

Privacy Policy

LOCAWEB GROUP PRIVACY POLICY

Updated on February 2, 2022

The Locaweb Group (“we”) takes privacy seriously. For this reason, in this Privacy Policy (“Policy”) we explain how we use, store, share and protect the personal data collected during the use of our services and solutions (collectively, the “Services”) and visits to our websites; as well as how data subjects can exercise the rights provided for in the legislation applicable.

The personal data collected by us depend on the context of your interactions with the Locaweb Group. In order to facilitate your understanding, in this Policy we explain, how we handle the data of (i) clients of the Locaweb Group (“Clients”), our Client’s consumers (“Consumers”) and users of our websites (“Users”), collectively (“Data Subjects” or “you”).

Specific Privacy Policies may be applicable to some of our products and services. For more information about our privacy practices relating to a product or service, please go to the webpage of the specific product or service.

1. Who we are

The Locaweb Group offers a comprehensive portfolio of Internet services that includes website hosting, cloud computing solutions, virtual store, marketing e-mail tools, and payment intermediary, among others. Know more about our services here: <https://institucional.locaweb.com.br/politicas/>

The Locaweb Group includes the companies/business units: Locaweb, Vindi, Cplug, KingHost, Tray, Yapay, Ideris, Melhor Envio, Etus, All In, Social Miner, Delivery Direto, Docca, Samurai, Nextios, Credisfera, Bling, PagCerto, Bagy, Octadesk, Squid, Síntese, and any other affiliates or subsidiaries.

The entity of the Locaweb Group that originally collects your information will be responsible for controlling your personal data.

2. Important definitions

General Data Protection Law (LGPD): Federal Law No. 13.709, published on August 14, 2018, which regulates Personal Data Processing activities, also in digital media, performed by an individual or legal entity of public or private law, with the purpose of protecting the fundamental rights of freedom and privacy, and the free development of an individual’s personality.

Processing Agents: These are the agents responsible for Personal Data Processing, and they are divided into two categories: Controller and Processor. The Controller is the person or company responsible for making decisions in Personal Data Processing. The Processor, in turn, is the person or company that processes personal data on behalf of the Controller and following the Controller’s instructions.

Personal data: Information about an identified or identifiable individual.

Processing: Any transaction carried out with Personal Data, whether or not automated; that is, the collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, assessment, control, change, communication, transfer, dissemination or extraction of information.

3. Clients

3.1 Data collected by us

In general, when a Client (or, for the purpose of this section, “you”), or the Client’s contractors, use or interact with the Services, we collect their personal data, which can be divided in three comprehensive categories:

(i) **Data provided by you:** when you engage, use or interact with the Services, or, in some way, communicate with us, some of your (or your company’s) data may be provided to us. These data include:

- Professional agreement data, such as your name, position, company, location, phone number and e-mail;
- Marketing preferences;
- Account credentials, such as your e-mail address, user ID and password;
- Payment information, such as credit card and banking data, and invoice address;
- Data relating to technical support and solution of problems. These relate to ticket opening data, such as the type of product or service that relates to your request for help, contact and authentication data, and the contents of your communications with us, including phone recordings.
- Financial data, such as relating to invoicing, salary, gross income, cost of products, expenses, financial inflow/outflow, sales accounting data.
- Third-party data, in using our platforms and services exclusively, according to the terms of services engaged.

(ii) **Data automatically collected by us:** we may collect data from other sources, such as public databases, and public profile data available in social networks and credit protection entities.

- Data about the devices used in accessing the Services, such as your IP address, operating system, geolocation and the device’s identifier.
- Record data, such as IP address and your activities in Services like: date and time relating to your use, pages and files viewed, searches, functionalities that you used, and other actions performed by you.
- Browsing data, and data on how you use and interact with our Services and the Services that are integrated to our platforms, which may include the dates on which you have used the Services, your browsing activities, actions performed, settings, registrations and information saved. We also collect information about the performance of Services, including metrics related to

sending e-mails and other types of communication that you send through the Services.

(iii) **Data that we collect from other sources:** we may collect data from other sources, such as public databases, and public profile data available in social networks and credit protection entities.

3.2 How we use these data

We use the data that we collect or receive as a result of the use of Services for the following purposes:

- Fulfill our contractual obligations undertaken with you or your company. This includes creating and generating the accounts that you may have with us; check your identity; charge the amounts owned by you; and supply, customize and improve our services;
- Notify you about any changes in our products and services;
- Reinforce our security and protection procedures, in order to provide safer and more effective services;
- Carry out internal operations, including support, solution of problems, data analysis, tests, research and statistics;
- Supply information about other services and/or products that we provide, and that are similar to those already contracted by you;
- Supply other services and/or products that are better adapted and suited to your capacities and needs, including financial services;
- Assess or understand the efficacy of the advertising we promote, aiming at providing advertising that may be important for you;
- Manage risks and detect, prevent and/or correct fraud or other potentially illegal or prohibited activities, as well as any violation of the applicable policies, contracts or terms of use;
- As required, in order to establish, exercise and defend rights in court, administrative or arbitration proceedings;
- Fulfill legal or regulatory obligations, or as provided for in court actions filed by law enforcement or government bodies with jurisdiction, or alleged jurisdiction, over the Locaweb Group.
- For other purposes, on which we provide a specific notice at the moment of the collection, or otherwise, as authorized or required by law.

