



# DINACO

## PRIVACY AND COOKIES POLICY

July 19th, 2021

*Dinaco Importação e Comércio Ltda.* ["DINACO"] appreciates your interest and access on our Privacy Policy ["Privacy Policy"].

We value your privacy and we ensure the protection of your personal data ["Personal Data"; "Data"], as Personal Data Holders ["Data Holder(s)"; "Holder(s)"] and users ["User(s)"] of our website.

*DINACO's* Privacy and Cookies Policy aims to ensure compliance with the protection of Personal Data based on the Brazilian General Data Protection Law (*Lei Geral de Proteção de Dados* n.º 13.709, of August 14th, 2018) ["LGPD"], the Consumer Protection Code (*Lei* n.º 8.078, of September 11th, 1990) and the Constitution of the Federative Republic of Brazil of 1988.

In our Privacy and Cookies Policy, you will have access to *which* information is collected, for *what* purpose, *how* it is treated, *who* has access to it and, finally, *how* it is legally stored and processed, in accordance with the principles of good faith, purpose, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination and accountability, pursuant to Article 6º of the LGPD.

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### RIO DE JANEIRO

Rua do Ouvidor, 50 . 10º andar . Centro  
Rio de Janeiro . RJ . Brasil . 20040-030  
Tel.: 55 (21) 3147. 3317

### SÃO PAULO

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 Dinaco Importação e Comércio  
 [www.dinaco.com.br](http://www.dinaco.com.br)



# DINACO

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# DINACO

## I. Definitions

First of all, it is important to clarify certain concepts.

"LGPD" refers to the treatment of Personal Data in a broad sense.

What does "**Treatment**" mean? The term "treatment" includes the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

What is meant by "**Personal Data**"? "LGPD" defines personal data as *"information related to an identified or identifiable natural person"*. In other words, it refers to any information that identifies a natural person.

Who is the "**Holder of Personal Data**"? It is defined as the natural person to whom the personal data, subject to processing, refers to.

How can "**Database**" be defined? As an organized collection of data stored and accessed electronically through computerized means.



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## II. Personal Data Processing Agents

*DINACO* is responsible for the treatment of Personal Data and acts both as Controller and Operator. Controller in the sense that, in this Privacy Policy, *DINACO* defines the parameters of the Personal Data processing activity and Operator, given it is the one who effectively performs the operation.

*DINACO*'s contact details are as follows:

- RIO DE JANEIRO

Address: Rua do Ouvidor n.º 50, 10º andar, Centro, Rio de Janeiro (RJ) - 20040-030 - Brasil

Telephone: +55 (21) 3147-3317

- SÃO PAULO

Address: Av. Roque Petroni Jr. n.º 850, Torre Jaceru, 4º andar, Jardim das Acácias, São Paulo (SP) - 04707-000 - Brasil

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### III. Access to DINACO's website

When using our website, *DINACO* does not collect any personal data neither network or Internet Protocol ("IP") addresses. This only happens after consent is given by the Data Holder for this purpose.

However, should the Data Holder voluntarily wish to contact *DINACO*, it will be necessary to process certain Personal Data, in the "Contact" and "Dinaco News" pages, both on *DINACO*'s website, as described below:

#### a. Which Personal Data?

Name, email, phone number and company you work for or represent.

Any Personal Data included in the boxes indicated as "Subject" or "Your Message", which have not been required or requested by *DINACO*, will not be considered, taking into account the principle of necessity and adequacy when processing Personal Data.

#### b. What is the purpose of collecting and processing Personal Data?

The collection and treatment of Personal Data described above, considering the principles of purpose and necessity, is intended to carry out and achieve commercial and business objectives, considering *DINACO*'s activity, such as:

Regarding the Personal Data entered on the "Contact" page:

- Communication with Holders/Users;
- Identification of Prospects.

