

Deteccion Privacy Policy Brazil K9

This Privacy Policy aims to demonstrate **DETECCION BRAZIL K9's** commitment to the privacy and protection of the Personal Data it collects from You, establishing the rules on the collection, registration, storage, use, sharing, enrichment and elimination of your data collected, within the scope of DBK9 's services and functionalities in accordance with current laws, with transparency and clarity for you and the market in general.

As a condition for accessing and using the exclusive features of the Platform, **you declare that you have read this Privacy Policy completely and carefully, being fully aware, thus granting your free and express agreement with the terms stipulated herein, authorizing the obtaining of the data and information mentioned here, as well as their use for the purposes specified below.** If you do not comply with these Guidelines, you must discontinue access.

1. COLLECTION AND USE OF PERSONAL DATA AND ACTIVITY RECORDING

1.1. Collection of personal data. The data is collected based on your voluntary adherence to the use of the Platform, in addition to data collected automatically, and includes:

DATA TYPES	PERSONAL DATA	PURPOSES
REGISTRATION		Identify and authenticate you.

	<p>Name; CPF/CNPJ number; <i>email</i> ; billing address.</p>	<p>Serve you! Comply with obligations arising from the use of the Platform's services.</p>
		<p>To create a consumer profile and carry out advertising for Deteccion's offers and services Brazil K9, whenever possible, anonymously .</p>
		<p>Protect you! Carry out fraud prevention, credit protection and associated risks, compliance with legal and regulatory obligations and contract execution.</p>
<p>DIGITAL IDENTIFICATION</p>	<p>IP Address and Source Logical Port; records of interactions with the Platform; screens accessed; device (operating system version; geolocation .</p>	<p>Comply with legal obligations! Comply with the obligation established by the Marco Civil da Internet - Law no. 12,965/2014 established by the Marco Civil da Internet - Law no. 12,965/2014</p>

		<p>Protect you! Carry out fraud prevention, credit protection and associated risks, compliance with legal and regulatory obligations and contract execution.</p>
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1.2 Data sharing hypotheses. Collected Data and recorded activities may be shared:

1. With competent judicial, administrative or governmental authorities, whenever there is a legal determination, request, requisition or court order;
2. Automatically, in the case of corporate movements, such as mergers, acquisitions and incorporations;
3. With partner companies and authorized suppliers to meet the purposes stated in this Policy, such as photography service providers, extracurricular activities, transportation; It is
4. With companies from the Detection Group Brazil K9, always in compliance with the security and Data protection guidelines and to meet the purposes of this Policy.

1.2.1. In these cases, Detection Brazil K9 will share the minimum amount of information necessary to achieve its purpose.

1.3. Subcontracting. The Detection Brazil K9 may subcontract the data processing and storage service (Data Operator), so that you **ARE AWARE** of the access and processing of Personal Data by third parties, service

providers, whose purpose is to ensure the efficiency of services. to be provided.

1.3.1. The Detection Brazil K9 undertakes to subcontract data processing and storage services only to companies with the respective specialty, guaranteeing all the rights of the Data Holder and imposing rules and responsibilities on the subcontracted Operator.

1.4. Data Security. The Detection Brazil K9 will make its best efforts to protect information, applying the administrative and technical protection measures necessary and available at the time, demanding from its suppliers the same acceptable level of Information Security, based on best market practices, based on clauses contractual.

1.5. Storage servers. The collected data will be stored on Deteccion 's own servers Brazil K9 located in Brazil, as well as in an environment using resources or servers in the cloud (*cloud computing*), which entails, in the latter case, transfer or processing of data outside Brazil, complying with provisions on international data transfer in accordance with article 33 of the General Data Protection Law or other applicable standards.

1.6. Data veracity. The Detection Brazil K9 is not responsible for the accuracy, veracity or lack thereof of the information provided by you or for its outdatedness, or for the documents sent, and you are responsible for providing it accurately and/or updating it.

1.6.1. The Detection Brazil K9 is not obliged to process or treat any of your data if there is reason to believe that such processing or treatment could result in any violation of any applicable law by the companies or that the Platform is being used, under the sole discretion of Deteccion Brazil K9, for any illegal, illicit or contrary to morality purposes.

1.6.2. Technologies used. The Detection Brazil K9 may make use of technologies such as cookies, and it is up to you to configure your internet browser if you wish to block them. In this case, some Platform functionalities may be limited.

1.6.3. All technologies used will always comply with current legislation and the terms of this Policy.

1.7. Third party *links* . It is important to highlight that, once on the Platform, you may be led, between *link*, to portals or other platforms, which may collect your information and have their own Privacy Policy, and it is up to you to read them or reject them.

1.8. Consent changes. You may change your consent grants, grant new permissions or request the revocation of your consent for current permissions through Deteccion 's Service Channels Brazil K9, being warned of the consequences that withdrawing consent may cause.

1.9. Data base. The database formed through data collection is the property and responsibility of Deteccion Brazil K9, and its use, access and sharing, when necessary, will be within the limits and purposes described in this Policy.