4. Consumers

This section is applicable to the personal data of our Client's Consumers (or for the purpose of this section, "you"), when we act as Controllers. Note that, in most of our products and services, the companies of the Locaweb Group act as Processors of personal data, according to the instructions given by our Clients. The Locaweb Group is not responsible for the privacy or security practices of its Clients. To understand how your data are processed by our Clients, please refer to the relevant privacy policies.

4.1 Data collected by us

(i) **Data received from our Clients:** Locaweb Group's Clients may provide their personal data to us through the Services. For example, when a Client uploads its contract base to use our marketing e-mail services; when you subscribe to a Client's newsletter; or when you make a purchase in a Client's virtual store, the Client may supply certain information to us, such as your name, your e-mail address, phone number or payment data.

(ii) **Data automatically collected by us:** when you interact with the Services purchased by the Client, such as when you interact with a marketing communication; browse the Client's website; or make a purchase in the Client's virtual store, we may collect information about your device and your activities. This information include:

- Data about the devices that you use to access the Services, such as your IP address, operating system, geolocation and the device's unique identifier.
- Browsing data, that is, data on how you use and interact with our Services, which may include the dates on which you have used the Services and your browsing activities, such as the pages viewed by you, or if you have opened an e-mail or added a product to the cart. We also collect information about the performance of Services, including metrics related to sending e-mails and other forms of communication sent by our Clients through the Services.

(iv) **Data that we collect from other sources:** we may collect data from other sources, such as public databases, public profile data in social networks, credit protection entities, particularly, when you make a purchase on a website that uses our payment intermediation services.

4.2 How we use these data

We may use the data that we collect or receive as a result of the use of Services by our Clients, for the following purposes:

- Provide, customize and improve our Services;
- Carry out internal operations, including support to our clients, solution of problems, data analysis, tests, research and statistics;
- Develop marketing strategies for our Clients, enabling them to provide advertising that is important for you;
- Proceed with the payment orders sent by you in payment intermediation operations;
- Manage risks and detect, prevent and/or correct fraud or other potentially illegal or prohibited activities, as well as any violation of the applicable policies or terms of use;
- Establish, exercise, and defend rights in court, administrative or arbitration proceedings;
- Fulfill legal or regulatory obligations, or as provided for in court actions filed by law enforcement or government bodies with jurisdiction, or alleged jurisdiction, over the Locaweb Group;
- Integrate products and services provided by the Locaweb Group and used by you;

- For other purposes, on which we provide a specific notice at the moment of the collection, or otherwise, as authorized or required by law.

5. Users

This section is applicable to the personal data that we collect when Users (or, for the purpose of this section, “you”) visit Locaweb Group’s websites.

5.1 Data collected by us

(i) **Data provided by you:** our websites make available different ways through which you may contact us. You may provide personal data, for example, when you express your interest in getting more information about our products and services; participate in surveys; subscribe our newsletter; download informational content; or contact us through any other means. These data include:

- Professional contact data, such as you name, position, company, location, phone number and e-mail address;
- Area of activity and interest;
- Nature of your communication with us;
- Marketing preferences;
- Any information that you may want to share with us.

(ii) **Data automatically collected by us:** when you use our websites, we may collect and store data automatically. These data include:

- Data about the devices that you use to access the Services, such as your IP address, operating system, browser information, geolocation and the device’s unique identifiers.
- Browsing data, that is, data about how you use and interact with our Services - which may include the dates on which you have used the Services and your browsing activities, as well as your interactions with our informational materials. We also collect information about the performance of Services, including metrics related to sending e-mails and other forms of communication that you send through our Services.

5.2 How we use these data

We may use the data that we collect or receive as a result of the use of our websites, for the following purposes:

- Provide, customize, and improve our websites;
- Reinforce our security and protection procedures, in order to provide safer and more effective services;
- Carry out internal operations, solution of problems, data analysis, tests, research, and statistics;
- Process transactions and manage your online accounts;
- Send marketing communications and recommend the products or services offered by companies of the Locaweb Group, according to you marketing preferences;

- Assess or understand the efficacy of the advertising we promote, aiming at providing advertising that is important for you;
- Manage risks and detect, prevent and/or correct fraud or other potentially illegal or prohibited activities, as well as any violation of the applicable policies or terms of use;
- As required, in order to establish, exercise and defend rights in court, administrative or arbitration proceedings;
- Fulfill legal or regulatory obligations, or as provided for in court actions filed by law enforcement or government bodies with jurisdiction, or alleged jurisdiction, over the Locaweb Group;
- For other purposes, on which we provide a specific notice at the moment of the collection, or otherwise, as authorized or required by law;

6. How we share the personal data

We may share the personal data we collect with other companies of the Locaweb Group, and with third parties and business partners that may be important for the provision and integration of Services. Said data sharing is based on the following criteria and has the following purposes:

