This Privacy Policy (“Privacy Policy“) sets out the terms and conditions under which Produzz Produções Audiovisuais LTDA. (“our Company” or “Produzz” ) collects information via its website located at www.Produzz.com.br(“Website”) and the other online services and products provided by our Company. As such, this Privacy Policy applies to any person (hereinafter referred to as “You” or “user”) who access or the Website (including any variations or successors of the Website) and/or any online services and products made available by our Company via the Website or a related online platform (collectively “Company’s Platform”).

In order to serve You better via our Website and the Company’s Platform, we require information from You, some of which may be considered as personal data. We understand however, the importance of the privacy and security of your information, and we have therefore set out in detail below how we collect and use your information. Kindly review the terms and conditions of our Privacy Policy as follows so that You may be reassured that we take data protection seriously:-

A. Please note that your access and use of our Website and our Company’s Platform is subject to our Company’s website’s Terms of Use (“Website TOU”), our Company’s Platform’s Terms and Conditions (“our Platform’s T&Cs”), as well as the terms and conditions as set out herein this Privacy Policy. Accordingly, by accessing our Website and/or using any of our Company’s Platform, You are agreeing to our collection of your information pursuant to this Privacy Policy. Should you disagree with any clause in our Platform’ T&Cs, our Website TOU and/or this Privacy Policy, please immediately cease your access of our Website and our Company’s Platform.

B. In order for you to fully utilize our Website and our Company’s Platform, enjoy the benefits conferred by our Company’s Platform, receive updates regarding our Website, our Company’s Platform, enjoy our loyalty programme, participate in our promotions, receive our marketing materials, newsletters or updates for information, programmes, and/or promotion regarding our services and products (our newsletters, updates and/or promotions shall be collectively referred to as our “Updates”), your Personal Data (as defined in clause 1.2 below) has to be provided to us, and we will need to keep and use your Personal Data in order to fulfil the purpose for which you have subscribed to our Company’s Platform, our Website, Updates and/or services.

For expediency and for compliance with any changes in the law, we reserve the right to amend this Privacy Policy in our sole discretion at any time without prior notice to You, and You agree that your continued access of our Website, our Company’s Platform and/or desire to receive our Updates constitutes your unconditional acceptance of our amended Privacy Policy. You agree that it is your sole responsibility to keep yourself updated of any amendments by reviewing this Privacy Policy at http://www.Produzz.com.br/privacy-policy(or such other web address accessible from our Website) regularly.

Types of Data Collected

When You visit our Website and/or sign up for our Companies’ Platform or Updates, we collect Personal Data and Anonymised Data.

“Personal Data” refers to information with personal identifiers, whether true or otherwise, that can be used separately or collectively to identify an individual, such as name, address, NRIC number, mobile number, email address, birthdate, gender, job designation, residency status, bank account and credit card details.

“Anonymised Data” refers to information that is not associated with or linked to your Personal Data and cannot be used to identify individual persons.

Collection of Anonymised Data

We collect Anonymised Data about You when you access or use our Company’s Platform and/or our Website via the application of generally acceptable web technologies including but not limited to “web beacons”, “cookies”, “clear GIFs”, “widgets”, “online evaluations”, “surveys”, “HTML5”, and third-party web analytics such as “Google analytics” (collectively, “Acceptable Technologies”). This automatic collection of non-personal information includes (without limitation) collection of your IP Address, the web browser software that You used, the specific pages of our Website viewed by You, the amount of time You spent viewing our Website or specific webpages on our Website, the number of times You return to view our Website, other click-stream data, the functions of our Company’s Platform that You regularly accessed or used, and third party websites that you may have visited prior to our Website and/or our Company’s Platform. Our purpose for the aforesaid collection of information is for us to understand the preference of our visitors and users so as to enhance and facilitate the ease with which You are able to access or use our Website.

As part of the Anonymised Data that we collect, when You access our Website and/or our Company’s Platform via your mobile device, we will also collect information regarding the type of mobile device that You are utilising so that our Website and our Company’s Platform can provide You with the version of our Website and our Company’s Platform best suited for access via your mobile device.

If You do not consent to our collection of Anonymised Data, please adjust the settings on your computer, tablet and mobile device to block or disable our use of the Acceptable Technologies. We use cookies for a variety of purposes in order to improve your online experience and for analytics. By disabling the collection of the Acceptable Technologies, you may not be able to take full advantage of our Website’s features. In the event that You choose to access our Website or our Company’s Platform without blocking or disabling or opting out of the Acceptable Technologies, such access by You will constitute your consent to our use of the Acceptable Technologies and our collection of information thereto.

