WZ Governance

Governance and compliance to operate in Brazil

Privacy and Data Protection Policy

WZ Investimentos Ltda, trading as WZ Governance · CNPJ 45.178.990/0001-90

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Privacy and Data Protection Policy

To provide our services, WZ Governance needs to process personal data of clients, prospective clients, partners and website visitors, always to the extent required for each engagement.

We are committed to respecting the confidentiality of information and the privacy of individuals. This policy therefore explains how personal data is processed by WZ Investimentos Ltda, trading as WZ Governance.

This policy is reviewed periodically to reflect changes in the law, in our services and in the technologies we use. We recommend consulting it regularly and checking the date of the current version shown on the cover.

It applies to the processing of personal data of clients, prospective clients, partners, service providers, people who send a CV or proposal, and visitors to the WZ Governance website and contact channels, such as the contact form, email and telephone.

1 General considerations

WZ Governance respects the privacy of all data subjects and takes reasonable measures to protect the personal data it collects and uses.

All information is processed in accordance with the applicable data protection laws and regulations, in particular Brazilian Law 13,709/2018, the General Data Protection Law (LGPD).

We maintain technical and organizational procedures to protect personal data. Partners and providers with access to such data commit in writing to confidentiality and security. Any privacy breach is treated seriously, and a partner's failure to follow these rules leads to the end of the relationship.

2 Purpose

To set out the rules for the processing of personal data by WZ Governance, in accordance with the LGPD and other applicable rules.

3 Scope

This policy applies to the processing of personal data carried out by WZ Investimentos Ltda, trading as WZ Governance, CNPJ 45.178.990/0001-90, headquartered at Av. Paulista, 1636, 15th floor, Suite 4, Bela Vista, São Paulo/SP, Brazil, CEP 01310-200, acting as data controller. It covers the personal data of:

- Visitors to www.wzgovernance.com and people who contact us through the form, by email or by telephone;
- Representatives, directors, shareholders and employees of clients and prospective clients;
- Representatives of partners and service providers, such as lawyers, accountants, auditors and banks;
- People who send a CV or partnership proposal on their own initiative;
- Followers and contacts of the WZ Governance institutional pages on social media.

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When WZ Governance processes personal data on behalf of and under the instructions of a client, as in outsourced accounting routines, it acts as data processor, and the processing also follows the contract signed with that client.

4 References

- Brazilian Law 13,709/2018, General Data Protection Law (LGPD);
- Brazilian Law 12,965/2014, Internet Civil Framework (Marco Civil da Internet);
- Regulations of the Brazilian Data Protection Authority (ANPD), including Brazilian Resolution CD/ANPD 2/2022;
- WZ Governance Confidentiality and Information Security Policy;
- WZ Governance Code of Ethics and Conduct.

5 Definitions

TERM	DEFINITION
Personal data	Information relating to an identified or identifiable natural person.
Sensitive personal data	Data on racial or ethnic origin, religious belief, political opinion, trade union membership, health, sex life, genetic or biometric data.
Data subject	The natural person to whom the personal data refers.
Processing	Any operation carried out with personal data, such as collection, use, storage, sharing and deletion.
Controller	The party that makes decisions about the processing of personal data.
Processor	The party that processes personal data on behalf of the controller.

6 Guidelines

6.1 Personal data we process

We process only the data required for each purpose. We do not collect sensitive personal data or data of children and adolescents.

- **Website form:** name, email, company, country, message and the language selected while browsing.
- **Website browsing:** technical access data, such as IP address, date and time, logged by the website hosting and font services. To measure traffic, the website uses Cloudflare Web Analytics, which produces only aggregated statistics, such as page views, country of origin, device type and referring site, without cookies and without identifying the visitor. The website does not use advertising cookies or cross site tracking tools; the language preference is stored only during the visit, in the visitor's own browser.

