



Privacy Policy – OPY Companies Websites

Prepared by:	Trench Rossi Watanabe
Approved by:	OPY
Date of 1st approval:	-
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PRIVACY POLICY

This website (hereinafter referred to as "Site") is operated and managed by **OPY Healthcare Gestão de Ativos e Investimentos S/A** ("**OPY**") and its subsidiaries (collectively referred to as "**OPY Companies**") as data controllers.

This Privacy Policy ("**Policy**") illustrates how **OPY Companies** treat users' personal data (hereinafter "**User**, "or "**You**") as per Law No. 13.709/18 (General Law on Personal Data Protection - "**LGPD**") and how this data is used, shared, and how it can be accessed, changed, or deleted. As proof of their commitment to privacy, **OPY Companies** have established this Policy within the broader scope of a privacy management model to ensure its full compliance as the building block of its culture. All personal data You provide through this Site are used exclusively for the purposes described below.

WHAT CATEGORIES OF PERSONAL DATA DO OPY COMPANIES COLLECT ABOUT ME AND HOW IS THIS DATA COLLECTED?

"Personal Data" means any information relating to You. Depending on how you interact with us, **OPY Companies** will collect, process, and use the following categories and types of personal data about You:

- **identification data**, such as your name, surname;
- **personal information**, such as date of birth;
- **contact information**, such as your e-mail address, home, and cell phone number;
- **professional information**, such as the company you work for, department and title;
- **information about your use of our services or the Site**, such as logs related to each session, including IP address, date, and time of access; and
- **browsing data**, **OPY Companies** use certain technologies (cookies, see below for more information) that automatically collect information about how users use our services. This information includes IP address or other unique device code (computer, mobile device, or other devices) used by the User to browse the website, date, and time of access, as well as identification, whether as a registered user or not, technical information, including the User's origin URL, browser information, and language. This information helps us continually improve our services and monitor



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the accuracy of the Site's operations, and it is not intended to be associated with the User's identification data. However, browsing data may identify you when compared to your personally identifiable information.

Your personal data is collected from the following sources:

- data You provide to us directly by contacting us; and
- information obtained through automatic tracking systems when using the Site and its services.

FOR WHAT PURPOSES DO OPY COMPANIES USE THIS PERSONAL DATA?

OPY Companies will process your personal data for the following purposes:

- managing and answering User's questions, doubts, or any other requests;
- assisting the User in their experience on the Site, clarifying doubts and suggesting content;
- technically managing the Site and its operational functions, including technical troubleshooting, statistical analysis, testing, and research;
- preventing or discovering fraudulent activity or misuse detrimental to our Site;
- complying with legal requirements provided for in Brazilian laws and regulations, as well as court orders or decisions or requests from authorities;
- protect the cybersecurity of Users and the Site;
- defending the OPY Companies in court or within the administrative scope, for example, in case of breach by Web Users, or exercising and protecting the rights and property of the OPY Companies;
- responding to User requests (for example, managing requests for information); and
- registration of Users who send their resumes through the Site aiming at internal selective processes of OPY Companies;

WHY DO OPY COMPANIES NEED TO COLLECT, PROCESS AND USE MY 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.



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When you contact us regarding the Site or with questions about the OPY Companies and their services, we will treat your personal data based on our legitimate interest, according to Article 7, IX of the LGPD. Our legitimate interest is to support and promote our activities and ensure that we provide users with complete information about OPY Companies and their services.

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

WITH WHOM CAN OPY COMPANIES SHARE MY PERSONAL DATA?

The achievement of the purposes described in this document may require the involvement of some companies in the processing activities, both as controllers in charge of the processing and as operators. 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 data is limited to the extent necessary. For the purposes outlined in this document, we may share your personal data:

- with consultants and technology and IT companies authorized to manage the Site and provide Site-related services and hosting providers;
- 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 Privacy Policy, 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 database to support IT 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 only process data under 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



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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.

MANAGEMENT OF PERSONAL DATA

The provision of the User's personal registration data is voluntary and optional. Users may freely decide not to provide information for contact purposes to OPY Companies and, subsequently, delete their registration.

SECURITY

OPY Companies will adopt technical and organizational security measures to protect Users' information against unauthorized access or use.

HOW LONG WILL OPY COMPANIES KEEP MY PERSONAL DATA?

OPY Companies process your personal data only for the purposes described in this Privacy Policy. Personal data are kept and deleted in accordance with the retention policy of the OPY Companies, insofar as they are necessary. These data must be deleted: (i) as soon as the reason for its use comes to an end; or (ii) according to the term provided in the LGPD or other relevant legislation. OPY Companies will also process your personal data until a statute of limitations provided in the applicable legislation has elapsed, for the case of any litigation related to the data. For more information, contact OPY Companies through the channels indicated in this Policy.

COOKIES

OPY Companies use cookies to improve your experience on the Site. A cookie is a small file, usually made up of letters and numbers, downloaded onto a computer when the User logs on to specific websites. Cookies allow a website to recognize the User's computer, track their browsing on various pages of a given website and identify the Users who return to the website. Cookies do not contain information that personally identifies the User, but the personal information that OPY Companies record from the User may be linked to information kept in and extracted from cookies. OPY Companies use cookies on the Site to perform and facilitate your browsing, provide, and allow you to use the Site's services, and analyze and monitor how the Site is used (for example, number of



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accesses and pages viewed). The purpose is to allow OPY Companies to conduct constructive changes to the website concerning its operation and navigation based on its legitimate interest.

- **Enabling or disabling cookies**

If users disagree with the use of cookies, they must configure their browser to refuse the acceptance of cookies. Please note that refusing/disabling cookies may limit the Site's usability and easy navigation.

UNDERAGE USER DATA

This Site is not intended for persons under eighteen (18), and OPY Companies do not knowingly collect their personal information.

If any information about minors is unintentionally stored, OPY Companies will arrange for timely deletion upon User's request.

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?

Every personal data subject has rights, and OPY Companies respect their rights under the LGPD. However, according to 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:



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- **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.

- **Right to correction**

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

- **Right to anonymization, blocking, or deletion**

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

- **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.

- **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 or due to any other applicable legislation.

- **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.

- **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.



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- **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.

- **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.

- **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.

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

WHO CAN I CONTACT REGARDING THIS MATTER?

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 through the e-mail: encarregado@opyhealth.com.

LINKS TO THIRD PARTY SITES

During navigation, it is possible to see contents that refer to third-party websites. OPY Companies cannot access, or control cookies or other functionalities used by third-party websites, and our Privacy Policy does not regulate the procedures of these external websites. Consequently, should you need additional information regarding their privacy protection procedures, it is necessary to contact and/or consult them directly.

CHANGES TO THE PRIVACY POLICY

For legal and/or organizational reasons, this Privacy Policy may be subject to changes. Therefore, we suggest You check this Privacy Policy regularly, referring to the most recent version. If OPY Companies make changes that they believe are important, Users will receive notifications through the Site.