



PRIVACY POLICY

LGPD/GDPR COMPLIANCE

REVIEW 02/11/2025

OUR PRIVACY POLICY WITH OUR CUSTOMERS

SPEEDSERVER website hosting, the name of the website hosting service of Nasca Tecnologia, Informática, Comunicações e Serviços Ltda., is fully committed to ensuring the transparency, privacy and security of our customers/users' data, which is why we detail our privacy policy below.

1. WHO WE ARE

1.1. SPEEDSERVER is a company that offers services and solutions in Cloud Computing, Virtual Data Center, Website Hosting, Web Services and Data Center Services.

2. IMPORTANT DEFINITIONS

2.1. The “General Personal Data Protection Law” is usually referred to as LGPD, published as Law No. 13,709/2018, and is the Brazilian law that regulates the processing of personal data by private and public organizations, online or offline. With the aim of protecting the fundamental rights of freedom and privacy and the free development of the natural person's personality, according to art. 1st of the LGPD.

2.2. Below we present some important concepts so that you can properly understand this policy, in accordance with art. 5 of the LGPD:





2.2.1. Personal data: information related to an identified or identifiable natural person;

2.2.2. Sensitive personal data: personal data about racial or ethnic origin, religious beliefs, political opinions, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data, when linked to a natural person;

2.2.3. Anonymized data: data relating to a data subject that cannot be identified, considering the use of reasonable and available technical means at the time of processing;

2.2.4. Database: structured set of personal data, established in one or more locations, in electronic or physical support;

2.2.5. Data subject: natural person to whom the personal data that are the object of processing refer;

2.2.6. Controller: natural or legal person, under public or private law, responsible for decisions regarding the processing of personal data;

2.2.7. Operator: a natural or legal person, under public or private law, who processes personal data on behalf of the controller;

2.2.8. Person in charge: a person appointed by the controller and operator to act as a communication channel between the controller, data subjects and the National Data Protection Authority (ANPD);





2.2.9. Processing agents: the controller and the operator;

2.2.10. Processing: any operation performed with personal data, such as those related to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction;

2.2.11. Anonymization: use of reasonable technical means available at the time of processing, through which data loses the possibility of association, directly or indirectly, with an individual;

2.2.12. Consent: free, informed and unequivocal expression by which the data subject agrees to the processing of his/her personal data for a specific purpose;

2.2.13. Blocking: temporary suspension of any processing operation, by means of storage of the personal data or the database;

2.2.14. Deletion: exclusion of data or a set of data stored in a database, regardless of the procedure used;

2.2.15. International transfer of data: transfer of personal data to a foreign country or international organization of which the country is a member;

2.2.16. Shared use of data: communication, dissemination, international transfer, interconnection of personal data or shared processing of personal databases by agencies and public entities





in compliance with their legal powers, or between these and private entities, reciprocally, with specific authorization, for one or more types of processing permitted by these public entities, or between private entities;

2.2.17. National authority: public administration body responsible for overseeing, implementing and monitoring compliance with this Law throughout the national territory.

2.3. In addition to the legal concepts related to the LGPD, it is necessary to present the concept of interested parties and those related to this privacy policy:

2.3.1. Customers: individuals or legal entities who use/acquire SPEEDSERVER's services and products as the final recipient thereof;

2.3.2. Customers of our customers: individuals or legal entities who use/acquire our customers' services or products;

2.3.3. Users: any person who uses our websites, products and services;

3. WHAT TYPE OF DATA DO WE COLLECT?

3.1. ABOUT CUSTOMERS

3.1.1. When a customer uses or interacts with SPEEDSERVER services and products, we collect their personal data, which are divided into three categories.

3.1.2. Data provided by the customer: when the customer hires us, we use





or interact with the services, or communicate with us in any way, you may provide us with certain data, such as:

- Professional contact information, such as your name, title, company, location, telephone number and email address;
- Marketing preferences;
- Account credentials, such as your email address, username and password;
- Payment information, such as credit card details, bank details and billing address;
- Data related to technical support and troubleshooting. This data includes ticketing data, such as the type of product or service related to your request for help, contact or authentication data and the content of your communications with us, including telephone recordings.