- **Companies of the Locaweb Group:** The companies of the Locaweb Group may share among them the personal data collected upon the provision of Services in order to operate, perform, improve and integrate our services and products in sales, delivery, payment and credit activities. Likewise, they may share your data in order to understand, customize, provide support, announce our Products and Services, and prevent fraud.
- **Third-party service providers:** We work with third-party service providers who help us to operate, perform, improve, understand, customize, provide support and announce our Services. When we share data with third-party service providers, they are required to use your data according to our instructions and terms, or upon your express consent, when applicable.
- **Credit Protection Entities:** We may share your registration data with partnering companies and financial institutions for purposes of analysis, mitigation of credit risk, prevention against fraud and credit offers. With respect to the analysis and offer of credit, the Locaweb Group and the partnering financial institutions may request information from credit agencies, including the Credit Information System – SCR, Receivables Registration Companies authorized by the Central Bank, and Credit Card Accrediting Companies. These provisions are applicable during the period that the data subject remains active with the Locaweb Group concomitantly with the partnering financial institutions, applying, in this context, items I, II and X of Article 7 of LGPD.
- **Regulatory bodies, and judicial or administrative authorities:** We may share your personal information in order to provide any information requested by the relevant authorities regarding a given Data Subject and the transactions performed by him/her. Moreover, we may share your personal data with government authorities or private entities in order to avoid fraud and abuse regarding the use of Services; investigate suspect violations of the law; or to combat any other suspect of non-compliance with our policies and contracts.
- **Transfer of Assets:** In case that a company or business unit of the Locaweb Group is reorganized or sold, and all or substantially all its assets are

transferred to a new owner, your personal information may be transferred to the buyer regardless of your authorization, in order to ensure the continuity of services;

- **With your authorization:** In other cases not mentioned above, if we intend to share your personal data and information, we will send a notice to you with information about the sharing, and to request your consent regarding the specific purpose of such sharing.
- **Third parties that may question the form of use or the contents promoted in our contracted products and/or services:** With the purpose of enabling and complying with free enterprise, free competition and defense of the interests of users in trade relations, we may share your name, address, corporate or individual tax ID (CNPJ or CPF respectively) in case of questions from consumers and/or clients and/or users regarding the form and contents promoted in our products and/or services.

7. Cookies and Tracking Technologies

We and our partners may use different technologies to automatically collect and store data about the use of Services. These technologies include cookies, pixels, web beacons and SDKs. We use the information that is collected through these technologies to optimize and customize your browsing experience, target advertising campaigns, and develop and apply security functionalities and fraud prevention procedures, among other possible uses. For more information, access our Cookies Policy, which is available in our website at: <https://www.locaweb.com.br/politicas/#politica-de-cookies>.

8. Transfer of personal data to locations outside Brazil

We may transfer some of your personal data to service providers located abroad, including providers of cloud services.

If your personal data are transferred to locations outside Brazil, the Locaweb Group will adopt the appropriate measures to ensure the right protection of your personal data, according to the requirements of the applicable data protection legislation, including by signing the appropriate agreements for transferring your personal data to third parties, if so required.

9. Interactions with Third Parties' Websites

We may make available links to other Internet websites. THE LOCAWEB GROUP WILL NOT BE RESPONSIBLE FOR THESE WEBSITES AND CONTENTS. MOREOVER, WE DO NOT SHARE, SUBSCRIBE, MONITOR, VALIDATE OR ACCEPT THE WAY THROUGH WHICH THESE WEBSITES OR CONTENT STORAGE TOOLS COLLECT, PROCESS AND TRANSFER YOUR PERSONAL AND PRIVATE INFORMATION. We recommend that you refer to the relevant privacy policies of these websites to obtain information about the use of your personal information by other websites or tools.

We may record your access to websites of third parties with the purpose of measuring their importance for our users.

10. Security

The Personal Data processed by the Locaweb Group are protected by physical, technical and organizational security measures that reduce the risk of loss, misuse and non-authorized access, disclosure and changes, such as firewalls and data encryption, control of physical access to data centers, and controls for authorization of access to information.

11. Data Subjects' Rights

Personal Data Subjects have some rights regarding their personal data, and they may exercise these rights by contacting us through the following e-mail address: privacidade@locaweb.com.br.

- Confirmation of the existence of personal data processing;
- Access to personal data according to the legislation applicable;
- Correction of incomplete, inaccurate or outdated data;
- Data portability;
- Exclusion of data, whenever these are processed according to the consent of the Data Subject, or when the data are not necessary, excessive or their processing is not in compliance with the legislation applicable;
- Request of information about the shared use of data. Please note that this Privacy Policy describes the activities regarding the sharing of personal data by the Locaweb Group. For further information about how we share your data, please contact us;
- Withdrawal of consent, if applicable;

For security reasons, we will meet your requests only if we are sure about your identity. Accordingly, we may request additional data or information to confirm your identity and the authenticity of the Data Subject.

LIMA ≡ FEIGELSON ADVOGADOS law firm is the Data Protection Officer (DPO) of the Locaweb Group.

Please note that, as mentioned above, the Locaweb Group operates as processor of personal data in most of the products and services provided, according to the instructions given by our Clients. If you are a Consumer, and you intend to exercise your rights regarding the personal data that are handled by the Locaweb Group as a processor, you should contact the Client that is using the Services.

12. Termination of Processing

This Privacy Policy is applicable to the aforementioned circumstances during the period that the Locaweb Group stores the personal data. We store and keep your information: (i) for the time required by law; (ii) until termination of personal data processing, as mentioned below; or (iii) for the time required to preserve the legitimate interest of the Locaweb Group. Accordingly, we will process your data, for instance, during the applicable statutes of limitation, or as required for compliance with a legal or regulatory obligation.

Termination of the personal data processing will occur in the following cases: (i) when the purpose for which the personal data was collected is achieved, and/or the personal data collected are no longer necessary or relevant for achieving said purpose; (ii) when the Data Subject requests the exclusion of his/her data; and (iii) when there is a legal order in this regard.

