

Privacy Policy - "GOBRUNCH"

Version 01.2020

1. GENERAL INFORMATION AND DEFINITIONS

This privacy policy has been compiled to better suit those who are concerned about out how their personal information is being used. The platform called GOBRUNCH values the privacy of its users and has created this Privacy Policy to demonstrate its commitment to protecting your privacy and personal data, under the General Data Protection Act and other laws on the subject, as well as describing how your privacy is protected by GOBRUNCH when collecting, treating and storing your personal information.

Please read our privacy policy carefully to gain a clear understanding of how we collect, use, protect or handle your personal information.

1.1 SETTINGS

User: all individuals who will use or visit the Site(s) and/or application(s), over 18 (eighteen) years old or emancipated and fully able to perform the acts of civil life or those absolutely or relatively incapable properly represented or assisted.

Personal Data: means any information provided and/or collected by GOBRUNCH and/or its affiliates, by any means, even public, that: (I) identifies, or that, when used in combination with other information processed by GOBRUNCH identifies an individual; or (II) whereby the identification or contact information of an individual may be derived. Personal Data may be in any media or format, including electronic or computerized records, as well as in paper-based files. Personal Data, however, does not include business phone, business mobile number, business address, business email.

Purpose: the objective, the purpose that GOBRUNCH wishes to achieve from each act of processing of personal information.

Need: justification for which it is strictly necessary to collect personal data, to achieve the purpose, avoiding excessive collection.

Legal bases: legal basis that makes legitimate the processing of personal data for a certain prior purpose by GOBRUNCH.

Consent: express and unambiguous authorization given by the User holding the personal data for GOBRUNCH to process his/her personal data for a previously described purpose, in which the legal basis necessary for the act requires the express authorization of the holder.

Data Controller: It should be noted that GOBRUNCH acts as a subcontractor of personal data, within the meaning of applicable legislation, for the management of any online event accessible through a GOBRUNCH Service. In this case, the data controller is the person or company that organizes the corresponding online event, that is, the GOBRUNCH Customer within the meaning of the General Conditions of Use.

This policy generally applies to all Users and potential Users of the services offered by GOBRUNCH, including Users of the websites or other means operated by GOBRUNCH

and summarizes how **GOBRUNCH** may collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control the information, modify, communicate, transfer, disseminate or extract the collected data, including personally identifiable information, in accordance with applicable legal bases and all applicable privacy and data protection laws.

By accessing and/or using the LGPD Brazil website, the User declares to be at least eighteen (eighteen) years old and has full and express capacity to accept the terms and conditions of this Privacy Policy and the Consent Form for all rights.

If the User does not fit the above description and/or does not agree, even if in part, with the terms and conditions contained in this Privacy Policy, he/she shall not access and/or use the services offered by **GOBRUNCH**, as well as the websites and services operated by him/ her.

2. COLLECTION AND USE OF PERSONAL INFORMATION

The User is aware that he/she provides information consciously and voluntarily through through the websites operated by **GOBRUNCH**. When the User registers and/or fills out forms offered by **GOBRUNCH**, certain Personal Data requested will be kept confidential and will be used only for the purpose mentioned in the table below:

CATEGORY OF PERSONAL DATA	PURPOSE	ACCEPTS	DECLARATION OF DESIRE
Name, E-mail and Company	In order to access the platform and receive promotional material, GOBRUNCH will need the User to provide his/her Name, E-mail and which Company he works in.	Authorization/ User Consent	I agree to provide my Name, E-mail and in which Company I work to access the material made available on the site, in addition to receiving eventual e-mails from GOBRUNCH . I am aware and U agree to the receipt of emails from GOBRUNCH .
Name, E-mail and Company	If the User wishes to contact GOBRUNCH through the "Contact Us" area available on the website, GOBRUNCH will need to collect the name and e-mail User.	Authorization/ User Consent	I agree to provide my Name and Email GOBRUNCH to contact me, as well as aware that this data will be used by GOBRUNCH for sending emails.

3. SHARING AND PROCESSING OF PERSONAL INFORMATION

GOBRUNCH does not sell, trade or transfer to external parties your Personal Data collected on its websites to email list brokers, without your express consent.

