

PRIVACY POLICY

AGROMENTORIA

1. INTRODUCTION

Thank you for using Agromentoria, a company that aims to help and advise the rural producer and the agribusiness companies, through Digital Media! Your trust is important to us, and we are committed to protecting both your privacy and the security of your personal and business information shared with us. Thus, through this document, we make clear and transparent our Privacy Policy for use of Agromentoria's System/Software: <http://www.agromentoria.com.br>, as well as the services linked to them.

The Privacy Policy is our commitment to the people who interact with us, and has as its main objective to clarify how Agromentoria will treat and protect personal data collected, ensuring the privacy of its holders, in accordance with the laws in force, regulated by the laws nº 12.965/2014 (Brazilian Internet Civil Rights Framework) and nº 13.709/2018 (The Brazilian General Data Protection Act - which acronym in Portuguese is LGPD)

If you have any questions, please contact Agromentoria through the phone number (51) 981581100 or through the e-mail: contato@agromentoria.com.br, inserting as subject of the e-mail "Privacy Policy".

2. DEFINITIONS

CLIENT: individual or legal entity that has accepted the conditions of the Terms of Use for using the Agromentoria's Site, System or Software, as well as the individual or legal entity that has hired the services of *AGROMENTORIA SERVIÇOS E CONEXÕES DE NEGÓCIOS LTDA*, regularly registered in the CNPJ (Register of Corporate Taxpayers with the Brazilian Federal Revenue Service) under nº 41.475.323/0001-19, provider of agronomy and consulting services to agricultural and livestock activities (Dispensed *), or other contract for punctual service;

PERSONAL DATA CONTROLLER: is the natural or legal person, under public or private law, to whom all decisions about the processing of personal data are delegated.

PERSONAL DATA: any information about an identified or identifiable natural person. In this way, anonymized data will not be considered personal data.

SENSITIVE PERSONAL DATA: personal data concerning racial or ethnic origin, religious conviction, political opinion, membership of a labor union or of a religious, philosophical or political organization, data concerning health or sex life, genetic or biometric data when linked to a natural person;

LGPD: Law nº 13.709/2018 (the "General Data Protection Act" or "GDPA"), also known as the General Law of Data Protection;

PERSONAL DATA OPERATOR: is the natural or legal person, governed by public or private law, who carries out the processing of personal data on behalf of the controller.

AGROMENTORIA WEBSITE: internet location identified through the domain name of <http://www.agromentoria.com.br>;

THIRD-PARTY: any person or entity not belonging or part of the contractual relationship formalized between the Agromentoria and Users;

DATA PROCESSING: any operation carried out with personal data, such as those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of the information, modification, communication, transfer, dissemination or extraction;

USERS: Those who make use of the AGROMENTORIA System/software, including customers, partners or potential customers and visitors.

When this Policy mentions "AGROMENTORIA", "we", "us" or "our", as well as the grammatical variations of the first person plural, it refers to the company *AGROMENTORIA SERVIÇOS E CONEXÕES DE NEGÓCIOS LTDA*, regularly inscribed in the CNPJ (Register of Corporate Taxpayers with the Brazilian Federal Revenue Service) under nº 41.475.323/0001-19, which is the exclusive and legitimate owner of the *AGROMENTORIA* System, used to collect, store and manage the information provided by users, and holder of any and all rights related to it.

3. GENERAL INFORMATION

This Policy covers the Treatment that AGROMENTORIA performs of the information capable of identifying the individual. when he accesses and makes use of Agromentoria's Site and System. Agromentoria thus provides the appropriate and necessary technical information so that it can, in a prior, have knowledge and agree with this Policy.

In case the User or the Customer does not agree with this Privacy Policy, he/she should not use the services. Thus, what is established in this document must be read carefully and, in case of doubt, it is possible to contact AGROMENTORIA directly.

The contact with AGROMENTORIA's data protection officer should be done through the e-mail contato@agromentoria.com.br, inserting as subject of the e-mail "Privacy Policy".

Our services are mostly aimed at serving rural farmers and agribusiness companies. Thus, when we make them available due to a contract with a legal entity Customer, the Controller of the personal data of third parties, such as employees and related parties, inserted in the AGROMENTORIA System will be the Customer itself. In these cases, Agromentoria will act only as Operator of the processing of personal data, performing the processing on behalf of the Controller (the Customer) and in accordance with the guidelines transmitted by the Controller. This is the case, for example, of third-party data that is entered by the User in the AGROMENTORIA System for the purpose of analyzing the case.

Although in most cases we act as the Operator in the treatment of personal data, in some situations AGROMENTORIA acts as the Controller. This is the case of the collection of personal data of Customers who are individuals, representatives of Customers, legal entities, visitors to the Agromentoria Site or Users linked to individuals. In all these cases agromentria is the person to whom decisions regarding the processing of their personal data are responsible.

