

v·tal

PRIVACY
POLICY

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V.tal wants to open the game and maintain a transparent relationship with you!

To this end, we will show you how we protect your personal data and preserve your privacy when you use our services or products or interact with us. But before that, take a look at some information that might interest you:

Who is V.tal?

We are V.tal *Rede Neutra de Telecomunicações S/A* - 02.041.460/000193, and we are located at Avenida das Nações Unidas, n. 12901, 27A, conjunto 2701, Torre Oeste, Bairro Chácara Itaim, in São Paulo/SP.

I have questions about this policy. What should I do?

If you have questions about privacy and data protection, please contact the V.tal Privacy Team and our Data Officer, Baptista Luz Advogados, by sending an email to: pp-privacidadevtal@vtal.com.

Why do I need to read this policy?

We want you to know your rights and know how V.tal makes use of the information collected about you.

01 How does V.tal collect your personal data and what types of data are collected?

We will collect data about you in different situations depending on your relationship with us. To better understand, look at these examples:



If you are a **commercial representative of a company**, you can contact our consultants through the V.tal website only by providing some necessary data, such as your name, email, phone, company name, CNPJ and reason for contact.

Much of this data is provided by yourself when you interact with us. But we may also obtain information about you in other ways, such as through our business partners or tracking technologies (so-called cookies, for example). Do not worry, because below we will better explain these situations to you.

It is very important for you to know that in some cases we act on behalf of other companies that you have hired. In these situations, unfortunately, we cannot guarantee full compliance regarding the use of information by these companies, which follow their own policies, controls, and internal records. We will always do our best to ensure that they respect your data and your privacy as we do, but we recommend that you also take a look at the Privacy Policy of the company responsible for the products or services you have contracted.

02 What are cookies and tracking technologies? How does V.tal use them?

In general, cookies and other tracking technologies are small text files stored in the browser or device. Cookies allow us to recognize your preferences in order to create a personalized experience. Some of your information is saved in this text file so that when you return to our websites or applications later, your browser is recognized and configured with the same previous preferences selected by you.

Some cookies are automatically deleted when you close your browser, but others must be deleted manually. **It's pretty easy to do! You can click on one of the links below, depending on the browser you use, to better understand how to remove your cookies:**

Firefox

Chrome

Safari

Microsoft Edge

Still not clear? Here are some examples of how we might use cookies:



Do you know when the resolution of our website adjusts to that of your cell phone or computer? Or when our pages load without any problem? This is thanks to a category of cookies, which **helps our websites to function properly.**



We need to understand how our websites are being used. For this purpose, some cookies may provide us with information about which of our pages are most accessed or how many clicks the user makes when browsing them. This all serves to **improve the content of the website and your browsing experience.**

Some of the cookies installed on your device or browser may not be ours, but from third parties. These cookies may continue to monitor your online activities even after you have left our websites. Be aware of this and make regular management of installed cookies.

03 With whom does V.tal share your Personal Data?

In order to offer our services to you, we need to count on the help of some partners and suppliers with whom we can share data, always seeking to preserve your privacy as much as possible. Understand better:



Protection of Rights

We may share any data that we believe is necessary to comply with a legal obligation, enforce our contracts or protect our employees and customers.



Telephony Providers and Operators

When we provide our infrastructure or connectivity services, including data communication solutions, we can work with providers or partner telephone carriers and share data for this purpose.



Public Authorities

We have to comply with the law. Thus, if a competent authority (such as ANATEL, Procon or the Judiciary) requires us or our partners (such as telephone providers or operators) to share data, we will need to comply with this order.



Other Suppliers

In addition, we may share personal data with other providers. These include, for example, companies contracted to assist us with billing, operating our websites or storing our data.

04 What are your rights as a Personal Data Subject?

Your data belongs only to you and, recognizing this, we understand that you need to know your rights. Below are the rights that Brazilian law and V.tal grant you:

Receive access to personal data that V.tal uses and stores about you;	Request correction of personal data that is incomplete, inaccurate or outdated;
Request the anonymization, blocking or deletion of the data we hold about you;	Request that we carry out the portability of your personal data to a third party;
To know which companies we share your data with ;	Receive clear and complete information about the possibility and consequences of not providing consent , when requested by V.tal;
Choose to revoke your consent previously provided to V.tal;	To object to our uses of your personal data.

To exercise or learn more about any of the above rights, we recommend contacting us by the email mentioned at the **beginning of this policy.**



Please note that in order to prevent fraud, **we may request some additional information in order to prove your identity.**

We do this to ensure the security and privacy of everyone, preventing the disclosure of your data to unauthorized persons.



In some cases, always justified, **we may not comply with a request to exercise rights.** Don't worry, we will always inform you of these reasons - including when, for example, a request may violate our trade secrets or any other situation where the law or legal proceedings prevent us from complying with your request.



In cases where we process data on behalf of our customers or partners, **we recommend that you contact such companies directly** for a faster fulfillment of your rights.

05 where is your Personal Data stored?

We may share your personal information with V.tal partner companies and/or suppliers for the provision of some of our services. We may, for example, transfer your personal data to companies responsible for hosting our databases, some of which have their headquarters abroad. We may also transfer your data internationally to other companies that are part of V.tal's economic group. Such transfers involve only companies that demonstrate compliance with applicable data protection laws, and maintain a level of compliance similar to or stricter than that provided for in applicable Brazilian law.

06 How long do we store your Personal Data?

V.tal has a personal data retention policy in line with Brazilian legislation. Personal data is stored only for as long as it is necessary to fulfill the purposes for which it was collected, unless there is any other reason for their maintenance, such as the need to comply with any legal, regulatory, contractual obligations, among others permitted under the law. We always make a technical analysis to determine the appropriate retention period for each type of personal data collected, considering its nature, need for collection and purpose for which it will be treated.

07 What are our responsibilities and how do we protect your Personal Data?

Our responsibility is to take care of your personal data and use it in the way we inform you.

To protect your data, we adopt the appropriate security practices for our activities.

We work to protect your privacy, but unfortunately we cannot guarantee complete security.

Hardware or software failures that are not under our control and other factors may compromise the security of your personal data, so we ask for your help in maintaining a safe environment for everyone.

You can help us by adopting good security practices in relation to your equipment and data (such as not sharing the password of your internet connection with third parties). If you identify or become aware of anything that compromises the security of your data, please contact us by sending an email to: **pp-privacidadevtal@vtal.com**.

08 Changes to the Privacy Policy

Because we are always looking to improve our products and services, we may update this policy to reflect the improvements we make. We ask that you revisit this policy from time to time to stay on top of these changes.

If relevant changes are made that may affect your rights as a holder, we will notify you.

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