In the case of termination of personal data processing, with due regard for the events set forth in the applicable legislation or in this Privacy Policy, the personal data will be deleted, and this Policy will no longer be applicable to your relationship with the Locaweb Group.

13. Amendment to the Privacy Policy

Due to the ongoing evolution of its business model, the Locaweb Group reserves the right to amend this privacy policy at any time, through the publication of the updated version in its website. Should there be a material change in personal data processing, you will be informed about it and have the opportunity to analyze the reviewed policy before deciding to continue using our Services.

[Close](#)

Cookies Policy

COOKIES POLICY – LOCAWEB GROUP
Updated on August 18, 2020

The objective of this policy is to supply to the audience that uses the website and the services offered by the Locaweb Group (“user” or “you”), clear and accessible information about the cookies that we use in our websites and mobile applications (collectively, the “websites”), and how they affect the experience of users. **This policy is supplementary to our Privacy Policy.**

1. What are “cookies”?

Cookies are essential tools for online browsing. They consist of files that identify the interactions between you, our Websites and our social networks or ads, and that are transferred to your equipment (PC, tablet or smartphone), aiming at optimizing and customizing your browsing experience in our Websites. The term “cookie” may be applied to describe several technologies, including, among others, pixel tags, web beacons and mobile devices identifiers. The Locaweb Group uses session cookies and persistent cookies. Session cookies collect information that does not allow to identify the user, and they are automatically excluded when you close your browser’s window. Persistent cookies, in turn, are stored in your computer or mobile device until they expire, and they collect information that may identify a person. Additionally, the cookies used in our Websites may be “proprietary,” that is, they may be defined by us – or by a third party on our behalf –, or developed by third parties, to allow the supply of resources or functionalities of reliable third parties in our Websites, through our Websites, or through the services that you use, such as ads, interactive contents

or analytics. These third parties may recognize your device when you browse our Websites or use our services, or when you browse other websites or use other services.

2. How does the Locaweb Group use cookies?

See below the different types of cookies that may be used in the Websites of the Locaweb Group.

2.1 Essential Cookies

Essential cookies are required for the operation of our Websites and the provision of services to you. Without these cookies, our Websites will not work as well as we would like, and we may not be able to supply certain services or resources linked to them. Types of Cookies

- Session: Session cookies are used for keeping the state of the application.
- Load Balancing: Load-balancing cookies are used for distributing and reducing the server's load.
- User Identification: User identification cookies are applied to ensure that users will only see their own information.
- Security: Security cookies are applied in security controls and checks.
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2.2 Preference Cookies

Preference cookies collect information about your choices and preferences, not only allowing our Websites to remember the language, location, device used or other settings, but also allowing your experience to be customized according to such preferences. Types of Cookies:

- Language: Language cookies are used for storing the language selected by users, and to show the correct options.
- Location: The user's approximate address (city, state, country, zip code), which is determined by the IP address, is stored to allow an automatic selection of the country, so that the establishments that are closer to the user can be shown.
- Mobile: When users view the Website using a mobile device, a cookie is defined to indicate whether the main website was selected (that is, if the device supports 'Flash'), or a non-Flash mobile website.
- Reference Website: The reference website is recorded to better understand the user's preference.
- Last Visit and Activity: The dates of your latest visits and activities, and similar information, are recorded in order to supply users with updates about "what has changed in the website since your last visit," and to have a better understanding of your preferences.
- Recently Viewed Videos: The dates and titles of recently viewed videos are recorded for a better definition of the user's preferences.
- Flash Cookies: Flash cookies are used to allow the reproduction of audio and video contents.

- Page History: Page history cookies are used to track the sequence of pages visited by the user. If the user receives an error message when visiting the Website, the cookie's information is stored in a log file for error reporting and resolution.
- Session: Session cookies are used for keeping the state of the application.

2.3 Analytical Cookies

Analytical cookies collect information about the use of our Websites, allowing us to improve the way they work. For example, analytical cookies show us which Website pages are most visited; help us to record any difficulties users may experience in navigating the Website; and show us if our ads are being effective. This enables us to see the global usage patterns of our Websites in an anonymized and aggregate manner. Types of Cookies

- Google Analytics: Google Analytics cookies collect statistical data to improve a website's presentation and browsing. Google completes the aggregated data with demographic data and other information of interest, so that we can better understand our visitors.

2.4 Advertising Cookies

Advertising cookies are used for marketing purposes, allowing us to target the ads that are shown to you based on your interests. The objective is to show advertising contents that are more important for you, as well as to improve campaign performance reports, and avoid showing ads that you have already seen. Some pages that you visit in the Websites may also collect information through the use of pixel tags, which may be shared with third parties that provide direct support to our promotional activities and website development. For example, the information on the use of our Websites may be shared with third parties such as advertising agencies, in order to help us targeting the advertising banners in our websites. Types of Cookies

- Advertising: Distribute targeted/behavioral ads.
- Market Studies: Conduct market studies.
- Campaign/Promotion: Measure the campaign's effectiveness.
- Fraud Detection: Detect click fraud.

3. Social Media Plug-ins

We also use social media buttons and/or plug-ins in our Websites. They allow you to connect to your social network in different ways. For purposes of plug-in operations, social media websites - such as Facebook - will define the tracking technologies in our website that can be used in improving your profile in their websites, or contribute with data stored for the different purposes set forth in their relevant privacy policy.

