

PRIVACY AND PERSONAL DATA PROTECTION POLICY

1. Purpose

netLex is committed to keeping Personal Data secure, while respecting and guaranteeing the fundamental rights to privacy and informational self-determination. The purpose of this Privacy and Personal Data Protection Policy is to establish, in an objective and transparent manner, the rules governing the collection, storage, use, processing, sharing, and deletion of Personal Data processed by netLex.

2. Target Audience

netLex customers.

3. Introduction

This Policy applies to all information collected on our Platform worldwide. Some provisions may pertain to specific, additional services that do not apply to all Users. By accessing our Platform, the User acknowledges the data processing practices set forth in this Policy.

In this Policy, we will use the terms as defined in the table below, unless the context indicates otherwise:

<u>Legal Basis</u>	Legal basis justifying the processing of personal data.
<u>Customers</u>	Legal entities that have contracted for the implementation services and licensing to use the Platform.
<u>Cookies</u>	Small text files stored in your browser or device that allow for the identification of your browser or device and the pages you visit.
<u>Personal Data</u>	Any information relating to an identified or identifiable natural person.
<u>netLex</u>	netLex Tecnologia Ltda., registered with the CNPJ under No. 20.127.575/0001-87, with headquarters at Rua Pernambuco, 554, 9th floor, Funcionários, Belo Horizonte/MG, ZIP Code 30130-156.
<u>Platform</u>	netLex's online systems.
<u>Sub-Processor</u>	Third-party service providers used by netLex to offer services to Customers and Users.
<u>Data Subject</u>	An individual to whom the Personal Data refers, whether as a Platform User or as a third party whose data is entered into the Platform.
<u>Data Processing or Processing</u>	Any operation performed on Personal Data, such as those involving the collection, generation, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation, or control of information, modification, communication, transfer, dissemination, or extraction.

<u>Users</u>	Individuals, 18 years of age or older, who have any connection to the Clients and who perform actions directly on the Platform.
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4. What Data We May Collect

netLex processes the Personal Data necessary for its activities, and the amount and type of information collected by netLex vary depending on the use of our services. Furthermore, most of the Personal Data we process is provided directly by the Data Subject or the Client.

To make this easier to understand, we have provided below a list of the Personal Data we process.

Source	Purpose	Type of Data Collected
Registration Forms	To grant access to the Platform	User Data: name; email; profile photo; and any information specified by the Client (e.g., job title)
Use of the Platform's features	Filling out questionnaires, drafting documents, submitting documents for review, and/or submitting documents for signature. This Data may pertain to Users and/or third parties.	Usage Data: name; email; CPF; address; and any information specified by the Client.
Navigating the Platform	To enable the Platform to function.	Browsing Data: data collected through cookies or device IDs, including IP address, date and time of access, geographic location, browser type, duration of visit, pages visited, actions taken on the Platform, and general device information (such as screen resolution).
Support and Onboarding	To provide support and onboarding services	Contact Data: name; email; phone number; and any information provided by the Customer and/or User.
Sending communications and meeting invitations	Used to invite Clients, Users, and Third Parties to demonstrations and to send information about the Platform.	Business contact information: name; email; phone number.

Marketing	Targeting content and advertising—both ours and our partners’—based on your profile and preferences.	Business contact information: name; email; phone number. Data about the access device: model, manufacturer, operating system, mobile carrier, browser type, connection type and speed. Cookies: Cookies and other similar technologies used to automatically collect information about browsing habits
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5. Cookies

Cookies are small text files stored in your browser or device. Cookies allow us to recognize your preferences so that we can, for example, understand, diagnose, resolve, and correct issues with the Platform. The purpose of collecting this information is to improve the user experience and provide support for using the Platform, as well as to enable the execution of activities and the management of history on the Platform.

Cookies may have an expiration date. For example, some cookies are automatically deleted when you close your browser (so-called “session cookies”), while others may be stored on your computer for a longer period until they are manually deleted (so-called “persistent cookies”).

If you do not wish to provide this information, disable cookies in your browser. To do so, simply follow the instructions provided by your preferred browser. More details can be found in the Cookie Policy available [here](#).

6. Legal Basis

Personal Data may be processed in the following cases:

- when necessary for the performance of a contract;
- upon the Data Subject’s provision of consent;
- to comply with a legal or regulatory obligation;
- for the regular exercise of rights;
- when necessary to serve the legitimate interests of netLex or third parties.

7. Sharing of Personal Data

netLex only shares data in cases permitted by law and/or with consent. The following are instances of personal data sharing:

- Sharing data with service providers to enable the provision of our services and the performance of our activities (for example, Zendesk, a platform used to provide support services);
- To comply with any terms, conditions, or agreements we have entered into with Clients;
- In specific cases provided for by law or pursuant to court orders.

We may use the Sub-Processors listed [here](#).