3.1.3. Data collected automatically: when you use our services or products, we may automatically collect and store data, such data includes:

- Data from devices that you use to access the services and products, such as your IP address, operating system, geolocation information and device identifier.
- Log data, such as your IP address and your activities on the services and/or products (such as the date and time associated with your use), the pages and files viewed, searches and other actions performed (such as which features you used).
- Navigation data, i.e. data about how you used and interacted with our services and/or products, which may include the dates and your browsing activities. We also collect information





about the performance of services and products, including metrics related to sending emails and other types of communication that the customer sends through the services and/or products;

3.1.4. Data collected from other sources: we may collect data from other sources, such as public databases, data from public profiles on social networks and credit protection entities.

3.2. FROM OUR CUSTOMERS' CUSTOMERS

3.2.1. Below we provide more details about the collection of data from “our customers' customers”, when we act as data controllers.

3.2.2. It is important to highlight that as a general rule we act as the operator of the personal data of “our customers' customers”, therefore, we are not responsible for the privacy or security practices of our Customers. To find out how our customers treat their own customers' personal data, it is necessary to consult their privacy policy.

3.2.3. Data provided by our customers: Our customers may provide us with their own customers' personal data through our services and products. When, for example, a Customer uploads their contact database to use our email marketing services, when you sign up for a newsletter from our Customer, or when a “customer of our customer” makes a purchase in the online store, our Customer may provide us with certain information such as their name, email address, telephone number or payment details.





3.2.4. Data collected automatically: when the “customer of our customer” interacts with the services and/or products purchased by our Customer, such as when you interact with a marketing communication, browse our Customer’s website or make a purchase in our Customer’s online store, we may collect information about your device and your activities.

This data includes:

- Data from the devices that the “customer of our customer” uses to access the services and products, such as your IP address, operating system, geolocation information and device identifier.
- Navigation data, that is, data about how the “customer of our customer” used and interacted with our services and/or products, which may include the dates and your browsing activities. We also collect information about the performance of the services and products, including metrics related to sending emails and other types of communication that the customer sends through the services and/or products;

3.2.5. Data collected from other sources: we may collect data from other sources, such as public databases, data from public profiles on social networks and credit protection companies.

3.3. USERS

3.3.1. Below we detail the data we collect from users who visit our websites;

3.3.2. Data provided by the user: our websites provide various ways in which you can contact us. The user may provide us with personal data, for example, when





expresses interest in obtaining more information about our products and services, participates in surveys, signs up for our newsletter, downloads informative content or otherwise contacts us.

This data includes:

- Professional contact details, such as your name, title, company, location, telephone number and email address;
- Area of activity and interests;
- Nature of your communication with us;
- Marketing preferences;
- Any other information you choose to provide to us.

3.3.3. Automatically collected data: when you use our websites, we may automatically collect and store data.

This data includes:

- Data from the device that the user uses to access the services and products, such as its IP address, operating system, geolocation information and device identifier.
- Navigation data, i.e. data about how you use and interact with our services and/or products, which may include the dates on which you used the services and/or products and your navigation activities, including, for example, your interaction with our informational materials. We also collect information about the performance of the services, including metrics related to the sending of emails and other types of communication that you send through the services.





4. HOW THIS DATA IS USED

4.1. The data collected or received is used for the following purposes:

4.1.1. To fulfill our contractual obligations with our customer. This includes creating and managing accounts that the customer may have with us, verifying their identity, collecting amounts due from the customer, providing, personalizing and improving our services;

4.1.2. To notify our customers about any changes to our products and services;

4.1.3. To reinforce our security and protection procedures, aiming to provide a safer and more effective service.

4.1.4. To carry out internal operations, including support, troubleshooting, data analysis, testing, research and statistics;

4.1.5. To provide information about other services and/or products that we offer similar to those already contracted by our customers;

4.1.6. Evaluate or understand the effectiveness of the advertising we serve, in order to provide relevant advertising to our customers and users;

4.1.7. Manage risks and detect, prevent and/or remedy fraud or other potentially illegal or prohibited activities, as well as violations of applicable policies, contracts or terms of use;

4.1.8. As necessary, to establish, exercise and defend rights in judicial, administrative or arbitration proceedings;





4.1.9. Comply with legal or regulatory obligations, or as required in a legal proceeding, by any law enforcement or government agency with jurisdiction, or claiming to have jurisdiction over SPEEDSERVER;

4.1.10. For other purposes for which we provide specific notice at the time of collection, or as otherwise authorized or required by law;

4.1.11. Provide, personalize and improve our services, products and websites;

4.1.12. Develop marketing strategies for our customers, so that they can offer relevant advertising to their own customers.