GOBRUNCH may disclose the Personal Data collected to third parties, in the following situations and to the limits required and authorized by law:

- I. With your customers and partners when necessary and/or appropriate to the provision of related services, in order to personalize your experience and allow us to deliver the type of content and offers you are most interested in;
- II. With companies and individuals hired to perform certain activities and services on behalf of **GOBRUNCH**;

- III. With group companies;
- IV. With suppliers and partners to achieve the services contracted with **GOBRUNCH** (such as information technology, accounting, among others);
- V. For administrative purposes such as: research, planning, service development, security and risk management;
- VI. Where necessary as a result of legal obligation, determination of competent authority, or judicial decision.

In the course of sharing Personal Data with third parties, all subjects mentioned in Items I to VI shall use the Personal Data shared in a manner consistently and in accordance with the purposes for which it was collected (or with which the User previously consented) and in accordance with what was determined by this Privacy Policy, other privacy statements of the website or countries, and all applicable privacy and data protection laws.

4. LEGAL REASONS FOR THE DISCLOSURE OF YOUR DATA

In certain circumstances, **GOBRUNCH** may disclose Personal Data, to the extent necessary or appropriate, to government agencies, consultants and other third parties for the purpose of complying with applicable law or a court order or subpoena or, furthermore, if **GOBRUNCH** believes in good faith that such action is necessary to:

- I. Comply with legislation requiring such disclosure;
- II. Investigate, prevent or take measures related to suspected or actual illegal activities or to cooperate with public agencies or to protect national security;
- III. Execution of its contracts;
- IV. Investigate and defend against any claims or allegations of third parties;
- V. Protect the security or integrity of services (e.g., sharing with companies that are experiencing similar threats);
- VI. Exercise or protect the rights, property and security of **GOBRUNCH** and its related companies;
- VII. Protect the rights and personal safety of your employees, users or the public;
- VIII. In case of sale, purchase, merger, reorganization, liquidation or dissolution of **GOBRUNCH**.

GOBRUNCH will scientificise the respective Users on any legal demands that result in the disclosure of personal information, in accordance with what was set out in item 4, unless such scientificization is prohibited by law or prohibited by a court order or, furthermore, if the request is emergency. **GOBRUNCH** may challenge these demands if it deems that the requests are excessive, vague or made by incompetent authorities.

5. SECURITY OF PERSONAL INFORMATION

All Personal Data will be stored in the **GOBRUNCH** database or in a database maintained "in the cloud" by service providers contracted by **GOBRUNCH**, which are duly in accordance with current data legislation.

GOBRUNCH and its suppliers use various security procedures to protect the confidentiality, security and integrity of your Personal Data, preventing any damages from the occurrence of such data, such as:

- We use regular malware scanning;
- Your personal information is contained behind secure networks and is only accessible by a limited number of people who have special rights to access those systems and are required to keep the information confidential. In addition, all sensitive information you provide is encrypted through Secure Socket Layer (SSL) technology;
- We implement a variety of security measures when a user enters, sends or accesses your information to maintain the security of your personal information.

Although **GOBRUNCH** uses security measures and monitors its system to verify vulnerabilities and attacks to protect your Personal Data from unauthorized disclosure, misuse or alteration, the User understands and agrees that there are no guarantees that the information may not be accessed, disclosed, altered or destroyed for violation of any of the physical, technical or administrative protections.

6. DATA RETENTION

GOBRUNCH retains all data provided, including Personal Data, as long as the User's registration is active and as necessary to achieve its services.

GOBRUNCH will retain your Personal Data and keep your data stored until any deletion request, or in accordance with the periods described in the Purpose Table.

GOBRUNCH may retain your Personal Data after receiving your request for deletion or after the deadlines of the Purpose Table if it is necessary to comply with legal obligations, resolve disputes, maintain security, prevent fraud and abuse and ensure compliance with contracts.

In addition, **GOBRUNCH** through the website uses cookies that are small files that a website or its service provider transfers to your computer's hard drive through your web browser (if you allow it) that allows the website or service provider systems to recognize your browser and capture and remember certain information. They are used to help us understand your preferences based on previous or current site activity, which allows us to provide you with enhanced services. We also use cookies to help us compile aggregate data about website traffic and website interaction so that we can deliver better on-premises experiences and tools in the future. You can choose to have your computer notified each time a cookie is being sent, or you can choose to disable all cookies. You do this through your browser settings. Because your browser is a little different, look for your browser's Help Menu to learn the correct way to modify your cookies. If you disable cookies, some of the features that make your website experience more efficient may not work properly.

7. LEGAL BASES FOR PROCESSING

GOBRUNCH only treats Personal Data in situations where it is legally authorized or with its express and unequivocal consent of the User.

As described in this Policy, **GOBRUNCH** has legal bases to collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control the information, modify, communicate, transfer, disseminate or extract data about the User.