4. How to Manage Cookies?

While most Internet browsers are initially set to automatically accept cookies, you may change settings to block cookies, or to alert you when cookies are sent to your device. To learn more, see the help options in your browser. Below are some links to the most popular browsers:

- Internet Explorer
- Firefox
- Chrome
- Safari Web and iOS

Bear in mind that, when cookies are disabled or removed, not all features of the Websites will operate as intended. For example, you may not be able to visit certain areas of our Websites, or to receive customized information when visiting them. If you use different devices to view and access the Websites (for example, PC, smartphone, tablet etc.), you should adjust the settings of browsers in each device, in order to meet your cookies preferences.

5. Contact us

If you have any question about this Cookies Policy, please send an e-mail to: abuse@locaweb.com.br.

[Close](#)

Anti-spam Policy

Get acquainted with Locaweb's anti-spam policies.

For purposes of this document, "policy" means a series of measures taken to achieve an end.

The objective intended by the Locaweb Group is to fight SPAM practices, as stated in its "ANTI-SPAM COMMITMENT." Accordingly, the measures adopted are classified as below:

a) INFORMATIONAL OR EDUCATIVE: intended to explain, not only to Locaweb's clients, but also to the public in general, WHAT SPAM IS and the ways to mitigate SPAM accusations. These explanations are included in this policy statement, and can be supplemented with "hints available at Locaweb's website;"

b) TECHNOLOGICAL: they consist of technical instruments that are made available for Locaweb's clients not only to avoid receiving SPAMs (such as filters, hidden nickname, list of blocked e-mails; confirmation of origin etc.), but also to avoid accusations of SPAM practices (active registration confirmation); and

c) REPRESSIVE: these measures consist of contractual provisions that authorize Locaweb to summarily interrupt the websites of clients who violate the ANTI-SPAM COMMITMENT undertaken by them upon engagement of Locaweb's services.

Anti-spam commitment of Locaweb and its clients

In compliance with the best Internet practices, and with those applied by the most influent non-governmental bodies on the internet, and following the requests of users, Locaweb hereby publicly expresses its commitment to anti-spam. Accordingly, Locaweb undertakes to avoid SPAM practices through all means that are within its reach, as well as to disclose the rejection of these practices and its purpose to prevent their adoption by clients.

On the other hand, in becoming a Locaweb client, you must accept fully and without restrictions, automatically, and for the simple fact of engaging any service provided by Locaweb, the commitment to NOT USING SPAM IN ANY OF ITS MODALITIES OR MANIFESTATIONS.

Thus, all Locaweb clients undertake to follow SPAM refusal norms, being responsible for complying with the rule of not using SPAM in any event or situation.

SHOULD WE NOTICE THAT A CLIENT IS SENDING SPAMS, HIS/HER WEBSITE WILL BE INTERRUPTED, AS PROVIDED FOR IN THE RELEVANT AGREEMENT, AND WITHOUT PREJUDICE OF OTHER APPLICABLE MEASURES.

Locaweb clients are not allowed to receive more than ten percent (10%) of bounced e-mails, except if another limit has been expressly set forth in the agreement signed with the client. In this case, the limit provided for in the agreement will prevail.

“Bounced e-mail” is any type of error that may compromise the delivery of messages to their recipients.

One of the most common errors is the absence of a destination inbox.

Thus, if a Locaweb client receives a percentage of e-mails above the 10% specified above, LOCAWEB will presume that the client is conducting SPAM activities.

The e-mail to denounce SPAM activities that may have been conducted by a Locaweb client is abuse@locaweb.com.br

THIS IS LOCAWEB'S AND ITS CLIENTS' ANTI-SPAM COMMITMENT. PLEASE RESPECT IT, AND MAKE IT BE RESPECTED BY OTHERS, FOR A BETTER INTERNET.

Basic information about the characteristics of spam practices

What is SPAM?

Objectively, for purposes of this commitment, SPAM is defined as the sending of e-mails and/or any other electronic message that may give rise to a complaint by a recipient and/or organization and/or individual for purposes of combating and restraining SPAM activities.

SPAM is not a feasible advertising means. Despite the temptation to use it as an advertising means, SPAMs are imposing changes in Internet regulations on the use of the e-mail system, and the restrictions and penalties against companies that use SPAMs are increasing.

It is always important to report a SPAM, which is a negative practice for the Internet, and the only way to fight against it is by denouncing it.

Why is SPAM a problem?

Currently, the Internet is an extremely dynamic and complex environment with much information available. The e-mail is an Internet component, and, today, it is among the most important communication means in this environment.

However, this communication means has been increasingly degraded by the high number of e-mails, not only relating to advertising, but also to jokes or any other e-mail types that are sent arbitrarily, without being requested by the recipient. This is SPAM. This degradation results in the increased use of space to store messages, and overloads servers that manage and transmit e-mails, as well as communication networks etc.

Additionally, non-requested e-mails are more and more ignored by the recipients, who start to refuse the companies that send them. Accordingly, even in commercial terms, SPAMs are becoming something highly not recommended.

