



## PRIVACY POLICY TERMS AND CONDITIONS

### General information

**QUICK TECH SOLUÇÕES TECNOLÓGICAS LTDA.**, a legal entity governed by private law, headquartered in São Paulo City, State of São Paulo, Brazil, established at Bela Cintra street, 768, Block 84, Consolação, Zip Code 01415-002, duly registered in the CNPJ under nº 36.458.379/0001-25, hereby discloses its personal data processing policy, in accordance with the Brazilian General Data Protection Law, which will become an integral part of the provision contracts of service you enter into, under the following terms.

This document is registered with the 1st Registry Office of Registration of Titles and Documents of Volta Redonda/RJ, as well as its subsequent changes will only be valid after the respective registration is carried out, as well as will be disclosed through the company's website on the Internet, at the address: <http://www.pmoveel.com/privacy/>

### Definitions

For the correct interpretation of this policy, the following definitions are adopted:

**PMOVEL Platform:** Software developed and owned by **QUICK TECH** with which its customers, usually legal entities, can register and control the time clock of their employees, internal and external, for the purpose of helping to control working hours.

**Contractor:** Company that has signed a licensing agreement with **QUICK TECH** for the use of its **PMOVEL** platform, in order to carry out remote control of its employees.

**User:** all individuals who will use the system, over 18 (eighteen) years of age or emancipated and fully capable of performing acts of civil life or those who are absolutely or relatively incapable, duly represented or assisted, indicated by the Contracting Party for the purpose of registering their work schedule.

**Personal Data:** means any information provided and/or collected by the Contracting Party and/or its affiliates, and inserted into the **PMOVEL** Platform, capable of identifying the User, including, but not limited to, identification or contact information. Personal Data are stored in a database operated by **QUICK TECH** during the term of the licensing agreement entered into with the Contracting Party.



**Purpose:** the objective, the purpose that **QUICK TECH** wants to achieve from each act of processing personal information.

**Necessity:** justification for which it is strictly necessary for the Contracting Party to collect personal data, to achieve the purpose, avoiding excessive collection.

**Legal basis:** legal basis that makes the processing of personal data for a specific purpose by **QUICK TECH** or the Contracting Party legitimate.

**Consent:** express and unequivocal authorization given by the User holding the personal data so that the Contracting Party, in the Condition of Data Controller, and **QUICK TECH**, as Operator, process their personal data, for a previously described purpose, in which the necessary legal basis for the act requires the express authorization of the holder.

This policy generally applies to the Contracting Party and is extended to all Users and potential Users of the services offered by **QUICK TECH**, and summarizes how **QUICK TECH** may process personal data, including acts of collecting, producing, receiving, classifying, use, access, reproduce, transmit, distribute, process, archive, store, eliminate, evaluate or control the information, modify, communicate, transfer, disseminate or extract the collected data, including personally identifiable information, in accordance with legal bases applicable laws and all applicable privacy and data protection laws.

### **Collection and Uses of Personal Information**

**QUICK TECH** will under no circumstances collect the personal data of the Users indicated by the Contracting Party. The responsibility for collecting and obtaining the respective terms of consent of the Users lies with the Contracting Party, a person with whom the Users have a direct link.

Upon entering into the licensing agreement, the Contracting Party will receive a username and password for each Manager indicated as responsible, where the latter will proceed with the registration of the users who will register their electronic point in the system. The "input" of the data of entry and exit times of work will be exclusively up to the User and will be carried out in accordance with the rules established by the Contracting Party. **QUICK TECH** will only be responsible for maintaining the integrity of the database and processing the data entered in accordance with the instructions received by the Contracting Party.



The User's personal data processed by the **PMOVEL** Platform are:

1. Full name;
2. CPF;
3. RG;
4. PIS;
5. Date of Birth;
6. Date of admission and dismissal of the company;
7. Position;
8. Telephone;
9. Email address;
10. Functional Enrollment;
11. Department where you carry out your work activities;
12. Workday;

The following are SENSITIVE personal data of the user, processed by the PMOVEL Platform:

13. Union affiliation;
14. Biometric data, including:
  - a- Face photo for proof purposes;
  - b- Iris;
  - c - Finger print.

The Contracting Party declares that it will only require the enabling of the data fields necessary to fulfill the reason for which it contracted with **QUICK TECH** the licensing of the **PMOVEL** Platform and under no circumstances will it use the sensitive personal data registered in the system to promote any type of discrimination or retaliation to the User, being fully responsible for the misuse of the information registered in the system.

All personal data processed by the **PMOVEL** platform will be kept confidential, with access restricted to the Contracting Party's managers, in accordance with its internal hierarchical structure, and will be used only for the purpose of obtaining a record of working hours (remote electronic point), its use for any other purpose is prohibited, without the express authorization of the User, holder of the data.



