

Privacy Policy - "GoBrunch"

Version 11.23.1

1. GENERAL INFO AND DEFINITIONS

The website named **GOBRUNCH** values the privacy of its users and created this Privacy Policy to demonstrate its commitment to protect your privacy and your personal data, in accordance with the General Law of Data Protection and other laws on the subject, as well as describe how your privacy is protected by **GOBRUNCH** when collecting, treating and storing your personal information. It also reflects **GOBRUNCH's** compliance with the applicable requirements of the Children's Online Privacy Protection Act ("COPPA"), the California Consumer Privacy Act ("CCPA"), the Family Educational Rights and Privacy Act ("FERPA"), the California Online Student Act, the Personal Information Protection Act ("SOPIPA"), the EU General Data Protection Regulations ("GDPR"), the General Data Protection Act and other applicable laws. For the purposes of this **GOBRUNCH** Privacy Policy, personal information (or "personal data") means information relating to an identified or identifiable person. Please read our privacy policy carefully to gain a clear understanding of how we collect, use, protect or handle your personal information.

1.1 DEFINITIONS

User: are all individuals or companies that make their registration on the site **GOBRUNCH**. The user under eighteen years old must use the site under the supervision and responsibility of his father, mother, school or legal guardian.

Personal Data: the personal data concerns all information provided and/or collected by **GOBRUNCH** concerning an identified or identifiable person. An identifiable individual is someone who can be identified, directly or indirectly, by name, electronic mail, location coordinates, online identifier or by link to one or more factors specific to the physical identity, such as position, school, and physiological, genetic, mental, economic, cultural or social aspects of the person.

Sensitive Personal Data: personal data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or religious, philosophical or political organization, data relating to health or sex life, genetic or biometric data, when linked to a natural person;

Anonymized data: data relating to a data subject who cannot be identified, taking into account the use of technical and reasonable means available at the time of processing;

Database: is a structured set of personal data, established in one or several locations, on an electronic or physical medium;

Controller: is the natural or legal person, whether governed by public or private law, who is responsible for decisions regarding the processing of personal data;

Operator or Processor: is the natural or legal person, governed by public or private law, who carries out the processing of personal data on behalf of the controller;

Data Controller: a person appointed by the controller and operator to act as a communication channel between the controller, the data subjects and the General Data Protection Regulation (GDPR);

Processing Agents: are the controller and the operator;

Treatment or Processing: any operation or set of operations carried out with personal data, whether or not by automated means, such as those relating to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction;

Pseudonymization: is the processing of personal data in such a way that the data can no longer be attributed to a specific data subject without the use of additional information, the process of which can be reversed through the use of an access key;

Anonymization: is the use of reasonable technical means available at the time of processing, whereby a piece of data loses the possibility of direct or indirect association with an individual;

Blocking: temporary suspension of any processing operation, by keeping the personal data or the database;

Exclusion: the elimination of data or a set of data stored in a database, regardless of the procedure used;

International Data Transfer: is the transfer of personal data to a foreign country or international body of which the country is a member;

Shared Use of Data: Is the communication, dissemination, international transfer, interconnection of personal data or shared processing of personal databases by public bodies and entities in compliance with their legal authority, or between these and private entities, reciprocally, with specific authorization, for one or more processing modalities permitted by these public entities, or between private entities;

Personal Data Protection Impact Report: is the controller's documentation that contains a description of the personal data processing processes that may generate risks to civil liberties and fundamental rights, as well as measures, safeguards and risk mitigation mechanisms;

Security Incident: is an event that negatively impacts the confidentiality, integrity or availability of information;

Data Breach: is a security incident that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed;

Research Agency: is the agency or entity of the direct or indirect public administration or non-profit private legal entity legally constituted, with headquarters and jurisdiction in the country, which includes basic or applied research of a historical, scientific, technological or statistical nature in its institutional mission or social or statutory objective;

National Authority: the public administration body responsible for ensuring, implementing and monitoring compliance with this Law throughout the country.

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

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

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

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

This policy applies, in general, to all Users and potential Users of the services offered by **GOBRUNCH**.

By accessing and/or using the **GOBRUNCH** site the User accepts all the terms and conditions of this Privacy Policy for all purposes of law.

If the User does not fit and/or does not agree, even in part, with the terms and conditions contained in this Privacy Policy, he/she should not access and/or use the services offered by **GOBRUNCH**.

1.2 PERSONAL DATA PROCESSING ACTIVITIES

The personal data processing activities provided for herein must comply with good faith and the Principles of Purpose, Adequacy, Necessity, Free Access, Data Quality, Transparency, Security, Prevention, Non-Discrimination, Accountability and Responsibility.

