



# PRIVACY POLICY

## INDEX

Index.....	1
1. Our commitment to protecting your data .....	2
2. Types of personal data collected and how to collect it.....	2
3. How we use cookies .....	4
4. Access to other websites via hyperlink.....	5
5. The basis for processing personal data.....	5
6. Marketing.....	6
7. Who will we share the data with .....	6
8. Personal data of third parties provided to us .....	7
9. How we keep data secure .....	8
10. Retention of collected information .....	9
11. Transfer of personal data abroad .....	9
12. Your Rights.....	9
13. Updates to this policy .....	12
14. Legislation and forum .....	12
15. Contact us .....	13

Reviewed by: Luiz Francisco França Borges	Checked by: Heliara Lopes do Nascimento	Approved by: Diego Diniz Sandrini
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## 1. OUR COMMITMENT TO PROTECTING YOUR DATA

ALS Limited and its associated entities ("the ALS Group", "we", "us" or "the Company") are committed to protecting your privacy and to collecting and processing, fairly, lawfully and in a transparent manner, all Personal Data it receives. This Policy describes how the ALS Group collects, processes and manages Personal Data.

For the purposes of this Policy, "Personal Data" means information that, together or separately, allows the identification of a person, directly or indirectly, as an individual.

## 2. TYPES OF PERSONAL DATA COLLECTED AND HOW TO COLLECT IT

The ALS Group collects Personal Data in a transparent manner from various people and in various ways for its commercial and study purposes. The Personal Data we collect may include a person's name, gender, postal or home address, job title, date of birth, photographic image, email address, telephone number, mobile number, business interests, academic qualifications and experience, professional memberships and associations, bank account details and service preferences.

Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health status, genetic, biometric and/or phenotypic information, sexual orientation or criminal convictions or offenses is sometimes collected if the individual has made this information available to us or has otherwise consented to its collection, or so that we can comply with our legal and regulatory obligations.

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Personal Data is collected when an individual calls or writes to us; visits one of our facilities or offices; consults us about our services or when we provide services; offers or provides services to us; interacts with our websites; fills in the registration form on our website in order to apply for our studies and researches or to receive information about our services; consults us about or applies for a position in the company; and works for us, with us or on our behalf. Personal Data may also be collected from third party sources, such as government bodies, credit agencies or from publicly available records or information sources.

Some data is collected automatically, such as: characteristics of the access device, browser, IP (with date and time), origin of the IP, information on clicks, pages accessed, the next pages accessed after leaving the pages, or any search term typed into the sites or in reference to them, among others. For such collection, we will use some standard technologies, such as cookies, pixel tags, beacons and local shared objects, which are used with the purpose of improving the Data Holder's browsing experience on the pages, according to their habits and preferences.

It is possible to disable, through the settings of your Internet browser, the automatic information collection by some technologies, such as cookies and caches, as well as our own website, especially as for cookies. However, the Data Subject must be aware that, if these technologies are disabled, some resources provided by the website that depend on the processing of the aforementioned data may not correctly work.

Furthermore, we promote satisfaction and preference studies, collecting information and opinions that help us to better understand their preferences, evaluate the quality and their impressions of our services, as well as for statistical and advertising purposes.

We clarify that your information may also be shared with companies that provide the technological and operational infrastructure necessary for our activities, such as payment intermediaries and information storage service providers.

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The Data Holder may request the deletion of their collected data [privacidade\\_investiga@alsglobal.com](mailto:privacidade_investiga@alsglobal.com). We will make the effort to answer you in the shortest notice possible, respecting the storage deadlines established by law.

**NOTE: Legal Basis:** In these cases, the data processing is authorized by item I of article 7 of Law No. 13,709/2018, the General Data Protection Law ("General Data Protection Law - GDPR")

### 3. HOW WE USE COOKIES

Cookies are files or information that may be stored on your device when you visit our website. In general, a cookie contains the name of the website that generated it, their life span and value, which is randomly generated.

We use cookies to improve your experience when interacting with our websites, as well as to compile information about navigation on our pages, helping us to improve their structures and content.

After you, the Data Holder, accept and agree to our Privacy Policy, made available on our websites, we will store a cookie on your device to remember this for the next session. Cookies can be used to make our websites work as expected; so that you don't have to log in every time you visit a particular section of the website; to remember your individual settings during and between visits to the websites; and to improve the speed and security of our websites.

At any time, the Data Subject may revoke their consent by deleting cookies from the pages of our website, and may do so through their preferred browser settings.