Regarding Personal Data required in the "Dinaco News" section:

- Disclose market's news and *DINACO*'s portfolio;
- Send invitations to in-person or remote events, as well as validating registration for such events;
- Communicate product launches and highlights, as well as other news from *DINACO* and/or its Represented Companies;
- Adequacy of communication tools;



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- Send portfolios, catalogs, product launches and news, among others, from *DINACO* and/or its Represented Companies;
- Promote products and/or the Represented Companies, seasonal campaigns, promotion of participation in events and obtaining of awards.

## c. How is Personal Data handled?

Processing Personal Data, voluntarily entered by the Holder, varies depending whether those were inserted in the "Contact" and "Dinaco News" pages.

With reference to the Personal Data entered on the "Contact" page, the treatment is carried out as follows:

By filling in the fields destined to Personal Data, these are sent, via email, to *DINACO's* Customer Service, the sector that supports the sales area. If possible, the Customer Service will reply to the Data Holder. If the Customer Service does not know how to answer to the Data Holder's contact, it forwards it to the competent areas, taking into account the message content and the interest of the User/Personal Data Holder.

The Personal Data is registered in *DINACO's* computer system and database, until the moment one of the situations of article 15º occurs or when the Holders/Users exercise his/her rights of anonymization, blocking or elimination, of elimination of the Personal Data processed with the consent of Holders/Users or in case of consent's withdrawal.

Differently, the treatment of Personal Data collected on the page "Dinaco News", occurs in the manner described below:

After entering the fields referring to the Personal Data previously mentioned in paragraph a), those are sent to the contracted third party, herein identified as 'Active Campaign', for their organization, management and storage in a database exclusive for *DINACO's* use and for the fulfilment of the purposes described above in paragraph b). At any time, 'Active Campaign' allows the download of the Data to spreadsheet, when the hypotheses of article 15 occur, or when the Holder/User exercises his/her rights of anonymization, blocking or deletion, of deletion of the Personal Data processed with the consent of the Holder/User or in case of revocation of consent.



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## c. Who has access to the Personal Data collected?

While those who have access to the Personal Data derived from the "Contact" page is solely and exclusively *DINACO*, including its collaborators, staff and members of the Board; the Database derived from the "Dinaco News" session is accessed by *DINACO* itself and by a contracted third party, identified as 'Active Campaign'.

It is also worth mentioning that 'Usabit' is responsible for the design of *DINACO*'s website. However, it does not have access to any Personal Data or databases.

## d. How is Personal Data processed lawfully?

Personal Data's treatment is lawful, legitimate, authorized, permitted as well as justified, due to:

1. Consent;
2. Compliance with a legal obligation;
3. Execution of contract and/or preliminary procedures;
4. Legitimate interest of the Controller.

All in accordance in Article 7º of LGPD.



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## IV. Other Means of Processing Personal Data

*WhatsApp* platform is also used by *DINACO*, through the cell phone numbers of its staff, whose specific Personal Data, such as name and cell phone number of the Personal Data Holder, are subject to treatment. Through this tool, all employees can establish a more direct and agile contact, considering *DINACO's* commercial and strategic purposes, besides the usual and reiterated practice through email addresses.

It is also important to mention *DINACO's* use of *WhatsApp Business*. In other words, through it, specific Personal Data, such as the cell phone number and name of the Holder, is processed. This platform has been configured to automatically send a message in order to obtain the consent of the Data Holder in regards of processing his/her Data, according to this Privacy Policy. By continuing the conversation, it means that the Data Holder has read and accepted this Policy. Other Personal Data may be necessary and, consequently, collected in the course of the conversation, aiming at the interest of the Data Holder himself/herself and the pursuit of a legitimate interest. However, collecting and processing Personal Data is limited by the principle of data minimization. If consent is not given, *DINACO* has available to the Data Holder other channels through which he/she may contact us.

