



## Privacy Note for Applicants in Selection Processes

Prepared by:	Trench Rossi Watanabe
Approved by:	OPY
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### PRIVACY NOTICE FOR APPLICANTS IN SELECTION PROCESSES

**OPY Healthcare Gestão de Ativos e Investimentos S.A.** ("OPY") has prepared this Privacy Notice for Applicants in Selective Processes. The purpose is to explain to those willing to participate in selective processes or to be considered for an opening or hiring by OPY or any subsidiaries (jointly referred to as "OPY Companies") how the OPY Companies, as controllers of the personal data, will collect, process, store, and use information about You, and what are your rights regarding this information.

When we say "We," we are referring to OPY Companies.

#### **What categories of personal data do the OPY Companies collect about me, and for what purposes do they use these data?**

"Personal Data" means any information relating to You. The OPY Companies will collect, process, and use the following categories and types of personal data about You:

- **identification data**, such as your name, marital status, your pictures (in case You provide one), identity, nationality, citizenship, visa status, passport information, driver's license data;
- **personal information**, such as date and place of birth, emergency contact information, and gender;
- **contact information** including your residential address, residential telephone number, cell phone, and personal e-mail address;
- **information on your professional background**, such as your resume, level of education, undergraduate studies, graduate studies, specialization, master's degree, doctorate, training, languages, courses, technical skills and competencies, articles or publications, involvement in associations;
- **information on your professional experience**, your position, title, employer, management level, length of service, usual working hours, work location, department, type of position and responsibilities, supervisor's name, duties, start and termination date of each previous employment, reasons for termination, employment history (including previous positions and employers and grounds for termination), and recommendation letters;
- **information on your salary and benefits**, such as your base pay, bonuses, commissions, compensation plan, increases, benefits including health insurance, life insurance, and other benefits like a pension plan, payment date, and information on deductions;



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- **information on performance and disciplinary measures**, such as performance appraisals, appraisal grades, details of internal disciplinary procedures;
- **information concerning absences**, such as sick leave, educational and training leaves;
- **information on your career aspirations**, including intended position, salary, and how you applied for the job;
- **notes during interviews**, as any other information that You voluntarily disclose during an interview; and
- **sensitive personal data**, which in our selection process will consist of data concerning people with disabilities or people with special needs, if the sole purpose is to hire people with disabilities or if the company has to take any additional measures to make the hiring feasible.

We can collect your personal data through information You submit in the job application, such as your resume, information You provide in interviews or voluntarily, through recruitment consultants hired by OPY Companies to assist in the selection process, and through public sources.

You are under no obligation to send us any information we may request from You. Depending on the type of information, it may not be possible to proceed with the selection process for a specific position.

We will collect and use your Personal Data for the following purposes:

- **our recruiting activities**, such as approaching you as an applicant through our team or consultants hired to provide recruiting services, conducting interviews, applying tests compatible with the position, if applicable, and other recruiting considerations.
- **planning and managing our human resources**, including sizing our teams appropriately;
- **company's investment decisions**;
- **planning and managing the competencies and skills of our employees and potential employees**;
- **analyzing job applications** in the most diverse ways;
- **organizing the hiring process** for specific vacancies;
- **offering a job** for an applicant for a particular position;
- **considering previous applicants for future vacancies**; and
- **complying with the law and defending and exercising the rights** of OPY Companies and third parties, if necessary.



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During recruiting, we may collect your **sensitive personal data**, for example, to recruit for a **specific vacancy destined for people with disabilities or if the company has to take any additional measures** to make the hiring feasible.

### **Why do OPY Companies need to collect, process, and use my personal and sensitive personal data?**

We will process your data in strict compliance with the provisions of applicable law, especially Law No. 13,709/18 (General Law on Personal Data Protection or "LGPD"). One of the legal bases for our personal data processing activities is provided in the LGPD, which we will explain below.

Except with reference to your sensitive personal data, we will process your personal data for the recruitment purpose described in this Notice based on our legitimate interest, according to Article 7, IX of the LGPD. Our legitimate interest in this activity is to ensure an efficient recruitment process and filling our vacancies with the most suitable candidates for the roles.

Let us suppose You move forward in our selection process. In that case, we will also process your data in preliminary procedures concerning your future contract with any OPY Companies, according to article 7, V of the LGPD.

In relation to your sensitive personal data, we will only process your personal data with your free, informed, and unambiguous consent, specific to these recruitment activities, in line with Article 11, I of the LGPD. Your consent is free and may be revoked at any time, as indicated below. However, it is ok if you do not wish to authorize the processing of your sensitive personal data. In that case, the only consequence is that your resume may not be considered for a specific position if there is a particular requirement for the job that involves access to some sensitive personal data, such as in the case of vacancies for People with Disabilities, under the terms of the law.

Finally, if necessary, OPY Companies may process your personal data to comply with the law and exercise rights of OPY Companies or third parties, according to article 7, II, and VI, and article 11, II, (a), and (d).