You may have configured your web browser and/or other tracking opt-out services to send signals to our Website requesting that our Website does not collect Personal Data and/or Anonymised Data from You (“Do Not Track Signals”). However, PLEASE BE ADVISED THAT OUR WEBSITE AND OUR SUPPLIERS/THIRD PARTY PROVIDERS DO NOT RESPOND TO “DO NOT TRACK SIGNALS” AND WILL CONTINUE TO COLLECT PERSONAL DATA AND ANONYMISED DATA PURSUANT TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE AFOREGOING COLLECTION OF DATA, PLEASE IMMEDIATELY CEASE ACCESSING THE WEBSITE AND OUR COMPANYS’ PLATFORM, OR ADJUST YOUR SETTINGS TO SPECIFICALLY BLOCK OR DISABLE OUR USE OF ACCEPTABLE TECHNOLOGIES AS PER CLAUSE 2.3 ABOVE.

To better assist You in understanding the generally accepted technology used in our collection of Anonymised Data:-

“IP Address” refers to a number that is automatically assigned to your computer when You access the Internet. Under certain circumstances, your IP Address remains the same from browser session to browser session. However, in the event that a consumer Internet access provider is utilized, your IP Address will likely vary from session to session. We track IP Addresses solely in conjunction with session cookies to analyse the flow of webpages on our Website.

“Cookies” refer to small pieces of data that a website or web app sends to your computer’s hard drive or mobile device’s internal storage while You are viewing the said website or utilizing the said web app. Our Website and our Company’s Platform utilise both session cookies (they expire the moment your Internet browser or access to our Company’s Platform is closed) and persistent cookies (they will remain in your computer and your mobile device until you actively take steps to delete them) so as to provide You with a more personalised and interactive experience on our Website and our Company’s Platform. By changing the options on your Internet browser and adjusting the settings in your mobile device, You can control whether to accept or decline cookies.

“Clear GIFs” refer to clear electronic images that are used to track your opening of webpages on our Website and your pattern of accessing the features on our Company’s Platform, for the purpose of allowing us to find out whether the content on our Website and the features in our Company’s Platform appeals to You. Clear GIFs are also commonly known as “web beacons” and may be included on our Website, our Company’s Platform or services, and generally works in conjunction with cookies to identify users and user behaviour. Some of our HTML based emails also utilise Clear GIFs in order for us to assess what are the emails we sent that have been opened and acted upon. Clear GIFs collect only limited data, such as a cookie number, the time and date of when a particular webpage on our Website is accessed, and a description of the webpage on our Website in which the clear GIF resides. Such collected Anonymised Data helps us to determine the effectiveness of the way our webpages are arranged on Our Site, our modes of communications and promotional campaigns.

“Third-party web analytics” refer to services provided by third party service providers for the assessment, analysis, measurement and reporting of the behaviour of visitors to a website in order to assess and improve the effectiveness of the website. One of the most well-known third-party analytics service is “Google Analytics”.

“HTML5 local storage” refer to caching services utilizing primarily a cache manifest file, which allows for storage of your preferences offline which will then be updated and synchronized when You go online.

Your Consent to our Collection, Retention and Use of Personal Data

In order for our Company to provide You with our services and products, You agree and consent to our Company collecting, using and retaining your Personal Data as follows:-

When You register an account with us to use the services, applications or products provided via our Website, sign up for our Updates, or email us with any queries, You will be required to provide us with your Personal Data in order for us to add You as a user of our services, applications or products that you sign up for, confirm your login credentials, add You to our mailing list, or to revert to your queries.

Should you sign up for services or products that allow you to upload any files or to post any text or information whether on our Website or on a third party website, your Personal Data will be required in order to identify you to your posts, and if the service or product that you subscribe to enables you to upload or post on any third party websites, you agree that some of your Personal Data may also be disclosed to such third party websites in the event that they require your Personal Data in order to allow you to upload or post. Please therefore check the privacy policies of such third party websites before you use any of our services or products to post or upload any file, text or information on such third party websites as their privacy policies will differ from ours.

