



## PRIVACY POLICY



MAINTENANCE SOFTWARE



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EAM Sistemas de Informática Ltda and ENGEMAN Enterprise Asset Management Ltda (“ENGEMAN”) are committed to safeguarding the privacy and protecting the data of all users and visitors of the websites <https://engeman.com.br>, <https://engeman.com>, related subdomains and the mobile app name: Engeman Starter, available in [Apple Store](#) and [Google Play](#).

We have been doing this for a long time, even before the Law - LGPD (General Law on the Protection of Personal Data), with the utmost professionalism and zeal in our activities. And, proof of this statement is made through our old and continuous: **Integrity Program – ENGEMAN.**

This Privacy Policy has the purpose of showing respect and the highest transparency, care with users about the types of data that may eventually be collected, the reasons for their eventual collections, **which will only be essential**, and, when it occurs, the way they will receive their treatment. In particular, when such data belong to the classification of **personal data**, according to the LGPD - General Law on the Protection of Personal Data.

This privacy policy was prepared in accordance with the LGPD - General Law on the Protection of Personal Data (Law 13.709 / 2018). And so, out of concern for greater security for all customers, suppliers, business partners, in short, all users, purchasers of our services and products, the Privacy Policy instrument on screen, will undergo continuous changes and updates. And, they will always be available for your queries.

This **Privacy Policy** is presented as follows:

1. **Sources of personal data**
2. **Legal basis for data collection**
3. **Types of data collected**
4. **Rights of data subjects**
5. **Data storage period**
6. **Third party services**
7. **Security**
8. **Updates and adjustments to the privacy policy**
9. **Acceptance of data usage**

## 1. Sources of personal data

The minimum, essential quantity and type of information collected by ENGEMAN is made according to the use you make of our services/products, and in particular, about: personal data. And, therefore, with the express commercial purpose to: provide the requested services, deliver the purchased products, keep the customer informed about the status and delivery of orders, when necessary to coordinate with the commercial partners the delivery or availability of the purchased services, send communications about services products and, provide the best and closest commercial/professional relationship with all customers - ENGEMAN. This **Privacy Policy** applies especially to the **Personal Data** we collect and deal with customers and are carried out through the following sources:

**1.1 ENGEMAN Websites and Apps:** These are the sites and applications aimed at consumers, customers and business partners, and operated by ENGEMAN, including sites operated under their own domains/URL of ENGEMAN, applications for mobile devices and mini sites maintained on third party social networks. And then, as ENGEMAN is the operator, and or even the controller in the treatment of personal data, it seeks to observe and respect the Law - LGPD, as evidenced by this **privacy policy**, through its instruments: communication channel for doubts, complaints, and/or suggestions regarding personal data processing, the person in charge of protecting personal data is always active, commonly known as DPO (Data Privacy Officer), among the other existing ones.

**1.2 Interaction Data:** Data from interactions records with the websites and applications and information about the contacts that are made with customers/users, regardless of the type of user/customer who made the contact. Such information also includes content/data when carried out: downloads (are downloaded) from pages (websites) and interactions via e-mail correspondence, such as openings and clicks. And there are situations in which ENGEMAN also receives data on interactions with ads on: third party sites/social networks.

The data and information mentioned above are treated as confidential, will only be treated for the commercial/professional purposes described here and, previously authorized by users/customers, in short, their grantors, by **express consent**.

In accordance with the legislation, when the aforementioned consent occurs, the grantor may, by means of a communication, request at any time its edition, revocation (cancellation), destruction

## **2. Legal basis for data collection**

Only means authorized by law are used as a legal basis for the collection of personal data by us, and are therefore listed in art.7 of the Law on screen, LGPD (General Law on the Protection of Personal Data). Thus, the legal bases used under this privacy policy will adjust according to the purpose presented for the collection / processing of personal data.

ENGEMAN, in compliance with all legislation, conducts business negotiations and deals with people who have their full capabilities for the acts of civil life, and/or are duly assisted/represented, according to the relevant legislation.

### **3. Types of data collected**

#### **3.1. Site visitors**

If the user happens to access the ENGEMAN websites, data may be collected, in particular personal navigation data, through an identifier cookie in the user's browser using third-party software and applications such as Google Analytics, RD Station and Facebook.

However, we make it clear that such data collections will only be carried out with prior/express consent and strict commercial purpose addressed here, with the users/suppliers of such data. Thus, it is reinforced that the data above can be used in order to provide a better business experience for the benefit of users (customers / suppliers / business partners).

This way we explain that Cookies are identifiers transferred to the user's browser or device, which allow the recognition of the browser or device used. They tell you how and when pages are visited, and how many people have accessed a particular page or website. This data may be automatically collected and stored in log files when the user visits the website on screen.