Purpose: The processing is carried out for legitimate, specific and explicit purposes, and is informed to the data subject, without the possibility of further processing incompatible with those purposes;

Adequacy: Compatibility of the processing with the purposes informed to the data subject, in accordance with the context of the processing;

Necessity: Limitation of the processing to the minimum necessary for the fulfillment of its purposes, with a scope of data that is pertinent, proportional and not excessive in relation to the purposes of the data processing;

Free Access: Guarantee to data subjects of free and easy consultation on the form and duration of processing, as well as on the completeness of their personal data;

Data Quality: Guarantee to data subjects that their data is accurate, clear, relevant and up-to-date, in accordance with the need and purpose for which it is processed;

Transparency: Guarantee to data subjects of clear, precise and easily accessible information about the processing and the respective processing agents, with due regard for commercial and industrial secrets;

Security: Use of technical and administrative measures to protect personal data from unauthorized access and accidental or unlawful destruction, loss, alteration, communication or dissemination;

Prevention: Adoption of measures to prevent the occurrence of damage as a result of the processing of personal data;

Non-discrimination: The impossibility of processing for unlawful or abusive discriminatory purposes;

Responsibility and Accountability: Demonstration by the agent of the adoption of effective measures capable of proving compliance with personal data protection rules, including the effectiveness of these measures.

2. COLLECTION AND USE OF PERSONAL INFORMATION

The User provides his personal information in a conscious and voluntary way by filling out the registration form that precedes his access to the **GOBRUNCH** site. The data collected will be kept confidential and will only be used for the purpose below:

PERSONAL DATA CATEGORY	PURPOSE	ACCEPT	STATEMENT OF WILL
Name, e-mail, occupation, company or school, date, time (time zone), stay, audio and image	In order to access the site and receive promotional material, GOBRUNCH will need the User to provide his/her Name, e-mail, company in which he/she works, occupation. In the case of students, the school in which he studies. The Personal Data collected will not be used to send any type of SPAM. The insertion of image and/or photo is optional for the exclusive use of Avatar creation.	Authorization/ User Consent	I agree to provide my Name, e-mail, company in which I work or Education Institution in which I study, to access the material available in the site, besides receiving from GOBRUNCH invitation e-mails. I am also aware that, by free choice, I can choose to insert image and/or personal photos to create Avatars. I also declare that I agree with the collection and sharing of the referred data by the organizer, who can record videos and voices during the webinar, as well as store messages sent for integration.
Name, e-mail, company, occupations, and school.	If the User wants to contact GOBRUNCH through the "Contact Us" area available on the site, the GOBRUNCH will need to collect the User's Name and e-mail in order to contact.	Authorization/ User Consent	I agree to provide my Name and e-mail for GOBRUNCH contact me

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 e-mail list brokers, without your express consent. The Personal Data collected may only be disclosed in the situations and limits required and authorized by law:

- I. For administrative purposes such as: research, planning, service development, security and risk management;
- II. When necessary as a result of legal obligation, determination of competent authority, or judicial decision.

In the event of sharing Personal Data with third parties, all subjects mentioned in items I and II shall use the Personal Data shared in a consistent manner and in accordance with the purposes for which they were collected (or with which the User has previously consented) and in accordance with what has been determined by this Privacy Policy, other website or country privacy statements, 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 in order to comply with applicable law or a court order or subpoena, or if **GOBRUNCH** believes in good faith that such action is necessary:

- I. Comply with legislation that requires such disclosure;
- II. To 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 your contracts;
- IV. To investigate and defend itself against any claims or allegations from third parties;
- V. Protecting the security or integrity of services (e.g., sharing with companies that are suffering similar threats);
- VI. Exercise or protect the rights, property and security of **GOBRUNCH** and its affiliated companies;
- VII. To protect the rights and personal security of its employees, users or the public;
- VIII. In case of sale, purchase, merger, reorganization, liquidation or dissolution of **GOBRUNCH**.

GOBRUNCH will identify the respective Users about eventual legal demands that result in the disclosure of personal information, in the terms of what was exposed in item IV, unless such identification is forbidden by law or prohibited by court order or, yet, if the request is emergency. **GOBRUNCH** may challenge these demands if it judges that the requests are excessive, vague or made by incompetent authorities.

5. SECURITY OF PERSONAL INFORMATION

All Personal Data collected and handled by **GOBRUNCH**, are stored by contracted service providers, with servers located in the United Kingdom and in the state of New York/USA, which are duly in accordance with local data protection legislation.