In the event that you registered an account with us to use any of our services or products, your Personal Data will be used by and retained with us until your account is terminated or expired.

We may collect and use your Personal Data to customize for You the user-experience of our Website and Company’s Platform based on your answers provided through our questionnaires or surveys.

When You enroll for any loyalty programme or other promotional campaigns that we provide, we will require your Personal Data in order to keep a record of and provide You with the benefits that accompany our loyalty programme and/or promotional campaigns. Unless You withdraw from our loyalty programme or promotional campaigns, or our relevant promotional campaign ends, we will keep your Personal Data for as long as You are still part of our loyalty programme and/or promotional campaigns (whichever is the later) so that we can provide You with the relevant benefits.

When You click on any of our Company’s Google ads or other internet based advertisements for more information regarding our Website or our services or products, we collect the Personal Data that You provide in order to follow up with you pertaining to your interest in our services, products and/or Website.

In addition, we will retain your Personal Data where necessary and for such duration where there is legitimate business and/or legal purpose to do so, and as may be required in order for our Company to comply with applicable laws and regulations, assist in any legal investigations, meet the demands from any regulatory or law enforcement bodies, for utilization in legal proceedings, minimizing fraud, collection of debts, resolving disputes, identifying issues, enforcing contractual breaches and/or claiming for damages.

Disclosure of Personal Data

We may need to disclose your Personal Data to:-

Third party service providers in order for us to administer the Website, the Company’s Platform, the services and products that we make available via the Website, facilitate your access to and use of our Website, products and services, for us to contact you as You may have requested via our Website or other channels, for us to maintain and update your records to ensure that you receive the benefits of subscribing to our services, products and/or Website, and for us to provide you with any other perks accompanying your participation in our loyalty programme and/or promotional campaigns. The aforesaid third party service providers have a contract with us to perform the services necessary for you to use our Website, our products and services, and receive Updates, and such third party service providers therefore include but is not limited to webhost companies, website maintenance companies, software maintenance companies, database storage companies, loyalty programme service providers, companies that assist to perform mass mailing on our behalf, etc.;

our book-keepers, accounting firms, audit firms, law firms and/or other professional advisory firms who are maintaining our records in accordance with legal requirements;

governmental, regulatory or law enforcement bodies who have a legal right to demand for your Personal Data;

financial institutions, banks, online payment service providers, credit card associations, credit bureaus, and other third parties whose services are required in order for you to make online payment(s) for our services or products;

credit bureaus, credit rating agencies and fraud preventing companies for the purpose of minimizing fraudulent activities via your Personal Data (which may include information pertaining to your credit cards); and

our affiliated or related companies and/or third parties to whom we may sell, divest, transfer, assign, share or otherwise engage in a transaction that involves, some or all of our Company’s assets (which may include your Personal Data), in the course of a corporate divestiture, corporate restructuring, merger, acquisition, joint venture, bankruptcy, dissolution, reorganisation, or any other similar transaction or proceeding.

Except as provided above, we do not sell, rent, licence or otherwise disclose your Personal Information to third parties or our affiliated companies. We are careful in our selection of third party service providers, and all such third party service providers as well as our abovementioned affiliated companies are bound by obligations of data protection (pursuant to contracts and/or applicable laws) similar to the obligations herein this Privacy Policy.

Transferring Personal Data out of Singapore

Pursuant to the purposes and activities as set out in sections 2 and 3 above, it may be necessary for us to transfer your Personal Data out of Singapore. You hereby agree and consent to the aforesaid transfer, on the understanding that the recipients of such Personal Data are also subject to applicable laws or contractual obligations similar to the obligations as set out in the Personal Data Protection Act 2012.

Accurate and Complete Personal Data

In order for us to provide You with our products and services, and to perform the activities as set out in sections 2 and 3 above, You warrant that the Personal Data that You provide to us is accurate, and that all Personal Data as may be relevant for that particular purpose/circumstance has been provided (for example, when registering an account via our Website for paid services, your credit card details must be correctly stipulated).

Do-Not-Call (“DNC”) Provisions and Registries

We respect your selections in relation to the channels via which you wish to receive our Updates. Therefore, if You have registered your telephone and/or fax number with the Do-Not-Call Registries in relation to telephone calls, text or fax messages, we will not send you any Updates via the channels that You have opted out of by registering with the Do-Not-Call Registries. However, if You have previously consented to our sending you Updates via your telephone number (calls or text messages) and/or facsimile number, we will continue doing so until you withdraw your consent by contacting our Data Privacy Officer at privacy@Produzz.com.br.