For more information on how to proceed in relation to the management of cookies in the browsers, see:

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- Internet Explorer: <https://support.microsoft.com/pt-br/help/17442/windows-internetexplorer-delete-manage-cookies>
- Mozilla Firefox: <https://support.mozilla.org/pt-BR/kb/ative-e-desative-os-cookies-queos-sites-usam>
- Google Chrome:  
<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=pt-BR>
- Safari: <https://support.apple.com/pt-br/guide/safari/sfri11471/mac>

## 4. ACCESS TO OTHER WEBSITES VIA HYPERLINK

ALS Group websites provide access to other websites through hyperlinks that are owned and operated by third parties that are not subject to this Policy. Since we have no control over these sites, you must read the privacy policy of each such site before visiting it to determine whether that site's privacy policy is acceptable to you.

## 5. THE BASIS FOR PROCESSING PERSONAL DATA

Personal Data is only processed where there is a lawful reason to do so, including:

- I. You have given us your consent.
- II. To perform a contract we have with you.

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- III. For our legitimate industry interests, including carrying out due diligence; monitor compliance with our policies and standards; and to protect and maintain security in our facilities and systems.
- IV. To comply with our legal and regulatory obligations.
- V. Need to adapt the services that are the subject of its activities;
- VI. To protect our interests in any type of conflict;
- VII. Through judicial decision or request from competent authority.

Personal Data may also be processed for related or support purposes for which such processing can reasonably be expected.

## **6. MARKETING**

Personal Data is not used for advertising purposes in countries where authorization for this purpose is required, unless such authorization has been granted to us. You can opt out of receiving marketing communications from us at any time via email [privacidade\\_investiga@alsglobal.com](mailto:privacidade_investiga@alsglobal.com).

## **7. WHO WILL WE SHARE THE DATA WITH**

Personal Data may be shared:

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- I. Within the ALS Group to provide you with the services you have requested and so that we can manage the relationship we have with you. Employees at ALS Group must maintain the confidentiality and security of Personal Data and may only process Personal Data in accordance with this Policy.
- II. With third parties, such as our suppliers and service providers, where we have engaged them to provide services on our behalf or where we have a legal reason or obligation to do so, for example to comply with a court order or a request from one of our regulators. When we disclose Personal Data to third parties who provide services on our behalf, we require the third parties to treat the Personal Data as necessary under this Privacy Policy and in accordance with applicable data protection and privacy laws.
- III. To protect our interests in any type of conflict, including Legitimate Interest, Compliance with legal obligations and legal actions;
- IV. Through judicial order or by the request of administration authorities that hold legal competence for their request.

## **8. PERSONAL DATA OF THIRD PARTIES PROVIDED TO US**

When you provide us with Personal Data about another person (for example, one of your employees, someone you do business with or a family member), you must ensure that you are authorized to provide that information and that we can collect, process and manage that Data Personal as set out in this Policy.

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## 9. HOW WE KEEP DATA SECURE

ALS Group implements appropriate industry-standard administrative, technical, organizational and physical safeguards intended to protect Personal Data against unauthorized or unlawful processing, as well as against accidental loss, misuse, unlawful destruction or deletion, unauthorized alteration or disclosure.

The information collected is stored on our own servers or hired by us and, therefore, we adopt the following precautions, in compliance with the guidelines on security standards established in Decree No. 8,771/2016, such as:

- I. Use of standard and market methods to encrypt and anonymize collected data;
- II. Protection against non-authorized access to its systems;
- III. Authorization for access by previously established people to the location where the collected information is stored; Those who come into contact with the information must undertake to maintain absolute confidentiality. Breach of confidentiality will result in civil liability and the person in charge will be held responsible in accordance with Brazilian legislation;
- IV. Maintenance of inventory indicating the moment, duration, identity of the staff member, and of the person in charge of the access and the object file, based on the records of connection and applications access, as determined in article 13 of Decree No. 8,771/2016.

**NOTE:** We adopts the best efforts in the sense of preserving the privacy of the data of the Data Subject. However, no website is completely secure and we cannot fully guarantee that all information that passes through the pages will not be the target of unauthorized access perpetrated through methods designed to obtain information improperly. For this reason, we encourage the Data Subjects to take the appropriate measures to protect themselves, such as, for example, keeping confidential all the names of Data Subjects and passwords.