Another option is via telephone, through the following numbers: +55 (21) 3147-3317, +55 (11) 5078-5078, 0800 772 2620 and 0800 772 6775. The telephone service has the purpose to answer questions, establish negotiations, strengthen invitations to events and promotions and for studying and researching client's satisfaction. Calls are not recorded and the eventual collection of Personal Data follows the same criteria as those obtained through *DINACO's* site, described above.

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## V. Rights of Users/ Holders of Personal Data

LGPD provides the following rights to Personal Data Holders:

1. Right to **confirmation** of the existence of Data's treatment, pursuant to Article 18° item I.

Data Holders/Users have the right to simply confirm that his/her Personal Data is being processed by *DINACO*.

2. Right to **access**, in the terms of Article 18°, item II.

Data Holders/Users have the right to request free, wide and complete information about his/her Personal Data stored by *DINACO*, within 15 (fifteen) days. This includes, in particular:

- The origin of their Personal Data;
- The receiving agents;
- The purposes by which the Personal Data is treated;
- The categories of Personal Data which are treated;
- If Personal Data has not been collected from the Data Holders, all information available on the origin of such Data.

3. Right to **rectification** of incomplete Personal Data, in accordance with article 18°, item III.

Holders/Users have the right to ask *DINACO* to rectify inaccurate, incomplete or outdated Personal Data concerning him/her, without undue delay.

Taking into account the purpose of processing the Data, Holders also have the right to request that the incomplete Personal Data to be completed, including by means of an additional declaration.

4. Right to **anonymize**, block or delete unnecessary or excessive Personal Data, as foreseen in article 18°, item IV.

Holders/Users have the right to make their data anonymous (irreversible measure that does not allow the identification of the individual), blocked (temporary measure) or eliminated (definitive measure



with the end of the treatment under the terms of articles 15º and 16º or when the treatment is illegal), when the Personal Data is unnecessary or excessive, extrapolating the principle of necessity.

5. Right to **portability**, under the terms of article 18º, item V.

Holders/Users have the right to expressly request *DINACO* to transfer his/her Personal Data to another service provider, with the exception of anonymized data.

6. Right to **delete** Personal Data treated with the Holders' consent, with the exception of the situations established in article 16º, in accordance with article 18º, item VI.

Holders/Users have the right to expressly request *DINACO* to delete his/her Personal Data, by which *DINACO* has the duty, in a timely manner, to delete it. According to article 15º, the treatment of Personal Data ends:

- By verifying the purpose of the treatment or of the relation;
- When Data is no longer necessary or relevant considering the purpose of the treatment;
- With the end of the period of treatment;
- By communication from Holders;
- By determination of the National Data Protection Authority ("ANPD").

7. Right to **revoke** the consent, as in article 18º, item IX.

Holders/Users may, at any time and through a free and facilitated procedure, expressly revoke his/her consent.



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## VI. Cookie Policy

- What are 'cookies'?

These are software files that are installed in the User's computer, cell phone or other device, through the browser, registering information, such as network address ('IP Address'), only after consent is given by the Data Holder.

- Which 'cookies' are used on *DINACO's* website?

The only 'cookies' used on *DINACO's* website are the Analytic Cookies, used anonymously, for the purpose of monitoring User's journey and used exclusively for statistical purposes, not allowing the identification of Users, aiming to:

- Improve the functioning of the website and its journey by Users;
- Measure how Users interact with the website content;
- Evaluate areas of the site which need improvement.

Therefore, no Personal Data, capable of identifying the User, is stored.

- Who uses the information stored in 'cookies'?

The information stored in the cookies on *DINACO's* website is for the sole and exclusive use of *DINACO*.

## V. Data Protection Officer (DPO)

In order to obtain further informations, to exercise any rights of the Personal Data Holders/Users or should you have any queries, you may contact the Data Protection Officer through the following email: [dpodinaco@fariadeoliveira.com](mailto:dpodinaco@fariadeoliveira.com).

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