4. PERSONAL DATA PROCESSED

Initially, we inform you that when you fill out the registration form for "Work with Us" and/or provide the information to Agromentoria for case analysis and/or service contract, the user declares that the information is true and agrees with the processing of registration data as established in this Policy.

The amount and types of personal data collected vary depending on the nature of the relationship the personal data subject has with Agromentoria. We will collect different data if the owner is only a visitor of the site, is requesting a proposal to provide services or already making use of the contracted services, for example.

When a person accesses Agromentoria Site, it is possible that some data are collected automatically, through cookies, as well as that it provides some data directly, voluntarily filling out some information. Automatically, it is possible to collect the following data: information about the computers, smartphones or other devices that the user uses to access the platform, domain name of your internet access provider, IP protocol address used to connect to AGROMENTORIA System/software, browser type and version, operating system, crash data, average time spent and pages visited on the Agromentoria Site, pages or content viewed, ad searches, and pages accessed before or after using our site, access times, and other statistics relevant to the provision of service.

We also use cookies and other similar technologies such as web beacons, pixels, browser analysis tools, server logs, and mobile identifiers. In many cases, the information we collect using cookies and other tools is used only in a non-identifiable way, without reference to personal information.

When the Customer shows interest in hiring the Agromentoria services or the relationship with us, we collect certain personal data relating to the Customer himself or his representative or person related to him, such as: full name, e-mail, telephone, area of activity, address, and other personal data voluntarily provided by the holder through the "attach curriculum" option. Furthermore, if the channel chosen by the holder is through our customer service channel via instant messaging application or e-mail, the data voluntarily provided will also be collected.

When the Customer contracts Agromentoria's services, it is necessary to send us some information that can be from the Customer himself, when the Customer is an individual, or from his representative or related person when the Customer is a legal entity, such as: e-mail, full name, telephone, CPF/RG (National Insurance Number and Identity Card or another type of photo ID) and address, profession and income tax return.

Moreover, depending on the nature of the contracted services, it is possible that data may be collected regarding family members, employees, partners and their

dependents, suppliers, Customers' service providers or other third parties, such as: name, salary, PIS/PASEP (the unification of PIS - Social Integration Program- with PASEP -Public Servant Fund- occurred in 1975), banking and financial data, Income Tax receipt number, electoral title, lawsuit to which he is a party, information on contracted insurance, purchase and sale agreements, lease agreements, public deeds, among others necessary for the performance of the contracted service, which will be established at the time of contracting, through the Service Contract.

5. PURPOSES AND LEGAL BASES FOR TREATMENT

We always seek to maintain your privacy while using the services offered by Agromentoria online and/or in person.

When someone accesses Agromentoria Site it is possible to collect your data through cookies and similar tools indicated above, the purpose of the treatment of these data is to improve the User experience, in terms of performance and usability, targeting content to his needs and expectations. These treatments are supported under the LGPD law (the "General Data Protection Act" or "GDPA") based on art. 7, subsections V, VI and IX.

When the Customer shows interest in the contracting of Agromentoria Services, the personal data are collected to allow the beginning of the interaction with Agromentoria, so that he can have knowledge of which are the services offered by us, as well as making it possible to know better Agromentoria itself, giving continuity to the relationship. These treatments are supported in art. 7, clauses V and IX of the LGPD law (the "General Data Protection Act" or "GDPA")

When the Customer performs the hiring of Agromentoria services, essential personal data are collected and processed for the provision of services contracted by the Customer and for the use of Agromentoria System. These treatments are supported under the LGPD, based on art. 7, item V.

Services provided by Agromentoria include, as contracted, the procedural management of judicial or administrative assets. These treatments are supported under the terms of the LGPD law, based on art. 7, item VI.

In this sense, part of the data collected are registration data relating to the holder or linked to business data, data for the validation and verification of the veracity of the information provided, procedural and/or administrative data, financial data and part of it is data relating to the services, which are entered by the Customer in the continuity and execution of the services.

Without this information it is not possible to provide with excellence and in a secure manner the online or in-person advisory services offered by Agromentoria for the management of the rural producer or agribusiness companies

Personal data may be processed to provide the User or the Customer with monitoring and access to information about their relationship with Agromentoria or confirmation of the identification or veracity of the information received.

