

# PRIVACY POLICY

## 1. INTRODUCTION

### 1.1 Goal

Our policy directs the way we collect, use, share and protect your personal data. We are striving to guarantee the security and confidentiality of such information, while maintaining transparency and abiding by the data protection laws.

### 1.2 Coverage

This policy applies to all personal data that we collect, whether it is through our site, applications, services or by way of direct interactions with the users. It is valid for all of our data processing operations, regardless of the user's location, and complies with the laws for the protection of relevant data, such as LGPD in Brazil and the CCPA in California, USA.

### 1.3 Commitment to Privacy

Our policy reflects our commitment to protecting the privacy and security of your personal data. We understand the importance of handling your information with care, using it solely in accordance with this policy's specifications. We are committed to maintaining transparency in our data processing practices, securing compliance with the applicable laws and regulations on data protection, and guaranteeing that you have continuous control over your personal information.

### 1.4 Compliance with the CCPA

Pluga is strict in following the *California Consumer Privacy Act* (CCPA) and other data protection laws in force, ensuring its transparency while collecting, using, storing and sharing personal data. We respect the users' rights regarding access, accuracy and deletion of their data. In compliance with our ethical practices and our privacy policy, we do not sell personal data to third parties under no circumstances whatsoever. Our commitment to privacy is reflected on the requirement that our suppliers must also protect such data, guaranteeing to the users the possibility to control and view their personal information.

### 1.5 Applicable Laws

This policy abides by the most relevant international and national laws related to the matter of privacy and data protection, such as the Brazilian General Data Protection Act (LGPD) and the California Consumer Privacy Act (CCPA) of the United States of America. We are committed to the updating of our practices and policies, and keeping them aligned with any legislation changes, to guarantee the protection of your personal data.

### 1.6 Overview on Users' Rights

You have the right to be informed on which personal data we collect and how such data is used; the right to access your information stored by the platform, and to carry out the deletion of your data.

## **1.7 Notice in case of incidents**

You must immediately notify Pluga about any unauthorized use of your account, through the e-mail [support@pluga.co](mailto:support@pluga.co).

It is important to stress out that the responsibility for the activities carried out in the account are incumbent upon the user, since the access is protected by a password that is personal and non-transferable. In case of any unauthorized access by third parties, there must be swift notice in order to safeguard the account's security.

## **2. PERSONAL INFORMATION COLLECTED**

Find below a description of the types of personal data collected, the sources from where they come and the purposes for such collection:

### **2.1 Data Collection**

It includes name, contact details (telephone and e-mail), company name, passwords, cookies, web beacons, and in case of paid subscriptions, payment data.

#### **2.1.1 Registration**

We collect personal information during the registration process in order to improve and personalize your experience with our services, and to integrate the payment systems.

When you register and provide your information to Pluga, you agree on the use of your data according to the description in our policy. If you include third parties' data, it is your responsibility to make sure that they have authorized the use of such data. You also agree on exempting Pluga from any liability regarding indemnifications related to the handling of such third parties' data, even if they are not users in our platform.

In order to guarantee the security and privacy for data with Pluga, access to the platform is restricted to a login and password that are personal and non-transferable. Those credentials are of the essence to avoid unauthorized access to your information. The responsibility for keeping the confidentiality of those credentials is exclusively yours, and Pluga is not liable for any inappropriate use of such access information.

#### **2.1.2 Access and Use of Data in Automations**

We access and use data that is transmitted through the automations created by the users to supply, maintain and improve our services. Such data is essential to provide quality services and to settle technical issues. It is retained by the Pluga servers for up to 3 months, after that time they are filed into the records and rendered anonymous. Such procedure is compliant with our higher standards of data security and privacy.

#### **2.1.3 Use of the Pluga Platform**

Your data is collected during the registration and the use of the platform, as well as information obtained automatically (such as cookies and web beacons).

We use cookies and web beacons for identifying the users, and to improve the quality of the information provided in the portal. You may configure your browser to receive prior notices or refuse cookies, if you wish.

In addition to the personal information provided by the Users, the Pluga Platform may also collect technical information, such as IP address, operational system, type of browser and reference sites.

We do not share your information with third parties, except for the rendering of our services, or whenever necessary for the compliance with legal requests by government authorities, within the limits legally established.

The Pluga Platform reserves the right to verify the information stored in its databases for legal and security purposes, such as identifying multiple users' IDs or aliases, aiming at settling disputes, solving problems and guaranteeing that the platform is not going to be used for illegal activities.

#### **2.1.4 Permission for the Handling of Information by the Pluga Platform**

The information you have provided and collected during the use of this system, and which do not personally identify you, such as browsing patterns (designated as "anonymized data"), may be used by the Pluga Platform for market analysis, producing statistics and acting as guidelines for marketing strategies.

Besides that, the information you supply shall be used for:

- (i) Managing your account, to customize the services provided;
- (ii) Executing your commands directly at the Pluga Platform, at the time of the registration or later on, and/or the debit of amounts from credit cards, where expressly under your authorization;
- (iii) Communicating updates at the Pluga Platform;
- (iv) Communicating new features and marketing actions by the Pluga Platform or its partners;
- (v) Complying with legal authorities' requirements, in order to meet investigation requests by such authorities.