Withdrawal of Consent

You may at any time withdraw your consent to our use, retention, disclosure or transfer of your Personal Data pursuant to this Privacy Policy by emailing our Data Privacy Officer at privacy@Produzz.com.br. However, please note that any such withdrawal of consent may result in us being unable to continue providing our services or fulfilling our contractual obligations with you, including but not limited to termination of your access to our services and products that you may have subscribed for, termination of accounts that you have registered with us, termination of any loyalty programme benefits that would otherwise have been available to You, inability to provide You with the opportunity to participate in promotions, inability to fulfil any purchase orders or subscription payments that You may have submitted to or through our Website or Company, and inability of the banks to process any credit card payments that you may have submitted through our Website or otherwise through our Company. Accordingly, your withdrawal of consent may also lead to the termination of any contract(s) that You may have with our Company, as well as termination of any contracts with third parties whose services or products are featured on our Website for which You have made a purchase or subscription for through our Website, and our Company therefore expressly reserves its rights and remedies thereto. Our Data Privacy Officer will further advise you on the legal consequences that may ensue should You contact him/her to withdraw your consent.

Should You wish to unsubscribe to our Updates, please click the “unsubscribe” option made available in our emails to you or email our Data Privacy Officer at privacy@Produzz.com.br. Once we have processed Your opt-out request, we will not send You any further Updates (including but not limited to promotional e-mails) unless You opt back in to receiving such communications. Consequently, please note that your un-subscription or opt-out may result in our being unable to make available to you any updates regarding our Website, our services, our products, matters concerning your user account(s) registered with us, your subscription (if any), your benefits under our loyalty programme and any ongoing promotions (which may also relate to our loyalty programme, or otherwise).

Access and Correction of Personal Data

Should You wish to access, update or make corrections to your Personal Data held with us, or if You wish to receive further clarifications on our Privacy Policy and your Personal Data held with us, You can do so at any time by emailing our Data Privacy Officer at privacy@Produzz.com.br.

There will be no administrative fees or other charges levied for any request to correct or update your Personal Data. However, for all other requests such as accessing a record of your Personal Data held with us, obtaining a record of when You accessed our Website, the dates that You made purchases for services or products via our Website, etc., a reasonable administrative fee may be levied depending on your request as time and resources will be spent in accommodating your requests.

Should You have any queries or complaints pertaining to this Privacy Policy, our Website TOU, our Platform’ T&Cs, our User Terms of Service, your Personal Data as registered with us, or in relation to our Company’s use, retention, disclosure or transfer of your Personal Data, or should You desire to learn more about our data protection policies and security measures, please email our Data Privacy Officer at privacy@Produzz.com.br.

Minors

Our Website and its associated products and services are not meant for persons who may be defined as minors under applicable law. We do not knowingly collect Personal Data from minors, however, through the internet, we are not able to ascertain on our end whether such individuals are minors. It is thus the responsibility of parents or guardians to ensure that their minors do not access our Website and provide us with Personal Data without their parental/guardian’s consent. If a parent or guardian becomes aware that his or her minor has accessed our Website and provided us with Personal Data without his/her consent, he or she should contact our Data Privacy Officer at privacy@Produzz.com.br promptly. If we become aware that a minor under 18 has provided us with Personal Data without their parent or guardian’s consent, we will delete such information from our records.

Security Measures for Protection of Personal Data

We ensure that our Website and associated services/products thereon is protected by reasonable security measures afforded by current technology, and that all our data hosts and servers are similarly protected by such security measures, including but not limited to firewalls.

Your Personal Data is kept securely and protected against unauthorized access and disclosure. We utilize security means such as (without limitation) password protection, encryption, locked and restricted access. We have strict policies in place restricting access to Personal Data to only our authorized personnel on a need-to-know basis.

We will take practical steps to ensure that your Personal Data will not be kept longer than as set out herein this Privacy Policy, or for as long as is necessary for fulfilling the purposes for which you have entrusted us with your Personal Data, or as may be required for legitimate business or legal purposes, whichever is the latest.