And, due to the zeal and great respect of this company, the user before the navigation above can choose to limit, refuse or even disable the cookies mentioned through the settings of the browser itself or through the pop-up displayed on the pages of ENGEMAN websites. When making the user the preferences above, we inform that some areas of the website may not work perfectly because they depend on certain pieces of information.

It should also be noted that this Privacy Policy - ENGEMAN, as it has no obligations regarding cookies/use of third-party cookies, therefore, is not responsible for the privacy policies and practices of others. Thus, we clarify that cookies inserted by third parties may eventually continue to monitor the user's activities online even after leaving ENGEMAN's services/virtual environment/website.

#### **3.2. Leads from ENGEMAN Websites and Services**

If the user interacts with the ENGEMAN materials and content, in addition to the navigation data mentioned above, visit data may be collected on the pages/websites, and other information that the user may choose/consent to share through interactions with forms, Landing Pages and e-mails.

For contracting services and/or products - ENGEMAN, the following data may be collected:

- contact details (name, email and phone);
- professional profile data (job title, company, company segment, number of company employees);
- location data (country, state and city);
- data for marketing purposes (preferences and information about maintenance management).

However, with the exclusive purpose and respect, in the most restricted, necessary way possible, to undertake the commercial relationship on screen, sale and provision of services to users / customers.

In this context, we explain that in order to offer content and commercial materials directed to the interests of the user/customer, it may be necessary to cross-check data that may be collected. Thus, ENGEMAN guarantees that when such a situation of data crossing occurs, it will never be done in a discriminatory way, respecting all users' rights and freedoms.

In this way, the user can at any time, as permitted by the Law - LGPD, request the identification, change or removal (elimination) of his/her personal data, and of such data processing permissions. If the user/customer/interested person is sufficient when he/she wishes to identify/edit or even delete his/her personal data, which he/she may have granted, he/she may contact ENGEMAN and make the request accordingly in the following communication/service channel: [paulo.silva@engeman.com.br](mailto:paulo.silva@engeman.com.br) / (37) 3249-2716. For which he/she will be served in the best way and in the shortest possible time, by the **person in charge / DPO** (Data Privacy Officer) responsible, **Mr. Paulo César da Silva**.

The collected data may be used to:

- Send by e-mail the material requested when filling out the form;
- Send by e-mail necessary information for activating and using the Engeman Starter application on mobile devices;
- Send Newsletters (related to Maintenance and Technology Management topics - ENGEMAN);
- Communication about products, services, promotions, news, updates, and other subjects, directed to the interests and other information collected from users under services/products - ENGEMAN;
- ENGEMAN employees may eventually contact you via email or phone to present products and services. But, through our privacy policy, they will respect this policy and in particular Law No. 13.709 / 2018 - LGPD - General Law on the Protection of Personal Data

Thus, the user will be able to request to unsubscribe from the e-mails that have registered/subscribed at any time in the lower bar of the e-mails received or, then, contact ENGEMAN through the service/communication channel: [paulo.silva@engeman.com.br](mailto:paulo.silva@engeman.com.br) / (37) 3249-2716

#### **4. Rights of holders of personal data**

Holders of personal data under Law No. 13,709 / 2020 - General Law on the Protection of Personal Data (LGPD), may exercise their rights, in accordance with Article 18 thereof, through:

I - confirmation of the existence of treatment;

II - access to data;

III - correction of incomplete, inaccurate or outdated data;

IV - anonymization, blocking or elimination of unnecessary, excessive or treated data that does not comply with the provisions of this Law;

V - data portability to another service or product supplier, upon express request, in accordance with the regulations of the national authority, subject to commercial and industrial secrets;

VI - elimination of personal data processed with the consent of the holder;

VII - information from public and private entities with which the controller made shared use of data;

VIII - information on the possibility of not providing consent and on the consequences of the refusal;

IX - revocation of consent.”

Should the user request information about his/her personal data, it may be necessary to request additional specific information to help confirm his/her identity and thus guarantee his/her right of access or to exercise his/her other rights. This will then be a security measure that will aim to ensure that personal data is not disclosed to any unauthorized person.

Confirmation of the existence or not, of access/treatment or not of personal data of the requesting holders, will be provided upon the request from him/her, in a clear/objective way, in a simplified format, immediately or by a clear and complete declaration, to be provided within up to **15 (fifteen) days**, according to article 19, item II, of the Law - LGPD, counted from the date of the effective request of the holder.

## **5. Period of storage of personal data**

The personal data of users and visitors may be stored, but when they are stored (processed) they will be stored only and for the period necessary for the provision of the service or the fulfillment of the purposes provided for in this instrument, as provided in item I Article 15 of Law 13.709 / 18.

