

**PRIVACY POLICY**  
**- [LMS Studion.mx] -**

The Privacy Policy was created to clarify how SERVIÇO DE APOIO ÀS MICRO E PEQUENAS EMPRESAS DO ESTADO DO MATO GROSSO – SEBRAE/MT (CNPJ/ME sob o nº 03.534.450/0001-52 (the "**INSTITUTION**") treats your personal data when you use the NAME OF THE PLATFORM LMS Studion.mx, always paying attention to the security, privacy and transparency of your data.

## **1. CONCEPTS**

In order to make this document easier to read, here are some useful definitions for its interpretation. These terms will be used in capital letters:

- (i) **Personal Data:** Information relating to a natural person that is used to identify a person or allows for identification. Examples of personal data that may allow you to be identified are: Name, CPF, IP address, e-mail address, Platform usage records, among others;
- (ii) **Platform:** Studion.mx is an LMS platform, which stands for learning management system, it hosts online courses, content and learning paths, simplifying corporate and institutional training for various employees in multiple areas;
- (iii) **Data Subject:** Natural person to whom the Personal Data refers;
- (iv) **User:** Individual registered to use the Platform;
- (v) **Processing:** Any form of use of Personal Data, including but not limited to the following activities: collection, storage, consultation, use, sharing, transmission, classification, reproduction, deletion and evaluation.

## **2. USER REGISTRATION**

The Holder may be registered on the Platform (i) by the INSTITUTION; (ii) by providing their registration data on the Platform; or (iii) by importing the data registered on a linked platform. Once the User's registration data has been validated, the User must agree to the Platform's Terms of Use and this Privacy Policy.

## **3. PERSONAL DATA PROCESSED**

To clarify the Personal Data that is collected through the Platform and the purpose for which this data is processed, some examples are listed below:

Collection method	Personal Data	Purpose for processing
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Provided by Users to register on the Platform	Data provided by the User to register on the Platform. Name, CPF, E-mail and other data required by the INSTITUTION may be requested.	Enabling access to the Platform and allowing the User to make use of the functionalities made available by the Platform (Execution of the contract and Consent)
Use of the Platform by the User	Data generated from the use of the Platform: Record of actions carried out on the Platform, including access attempts, access to data stored on the Platform, editing of data on the Platform, insertion of new data on the Platform, <i>uploading</i> and downloading of documents, IP of equipment used for access, among others.	Register the actions taken by Users (Execution of the contract and Legitimate interest)
Support and Chat	Data provided by the User when performing a service.	Answering requests and resolving doubts from Users (Execution of the contract and Consent).
Contacting the User	Identification and contact details. The following can be used Name, telephone number and e-mail address.	Carrying out a satisfaction survey (Legitimate interest)
Public databases	Data obtained from public databases, especially those provided by public bodies.	Validating data and providing information to Users.

In order to improve the tools made available by the Platform and improve the user experience, artificial intelligence tools may be used to process the Personal Data contained in the Platform, with the proviso that they will not be used to improve the artificial intelligence tool adopted.

#### **4. SHARING PERSONAL DATA**

The INSTITUTION may share the Personal Data to enable the fulfillment of the contracted services and the operation of the Platform, providing the information to commercial partners,

suppliers, and also to authorities and regulatory bodies, when necessary. Whenever data is shared, it will be done within the limits and purposes for which it was shared.

NOTICE IS HEREBY GIVEN THAT, FOR THE LICENSING AND OPERATION OF THE PLATFORM, PERSONAL DATA WILL BE PROCESSED BY DOT DIGITAL GROUP (CNPJ No. 01.354.395/0001-93) IN ACCORDANCE WITH THE GUIDELINES OF THE INSTITUTION. Any queries regarding the processing of personal data by DOT DIGITAL GROUP LTDA., as well as the exercise of rights by data subjects, should be sent to the address listed in its Privacy Policy - <https://dotgroup.com.br/politica-de-privacidade/>.

Furthermore, when using the Platform, the Data Subject may be redirected to third-party websites or platforms, including in cases to access specific features of the Platform. Once redirected to a third-party website or Platform, privacy practices will be governed by the privacy policies and terms of use of such third parties. The provisions stipulated in this Privacy Policy do not apply to the Processing of Personal Data by third-party websites and platforms.

## **5. RETENTION, INTERNATIONAL TRANSFER AND DELETION OF YOUR PERSONAL DATA**

The Personal Data registered and generated on the Platform will be recorded on the User's mobile device. For as long as the Data Subject maintains relations with the INSTITUTION, the data will be stored and maintained in a secure and controlled environment. The INSTITUTION may store the Personal Data, even after the end of the relationship with the Data Subject, for auditing purposes, compliance with legal or regulatory obligations, for the regular exercise of the INSTITUTION's rights, or for the necessary period following the legal basis justifying the retention of the data.