1.10. Access to the database. Access to processed data is restricted only to professionals duly authorized by Deteccion Brazil K9, and its use, access and sharing, when necessary, will be in accordance with the purposes described in this Policy.

2. DATA STORAGE AND RECORDS

2.1. Data storage. The Personal Data collected and activity records are stored in a secure and controlled environment for the period required by law, considering:

PERSONAL DATA	STORAGE PERIOD	LEGAL BASIS
Registration data	During the period in which they are relevant to achieving the purposes listed in this instrument	Art. 7 of the LGPD and Art. 6 of the GDPR. (Compliance with contract between the parties).
Digital identification data	6 months	Art. 15, Civil Rights Framework for the Internet
Other data	As long as the relationship lasts and there is no request for deletion or revocation of consent	Art. 9, Section II of the General Personal Data Protection Law

2.2. Data deletion. The data may be deleted before this period, if you request. However, it may happen that the data needs to be kept for a longer period, in accordance with article 16 of the General Law on the Protection of Personal Data, to comply with a legal or regulatory obligation, compliance with the contract, study by a research body (ensuring, when possible, the anonymization of Personal Data), transfer to a third party (respecting the data processing requirements set out in the same law). After the deadline and legal necessity, they will be deleted using safe disposal methods, or used anonymously for statistical purposes.

3. RIGHTS OF THE PERSONAL DATA HOLDER

3.1. Data display and rectification. You can request the display or rectification of your Personal Data through the Service Channels.

3.2. Limitation, opposition and deletion of data. Through the Service Channels, it will also be possible to:

- request limitation and anonymization of the use of Personal Data;
- express your opposition to the use of Personal Data;
- request the deletion of your Personal Data, as long as the minimum legal period related to data storage has elapsed; or
- claim data portability to another service provider in the same field, upon express request, in accordance with the regulations of the national authority.

3.2.1. If you withdraw your consent for purposes that are fundamental to the regular functioning of the Platform, the services and functionalities may become unavailable to you.

4. HOW TO EXERCISE YOUR RIGHT AS A DATA SUBJECT

4.1. Your rights as holder of personal data may be exercised directly by you, through the management of registration information, while another party will depend on sending a request on email: barbosapedrotheadv@gmail.com for subsequent evaluation and adoption of the necessary measures.

4.2. The User is aware that any request to delete essential information for managing their registration with Deteccion Brazil K9 will result in the termination of your contractual relationship, with the consequent cancellation of the services then provided.

4.3. The Detection Brazil K9 will make all reasonable efforts to respond to requests made by Users in the shortest possible time. However, justifiable factors, such as the complexity of the requested action, may delay or prevent its rapid response, being certain that, in the event of delay, the due reasons will be provided.

4.4. Finally, the User must be aware that their request may be legally rejected, whether for formal reasons (such as their inability to prove their identity) or legal reasons (such as the request for deletion of data whose maintenance is a free exercise of rights by Detection Brazil K9 , given that, in the event of it being impossible to meet these requests, Deteccion Brazil K9 will present reasonable justifications.

5. GENERAL PROVISIONS

5.1. Data Officer. For all data processing purposes, as provided in articles 5, item VIII and 41, §1 of the General Personal Data Protection Law, declares Deteccion Brazil K9 has a data handler and can be contacted through the Service Channels available on the *website* .

5.2. Update of Terms. The Detection Brazil K9 reserves the right to change the content of this Privacy Policy at any time, according to the purpose or need, such as for adequacy and legal compliance with a provision of law or standard that has equivalent legal force, and it is your responsibility to verify it. whenever you access the Platform.

5.2.1. In the event of updates to this document that require new collection of consent, Deteccion Brazil K9 will notify you using the contact details you provided.

5.3. Service channels. If you have any questions regarding the provisions contained in this Privacy Policy, you may contact Deteccion Brazil K9 on email: legaldepartment@dbk9.com.br

5.4. Nullity. If any provision of this Privacy Policy is considered illegal or illegitimate by the authority of the location in which you reside or your internet connection, the other conditions will remain in full force and effect.

5.5. Communication. You acknowledge that all communication carried out by *email* (to the addresses provided in your registration), *SMS*, instant communication applications or any other digital and virtual form are also valid as documentary evidence, being effective and sufficient for the disclosure of any matter that refers to the services provided by Deteccion Brazil K9, as well as the conditions of its provision or any other matter addressed therein, except for the expressly different provisions set out in this Privacy Policy.

6. APPLICABLE LAW AND JURISDICTION

6.1. Applicable law and forum. This Privacy Policy will be interpreted in accordance with Brazilian legislation, in the Portuguese language, with the jurisdiction of the District of Curitiba being elected to resolve any dispute or controversy involving this document, unless there is a specific exception regarding personal, territorial or functional jurisdiction under the applicable legislation.

7. DPO

7.1. The data controller – also called DPO (Data Protection Officer) – is the person responsible to act as a communication channel between Deteccion Brazil K9 and data subjects. The person appointed as DPO of

Deteccion Brazil K9 is Jusconnect Soluções Empresariais LTDA, regularly registered with the CNPJ under nº 45.660.624/0001-73, with electronic email

8. COMPLIANCE WITH THE CONDUCT MANUAL

8.1. We reinforce our commitment to the highest standards of ethics and compliance in all of our operations. Integrity is a core value that guides our approach to protecting the privacy and confidentiality of our customers' and users' data.