However, we inform that if there is **special legislation**, and, therefore, express determination of other special legislation in a different period for treatment, in particular, storage of personal data, it will be analyzed and respected.

The data may be removed or anonymized at the express and registered request of the holder, except in the contrary cases provided for by law.



Furthermore, the personal data of the holders may be preserved after the end of their treatment in the following cases provided for in article 16 of the aforementioned Law - LGPD:

- I - compliance with legal or regulatory obligations by the controller;
- II - study by a research body, guaranteeing, whenever possible, the anonymization of personal data;
- III - transfer to a third party, provided that the data processing requirements provided for in this Law are respected;
- IV - exclusive use of the controller, being forbidden to access it by a third party, and provided the data is anonymized.

## **6. Third Party Services**

Some third-party suppliers hired by ENGEMAN may use information from the users/owners of the data on screen, but, to the extent necessary to allow them to perform the services provided and also deliver the purchased products. For such suppliers, it is recommended that they consult their own privacy policies for a better understanding of the way in which personal information will be used by them.

Personal data of users of ENGEMAN's websites may be shared with suppliers RD Gestão e Sistemas S.A./ RD Station Inc. (CNPJ 13.021.784 / 0001-86), Google Brasil Internet Ltda. (CNPJ 06.990.590 / 0001-23), Facebook Serviços Online Do Brasil Ltda. (CNPJ 13.347.016 / 0001-17) and Yahoo! do Brasil Internet Ltda. (CNPJ 02.967.773 / 0001-77).

Suppliers can be located or have facilities located in different countries. Under these conditions, the personal data that is transferred may be subject to the laws of jurisdictions in which the service provider or its facilities are located.

Thus, when there are necessary demands for the transfer/sharing of personal data **abroad**, in short, countries outside Brazil, especially via the internet (cloud computing), in these cases, the data are treated in accordance with the Law -

LGPD (General Law on the Protection of Personal Data) and other legislation on the protection of personal data, internationally, of each country.

When accessing ENGEMAN's services and providing their information, the user/holder will give his/her express consent for the processing, transfer and storage of this information to other countries.

Upon being and being redirected to a third-party application or website, the user/holder will no longer be governed by this Privacy Policy, as it will no longer be under our control obligation. Therefore, ENGEMAN is not responsible for the privacy practices of other sites and encourages the reading of the privacy statements of the suppliers mentioned here.

## **7. Security (Protection)**

The privacy of the user/holder, as well as of the personal data eventually collected/processed, will be guaranteed through security measures and prevention against the improper access of third parties to this information, following strict standards of security and confidentiality, namely: physical protection and asset logic, encryption, access management, adherence to secure software development and internal compliance policies.

Even so, despite all efforts, no transmission/sharing of personal data via the Internet or other public or private networks is completely secure. Therefore, there will be no maximum guarantee that this information will not be unduly intercepted by unauthorized personnel and without limitation through the action of hackers. Thus, ENGEMAN will not be responsible for the occurrence of any intersection, access or unauthorized use of the data as above, nor for any type of direct, indirect, moral damage and lost profit suffered by users/owners.

## **8. Changes to the Privacy Policy**

This Privacy Policy as a measure of care and security will suffer over time, its updates. Therefore, we recommend that you periodically consult this page and the Privacy Policy so that you, the holder of personal data, have knowledge about them.

## **9. Specific and express acceptance of personal data**

Users and visitors of ENGEMAN websites and applications acknowledge and agree that the collection/treatment and use of personal data mentioned in this instrument does not constitute any violation of their rights to privacy and confidentiality or any other right related to the protection of personal data. Our users are aware that their privacy rights are independent and not to be confused with intellectual property rights, image rights, rights to honor and reputation and other personality rights of the data subject, and that, therefore, not always the information that you provide to ENGEMAN will be protected by such rights.

This instrument does not revoke or replace other instruments dealing with confidentiality and privacy agreed directly between the parties, due to the signing of a partnership or any other commercial relationship.

When providing/granting personal data, in particular, through our websites and applications, the user/holder will automatically agree to the collection, use, storage and treatment of their personal data, under the terms described here.

In case of doubts or need for further clarification, the user/holder must use the following service/communication channel [paulo.silva@engeman.com.br](mailto:paulo.silva@engeman.com.br) / (37) 3249-2716.

**Legislation.** This **Privacy Policy** will be governed, interpreted and executed in accordance with the Laws of the Federative Republic of Brazil, especially by Law No. 13.709 / 2018 - **LGPD (General Law on the Protection of Personal Data)**, with respect and observation in what is mandatory, to Laws of other states/countries.