### **Got it - but with whom will OPY Companies be able to share my personal data?**

The achievement of the purposes described in this document may require the involvement of some companies in the processing activities. Accordingly, OPY Companies may share your data with third parties, as indicated below. However, under our internal policies, the access by third parties to personal



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data is limited to the extent necessary. For the purposes outlined in this document, we may share your personal data:

- with recruitment companies that provide services to OPY Companies;
- with regulators, authorities, and other third parties, if necessary to comply with a legal obligation or to exercise the rights of OPY Companies or third parties;
- with acquiring companies, in the context of a buy-out or other transaction of sale of assets or corporate operation involving the OPY Companies;
- with operators. To the extent necessary for the processing purposes pointed out in this Instrument, OPY Companies may share your personal data with third parties, either from the OPY Companies' economic group or independent third parties, to process personal data according to our specific instructions on behalf of OPY Companies ("Operators"). Operators may process data for the administration of our recruitment base, support I.T. systems and the organizational activities of OPY Companies. However, they will be subject to contractual obligations to implement technical and organizational security measures to protect personal data and to only process data in accordance with the instructions of the OPY Companies.

Some third parties with access to personal data may be located in other countries or process data outside Brazil. Consequently, the level of data protection in the other country may not be equivalent to the level of protection in Brazil. Therefore, we will only transfer your personal data to countries that the National Data Protection Authority ("ANPD") has decided to have an adequate level of protection, or we will take effective measures to ensure that all recipients of personal data implement a sufficient level of data protection. These measures may include, for example, contracts for the transfer of personal data under standard clauses in compliance with the provisions of the LGPD.

### **How long will OPY Companies keep my personal data?**

We will keep your personal data for as long as necessary for the recruitment activity or the minimum period required by law. We do not keep personal data for longer than necessary. But we may, for example, keep your personal data until a statute of limitations has elapsed in the event of any litigation, always based on the applicable law. We may also maintain limited recruitment history data at OPY Companies to the extent permitted by applicable law.



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### **As to the activities described in this Instrument, do OPY Companies make decisions solely based on automated processing of personal data?**

No, OPY Companies do not make decisions solely based on the automated processing of your personal data in the activities described in this Instrument.

### **What rights do I have regarding my personal data?**

First, according to the circumstances, You may no longer be interested in continuing the OPY Companies selection process. In this case, You may at any time communicate this fact to the OPY Companies, and we will promptly stop considering You as a potential candidate.

Furthermore, every personal data subject has rights, and OPY Companies respect their rights under the LGPD. However, under the applicable legislation, users must exercise their rights in such a way as to protect the industrial and commercial secrets of OPY Companies and third parties, as well as the fundamental rights of third parties.

You have the following rights concerning your personal data, which may or may not be applicable or may be limited under applicable laws and regulations, depending on your personal data processing activity:

**(i) Right of confirmation of processing and right of access**

You have the right to obtain confirmation of the processing activity involving your personal data. If OPY Companies process your personal data, you have the right of access, that is, to obtain a simplified or complete statement on the categories of personal data processed, the origin of the data, and the purposes of the processing. In case your personal data is processed based on your consent or in a contract signed between You and the OPY Companies, You also have the right to obtain a full copy of the personal data processed based on the consent or the contract.

**(ii) Right to correction**

You have the right to request correction of incomplete, inaccurate, or outdated data about You.

**(iii) Right to anonymization, blocking, or deletion**

In some instances, when your personal data are unnecessary, excessive, or treated in disagreement with the LGPD, You have the right to request the anonymization, blocking, or deletion of these data.



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**(iv) Right to data portability**

In some cases, as provided and to the extent required by ANPD, and always respecting the commercial and industrial secrets of OPY Companies, You have the right to the portability of your personal data to another company.

**(v) Right to deletion**

Whenever your data is processed based on your consent, You have the right to request the deletion of such personal data. However, exceptions apply to cases in which OPY Companies have the right to retain the data under the terms of the LGPD.

**(vi) Right to information about shared use of data**

You have the right to obtain information about the public and private entities with which OPY Companies shared your personal data.

**(vii) Right to refuse and revoke consent**

Every time we ask for your consent to process your personal data, You have the right to refuse consent. We will always inform you of this right and the consequences if you choose not to consent to a processing activity. In addition, You may revoke your consent to processing your personal data for a specific purpose at any time. In this case, all processing activities carried out up to the date of revocation will be validated.

**(vii) Right to petition to ANPD**

You have the right to report the OPY Companies to the National Data Protection Authority (ANPD) about your personal data.

**(ix) Right to object to illegal processing**

You have the right to object to any processing of your personal data that violates the provisions of the LGPD.

**(x) Right to review decisions solely based on automated processing**

You have the right to request a review of decisions made exclusively based on automated processing of personal data that affect your interests, including decisions aimed to define your personal, professional, consumer, and credit profile or aspects of your personality.



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To exercise any of these rights, please contact us as indicated in the item below.

### **Who can I contact regarding this matter?**

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If You have any questions, doubts, or concerns regarding this Privacy Notice, or if You wish to exercise Your rights as a rightful claimant, You may contact the OPY Companies Data Protection Officer.

Contact us at the following address:

- e-mail: [encarregado@opyhealth.com](mailto:encarregado@opyhealth.com)