United Kingdom: The Azure and Digital Ocean servers are located, responsible for storing the user's name and e-mail address;

USA: The Digital Ocean and AWS servers are located, which are responsible for storing the recordings captured on the platform in the cloud.

The **GOBRUNCH** and its suppliers use several security procedures to protect the confidentiality, security and integrity of your Personal Data, preventing the occurrence of eventual damages due to the treatment of these 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 access rights to these systems and are required to keep the information confidential. In addition, all sensitive information you provide is encrypted using SSL (Secure Socket Layer) 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.
- The personal data collected is all anonymized and stored in different servers making it difficult to associate, directly or indirectly, the User.

Although **GOBRUNCH** uses security measures and monitors your system to check vulnerabilities and attacks to protect your Personal Data against unauthorized disclosure, misuse or alteration, the User understands and agrees that there is no guarantee that the information cannot be accessed, disclosed, altered or destroyed by violation of any of the physical, technical or administrative protections.

The User may still, at his discretion, create a login and password for access to **GOBRUNCH**, or opt for the use of social network integrations that have their own secure access code.

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 will keep your data stored until any request for deletion. In addition, **GOBRUNCH** through the site, uses cookies that are small files that a site or its service provider transfers to the hard disk of your computer through your Web browser (if you allow) that allows the systems of the site or the service provider to recognize your browser and capture and remember certain information. They are used to help us understand your preferences based on previous or current website activity, which allows us to provide you with enhanced services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can provide better site experiences and tools in the future. You can choose to have your computer warn you 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 to 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 site experience more efficient may not work properly.

7. LEGAL BASES FOR PROCESSING

The **GOBRUNCH** only treat Personal Data in situations where it is legally authorized or through its express and unequivocal consent of the User. As described in this Policy, **GOBRUNCH** has legal grounds to collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, archive, store, delete, evaluate or control information, modify, communicate, transfer, disseminate or extract data about the User. The legal grounds include your consent and legitimate interests, provided that such processing does not violate your rights and freedoms. Such interests include protecting the User and **GOBRUNCH** from threats, complying with applicable legislation, regularly exercising rights in judicial, administrative or arbitral proceedings, enabling the conduct or administration of business, including quality control, reporting 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 treatment of personal data, and **GOBRUNCH** may terminate the achievement of its services to this user in the event of such request.

If you have any doubts about the legal basis for the collection, treatment and storage of your personal data, please contact **GOBRUNCH** and its Data Protection Officer through the e-mail: support@gobrunch.com.

8. RIGHT TO ACCESS AND CONTROL YOUR PERSONAL DATA

GOBRUNCH offers the User several options of what to do with your Personal Data collected, treated and stored, including its deletion and/or correction. The User can:

- I. **Delete Data:** the User may request the deletion of some of his 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 to his/her data in certain cases, especially if they are incorrect.
- III. **Objection, limits or restrictions to the use of data:** the User may request the interruption of the use of all or some of his/her Personal Data (for example, if we do not have the right to continue using them), or limit our use of such data (for example, if his/her Personal Data are incorrect or stored illegally), highlighting that **GOBRUNCH** may treat the Personal Data in accordance with the legal grounds listed in the table in item 2.
- 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 of the data that the User has provided in a legible format in printed form or by electronic means.

All our service providers comply with the applicable data protection regulations in accordance with the personal data protection contracts we have signed with them. At any time, you may object to the processing of your personal data for the purpose of providing GoBrunch Services by writing to the DPO. This will, however, lead to termination of the contract, preventing you from accessing GoBrunch Services.

9. POLICY REVISIONS

If **GOBRUNCH** modifies this Privacy Policy, such changes will be published in a visible way on the **GOBRUNCH** website. This Policy is valid from November/2023. If the User has any questions regarding the privacy policies, please contact the **GOBRUNCH**, through the Data Protection Officer service channel.

10. CONTACT

GOBRUNCH appointed CTO Mike Watanabe as Data Protection Officer ("DPO"). The User can contact the DPO at the following physical address or via email support@gobrunch.com.

11. MEDIATION AND FORUM OF CHOICE

This policy is subject to the Law of the Federative Republic of Brazil and the District Court of São Paulo is competent to settle any controversy regarding it. In case of incident with Personal Data, the **GOBRUNCH**, from now on, reserves to appoint the Arbitration and Mediation Center of the American Chamber of Commerce for Brazil - São Paulo, able to settle the issues involving the users who hold the data, under the General Law of Data Protection.