



## Online privacy and use of Cookies

The purpose of this document is to define the processing of personal data of users of the TradeTools Creator system, and the use of Cookies on its website.

### Terms and definitions

**Antispyware:** A program or a software specifically designed to detect, nullify and eliminate spyware and other types of malicious code from a computer.

**Anti-virus:** A program or a software specifically designed to detect, nullify and eliminate viruses and other types of malicious code from a computer.

**Cookies:** are digital files with small bits of data (and usually with a unique identifier), which are stored on an individual's device through their browser or application. These files store information to identify the individual and their preferences.

**Cryptography:** The science and art of writing messages in encrypted form or in code. Among other purposes, it is used to authenticate the identity of users and electronic transactions, and to protect the confidentiality of personal and commercial communications.

**Personal data:** Data related to an identified or identifiable natural person or legal entity.

**Firewall:** A device constituted by a combination of software and hardware, used to divide and control access between computer networks.

**Personal firewall:** Software or program used to protect a computer against unauthorized access from the Internet. It is a specific type of firewall.

**Tool:** An alternative denomination of a system or a software that enables some service to be executed.

**Logoff:** Procedure by which the user informs the exit of a website for the closure of communication sessions, in order to avoid unauthorized access by third parties.

**Browser:** Application used for browsing the tool or system, and the website.

**System:** A program or a tool that performs any function or service, and which may be embedded or available in a cloud. It is also called software.

**Software:** A program that performs some function or service. It may be embedded or available in a cloud. It is also commonly called system or tool.

**Spam:** Term used to refer to unsolicited emails, usually sent to a large number of people.

**Spyware:** Term used to refer to a large category of software that has the purpose of monitoring activities of a system and sending to third parties the information collected in a disguised, unauthorized and malicious way. The information being sent is either stored data, passwords, or banking and personal information.

**Processing:** Any operation carried out with personal data, such as those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, handling, filling, storage, elimination, evaluation or monitoring of information, modification, communication, transfer, dissemination or extraction.

**User:** Any person authorized to access Tradetools SaaS tool or its website, through identification and authentication, or free access areas. Among users are mainly clients, suppliers, partners, representatives, employees and job applicants.

**Virus:** A program or part of a computer program, usually malicious, that spreads by infecting a machine, inserting copies of itself and becoming part of other programs and computer files. Besides performing other malicious activities, its objective is to cause damage to information.

## Principles

The Privacy Notice is based on Privacy and Personal Data Protection Policy and its principles, among which are the commitment to transparency and respect in the relationships with all its stakeholders, whether they are customers, suppliers, partners, representatives, employees and users of the tool or website.

Tradetools is concerned about the privacy and data security of users who access its system and website, and therefore protects all the personal data and information inserted in it according to the General data protection law.

## Processing of personal data

The Tradetools Creator system contains restricted access areas, that are accessible only to users who have received specific authorization by means of a user ID and password authentication. However, no personal data is requested when accessing this area.

The Tradetools website requests personal data from users upon request in the embedded form, and this data is stored in the information systems used by the company.

Tradetools information systems are secure and controlled, and the personal data of users is kept only for the necessary period and according to the following criteria:

- (i) For the duration of the relationship between the user and Tradetools;
- (ii) For as long as necessary for Tradetools to comply with its global legal and contractual obligations.

The personal data of users is collected and protected in accordance with strict standards of confidentiality and security, and is not passed on to third parties.

The veracity of personal data entered by users is their sole and exclusive responsibility, which is

why extreme care is required when entering them.

Users may, at any time, correct or update their personal data provided on the Tradetools website, through the contact channels available on the website itself.

## Security of personal data

Tradetools takes appropriate security measures to prevent unauthorized access, alteration, disclosure or erasure of personal data. Such measures include, but are not limited to, internal review of processing practices, storage and security measures, as well as other physical security measures to prevent unauthorized access to data storage systems.

Access to users' personal data is restricted to Tradetools' employees. These individuals have confidentiality obligations and may be civilly and/or criminally prosecuted if they breach their obligations. Users' personal data is not sold, rented or exchanged with any third parties.

Attempts to break into the website or systems or any other computerized environment will be understood as illicit action and will be treated in accordance with the provisions of the civil and criminal legislation in force.

## Collected personal data and its use

For the use of the services and the restricted access areas of the Tradetools' website, the following Personal data may be required from the user:

**Personal data provided:** when the user requests any service or access to information that requires registration, their Personal data may be requested (such as name, email address, job title). The personal data collected from users are processed in an appropriate manner, according to the criteria for:

**Disclosure:** Access, use, preservation, removal or disclosure of Personal data is necessary to: (a) compliance with applicable law, regulation, legal process or governmental request; (b) applicable terms of service, including investigation of potential breach; (c) detect, audit, prevent, or otherwise address fraud, technical or security issues; and (d) protect against imminent harm to the rights, property or safety of Tradetools, its users or the public as required or permitted by applicable law. Tradetools may collect Personal Data from users when they register with the site and voluntarily provide such information. Tradetools may combine Personal Data collected on its website or system/tool with information from other services provided by Tradetools or third parties to provide a better user experience, including content customization.

The user may refuse to fill in and submit Personal data on the Tradetools website. In this case, the provision of these services via the website may not be possible.

## Anti-spam

Tradetools is concerned with the control of unsolicited commercial email (also called "spam") and is committed to not send unsolicited or unauthorized emails to users, except as permitted by the user. Tradetools does not sell, rent or trade its email lists to third parties.

## Acceptance of terms

By using Tradetools' website and/or system, the user confirms that they accept the terms of this Privacy Notice. If the user does not agree to this online Privacy Notice, the user shall not use the Tradetools' website and/or system.

## Recommendations

This Privacy Notice is subject to change at any time, which is why we recommend that users check it regularly.

For security reasons, it is recommended that users maintain the software and other protection devices on their computers always updated, such as operating system, personal firewall, antivirus and antispyware systems, and adopt best practices in information security.

The security of user access passwords is fundamental to the protection of users' personal information. Anyone who has access to them may not only read, use or alter user data, but may also perform malicious actions in the user's name. The passwords are unique, non-transferable and of the entire responsibility of each user, who should keep them under their guard and control. Tradetools recommend choosing a strong password, with at least eight digits, that includes a combination of numbers and letters unrelated to obvious or personal data of the user (such as name, surname, email, date of birth, etc.). It is also recommended that each user changes their password periodically, through specific procedures available on the websites, and does not allow third parties, even relatives, to know the password.

Tradetools does not send emails requesting passwords, personal data, card numbers or secret passwords from its users. Likewise, we do not send emails containing files or links for debt collection. In case the user receives emails sent by an unknown person with this purpose, they should immediately communicate this to Tradetools' customer service department, through one of the addresses or channels informed on the website.

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# Contact

Tradetools regularly reviews the provisions of its Policies for best practice and understanding. Questions regarding this Policy or the treatment of Personal data may be sent to **[info@tradetools.com.br](mailto:info@tradetools.com.br)**.