8.2. Our company adopts a "Manual of Ethical and Business Conduct, Compliance and Anti-Corruption" as an integral part of our organizational culture. The Ethical Conduct Manual establishes clear guidelines for the appropriate and responsible conduct of our employees, partners and other parties involved in our operations.

8.3. It is imperative that everyone involved with our company understands and adheres to the Ethical Conduct Manual. This includes, but is not limited to, our employees, contractors, suppliers and business partners. The Ethical Conduct Manual defines expectations related to integrity, business ethics, prevention of corruption and compliance with all applicable laws and regulations.

8.4. In particular, we emphasize the importance of complying with applicable data privacy laws and regulations, which are fundamental to protecting the privacy of our customers and users. Our employees and partners must be aware of their responsibilities with regards to data security and privacy and must follow all relevant policies and procedures.

8.5. The Ethical Conduct Handbook also highlights the need to report any violations of ethics, compliance, or any privacy-related concerns. We encourage everyone involved with our company to report any activity that may be in violation of the Ethical Conduct Manual or our data protection commitments.

8.6. When using our services or interacting with our company, you acknowledge and agree with the importance of complying with the Manual of Ethical and Business Conduct, Compliance and Anti-Corruption. We are committed to promoting a culture of integrity and protecting your privacy. For any questions, concerns, or reports of violations, please contact us using the contact information provided in this privacy policy.

9. RECORDING AND STORAGE OF INSPECTION VIDEOS

9.1. Our company, dedicated to detecting explosives and narcotics using sniffer dogs, values transparency and compliance with data privacy regulations. As part of our services, it is necessary to record inspections carried out on vessels to ensure the safety and integrity of our customers and their operations.

9.2. As established in the LGPD (General Data Protection Law) in Brazil and the GDPR (General Data Protection Regulation) in the European Union, we are committed to ensuring that the collection, storage and processing of personal data occurs lawfully, fair and transparent, based on the following legal foundations:

- 1. Contract Execution (Article 7, item V of the LGPD and Article 6(1)(b) of the GDPR):** The collection and storage of videos and data related to the inspection of vessels are necessary for the execution of

contracts concluded with our customers. This includes allowing vessel owners to track inspections carried out at their facilities.

2. Legitimate Interest (Article 7, item IX of the LGPD and Article 6(1)(f)

of the GDPR): We have a legitimate interest in maintaining visual records of inspections to ensure the effectiveness of our services, as well as to ensure security and integrity operations related to the detection of explosives and narcotics.

3. Legal Obligation (Article 7, item II of the LGPD and Article 6(1)(c) of

the GDPR): In accordance with applicable laws and regulations, we are obliged to keep records of inspections for safety, regulatory and legal purposes.

9.3. Videos recorded during explosive and narcotics detection inspections are securely stored in our system and are only accessible by vessel owners or their authorized representatives. These videos will not be shared with third parties without the explicit consent of the vessel owners, except when required by law.

9.4. Videos recorded during inspections will be retained for the period necessary to comply with our contractual, legal and regulatory obligations. After the end of this period, the videos will be duly deleted.

9.5. According to data protection laws, you have the right to access, correct or delete your personal data, including recorded videos (Article 18 of the LGPD and Article 17 of the GDPR). To exercise these rights or to obtain more information about our privacy practices, please contact us using the contact information provided in this privacy policy.

9.6. Thank you for choosing our services. We are committed to protecting your privacy and complying with all legal data protection obligations. If you have any questions or concerns regarding privacy or

the use of videos during inspections, please do not hesitate to contact us. Your safety and trust are of utmost importance to us.

10. GLOSSARY

10.1. For the purposes of this document, the following definitions and descriptions should be considered for better understanding:

- Personal Data: information relating to an identified or identifiable natural person;
- *Cloud Computing* : or cloud computing, is service virtualization technology built from the interconnection of more than one server through a common information network (example: internet), with the aim of reducing costs and increasing availability of supported services;
- Platform: designates the electronic address legaldepartment@dbk9.com.br and its subdomains;
- Person in charge: person appointed by the controller and operator to act as a communication channel between the controller, data subjects and the National Data Protection Authority;
- Controller: natural or legal person, governed by public or private law, who is responsible for decisions regarding the processing of Personal Data;
- Operator: natural or legal person, governed by public or private law, who processes Personal Data on behalf of the controller;
- National authority: Public Administration body responsible for ensuring, implementing and monitoring compliance with the General Data Protection Law throughout the national territory;
- Cookies : files sent by the Detection server Brazil K9 for your mobile device or *desktop* , with the purpose of identifying the device and obtaining access data, thus allowing you to personalize your navigation on the Platform, according to your profile;

- IP: abbreviation for *Internet Protocol* . It is an alphanumeric set that identifies your device on the internet; It is
- You: natural or legal person who accesses and/or uses the Platform's functionalities.