controller role;

BEFECTIVE, even if it may have access to the data of the Contractor's users, does not collect, treat and has no contact or access to any sensitive data;

BEFECTIVE uses the data received EXCLUSIVELY to perform the contracted service, without performing enrichment, sale, or any other act other than the above in this Privacy Policy;

The data collected by BEFECTIVE will be stored for as long as the contractual relationship between the companies persists, so that they will be deleted in case of termination of the contract;

Finally, when you access our website or system, we may also collect information such as: the type of your browser, the IP address of the user's computer, the date and time of access. This information can be aggregated to measure the number of visits, average time spent, page views, and other statistics. We use this data to monitor the performance of our services and thereby implement improvements.



#### **4 SHARING**

BEFECTIVE may share some of your data with our service providers related exclusively to the operation of our company. Such sharing may be necessary to ensure the quality of our services;

BEFECTIVE will only use service providers who are committed to the privacy and information security.

#### **5 COMMUNICATION AND SECURITY**

Personal data is treated as confidential and all information you provide to us is stored on secure devices. We put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized, altered or disclosed manner;

We keep our software up to date, back up and logs. We use credentials, passwords, encryption, digital certificates and other forms of individual, secret, non-transferable and protected authentication with security-compliant degree of information;

BEFECTIVE software Application Programming Interface (API) was developed by the company itself and the bcrypt encryption method is used, with cloud storage on Amazon (AWS);

BEFECTIVE may use the collected data to improve security and improve services for contractor and its Users. In this way, we can analyze and solve technical problems, as well as identify and curb fraud in the use of our Service;

BEFECTIVE is not responsible, directly or in the alternative, for the misuse of the Platform by the Contractor and its Users, as well as for the actions carried out by them;

In case of untying of a Collaborator in relation to the Contractor, it is the responsibility of the Client to perform the deactivation of the User on the platform, or immediately inform the BEFECTIVE'S SUPPORT to do so through the service channel: [support@befective.com](mailto:support@befective.com)

#### **6 INTERNATIONAL DATA TRANSFER**

Security and Prevention are critical principles to ensure the Holder's Privacy. The data under BEFECTIVE's custody will be shared with sub-operators from another country under the following conditions:

- a) the country is classified as having an adequate level of data protection; or
- b) the transfer is authorized by the National Data Protection Authority.

#### **7 PRIVACY POLICY UPDATE**



BEFECTIVE always seeks to improve its software to ensure the best service and platform protection, whereas, eventually, this Privacy Policy may be updated or changed unilaterally by BEFECTIVE;

Such changes/updates will always be communicated to the Contractor and its Users, who will always be guaranteed the option to cancel the contract, at any time, if you disagree with the new terms and policies.

## **8 PRIVACY POLICY VALIDITY**

BEFECTIVE'S Software Privacy Policy becomes effective from the moment the CONTRACTOR signs the service contract;

The term of this Privacy Policy shall be for an indefinite period, and shall be in force for the duration of the contractual relationship between the parties and the duties arising therefrom.

## **9 GENERAL DATA PROTECTION LAW (GDPL)**

GDPL is the law that regulates the processing of personal data, including in digital media, by a natural person or by a legal entity governed by public or private law, with the aim of protecting the fundamental rights of freedom and privacy and the free development of the personality of the natural person;

The processing of personal data (information related to identified or identifiable natural person) performed by BEFECTIVE has specific needs and purposes for the performance of the services, as already demonstrated above, also respecting free access, security, transparency and all other principles listed in the law, after all, our greatest value are our customers;

Data subjects will always have free access to your information, as well as request editing and updating. For more information or needs regarding your data, please contact our data officer directly by e-mail: [security@befective.com](mailto:security@befective.com), or by the contact of our company available on our website [www.befective.com](http://www.befective.com)

## **10 GENERAL PROVISIONS**

The CONTRACTOR and its Users declare that they agree and undertake to comply with the guidelines and provisions set forth in this BEFECTIVE'S Privacy Policy;

This Privacy Policy, for all purposes and purposes of law, is an integral and inseparable part of BEFECTIVE's Software Use License Agreement in the form of an attachment;

BEFECTIVE is not responsible for any damages and/or problems arising from the delay, interruption or blocking of data transmissions that occurred on the Internet;

The Parties acknowledge and declare that there is no employment, associative or corporate link between them, their employees, agents or service providers, directly or indirectly involved in the achievement of their object, so that any covenant, misuse, misuse of



information by Users within the platform do not concern BEFECTIVE, responsibility and relationship of the Contractor and its Users.