8. Data Subject Rights

netLex guarantees Data Subjects the following rights:

Existence and Access	the right to request information regarding whether your data is subject to any type of processing by netLex and how this is done, as well as access to and confirmation of the Personal Data we process;
Rectification	the right to request the correction or modification of data concerning you that is incorrect, incomplete, inaccurate, or out of date;
Objection	the right to object to processing carried out based on one of the grounds for exemption from consent;
Deletion	the right to request the deletion of data provided with your consent
Explanation	the right to request clear and precise information regarding the processing of Personal Data;
Portability	Right to request the portability of Personal Data to another service or product provider
Unsubscribe	the right to request removal from our communication or marketing lists, thereby ceasing to receive our email messages.

Requests to exercise any of the rights listed above will be addressed as quickly as possible. If there is any impediment, we will communicate the reasons preventing us from promptly fulfilling the request or, if applicable, inform you that we are not the data controller you are seeking.

netLex does not use automated decision-making mechanisms.

9. Data Retention and Deletion

Personal Data is stored on servers located in the U.S., Ireland, and/or Brazil, depending on the contractual agreement with the Client. Personal Data will be retained only for as long as necessary, in accordance with the listed purposes and legal requirements.

Upon termination of the contract between netLex and the Client, netLex will provide the Client with access to the REST APIs and related documentation to extract documents, data, and information stored on the platform in base64 format; it is the Client's responsibility to have the technological infrastructure capable of processing the response to these requests, converting the data to the desired format, and storing the files on its own system or that of another provider.

Users' Personal Data will be deleted when the User is removed from the Platform or upon termination of the contract between netLex and the Client. Only the email addresses and names of deleted Users may be retained for historical purposes, provided this is consistent with the processing required by the Client. This deletion does not apply to backups, which will be retained for 5 years.

The Personal Data of third parties, used on the Platform by Clients in documents or contacts, will be deleted in accordance with the Clients' requests. If the Data Subject contacts



netLex directly, netLex must notify the respective Client so that specific instructions regarding the deletion can be provided by the Data Controller.

10. Artificial Intelligence

netLex is integrated with the OpenAI API to enhance and expand the services we offer our users. The OpenAI API is a natural language processing tool that allows us to create advanced features such as drafting and reviewing contractual clauses in a document.

The use of the OpenAI API on our Platform is strictly controlled, such that it will only be made available following prior approval and configuration by the environment administrator in the Platform's settings menu. This means that the specific, authorized features that use the API will be made available to Users only after the administrator's approval, and their use will be in accordance with the guidelines and policies established by the client.

The input data entered into netLex AI is used to generate a response via the artificial intelligence model and provide it to the user. For this reason, any personal data entered into this feature will be processed for this purpose. The data provided will not be used to train the model.

11. International Data Transfer

The collected data may be stored and/or processed on servers located in the U.S., Ireland, or Brazil (as defined in the agreement with the Client), which may result in the transfer or processing of data outside Brazil by netLex. In addition, netLex may subcontract the processing and/or share your personal data with third parties located in other countries.

This Policy is global in nature. Our goal is to meet the requirements and expectations in every country where our Users are located. Because we operate globally, we may transfer your information outside your country, including to the United States. This is necessary for the provision of our services and for the purposes described in this Policy. netLex will take the necessary measures to ensure that the international transfer of personal data is carried out in accordance with applicable laws.

12. Final Provisions

netLex has a Data Protection Officer (DPO), Ms. **Lara Jardim**, who oversees and guides all personal data processing activities. For any questions or requests related to personal data, data subjects may contact the DPO:

- Compliance email: compliance@netlex.com.br
- DPO email: dpo@netlex.com.br
- Phone: 3003-0618
- Address: R. Pernambuco, 554 - 9th floor - Funcionários, Belo Horizonte - MG, 30130-156

netLex reserves the right to update this Policy whenever necessary. When this occurs, we will post a notice on the website, send an email, and/or notify you by other means, in accordance with applicable law.

This Privacy and Personal Data Protection Policy was approved by the Officers on April 30, 2021.

Change History	
Date	Major Changes
May 21, 2021	No changes were made. Only the version dated April 30, 2021, was uploaded, with the “signature” option on the netLex Platform disabled.
September 22, 2021	Amendment to the Final Provisions
September 14, 2022	Update to the link for the List of Sub-processors
September 20, 2022	Added link to the Cookie Policy
September 21, 2022	Annual Review of Policies and Guidelines. No updates were necessary.
September 28, 2022	Annual review of Policies and Guidelines. Text formatting adjustments.
September 29, 2023	Annual review of Policies and Guidelines. Addition of the Artificial Intelligence section.
September 30, 2024	Annual review of Policies and Guidelines. Changes: • Specific corrections to verb-noun agreement in Portuguese; • Replacement of “generally also have a” with “may have” in item 5. Cookies, and • Replacement of “with” with “between netLex and” • Change of the street’s ZIP code from 30130-151 to 30130-156 in Section 3.
11/12/2024	Amendment to item 12 with the appointment of DPO Lara Jardim and her contact email address.
March 31, 2025	Addition to item 9 of information regarding the retention period for backups and clarifications on the format for returning data and documents.
September 29, 2025	Annual review of Policies and Guides. No updates were necessary.