4.1.13. Proceed with payment requests made by “customers of our customers” in payment intermediation transactions.

4.1.14. Process transactions and manage your online accounts;

4.1.15. Send marketing communications and recommendations of products or services offered by SPEEDSERVER, in accordance with your marketing preferences.

5. DATA SHARING

5.1. We may share the personal data collected with other companies in our customers' economic group, with third parties and business partners, so that the provision of our services is viable.





5.2. This sharing, if it occurs, observes the following criteria and purposes:

5.2.1. **WORKSPACE SERVICES Group Companies:** WORKSPACE SERVICES Group companies may share among themselves the personal data collected from the provision of services in order to operate, execute, improve, understand, personalize, support, advertise our services and prevent fraud.

5.2.2. **Credit protection companies:** We may share your registration data with entities focused on reducing credit risk and protecting companies and individuals against fraud, in order to validate the information provided;

5.2.3. **Regulatory bodies, judicial or administrative authorities:** we may share your personal information to provide the competent authorities with all the information they request regarding the Holder and the operations carried out by him/her on the websites. Additionally, we may share your personal data with public authorities or private entities to combat fraud and abuse in the use of the services, to investigate suspected violations of the law, or to combat any other suspected non-compliance with our policies and agreements.

5.2.4. **Third-party service providers:** We work with third-party service providers to help us operate, perform, improve, understand, customize, support, and advertise our services. When we share data with third-party service providers, we require that they use your data in accordance with our instructions and terms or with your express consent, where applicable.





5.2.5. Transfer of assets: If a company or business unit of SPEEDSERVER Website Hosting is reorganized or sold and all or substantially all of its assets are transferred to a new owner, your personal information may be transferred to the buyer regardless of your authorization to ensure the continuity of services;

5.2.6. By authorization: In other cases not provided for above, if there is an objective of sharing personal data and information, we will send you a notification with information regarding such sharing to request your consent, for a specific purpose.

6. COOKIES AND SIMILAR TECHNOLOGIES

6.1. Cookies are small data files that are placed on your computer or other devices (such as smartphones or tablets) while you browse the website.

6.2. The term “cookie” can be used to describe a number of technologies, including, but not limited to, pixel tags, web beacons and mobile device identifiers.

6.3. We use cookies, pixels, and other technologies (collectively, “cookies”) to recognize your browser or device, learn more about your interests, provide essential features and services, and to:

6.3.1. Track your preferences to deliver only ads that are relevant to you.





6.3.2. Conduct research and diagnostics to improve content, products and services;

6.3.3. Prevent fraudulent activities;

6.3.4. Improve security.

6.4. SPEEDSERVER uses session cookies and persistent cookies.

6.5. Session cookies collect information that does not allow the identification of the user and are automatically deleted when your browser window is closed.

6.6. Persistent cookies are stored on your computer or mobile device until their expiration and collect information that can identify the individual. The cookies used may be “first party”, that is, cookies set by us – or by a third party on our behalf – or “third party”, which enable features or functionalities of trusted third parties to be provided on or through the websites or in services you use, such as advertising, interactive content or analytics.

6.7. These third parties may recognize your device when you browse our websites and/or use our services or when you browse other websites or use other services.

6.8. Most internet browsers are set to automatically accept cookies, but you can change your settings to block these cookies or block your device. For more information, consult your browser's help options.





6.9. Below we list some links to the most popular browsers:

- Google Chrome
- Internet Explorer
- Microsoft Edge
- Mozilla Firefox
- Opera
- Safari

6.10. IMPORTANT: If cookies are disabled or removed, not all features of the website may function as intended.

6.11. If you use different devices to view and access websites (e.g. computer, smartphone, tablet, etc.), you must configure each browser on each device to suit your cookie preferences.