For the purposes of storing and securing Personal Data, this data may be stored abroad. In this case, the INSTITUTION will ensure that the requirements for the international transfer of data are observed in accordance with the provisions of the LGPD and ANPD guidelines.

It should be noted that Users' Personal Data is stored for as long as the Client maintains links with the INSTITUTION and, therefore, will not be deleted when the User's registration is suspended.

## **6. RIGHTS OF PERSONAL DATA SUBJECTS**

### **a) Right to transparent communication and access to information**

The INSTITUTION will inform the Data Subject, in accordance with the law, in a clear and transparent manner, about the processing of their Personal Data as controller, providing them, upon request, with complete information about the processing.

**b) Right of correction and deletion**

The INSTITUTION ensures that the Data Subject can rectify their Personal Data, particularly when it is incorrect, inaccurate, or out of date, or complete the data if it is incomplete.

In the same way, all the Processed data, in the capacity of the controller, will be deleted from the servers when requested by the Data Subject or when they are no longer necessary or relevant for the provision of the contracted services. Unless there is any other reason for maintaining it, such as any legal obligation to retain data or the need to preserve it in order to protect the INSTITUTION's rights.

**c) Revocation of consent**

The INSTITUTION will obtain the Data Subject's consent to collect and process their Personal Data for various purposes, except in cases where consent is not required. The INSTITUTION guarantees the Data Subject the right to withdraw consent at any time by means of communication.

**d) Communication channels for the exercise of rights**

Data Subjects, whether they are Customers, Users, suppliers, or third parties, may exercise their rights through the Privacy Policy available at the following link <https://minio-cpe.sebrae.com.br/documento/politica-privacidade.pdf>

The INSTITUTION reserves the right not to respond to requests for the exercise of rights if it determines that it is not possible to securely identify the Data Subject, informing the person who is exercising his rights in this situation.

The INSTITUTION seeks to respond to all requests, assessing whether their satisfaction complies with the applicable legal and regulatory requirements. The INSTITUTION reserves the right not to comply with the request whenever it determines that there is a legal basis preventing the Data Subject from exercising the invoked right.

**7. ACTIVITY LOG - COOKIES**

Cookies are small text files with little information that are downloaded to your browsing device (such as a computer or smartphone) when you visit a page. Cookies can be recognized by the page and/or solution that downloaded them, helping to determine whether the browsing device has visited before. They may also contain user preferences or other information.

It is possible to divide the cookies used by the Platform into (i) First-party cookies, which are set by the owner of the page and/or solution, and (ii) Third-party cookies, set by a third-party service other than the INSTITUTION. Third-party cookies allow third-party resources or functionalities to be used on the page and/or solution to enrich it in terms of functionalities, such as allowing the analysis of technical telemetry, advertisements and videos.

The use of first-party cookies is necessary for the Platform to function, while the second category is optional. You can configure your browser to notify you when cookies are received and to prevent cookies from being installed. Please consult your browser's instructions to expand on this information. To use the Platform, the User is not required to allow the installation of cookies. However, disabling them may affect navigation and user experience.

## **8. SECURITY MEASURES**

The INSTITUTION uses various types of security measures to guarantee the integrity of Personal Data, in accordance with the information security standards practiced by the sector when Processing Personal Data.

Personal Data may also be stored using cloud computing technology and other technologies that may emerge in the future with the objective of improving and enhancing our services and security.

The INSTITUTION strives to protect the privacy of Personal Data, but unfortunately, it is not possible to guarantee total security. Unauthorized entry and use by third parties of User information, hardware or software failures not under the INSTITUTION's control, and other external factors may compromise the security of Personal Data. If the User identifies or becomes aware of any factor that compromises the security of their data in their relationship with the INSTITUTION, please contact us using the contact details indicated below.

## **9. CHANGES TO THIS PRIVACY POLICY**

The INSTITUTION may change this Privacy Policy at any time. Whenever any relevant condition of this Privacy Policy is changed, such changes shall be valid, effective, and binding after the new version is posted on the Platform.

## **10. CONTACT**

If you have any doubts or questions regarding this Privacy Policy and the processing of Personal Data when using the Platform, please contact us using the contact details provided in the Privacy Policy on the link <https://minio-cpe.sebrae.com.br/documento/politica-privacidade.pdf>

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