



INITIAL STATEMENT

EWAIDER&CO recognizes the value of privacy and information security in the world of dynamic and transactional relations characterized by the large volume of data passing through new technologies and thus commits itself, including its controlled companies, to the faithful and full compliance with data protection rules of the Federative Republic of Brazil (Law No. 13709/18) and non-conflicting European Union rules (Regulation 16/679) in the services provided involving the processing of personal data.

PERSONAL DATA TREATED

EWAIDER&CO declares to promote the storage, transmission and processing of personal data necessary to perform the contractual obligations established by the Declarant vis-à-vis the client for the provision of payroll processing services, including but not limited to ancillary answering services, support, reporting and data hosting.

DATA PROCESSING

By collecting personal data, **EWAIDER&CO** ensures that it will store it under safe conditions and technology structure, by applying the most advanced technical criteria of information protection and in compliance with the requirements of the Brazilian Civil Internet Framework (MCI) and the Data Protection Laws, which will extend until the relationship between the client and **EWAIDER&CO** lasts.

Personal data obtained by **EWAIDER&CO** will have restricted access, with the information security structure applied to limit the access of each data, ranging from personal to professional data, or to a sector that actually needs such data to perform the contracted purposes.

While observing best information security practices, **EWAIDER&CO** shall not be held liable for client negligence or malicious action by third parties and disclaims the obligation to repair damages arising from security incidents or breach of data, faults or vices, unless proven to be caused by **EWAIDER&CO**'s own wrongful or deliberate conduct.

RISK GOVERNANCE, COMPLIANCE AND INFORMATION SECURITY

EWAIDER&CO maintains an adequate Security Program and Corporate Information Security Policy, in addition to the Corporate Business Continuity Policy, the Corporate Risk Management, Internal Control and Compliance Policy, and a comprehensive internal regulatory framework related to information security and good corporate governance practices, acting in accordance with contemporary best practice frameworks such as ISO / ABNT models.

DATA SHARING

EWAIDER&CO will not disclose to third parties, partners or in any business dealings the information collected except:

- I. Business succession, such as merger, acquisition and incorporation;
- II. Relationship required for the execution of the contracted services;
- III. Order arising from judicial, police or administrative authority



INTERNATIONAL DATA TRANSFER

EWAIDER&CO is committed to ensuring compliance with legal requirements with any clients and partners who receive or transmit data subject to the Brazilian Data Protection Act to which **EWAIDER&CO** is responsible, however, **EWAIDER&CO** understands that as a result of the contractual object between the parties, the transfer of information between the client and partner located outside the Brazilian territory is necessary and for this reason they have the manifest and unambiguous acceptance by the owner of the personal data for such, as well as its understanding of the eventual transfer of data in compliance with the order issued by official authorities from countries outside the Brazilian territory.

HOLDER RIGHTS

EWAIDER&CO entitles the data holder to:

- I. Correction of its data;
- II. Data portability, if applicable;
- III. Opposition to use of data for previously authorized purpose;
- IV. Exclusion of data, except data necessary for the fulfillment of legal duty and the exercise of the right of defense in judicial and / or administrative proceedings;

EWAIDER&CO ensures that, upon termination of the contractual relationship or withdrawal of consent to process the data, personal information collected and stored will be deleted, subject to the maintenance of the records necessary to comply with legal duty or for possible defense in court proceedings. or administrative.

DISCLAIMER

EWAIDER&CO's liability is limited to efforts to ensure the use of best security practices and compliance with the Data Protection Act, and it shall be held accountable for malicious practices, as well as data security breaches or illegalities committed by third parties, whether these are business partners or not.

October 8th 2019

Eric Waidergorn
CEO | Ewaider&Co