In addition, Agromentoria can process the personal data collected from the legal base of legitimate interest, art. 7, item IX of the LGPD, to:

- provide, understand, improve and develop Agromentoria Site;

- create and maintain a reliable and secure environment, as well as comply with our legal obligations and ensure the safety of users, Customers and those who interact with us, detecting and preventing fraud, spam, abuse, security incidents and other harmful activities;
- customize, evaluate, and improve advertising and marketing to send users promotional messages, newsletters, and other information that may be of interest to them based on their preferences;
- conduct economic research of national and international market aimed at agribusiness, better investment opportunities, fundraising, management and settlement of rural credit liabilities, and relevant opportunities for rural producers or agribusiness companies and related areas;
- conduct research and test resources under development and generate reports and indicators relating to field activities;
- use the information to offer services in a personalized way and to improve commercial and promotional initiatives, as well as sending out newsletters;
- manage the services provided, improve them and identify possible needs of users by sending e-mails or notification on the mobile device with alerts and communications related to the functions of the system, in order to allow the User to explore all its features, as well as with relevant information activities of the rural producer, such as climate/weather in the production region, investment opportunities, farm acquisition, auctions, among other types.

We also reserve the right to process your personal data when it is necessary for compliance with a legal or regulatory obligation (e.g. custody of information for compliance with Law No. 12,965, of April 23, 2014, also known as the Brazilian Internet Civil Rights Framework), for the regular exercise of rights in judicial, administrative or arbitral proceedings, for as long as necessary or on the base of other legal hypotheses provided for in the LGPD.

6.STORAGE AND SHARING OF PERSONAL DATA

We do not publicly disclose or share personal data with third parties unless necessary to fulfill the Customer's request, for our professional or legitimate needs, or as required or permitted by law.

The personal data processed by us will be stored for a reasonable and legitimate time, according to the purpose of each processing and the prescribed prescriptive and contractual deadlines. If the Customer or User wishes to have access to the specific storage periods for each data collected, they may ask us.

After the established deadline and the legal necessity, the personal data will be deleted using safe disposal methods and within the scope and technical limits of the activities, or used anonymously.

If requested, the data may be deleted before the internal deletion period set by us.

However, it may happen that data needs to be kept in our bank for reasons of exercising rights, complying with a law or court order, fraud prevention, credit protection

and other legitimate interests - if this is the case, we will inform you that the data whose deletion has been requested by you will not be deleted. In such cases, we may even withhold your information even if the account to which your data is linked is excluded.

We note that in providing our services, the use of data sub-processors, business partners and third-party services may also lead to the sharing of personal data that we process.

Personal data may be shared with payment providers, as well as some relevant information to enable the provision of services to Customers, and may be shared with government sites, public agencies, etc.

Any sharing of data will always be within the limits and purposes of our business described here.

We emphasize that we only use sub-processors that offer guarantees of compliance with the principles, rights of the owner and the data protection regime provided for in our national legislation, LGPD.

Furthermore, the personal data provided by our Customers may be shared with partner companies (accounting, law firm, farm automation, technology, and agricultural inputs), in case it is necessary for the execution of the contracted Services, according to the Consent of the Customer, through a specific contractual clause.

7. SUBJECT RIGHTS DIREITOS DOS TITULARES

The holder can exercise any of the rights described in this section with its data controller by sending an e-mail to contato@agromentoria.com.br, inserting as the subject of the e-mail "Privacy Policy".

Keep in mind that we may ask you to confirm your identity in advance for data security reasons.

We respect the data subjects' rights and when acting as controller we ensure that you can request this at any time:

- confirmation of the existence of processing of your personal data;
- access to your personal data processed by us;
- the correction of your incomplete, inaccurate or outdated personal data;
- the anonymization, blocking or deletion of your personal data considered unnecessary, excessive or processed in contravention of the provisions of the General Data Protection Law;
- the portability of personal data to another service provider or product, by express request, in accordance with the regulations of the national authority, respecting commercial and industrial secrets;
- the deletion of your personal data processed with your consent, except in cases in which the treatment was carried out on a legal base other than consent;
- information about which public or private entities we make shared use of data;
- information about the possibility of refusing to provide certain consents and about the consequences of refusal;

- revocation of consent.

If it is impossible to immediately adopt the measures indicated above, we will send a response to indicate the factual or legal reasons that prevent its immediate adoption, pursuant to art. 18, § 4 of the LGPD.

The User may ask us to correct incorrect or incomplete personal information.

We may retain some of your personal and business information as necessary for our legitimate rights and interests, such as detection, such as fraud prevention, and such as improving security in the Agromentoria System/software.

In addition, some copies of your information (for example, access records, insertion of the website Agromentoria the home page of the mobile device) may remain in our database, but are disassociated from personal identifiers.

If the Customer is the controller of your personal data or that of third-parties provided for the assessment of the case/provision of service, the above requests should be directed to him, and not to us.

8. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be revised and/or updated at any time. This document will always be available for consultation on this Website, through free and easy access.

Agromentoria reserves the right to promote improvements and updates that can change its structure or layout, as our convenience and need.

In case of doubts, suggestions and/or any other type of contact regarding this document, the User must send a message to the e-mail address contato@agromentoria.com.br.

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