Supplementary information sources

SpamCop - Spam Reporting and Filtering Software - <http://spamcop.net>

Spam.Abuse.net - "Fight Spam on the Internet!" information center
- <https://www.abuse.net/>

ScamBusters.org - Stop Spam!
- <http://www.scambusters.org/stopspam/index.html>

SpamBot Beware - Glossary of Spam Related Terms
- <http://www.turnstep.com/SpamBot/glossary.html>

Brazilian Internet Steering Committee (CGI.br) - <http://antispam.br>

Basic instructions to minimize accusations of spam practices

Precautions

- Do not send "newsletters" assuming that recipients would like to receive them.
- Do not include a "register your e-mail" field in your website without strictly following the "Active Confirmation" described in this document.
- Do not buy e-mail lists. This is illegal, and it will certainly result in complaints on

the sending of SPAM by your website.

- Do not believe if a seller assures that an e-mail list was approved by the recipients to receive messages. That's a lie.
- If a visitor to your website registers as your client, this does not mean that he/she accepted to receive your ads. The recipient should explicitly request to receive your advertising e-mails.
- If you have a program that records all e-mail addresses of persons that send questions to your website, and you use this list to send e-mails, you will certainly be accused of SPAM.
- There is not a legislation about this subject in Brazil. So, the argument that the e-mails sent cannot be considered a SPAM based on a congress act or legislation, whether national or international, will not be valid.
- Always refer to the website www.locaweb.com.br to see any updates about this subject.

Active Registration Confirmation

The best way to register in order to validate the sending of e-mails is through a process called "Active registration confirmation." It consists of explicitly requesting the registration of a client, in order to guarantee that he/she will accept to receive you communications in the future.

This technique is particularly useful in cases where you want to build your e-mails list without taking the risk of being accused of being a SPAMMER for having accepted an address without the authorization of the owner. This occurs frequently when you have an "Indicate a friend" field in your website, which leads to many "Friends" being indicated without their knowledge and, thus, they may consider any communication from you as a SPAM.

How to implement the active confirmation?

- If you have an "Indicate a friend" field and any e-mail address is indicated to receive communications, DO NOT include it in your list immediately.
- If you have a client registration form in place, be sure that it includes a clear "checkbox" stating that the client agrees to receive informative materials, ads etc. relating to your website.
- Send an e-mail to the registered address immediately with a very clear and objective text, WITHOUT ADS, and only containing the information that someone has indicated the e-mail address to continue receiving communications from your website. If the recipient really wants to receive such communications, he/she must reply to your e-mail using a text previously defined.
- Include the e-mail address in our list only if you receive such reply and if it is affirmative.
- Keep the e-mail with the confirmation, since it will be your single evidence that the visitor has explicitly accepted to receive your communications.

Important: this process does not guarantee that your website will not be accused of SPAM, but it is a means to protect yourself against this situation and show good faith and transparency.

ATTENTION:

If a Locaweb client is accused of SPAM practices, and his/her website cannot be immediately removed for some reason, Locaweb reserves the right to require, for purposes of maintaining the provision of its services, that the website accused of this practice COMPULSORILY adopts the "Active Registration Confirmation" technical resource. Also, depending on Locaweb's subjective analysis, the case may be considered "serious," and Locaweb may require that the e-mails list used by the website is invalidated, so as to guarantee that the website will not continue to send potentially unwanted e-mails to certain addresses.

This "ANTISPAM COMMITMENT" cancels and replaces the previous commitment, registered in the 3rd Registry of Deeds and Documents of the Capital of the State of São Paulo, under No. 8518948, on August 29, 2006.

São Paulo, April 08, 2008

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Unlimited Policy

Get to know the definitions of space, and what is not allowed under the unlimited policy.

Definition of "Shared Website Hosting"

At Locaweb, *Hospedagem Basic*, *Hospedagem Plus*, *Hospedagem Business*, *Hospedagem Max*, *Hospedagem I*, *Hospedagem II*, *Hospedagem III*, *Revenda Standard*, *Revenda Premium*, *Revenda Ultimate*, *Revenda I*, *Revenda II* and *Revenda III* plans are defined as "shared website hosting." The objective of shared hosting is to share the resources of large servers among several websites, thus reducing the costs for clients.

In servers of this kind, in which various website share their resources, if a given website consumes a large memory or CPU volume, regardless of the reasons for that, all other websites will feel the effects of such consumption, which may lead to slow accesses or lack of availability.

For this reason, it is very important that your website applies good programming practices, both in terms of performance and security, which are characteristics inherent to the quality of the code.

When we detect a website in these conditions, we analyze the reasons for the excessive increase in consumption, and suggest the most appropriate solutions, such as migration, programming optimization and so on.

Definition of "space" and "transfer"

For a better knowledge of the term “unlimited” with respect to space and transfer, we define “space” as the quantity of data recorded in a disk, code files, images, videos and the like. In all cases, “transfer” is the quantity of data transmitted between our servers and the legitimate visitors/users of your websites.

So, “unlimited” means that there are no restrictions on the space consumed during the accesses of visitors/users to your website, as well as on data transfers. As a result, there will be no additional charges regarding this aspect. All contractual clauses currently in effect and not related to space and transfer limits, will be fully maintained. In case of doubt regarding the practical application of the agreement or this promotional ad, the agreement’s provisions will prevail.

For this reason, to have unlimited space and transfers does not mean that you can use your hosting in a way that affects a server’s operations; for illegal purposes; or in a manner that may otherwise violate the legislation in effect.

