

SOUL BILÍNGUE PRIVACY AND DATA PROTECTION POLICY

This Privacy Policy outlines how SOUL BILÍNGUE ASSOCIATION, a non-profit private legal entity, registered under CNPJ/MF no. 31.325.378/0001-99, with its headquarters at Avenida Bento do Sacramento, 348, Vila Lavínia, Mogi das Cruzes/SP, ZIP Code n.08737-010, uses and discloses the data we collect from students (current, potential, or visitors).

We recommend that you carefully read this document, which aims to provide Students, Collaborators, Partners, Employees, and Volunteers with a commitment to Privacy and Data Protection.

1. DATA PROCESSING RESPONSIBLE

SOUL BILÍNGUE ASSOCIATION, a non-profit private legal entity, registered under CNPJ/MF no. 31.325.378/0001-99 and headquartered at Avenida Bento do Sacramento, 348, Vila Lavínia, Mogi das Cruzes/SP, ZIP Code n.08737-010, will be responsible for processing your personal data, acting as the controller for user information.

2. PERSONAL DATA PROCESSED

We respect your privacy. Any information provided will be treated with care and security, used within the limits set by this policy, always backed by the Law with the primary objective of protecting your data. The processing of personal data enables the provision of educational services offered to provide you with benefits and meet obligations set out in specific laws or regulations.

Among your personal data that may be processed and collected, in accordance with the current standards of the General Data Protection Law (LGPD), are your qualification data (such as name, sexual orientation, ethnicity, RG, CPF, and date of birth), contact data (such as phone, mobile, email, and full residential address), financial data (such as bank, agency, and account number), professional data (like workplace), health data (like the student's vaccination status), socioeconomic data (estimated family income, per capita family income, number of family members, access to electronic equipment, among others) and data related to your school life (education level, ENEM score, high school or higher education transcript, high school or undergraduate diploma or course certificate).

This information can be actively provided by you, either at the time of application to the selection process, during enrollment, when requesting contact, or automatically collected when using online platforms, for instance, connection data such as internet access capability, internet IP, local IP, MAC Address, connection location, machine name, request code, among other information.

Furthermore, some products used internally like Google Analytics, Google Optimize, Google Ads, ZOOM, and Adobe and Microsoft Packages might collect additional information.

2.1. ABOUT PERSONAL DATA

Under current legislation, personal data are understood as all data related to a natural person identified or identifiable. These data, like name, CPF, address, email address, phone

contact, and enrollment number are essential for SOUL BILÍNGUE's operations and are required throughout the selection, enrollment, and educational service delivery processes. These data will be collected, processed, and stored rigorously and confidentially, in accordance with current legislation to ensure their security, anonymity, and confidentiality.

2.2. ABOUT SENSITIVE PERSONAL DATA

In accordance with the General Data Protection Law, "Sensitive Personal Data", specified as personal data about racial or ethnic origin, religious belief, political opinion, union membership, or membership in a religious, philosophical, or political organization, data related to health or sexual life, genetic or biometric data, linked to a natural person, will be collected at the time of enrollment and treated with utmost confidentiality.

Sensitive data collected are used to define the socio-cultural and economic profile of the candidates, aiming to maintain and perpetuate diversity and democratize access to education. After enrollment is completed, you will receive an email notifying you about the disassociation of any personal identification from your sensitive data, which will then be treated as anonymous and impersonal data, used solely for statistics and entirely anonymized strategy.

2.3. ABOUT ANONYMIZED SENSITIVE PERSONAL DATA

After the sensitive personal data outlives its usefulness, they will be stored separately, with no means or mechanism for personal identification, treated as Anonymized Data, in full legal harmony, with the purpose of fulfilling legal obligations, as well as for the treatment of statistical indicators, strategic action definition, and results analysis.

2.4. ABOUT VIDEO, SOUND, AND IMAGE FILES – ONLINE INTERACTIVE PLATFORM LESSONS

Soul Bilingue collects, stores, and processes the content of lessons conducted through the ZOOM platform, using a recording tool for audio and video, as well as chat content, aiming for academic improvement and indispensable for contractual exercise, as per the law.

2.5. ABOUT DATA OWNER CONSENT

The data owner is aware and consents to data processing as described in item 2.4 and can, at any time, contact the data officer to exercise their rights, as long as it does not harm the execution of the contract.