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- **Social media:** aggregated statistics provided by the platforms themselves (LinkedIn, Instagram and YouTube) on the reach of the WZ Governance institutional pages, such as views, followers and interactions, without identifying individual followers.
- **Newsletter:** email and the language of the page where the subscription was made, a record of the subscription (date, time and IP address) and data on message opens and clicks, used in aggregated form to assess interest in the content.
- **Relationship with clients and prospective clients:** name, position, company, email, telephone and communication history.
- **Delivery of services:** identification data of shareholders, directors and legal representatives, such as identity document, passport, CPF, nationality and address, when required for company formation, legal representation, powers of attorney, filings with public bodies, regulatory authorization requests and trademark registration.
- **Partners and providers:** contact and identification data of their representatives, required for engagement and payment.
- **Unsolicited CVs and proposals:** the data the person chooses to send.

6.2 How data is collected

Data is provided directly by the data subject or by the client who refers them, through the website form, the newsletter subscription, email, telephone, meetings, contracts and documents sent for the delivery of services. It may also be obtained from public sources, such as Commercial Registry and Federal Revenue records, when required for the engagement.

6.3 Purposes and legal bases

PURPOSE	LEGAL BASIS (LGPD, ARTICLE 7)
Replying to enquiries and preparing proposals	Steps prior to a contract, at the data subject's request (item V)
Delivering the contracted services	Performance of contract (item V) and regular exercise of rights (item VI)
Meeting legal, regulatory and tax obligations	Compliance with legal or regulatory obligation (item II)
Representing clients before public bodies and regulators	Performance of contract (item V) and compliance with legal obligation (item II)
Keeping the website and systems secure	Legitimate interest (item IX)
Measuring website traffic and social media reach, in aggregated form, to improve content	Legitimate interest (item IX)
Sending institutional communications about WZ Governance services	Legitimate interest (item IX), with the option to unsubscribe at any time
Sending the newsletter to those who subscribed on the website	Consent (item I), given at the time of subscription and revocable at any time through the unsubscribe link
Assessing unsolicited CVs and proposals	Steps prior to a contract and legitimate interest (items V and IX)

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Where a purpose depends on consent, it will be requested clearly and specifically at the time of collection and may be withdrawn at any time through the channel indicated in section 8.

6.4 Sharing

WZ Governance does not sell, rent or transfer personal data. Data is shared only to the extent required for the purposes of this policy, with:

- **Technology providers:** website hosting, website traffic statistics, social media analytics tools, newsletter delivery platform (MailerLite), email service and cloud storage;
- **Partners involved in the engagement:** lawyers, accountants, auditors, translators and banks, always with the client's knowledge;
- **Public bodies and regulators:** such as the Commercial Registry, Federal Revenue, Central Bank of Brazil, INPI and notary offices, when required to deliver the contracted service;
- **The client's headquarters and group companies:** for reporting and approval of the work;
- **Authorities:** under legal, regulatory or court order.

Third parties that receive personal data must process it only for the stated purpose and with the same guarantees of confidentiality and security.

6.5 International transfer

As WZ Governance serves international groups, personal data may be transferred outside Brazil, especially to the client's headquarters and to technology providers with servers abroad, such as the website hosting services and the newsletter delivery platform.

Such transfers take place only under the conditions set out in article 33 of the LGPD, such as the performance of a contract at the data subject's request, the use of data protection contractual clauses or transfer to countries with an adequate level of protection.

6.6 Security

We apply the technical and administrative measures described in the Confidentiality and Information Security Policy, including corporate email with two factor authentication, devices protected by password and encryption, and access to data limited to those working on each engagement.

In the event of a security incident that may cause relevant risk or harm to data subjects, WZ Governance will notify the affected data subjects and the ANPD, within the deadlines and in the manner set out in the applicable regulations.