Should this happen, the applicable measures will be taken as provided for in the agreement available at <http://www.locaweb.com.br/contratos/>

What is not allowed in “UNLIMITED”?

The following actions will not be allowed, among others:

- Using hosting as a virtual disk, that is, as a space for storage or backup of files that are not elements of your website. For this purpose, you may use other products, such as Cloud Computing or Dedicated Servers options. The purpose of Website Hosting is to host Internet sites only, since we already make available the service for backup of your website.
- Hosting of films, TV series, music, apps or any material subject to copyrights and characterized as “piracy,” stored in any format or file extension.
- Using hosting as a “mirror” for other websites; or as an upload server, such as RapidShare or MegaUpload; or as a large mass distributor of multimedia – in this case, the most appropriate products are, definitely, dedicated servers or Cloud Computing.
- Making your login and password for the Dashboard, SSH, FTP available to the public – for example, in forums, discussion lists, chats, and other websites -, with the purpose of sharing files with the public in general.
- Regarding MySQL, PostgreSQL and SQL Server databases, “legitimate access” are those made from websites hosted with Locaweb. External direct accesses to the database are limited to a maximum of 1 simultaneous connection (for database management purposes). There is a limit of 30 simultaneous connections for MySQL and PostgreSQL databases, whether made from your website/app, or through direct access. For SQL Server databases, simultaneous connections are unlimited. MySQL, PostgreSQL and SQL Server databases should not be used in websites/apps or tools that do not relate to your hosting plan and/or are not hosted with Locaweb.

- Exclusively regarding MySQL databases, aiming at improving the performance and reducing the chances that a client causes losses for other clients hosted on the same server, the following restrictions will be applied: MAX_JOIN_SIZE=1000000 (1 million). SQL_SELECT_LIMIT=1000000 (1 million). These values refer to the quantity of records that the database will search in order to fulfill the requirements of a query. These limits do not relate to the quantity of records in a table, but to the quantity of records that will be read in order to fulfill a query.

But keep calm. If you are hosting your content website, dynamic web application, or e-commerce, and it is compatible with the principles of “shared website hosting,” you should not worry about transfer limits that may hinder your growth, since you also know that other websites hosted with the same server will not affect your website for the same reasons.

All contractual clauses currently in effect and not related to space and transfer limits, will be fully maintained. In case of doubt regarding the practical application of the agreement or this promotional ad, the agreement’s provisions will prevail.

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Postmaster Policy

E-mail deliveries through Locaweb's network follow the technical requirements below:

1 - Locaweb's e-mail servers may reject connections of IP addresses that do not comply with [RFC 1912](#) recommendations regarding reverse DNS settings.

2 - Locaweb's e-mail servers will not accept connections from systems configured with dynamic IPs.

3 – Locaweb servers may reject connections from servers with over 10% of error in the recipients list.

4 - Locaweb may reject messages when the original IP address of the connection is not considered valid according to its SPF entry, for domains that publish its SPF records.

5 – Locaweb analyzes the message flow, and it may reject connections from servers with a suspicious SPAM behavior.

6 – Locaweb publishes its SPF records and recommends that all clients do the same.

7 - Complaints from Locaweb users may be used as a basis for refusing access to the electronic mail system.

8 – E-mail servers also follow the recommendations below: [RFC 974](#), [RFC 4408](#), [RFC 2821](#), [RFC 2822](#) and [RFC 4871](#).

Privacy Policy for Job Applicants

Updated on March 15, 2022

Locaweb Serviços de Internet S/A is committed to raise the awareness of its job applicants (“Job Applicants” or “you”) on the protection of their personal data. Accordingly, we present our privacy policy (“Privacy Policy”) with the purpose of supplying clear and accurate information to Job Applicants about the collection, use, storage, and other types of personal data processing carried out by Locaweb in the context of their selection and hiring process, in case that you are selected.

This document aims at presenting, in an objective manner, personal data processing characteristics and possibilities.

IN THE EVENT THAT YOU ARE APPROVED IN OUR SELECTION PROCESS AND HIRED, THE PROCESSING OF YOU PERSONAL DATA WILL START TO BE FULLY GOVERNED BY THE EMPLOYEE’S PRIVACY POLICY. IN CASE OF CONFLICT BETWEEN THIS DOCUMENT AND THE EMPLOYEE’S PRIVACY POLICY, THE LATTER WILL PREVAIL.

Personal data that we process

To the extent permitted by the applicable laws, we may collect and process the following types of personal data about you throughout your selection process.

- **Record data.** Locaweb will process your record data, such as full name, address, date of birth, and ID number (RG, CPF, CNH, RNE and/or voter’s card) for purposes of identification during your selection process and registration with Locaweb.
- **Contact information.** Locaweb will process your electronic and home address data, as well as your phone number, in order to contact you about the development of the selection process and make a proposal, as the case may be.
- **Information made available by you in your resumé or in professional social networks.** Locaweb will process information about your trajectory, and professional and academic experience, as well as on the skills indicated in the resumé you shared with Locaweb, such as those that you have publicly manifested in your professional networks. Locaweb processes this information in order to analyze your professional profile relating to other applicants, so as to assess if you have the profile required for the job position at Locaweb.
- **Information made available by you in interviews and tests, and in inquiries carried out by Locaweb.** In addition to the information mentioned in the previous topics, in case that you selection processes advances and Locaweb invites you to carry out interviews and tests, after the initial inquiries, Locaweb will process any personal data that you have made available in these situations, which may include, among others, (i) details about your personal life and your latest jobs; (ii) compensation and benefits expectations; (iii) result of queries in

the E-social program; (iv) behavioral profile report and autobiography; and (v) result of psychotechnic tests.