3. DATA STORAGE DURATION

The personal data collected and maintained by Soul Bilingue is used from the admission stage until the end of the course, with the issuance of the diploma or completion certificate. After fulfilling the contractual obligation, in compliance with our legal duty, we will keep your data stored for the minimum legal period required as expressed in this policy.

Soul Bilingue, as a non-profit association that relies on result analysis and comparative frameworks for the correct performance of its activities, determines the following storage periods:

- Personal Data: 5 years
- Sensitive Personal Data: Until the completion of the enrollment process.
- Anonymized Database: Lifetime (for statistical and strategic purposes).

4. PURPOSE OF PERSONAL DATA

Your personal data is used in the selection and enrollment criteria, as well as to keep in touch with you, enabling the execution of the services we provide, in order to offer the best assistance and support in accessing services and/or products. The use of data also occurs in compliance with legal obligations related to the provided service.

Soul Bilingue uses all the collected information for the following purposes:

- a) Execution of the contract and meeting its purpose;
- b) Responding to requests and providing the necessary support during the use of services and/or products, as well as the academic journey;
- c) Expanding offers and promoting courses, services, events, and promotional materials that may be of interest to you;
- d) Enhancing and improving courses and services;
- e) Personalizing your user experience (customer experience);
- f) Meeting the existing legal or regulatory requirements to which Soul Bilingue is subjected;
- g) Allowing the exercise of defense in judicial, administrative, or arbitration processes.

Furthermore, with prior authorization, the collected information can be used for advertising purposes, as well as for sending communications about courses, events, seminars, and other extracurricular activities of interest. If you are bothered and no longer wish to receive any information from Soul Bilingue, you can request discontinuation at any time through communication channels.

5. PERSONAL DATA SHARING

The sharing of personal data, when carried out, is with service providers essential for the functioning of academic activities, controlled by Soul Bilingue, for the execution of student contract services or to authorities/government agencies due to legal and regulatory obligations, especially regarding the Regulatory Framework for Civil Society Organizations or in compliance with specific court orders or police orders.

5.1. SHARING OF SENSITIVE PERSONAL DATA

Sensitive personal data will not be shared or disclosed in an identifiable manner and will be treated as confidential data, with access limited to the General Data Controller and the Enrollment and Admissions Team, strictly in compliance with legal and contractual obligations, unless required by a court order or opposing legal provision.

5.2. SHARING OF ANONYMIZED SENSITIVE PERSONAL DATA

Anonymized sensitive personal data, since they cannot be used as identification criteria, may be shared for all legal purposes, including strategic, statistical, legal, fiscal, and media purposes.

6. WHAT ARE COOKIES AND HOW WE USE THEM - ONLINE PLATFORMS

Cookies are small files, placed and stored on a computer, smartphone, or another internet device when a user visits a specific website.

Soul Bilingue uses cookies to store information, such as the personal preferences of the client when accessing Online Platforms.

The Online Platforms of Soul Bilingue may have links to other sites or third-party services, which may contain useful information and tools, but are not included in this Privacy Policy. Users should note the existence of their own policies. We are not responsible for the privacy policy or content present on third-party sites and platforms.

7. DATA SECURITY

The information collected is treated by us as confidential. Any employee, collaborator, volunteer, or service provider who comes into contact with this information commits to not misuse its purpose and not to use it in a manner inconsistent with what is provided in this Privacy Policy. Any unauthorized advertising or disclosure is strictly prohibited.

8. APPLICABLE LEGISLATION

Soul Bilingue's policy has been crafted in particular compliance with Legislation No. 13.709/2018 (General Data Protection Law "LGPD"); No. 12.965/2014 (Civil Rights Framework for the Internet); No. 13.019/2014 (Regulatory Framework for Civil Society Organizations) and No. 8.078/1990 (Consumer Protection Code), without prejudice to observing other applicable legislation relevant to the institution's activities.

9. UPDATES TO THE PRIVACY AND DATA PROTECTION POLICY

Soul Bilingue commits to updating this policy in response to any changes in the Treatment of your Personal Data.

10. CONTACT AND QUESTIONS

If you have any questions, suggestions, or requests related to this document, please contact us via the email address: ouvidoria@soulbilingue.com.