Legal bases include your consent (collected expressly and unequivocally in the Consent Form), contracts and preliminary contractual procedures (in which processing is necessary to enter into the contract with the User) and legitimate interests, provided that such processing does not violate your rights and freedoms, as can be seen in the Purpose Table.

Such interests include protecting the User and **GOBRUNCH** from threats, complying with applicable law, exercising regular rights in judicial, administrative or arbitration proceedings, enabling the conduct or administration of business, including quality control, reports and services offered, managing business transactions, understanding and improving business and customer relationships, and enabling users to find economic opportunities.

The User has the right to deny or withdraw the consent provided to **GOBRUNCH**, when this is the legal basis for the processing of personal data, and **GOBRUNCH** may terminate the achievement of its services for this user in the event of such request.

If you have questions about the legal bases for the collection, processing and storage of your personal data, please contact **GOBRUNCH** and its Data Protection Officer at support@gobrunch.com.

8. RIGHT TO ACCESS AND CONTROL YOUR PERSONAL DATA

GOBRUNCH offers the User several options for what to do with their Personal Data collected, processed and stored, including its deletion and/or correction. The User may:

- I. Delete data: The User may request the deletion of some of his/her Personal Data (for example, if they are no longer necessary to provide the services to him);
- II. Change or correct data: The User may edit or request the editing of some of his/her Personal Data. The User may also request updates, changes or corrections of their data in certain cases, especially if they are incorrect.
- III. Object, limits or restrictions on the use of data: The User may request the interruption of the use of all or some of his Personal Data (for example, if we do not have the right to continue to use it), or limit our use of such data (for example, if your Personal Data is incorrect or stored illegally), noting that **GOBRUNCH** may treat personal data according to the legal bases listed in the table below:

CATEGORY OF PERSONAL DATA	PURPOSE	ACCEPTS	DECLARATION OF DESIRE
NAME, E-MAIL AND COMPANY	IN ORDER TO ACCESS THE PLATFORM AND RECEIVE PROMOTIONAL MATERIAL, GOBRUNCH WILL NEED THE	AUTHORIZATION/ USER CONSENT	I AGREE TO PROVIDE MY NAME, E-MAIL AND IN WHICH COMPANY I WORK TO ACCESS THE MATERIAL MADE AVAILABLE ON

	USER TO PROVIDE HIS/HER NAME, E-MAIL AND WHICH COMPANY HE WORKS IN.		THE SITE, IN ADDITION TO RECEIVING EVENTUAL E-MAILS FROM GOBRUNCH. I AM AWARE AND U AGREE TO THE RECEIPT OF EMAILS FROM GOBRUNCH.
NAME, E-MAIL AND COMPANY	IF THE USER WISHES TO CONTACT GOBRUNCH THROUGH THE "CONTACT US" AREA AVAILABLE ON THE WEBSITE, GOBRUNCH WILL NEED TO COLLECT THE NAME AND E-MAIL USER.	AUTHORIZATION/ USER CONSENT	I AGREE TO PROVIDE MY NAME AND EMAIL GOBRUNCH TO CONTACT ME, AS WELL AS AWARE THAT THIS DATA WILL BE USED BY GOBRUNCH FOR SENDING EMAILS.

- IV. The User has the right to access or take his/her data: the User may request a copy of his/her Personal Data and the data that the User has provided in a readable format in printed form or by electronic means.

The User may make the requests listed above by contacting our Data Protection Officer via email support@gobrunch.com and these requests will be considered in accordance with applicable laws.

9. POLICY REVIEWS

If **GOBRUNCH** modifies this Privacy Policy, such changes will be published in a visible way on the **GOBRUNCH** website. This Policy is valid from 01/10/2020. If the User has any questions regarding the privacy policies of the website, please contact **GOBRUNCH** at the data protection officer's service channel/address below.

10. CONTACT

GOBRUNCH has appointed CTO Mike Watanabe AS Data Protection Officer ("DPO"). The User may contact the DPO at the following physical address or via the e-mail support@gobrunch.com.

11. MEDIATION AND ELECTION FORUM

This policy is subject to the Law of the Federative Republic of Brazil and the Forum of the District of São Paulo is competent to resolve any controversy in relation to it. In the event of an incident with Personal Data, **GOBRUNCH** reserves to appoint the Arbitration and Mediation Center of the American Chamber of Commerce for Brazil – São Paulo, able to resolve the issues involving the Users who hold the data, in accordance with the General Data Protection Law.