6.7 Retention and deletion

Personal data is kept only for as long as required for the purposes of this policy:

- **Enquiries that do not lead to an engagement:** deleted within 24 months of the last contact;
- **Data related to contracts and services:** kept during the contract and for the applicable legal, accounting and tax periods after it ends;
- **Unsolicited CVs and proposals:** kept for up to 12 months, unless deletion is requested earlier.

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- **Newsletter subscribers:** kept while the subscription is active; after unsubscribing, the email address is kept only on a suppression list, to ensure no further messages are sent.

Deletion requests: Once the relationship with WZ Governance has ended, there is no need to request deletion of personal data. At the end of the periods above, data is deleted using secure disposal methods or anonymized.

Anyone who sent a CV or proposal and does not want their data to remain stored may request deletion at any time at office@wzgovernance.com.

After the relationship with an employee ends, personal data is kept only for the period needed to meet legal and regulatory obligations and is then deleted using secure disposal methods or anonymized.

In other situations, deletion requests may be sent to office@wzgovernance.com with the subject "LGPD: deletion of personal data".

6.8 Data subject rights

Under article 18 of the LGPD, data subjects may request at any time:

- Confirmation that processing takes place and access to the data;
- Correction of incomplete, inaccurate or outdated data;
- Anonymization, blocking or deletion of unnecessary data or data processed in breach of the law;
- Portability of the data to another provider;
- Deletion of data processed on the basis of consent and withdrawal of that consent;
- Information on the entities with which the data has been shared;
- Objection to processing based on legitimate interest;
- Review of decisions made solely on the basis of automated processing.

Requests should be sent to office@wzgovernance.com and are answered within 15 days. We may ask for information to confirm the identity of the requester. Some data may need to be kept to meet legal obligations, which will be explained in the reply.

Data subjects may also file a complaint with the Brazilian Data Protection Authority (ANPD).

6.9 Institutional communications and newsletter

WZ Governance may send communications about its services to clients and professional contacts. Each communication offers an unsubscribe option, which may also be requested by email at any time.

The newsletter is sent only to those who subscribed on the website, with consent given in the subscription form itself, in the language of the page where the subscription was made. Unsubscribing is possible at any time through the link included in every message or by email to office@wzgovernance.com.

7 Responsibilities

RESPONSIBLE PARTY	DUTIES
Managing partner	Approve this policy, respond to data subjects and the ANPD, and ensure compliance with the rules set out here.

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RESPONSIBLE PARTY	DUTIES
Employees	Know and comply with this policy, access only the data needed for their work, keep it confidential even after the relationship ends, follow the information security rules, and report any incident or suspected breach to the managing partner immediately.
Partners and providers	Process the data received only for the stated purpose, with confidentiality and security, and report any incident without delay.

8 Contact and reporting

Questions, requests and complaints about this policy or about the processing of personal data should be sent to WZ Governance through the channel below, stating name, email and the details of the request.

- **Channel:** office@wzgovernance.com
- **Address:** Av. Paulista, 1636, 15th floor, Suite 4, Bela Vista, São Paulo/SP, Brazil, CEP 01310-200

Communications are handled confidentially, and there is no retaliation against anyone reporting in good faith.

9 Review

This policy is reviewed annually or whenever there is a change in the law, in the services or in the systems of WZ Governance. The current version is always available at www.wzgovernance.com.

10 Legal notice

WZ Governance is not responsible for the misuse or loss of personal data to which it has no access or control. It is also not responsible for the illegal and unauthorized use of such information resulting from the misuse or diversion of access credentials, or from negligent or malicious conduct arising from acts or omissions of the data subject or of anyone authorized on their behalf.

Version control

CODE	POL 001	VERSION	1.2
EFFECTIVE	October 2026	REVIEW	Annual
APPROVAL	Managing partner	CLASSIFICATION	Public

VERSION	DATE	DESCRIPTION OF CHANGE
1.0	October 2026	Initial issue
1.1	October 2026	Addition of website traffic statistics, social media reach and the newsletter
1.2	October 2026	Newsletter update: subscription without email confirmation

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