Third Party Websites, Social Network Sites and Video Sharing Sites

Our Website may contain hyperlinks to websites or applications (whether computer-based or mobile-based) operated by third parties. Such third party websites or mobile applications are not governed by our Platform’s T&Cs, Privacy Policy or Terms of Use. We are not responsible for the privacy policies or data security of such third party websites or mobile applications, even if they are co-branded with our Company name or logo, or Website or Updates displays products or services that originate from such third parties. As such, we urge You to learn about the privacy policies of these third party websites before accessing or using them, and to be careful about providing any Personal Data to such third party websites or applications. We seek your understanding that we are not liable for any acts or omissions or any loss or damage that You may suffer due to your use or access of such third party websites or applications.

We may utilize reputable social media/network sites such as, but not limited to Facebook, Twitter, Instagram, Pinterest and LinkedIn (collectively the “Social Media Sites“) so as to connect to your social networks. In order to generate interest in our Website and services/products amongst the contacts in your social networks and to allow you to share your interest in our Website and services/products, we provide access to our Website to the third party Social Media Sites, and there are links on our Website to such Social Media Sites. The aforesaid association with the Social Media Sites does not constitute any endorsement or recommendation of any of the Social Media Sites by our Company nor vice versa. As per clause 11.1 above, kindly review the terms of use and privacy policies of the Social Media Sites before You use or access such Social Media Sites in conjunction with our Website, our services/products, or any of our promotions in relation to our Website and our services/products made available via any Social Media Sites.

Our Website and associated services/products may allow you to upload or post videos, audio or other media or graphic files on third party video sharing sites such as YouTube, Dailymotion, Vimeo, Photobucket, etc. The aforesaid association between our Website, our Company’s Platform, and our other services/products does not constitute any endorsement or recommendation of any of the third party video sharing sites by our Company nor vice versa. As per clause 11.1 above, kindly review the terms of use and privacy policies of the third party video sharing sites before You use or access such third party video sharing sites in conjunction with our Website, our Company’s Platform, and/or our other services/products and/or promotions.

The association of our Website with the Social Media Sites and third party video sharing sites makes available certain features which when used by You, may result in information being made available from your accounts with the Social Media Sites and/or video sharing sites to our Company. Such information which we collect about You shall constitute public information that is available in the general domain because such information was made publicly available by the Social Media Sites and/or video sharing sites. Should You prefer that we do not collect your information from the Social Media Sites and/or video sharing sites, please (i) do not use the features or links that associates our Website and/or our services/products with the Social Media Sites and/or video sharing sites; and (ii) adjust the settings in your accounts with the Social Media Sites and video sharing sites to prevent the sharing of your information with our Website and our associated services/products. Our Company cannot control nor is our Company howsoever responsible for the sharing of your information by the Social Media Sites and/or video sharing sites with third parties. However, please note that You may not be able to use certain features on our Website, our Company’s Platform, and/or in our other services/products should you restrict the sharing of your information.

One of the features which You may see available on our Website in association with the Social Media Sites, is the “like” feature by Facebook, and other similar functions provided by other Social Media Sites. When You “like” our Website or our services/products, information about our Website and our services/products will be made known to your network within your Social Media Sites’ accounts via a variety of methods employed by the relevant Social Media Site. Your information may also be made known alongside with our services/products that you have liked pursuant to the methods/channels made available by Social Media Sites in relation to such features. If You are not agreeable to the aforegoing, please instruct the relevant Social Media Site or adjust your account settings with the Social Media Site. Please note however that we are not obliged to display on our Site or any related webpages (whether on Social Media Sites or otherwise) any of your information, including but not limited to your photo or name, even if You “like” our Website or our services/products. In the event that any of your information, product or service endorsements (including your liking of our Website or any of our Company’s services or third party products or services) appear on our Website or any related webpages (whether on Social Media Sites or otherwise), we shall have the right in our sole discretion to remove or continue retaining such information or product/service endorsements from our Website or any related webpages without any notice or reference to You.

Governing Law and Jurisdiction

The terms and conditions of this Privacy Policy are governed by the laws of Singapore. In the event of any disputes arising from this Privacy Policy and your use of our Website, Company’s Platform and/or our other services and products, You must first contact our Data Privacy Officer at privacy@Produzz.com.br regarding your concern and use your best endeavours to amicably settle any dispute in good faith. We on our part will also use our best endeavours to amicably settle your concerns in good faith. However, if no amicable resolution is reached within 30 days, You agree to submit to the exclusive jurisdiction of the Courts of Singapore.