- **Additional information.** As a mandatory part of the final phase of the selection process, and in order to know more about the Applicants, we may request additional information for confirmation purposes, which may include the possible receipt of information about you from third parties, including public databases. The processing of information obtained from third parties is strictly limited to the purposes provided for in this Privacy Policy, and it is intended for analyzing your profile for the job position at Locaweb.

- **Information available in public sources.** Locaweb reserves the right to conduct searches in public sources, such as Courts, the Brazilian Tax Authority, Commercial Registries, Transparency Portal (Politically Exposed Persons), news portals, and others, in order to comply with the anti-money laundering legislation, the Law on conflict of interests, and the norms issued by the Central Bank of Brazil (Bacen) and the Brazilian Securities Commission (CVM), considering that some companies of our group are regulated by these bodies.

Locaweb may collect this information directly from you and/or from the profiles that are publicly available in social networks.

With whom do we share your personal data?

Locaweb may share your personal data with third parties or business partners that are important for information technology purposes, as well as for the management and performance of the selection process phases. Data sharing is based on the following criteria and purposes:

- **Service Providers.** We may share your personal data with service providers engaged by Locaweb to supply HR software and other information technologies used in managing the selection process, and job agencies specializing in selection processes (including the recruiting and selection of Applicants who fit in the concept of “persons with disabilities” – PWD), among others.

- **Request from the relevant authorities.** Locaweb may also share your personal data with third parties, including government bodies, in order to respond to investigations, court orders, and court proceedings, or to investigate, prevent or adopt measures regarding illegal activities, suspicion of fraud, or situations involving potential threats to the physical security of any person, or as required by legislation.

- **New Business.** In case that Locaweb gets involved in a merger, purchase or sale of all or some of its assets, your personal data may be shared with the buyer. In case of change in the identity of your personal data controller as a result of any transaction, you will be notified of any choices you may have about your personal data.

International transfers of your personal data

Locaweb may transfer some of your personal data to service providers located abroad, including providers of cloud services.

If Locaweb transfers your personal data to locations outside Brazil, Locaweb will adopt the appropriate measures to ensure the right protection of your personal data according to the requirements of the legislation applicable, including by signing the appropriate agreements on the transfer of personal data.

How long will we retain your personal data?

Locaweb stores and keeps your information (i) for the time required by law; (ii) until completion of the personal data processing, as mentioned below; or (iii) for the time required to preserve Locaweb's legitimate interests, such as the statutes of limitation applicable, or for compliance with legal or regulatory obligations.

Personal data processing will be deemed complete when any of the following situations takes place:

- The purpose for which the data were collected has been achieved.
- The personal data collected ceased to be necessary or relevant to the achievement of the specific purpose planned.
- Manifestation of the Job Applicant in cases where Locaweb has received his/her consent on certain personal data processing.
- Legal or regulatory order.

In the cases of completion of personal data processing mentioned above, with due regard for the possibilities set forth in the applicable legislation or in this Privacy Policy, the personal data will be appropriately deleted.

If you are not selected, we will keep your resumé and your data for a period of three (3) months. If you want these data to be eliminated, you should contact Locaweb's Human Resources area or the Data Protection Officer by e-mail privacidade@locaweb.com.br

Your rights in relation to your personal data we process

You will have certain rights in relation to your personal data, including, among others:

- Receive clear and complete information about processing of your personal data, including events of personal data sharing;
- Request access to your personal data and/or confirmation about the existence of data processing;
- Request that we rectify any inaccurate, incomplete and outdated personal data;
- Oppose to the processing activities, and request anonymization and exclusion of personal data, in specific circumstances;
- Request the portability of your personal data;
- Withdraw consent at any time, when Locaweb processes your personal data based on consent;
- Request the review of automated decisions that may affect your interests.

You may exercise these rights by contacting Locaweb's Human Resources area by e-mail rhrecrutamento@locaweb.com.br, or the Data Protection Officer by e-mail privacidade@locaweb.com.br

Personal Data Protection

Locaweb uses the appropriate organizational technical measures to protect your personal data against non-authorized or illegal processing, or accidental loss, destruction or damage. Your personal data are safely stored in protected equipment. Just a limited number of persons will have access to this equipment, and only individuals with legitimate reasons will have access to your personal data.

Amendments to this Privacy Policy

Locaweb reserves the right to amend this Privacy Policy at any time, upon publication of the updated version on [insert]. Applicants will be duly informed about significant amendments to the Privacy Policy.

Identification of the Controller and Data Protection Officer

Locaweb Serviços de Internet S/A, enrolled with CNPJ under No. 02.351.877/0001-52, with principal place of business at Rua Itapaiuna, No. 2434, Vila Andrade, in the City and State of São Paulo, Postal Code 05707-001, is the controller of your personal data. LIMA ≡ FEIGELSON ADVOGADOS law firm is the person in charge of personal data processing (“Data Protection Officer”), and they can be contacted by e-mail privacidade@locaweb.com.br

If you have any doubt about this Policy, please contact Locaweb’s Human Resources area or the Data Protection Officer by e-mail privacidade@locaweb.com.br

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