To terminate your account at the Pluga Platform, update or correct your data, or to request the canceling of the receiving of messages, you may make such alterations directly at the configurations panel available at the Platform.

By saying that we use your personal information within the context of a request, command, transaction or agreement (or to prepare for that), or to provide services that you have requested (such as accessing the Pluga Platform), such information is necessary for the appropriate rendering of the services.

#### **2.2 Purposes of the Collection**

These data are used to facilitate browsing on the platform, integrate payment systems, customize your experience, and to improve the quality of the services offered by Pluga.

## **2.3 Obligations of the User**

It is incumbent upon the user to abide by the current Terms of Use, in accordance to what has been published by the Plugu Platform on its site, as well as to follow this Privacy Policy, which includes respecting third parties' intellectual property rights.

You must not make the download, upload or any other manner of spreading material or information that is violent, offensive, racist and xenophobic or that violates the spirit and the goals of the Plugu Platform and its community of Users.

It is forbidden to provide to the Plugu Platform or to any other user, any information that they believe to be harmful to them as a person, either professionally or socially.

Therefore, when posting comments on public locations within the Plugu Platform or within any other of its communications channels, you must be aware that such information is going to be viewed by other users and by the public in general.

## **2.4 Minors**

Our services are not intended for children younger than 16 years old, and we do not intentionally collect personal data from any person under 16 years of age.

If you are under 16, please, do not use our services nor provide your information through the site or in any other manner.

# **3. CONSUMERS RIGHTS UNDER THE CCPA**

## **3.1 The Right to Know**

You have the right to request information about the personal data collected by the Plugu Platform, including which data has been collected, the purpose of such handling, and any third parties with whom such data has been shared.

## **3.2 The Right to Access**

You have the right to request a copy of your personal data that Plugu has collected for the past 12 months. The categories for data include, but are not limited to: personal identification information (such as name and contact), registration data, history of financial transactions, and any other category of personal data collected and processed by the platform.

For data relating to events processed between automations, Plugu shall retain such information for up to 3 months before filing them and rendering them anonymous regularly. This guarantees a balanced data management between the necessary retention and the protection of privacy.

## **3.3 The Right to Deletion**

You may carry out the deletion of your personal data, except in specific cases, such as where the data is necessary for completing a transaction, detecting security, being used internally in a legal manner, among others.

## **4. HOW TO EXERCISE YOUR RIGHTS:**

### **4.1 Instructions for the Request**

At the self-service panel within the Pluga Platform, you can directly manage several actions, such as exporting data from your automations, deleting specific automations and even permanently deleting your account. In case you have any doubts during such proceeding, you may send an e-mail to [support@pluga.co](mailto:support@pluga.co), in order to obtain additional assistance.

### **4.2 Verification of Identity**

The verification of the user's identity is carried out through the login at the Pluga Platform, utilizing his usual credentials (login and password).

### **4.3 Time for Answering**

We answer to the user's claims for their rights, within the legal periods of time established by the law.

### **4.4 Support to the User**

You may contact us through the e-mail [support@pluga.co](mailto:support@pluga.co) for any questions, assistance in making requests or to obtain more information on how your personal data are handled. We are prepared to provide you with guidance and clarifications, with the aim of offering a transparent and safe experience.

## **5. NON DISCRIMINATION**

We do not discriminate against the users that exercise their right to privacy, and no user shall be subjected to an unfair treatment, such as differentiated fees, decreased service quality, or penalties. The equality for access to and the quality of the Pluga services shall be maintained for all the users, regardless of their having exercised their rights to privacy.

## **6. SECURITY AND RETENTION OF DATA**

We implement solid security measures to protect your personal data against unauthorized access, use or disclosure. Among the main security practices are the use of password cryptography and confirmation protocols via e-mail. Regarding the period for retention of data, we retain personal information for the time necessary to meet the goals described in the policy, abiding by legal and regulatory requirements. After such time, the data is permanently deleted in a safe manner.

Regarding your right to privacy on information, we carry out a review on our database from time to time. This process guarantees that the information is kept updated for the purpose it was originally intended.

You have the option of deleting data from your account, automations and accounts connected by simply accessing the control panel at the Pluga Platform. We must stress out that, when you cancel the registration, you are going to lose access to your history at the Pluga Platform and shall no longer be able to export your data. Therefore, we recommend that the exporting of your data be carried out before requesting to have your account deleted.

After the deletion, we shall no longer have Access to your personal data, except those that due to legal obligation are required to be retained. In these situations, we will delete this data as soon as there is no longer a reason to keep it.

Finally, the Pluga Platform reserves the right to file certain data, always anonymized, for the purposes of statistical analysis, such as the following up of growth rates in the use of apps integrated to the Pluga Platform.

## **7. UPDATES TO THE POLICY**

Our Privacy Policy is subject to updates from time to time in order to reflect changes in the data handling practices or in the applicable laws. Our users shall be notified regarding any significant changes through the Pluga official communication channels. It is important for you to review such policy regularly, so as to keep you updated on how your personal data is being handled and protected.

Version	Date of publishing
1.0	09/01/2024

## **8. CONTACT AND FEEDBACK**

If you have any doubts about Pluga's privacy policy or any suggestions for improvement, send an e-mail to [support@pluga.co](mailto:support@pluga.co). We appreciate your feedback, and we are committed to take into account all the suggestions made to improve the protection and management of personal data.