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## **10. RETENTION OF COLLECTED INFORMATION**

The information collected through the pages will be automatically deleted from their servers when they are no longer useful for the purposes for which they were collected, or when the Data Subject requests the deletion of their personal data.

Without prejudice, the information may be kept for compliance with legal or regulatory obligations, transfer to third parties - provided that the data processing requirements are respected - and for our exclusive use, with access by third parties prohibited, provided that it is anonymized or de-characterized in the case of images.

## **11. TRANSFER OF PERSONAL DATA ABROAD**

As we are a global organization, if necessary, Personal Data may be transferred abroad for the purpose for which you granted it to us and in accordance with this Policy.

By providing Personal Data, you agree and consent to your Personal Data being transferred to another country. When transferring Personal Data abroad, appropriate safeguards are implemented to protect your Personal Data.

## **12. YOUR RIGHTS**

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In compliance with applicable regulations, with regard to the processing of personal data, we respect and guarantee the Data Holder the possibility of submitting requests based on the following rights:

- I. The confirmation of existence of the processing.
- II. The access to the data.
- III. The correction of incomplete, incorrect or non-updated data.
- IV. The anonymization, blocking or deletion of unnecessary and excessive data or data processed in non-compliance.
- V. The portability of their data to another service or product supplier, through expressed requested by the Data Subject.
- VI. The elimination of processed data with the consent of the Data Subject.
- VII. Obtaining information about the public or private entities with which we share your data;
- VIII. The information on the possibility of not supplying their consent, as well as being informed on the consequences, in case of rejection.
- IX. The revoke of the consent.

The Data Subject can practice their rights through a written communication sent to the email: [privacidade\\_investiga@alsglobal.com](mailto:privacidade_investiga@alsglobal.com), specifying:

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1. Full Name or Company Name;
2. CPF Number (Registration of Natural Persons of the Federal Revenue Office of Brazil) or Taxpayer ID (National Registration of Corporate Entity, of the Federal Revenue Office of Brazil);
3. Email address of the Data Subject and, if it is the case, their representative;
4. Right you wish to exercise regarding your data;
5. All documentation that may prove or justify the practice of the right.

The Data Subject will be informed in case of rectification or deletion of their data.

If you need any assistance to exercise your rights, the Data Subject can contact us, as per the guidelines in this Policy.

The Data Subject is aware that the exclusion of essential information for participation in our studies and research will result in the termination of their registration, with consequent exclusion from any activity in which they are participating or could participate in the future.

The ALS Group also recognizes the right of an individual to make a complaint if they have a concern regarding our processing of their Personal Data.

If you intend to carry out any of the above procedures, please consult the Contact Us section of this Policy. Requests will be responded to within the time required by applicable data protection and privacy laws or within a reasonable period of time.

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If you are not satisfied with the way we handle your request or our treatment of your Personal Data, you can contact the relevant privacy regulatory or supervisory authority to make a complaint.

We will make every effort to fulfill such requests in the shortest possible time. However, even in the case of a deletion request, the minimum storage period for the Data Subject's information, determined by Brazilian legislation, will be respected. The laws of grounding for the time of storage are:

Consumer Defense Code (5 years after the end of the relationship), Article 15 of the Civil Mark of the Internet (6 months for the digital identification data) and Article 7 of CFM Resolution (Federal Medicine Council) CFM RESOLUTION 1821/2007, which determines that the storage of medical data is permanent.

## **13. UPDATES TO THIS POLICY**

Updates to this Privacy Policy may be developed periodically to reflect any changes to the way we collect, process or manage Personal Data. Updates will be published on [www.alsglobal.com](http://www.alsglobal.com) and on the ALS Group Intranet, with updates coming into effect from the moment of publication.

## **14. LEGISLATION AND FORUM**

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This Policy is governed, interpreted and executed according to the Laws of the Federative Republic of Brazil, especially Law No.. 13,709/2018, regardless of the Laws of other states or Countries, being competent the jurisdiction of domicile of the Holder of Data, to settle any doubts due to this document.

## 15. CONTACT US

If you have questions or concerns about our Privacy Policy, please contact us at:

- Link Talk to Us at [www.alsglobal.com](http://www.alsglobal.com)
- Sending and email to [privacidade\\_investiga@alsglobal.com](mailto:privacidade_investiga@alsglobal.com)
- Or write to us at:  
Person in charge of privacy  
ALS Limited  
PO Box 66  
Everton Park QLD 4053  
Australia
- **Name of the Data Protection Officer (DPO):** Heliara Lopes do Nascimento.

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