7. INTERNATIONAL DATA TRANSFER

7.1. We may occasionally transfer personal data to service providers located abroad, including cloud service providers.

7.2. Should this occur, SPEEDSERVER will implement appropriate procedures to ensure adequate protection of personal data in accordance with the requirements of applicable data protection legislation, including by entering into appropriate data transfer agreements with third parties for personal data when required.

8. THIRD PARTY LINKS





8.1. We may occasionally, at our discretion, include or advertise third party products and/or services on our website. These third party websites have privacy policies that are independent of ours. We therefore have no responsibility or liability for the content and activities of these linked websites. However, we seek to protect the integrity of our website and welcome any feedback regarding these websites.

9. DATA SECURITY

9.1. SPEEDSERVER is concerned about your data and therefore has implemented internal policies and controls to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and that it is only accessed by employees who reasonably require access based on their responsibilities.

9.2. We seek to apply security at multiple levels, physical security, network security, host security, software security and security of customer and user accounts and maintain internal security policies to support these areas, such as firewalls and data encryption, physical access controls to data centers, and information access authorization controls.

10. DATA SUBJECT RIGHTS

10.1. Since the LGPD came into effect, the data subject will have the right to obtain, at any time, upon formal request, information regarding his/her data.

10.2. SPEEDSERVER has a period of 15 (fifteen) days, counted from the date of receipt of the data subject's request, to respond





to requests, according to art. 19, II of the LGPD.

10.3. According to art. 18 of the LGPD, data subjects may obtain from the data controller, at any time, by requesting the person in charge:

- I - confirmation of the existence of processing;
- II - access to data;
- III - correction of incomplete, inaccurate or outdated data;
- IV - anonymization, blocking or deletion of unnecessary, excessive data or data processed in non-compliance with the provisions of this Law;
- V - portability of data to another service or product provider, upon express request, in accordance with the regulations of the national authority, observing commercial and industrial secrets;
- VI - deletion of personal data processed with the consent of the subject;
- VII - information on the public and private entities with which the controller shared data;
- VIII - information on the possibility of not providing consent and on the consequences of refusal;
- IX - revocation of consent.

10.4. For security reasons, we can only fulfill the request if we are certain of the identity of the requesting data subject. Therefore, we may request additional data or information for confirmation.

11. TERMINATION OF DATA PROCESSING

11.1. This privacy policy applies to all the occasions mentioned above and for the entire time that SPEEDSERVER stores personal data.





11.2. We will store and maintain personal data:

11.2.1. For the period required by law;

11.2.2. Until the end of the processing of personal data, as mentioned;

11.2.3. For the time necessary and to present the legitimate interest of SPEEDSERVER;

11.2.4. In this way, we will process your data, for example, during the applicable prescriptive periods or as long as necessary to comply with a legal or regulatory obligation.

11.2.5. The processing of personal data will end in the following cases:

11.2.5.1. When the purpose for which the personal data was collected is achieved, and/or the personal data collected is no longer necessary or relevant to achieve such purpose;

11.2.5.2. When the holder requests the deletion of his/her data;

11.2.5.3. When there is a legal determination to this effect.

11.2.6. Upon termination of the processing of personal data, in compliance with the hypotheses established by applicable legislation or by this Privacy Policy, the personal data will be deleted and this Policy will no longer apply to your interaction with SPEEDSERVER.





12. SPEAK TO THE SPEEDSERVER DATA PROTECTION OFFICER

12.1. Contact our data protection officer by email: info@speedserver.com.br, we are at your disposal.

13. LEGISLATION AND JURISDICTION

13.1. This policy will be governed, interpreted and executed in accordance with the Laws of the Federative Republic of Brazil, especially Law No. 13.709/2018, regardless of the Laws of other states or countries, and the jurisdiction of the city of Guarulhos/SP shall be competent to resolve any doubts arising from this document.

14. LAST UPDATE - CHANGES TO THE PRIVACY POLICY

14.1. This Privacy Policy may be updated at any time, seeking its continuous improvement.

14.2. If we decide to change this privacy policy in any material way, we will notify you here, by email, or by means of a notice on our product or service website. In all cases, your continued use of any Services constitutes acceptance of such changes.

14.3. Before using information for purposes other than those set out in this Privacy Policy, we will ask for your consent.

14.4. Last updated LGPD on September 20, 2020.

SPEEDSERVER website hosting