## Sharing and handling of personal information

The personal data registered in the Users' system will be of restricted access to the users themselves and their hierarchical managers, and cannot be shared with third parties without their prior and express consent, except in the event of providing the data to public authorities with supervisory power, including, but not limited to, labor inspection, and authorities of the Judiciary, when requested.

**QUICK TECH** is committed to never using the data stored on the **PMOVEL** platform other than to fulfill the purpose specified in the system licensing agreement signed with the Contractor, the data controller, and will only provide access to users' personal data in the following hypotheses:

- I – With companies in its group, to fulfill the purposes of the licensing agreement entered into;
- II - With companies and/or affiliates of the Contracting Party, as well as its service providers such as accounting, information technology, etc..., on its determination as controller of personal data, for the purpose of fulfilling the purpose for which it contracted with **QUICK TECH** the licensing of the **PMOVEL** platform;
- III – When obliged by legal determination or order of a police or judicial authority.

In the event of sharing Personal Data with third parties, all subjects mentioned in items I and II above must use the Personal Data shared consistently and in accordance with the purposes for which they were collected (or to which the User previously consented) and as determined by this Privacy Policy and all applicable privacy and data protection laws.

**QUICK TECH** will inform the respective Users and the Contracting Party about any legal demands that result in the disclosure of personal information, unless such notification is prohibited by law or prohibited by a court order, or even if the request is an emergency. The Contracting Party may, as data controller, contest these demands with the people who determined the availability of the data, if it deems that the requests are excessive, vague or made by incompetent authorities. Under no circumstances will **QUICK TECH** be held responsible for complying with an order from police or judicial authorities.

## Personal information security

All personal data processed by the **PMOVEL** platform will be stored in a database maintained by **QUICK TECH** and stored in the “cloud” on servers contracted by **QUICK TECH**, which may be located outside the Brazilian territory.



**QUICK TECH** and its suppliers use several security procedures to protect the confidentiality, security and integrity of your Personal Data, preventing the occurrence of possible damages due to the processing of this data.

However, although **QUICK TECH** uses security measures and monitors its system for vulnerabilities and attacks to protect your Personal Data from unauthorized disclosure, misuse or alteration, the User understands and agrees that there is no guarantee that the information will not be accessed, disclosed, altered or destroyed for breach of any of the physical, technical or administrative safeguards, including, but not limited to, improper disclosure of login and password provided to users to access the system.

The entire system access policy, including the use or not of biometrics, geolocation and password policy is defined by the Contracting Party, and **QUICK TECH** is only responsible for adopting on the **PMOVEL** platform the policy defined by the Contracting Party, which shall obtain from its Users the respective terms of consent.

#### **Data retention and exercise of data subject rights**

**QUICK TECH** retains in its **PMOVEL** platform database and makes this data available for the Contracting Party to use all the data provided, including Personal Data, while the User's registration is active and as necessary to perform its services.

After the User is disconnected from the Contracting Party's staff, the personal data will be retained in the system for the time necessary to store information on the origin of the employment relationship as required by law. After this period, the data will be delivered to the Contracting Party and deleted from the system, and the Contracting Party will be solely responsible for such information.

**QUICK TECH** may keep the Personal Data of users after receiving your request for deletion if necessary to comply with legal obligations, resolve disputes, maintain security, prevent fraud and abuse and ensure compliance with contracts.

Upon termination of the licensing agreement between **QUICK TECH** and the Contracting Party, the personal data of the users will be delivered to the Contracting Party in report format or in a standardized file, being subsequently excluded from the **QUICK TECH** database, thus, the Contracting Party is exclusively responsible for responsibility for this information.



### **Revisions to this Policy**

If **QUICK TECH** modifies this Privacy Policy, such changes will be published visibly on the company's website, in addition to registering the change in a notary's office. This Policy is valid from May 7, 2021. If the User has any questions or complaints regarding the privacy policies of the **PMOVEL** system, please contact **QUICK TECH**, through the addresses below/service channel of the Data Protection Officer.

### **DPO**

**QUICK TECH** has appointed Mr. Thiago Cezar da Silva Souza Alves as Data Protection Officer (“DPO”). The User may contact the DPO at the company's physical address indicated in this document or via the e-mail [dpo@pmovel.com.br](mailto:dpo@pmovel.com.br).

Sao Paulo, August 05, 2022.

**QUICK TECH SOLUÇÕES TECNOLÓGICAS LTDA**

**THIAGO CEZAR DA SILVA SOUZA ALVES**

**DPO – QUICK TECH SOLUÇÕES TECNOLÓGICAS**