

PRIVACY POLICY
PAPAKI GROUP

1. Introduction

We collect and use some personal data belonging to our customers, suppliers and employees. In doing so, we act as the **controller** of this data, and we are subject to the provisions of Federal Law No. 13709/2018 (General Personal Data Protection Law - LGPD).

We are committed to protecting your personal data and have therefore prepared this privacy policy, which contains important information about:

- Who our customers, suppliers and employees are;
- What data we collect and what we do with it;
- Your rights regarding your personal data; and
- How to contact us.

2. Who our customers, suppliers and employees are - Stakeholders (P.I.)

Our customers are the legal entities that purchase our audiovisual production services: advertising agencies, advertisers, free-to-air and pay-tv channels, streaming platforms and others.

Our suppliers are individuals and companies that provide products and services to:

- A) Our core business (audiovisual production): producers, assistants, designers, studios, make-up artists, costume designers, chambermaids, actors, light rental companies, camera rental companies, transport companies, catering companies, photographers, machinists, electricians, drivers, assistants, etc.
- B) Support for our business activity: accountants, lawyers, consultants, IT technicians, human resources specialists, compliance, among others.

Our employees are professionals hired for their technical and artistic skills, who work on the development of our business activities.

3. Data we collect and why we collect it

Our company collects and uses some personal data from our stakeholders in accordance with the provisions of this section.

A) Personal data expressly provided by stakeholders

We may collect the following personal data that stakeholders expressly provide to us when dealing with our company:

- Full name
- ID Card
- Taxpayer register CPF
- Birth Date
- Profession/Technical Role
- Number of Professional Registry
- Technical or Artistic Background
- Home Address
- Email
- Telephone Number
- Banking data

This data is collected at the following times:

- When customers want to start a business relationship;
- When suppliers are contacted and assessed by our team;
- When suppliers are selected to provide services;
- When employees apply and/or are hired for a position in the company.

Data provided by stakeholders is collected for the following purposes:

- Customers: business relationship;
- Suppliers: assessment and contracting.
- Employees: assessment and hiring.

B) Sensitive data

Our company may collect the following sensitive data from its suppliers:

- Data on racial or ethnic origin
- Biometric data

Sensitive data is collected at the following point:

- Data on the racial or ethnic origin and biometric data of suppliers is collected exclusively at the time of registration for casting processes for actors and extras.

This data provided is collected for the following purposes:

- Data on the racial or ethnic origin and biometric data of suppliers is collected for the sole purpose of casting actors and extras to take part in advertisements, TV shows and feature films.

Sensitive personal data will only be collected and used with specific and separate consent of the data subjects, except, where applicable, in cases where the General Data Protection Law allows this type of data to be processed on other legal bases than consent.

In any case, sensitive personal data will only be processed to fulfill specific purposes expressed in this policy or duly informed to the stakeholders by other means.

C) Data from children and adolescents

We may collect data from children and adolescents:

- Full name
- ID Card
- Taxpayer register CPF
- Birth Date
- Home Address
- Email

- Telephone Number
- Banking data

Data collected from children and adolescents at the following point:

- When registering for casting processes for actors and extras.

Data collected from children and adolescents is used exclusively for the following purposes:

- Casting actors and extras for appearances in advertisements, TV programs and feature films. Banking data is required for making payments.

Data from children and adolescents is processed on the basis of the best interests of the child or adolescent.

D) Data collection not expressly provided for

Occasionally, other types of data not expressly provided for in this Privacy Policy may be collected, provided that it is provided with the consent of the stakeholders, or that the collection is permitted under another legal basis provided for by law.

In any case, data collection and the resulting processing activities will be informed to the Stakeholders.

4. Sharing personal data with third parties

We share some personal data mentioned in this section with third parties. The shared data is:

- Suppliers: full name, technical role, technical or artistic background.
- Suppliers (actors): name, birth date, racial or ethnic origin, biometric data and artistic background.
- This data is shared with our customers: advertising agencies; advertisers; TV channels and streaming platforms.

This data is shared for the following reasons and for the following purposes:

- Sharing is done to enable our customers to approve the selection of the technical team and the choice of actors and extras to produce audiovisual works on demand.

In addition to the situations described above, we may share data with third parties in order to comply with a legal or regulatory order, or to comply with an order issued by public authority.

In any case, the sharing of personal data will comply with all applicable laws and rules, always seeking to ensure the security of the data of stakeholders, with due regard for the technical standards used in the market.

5. How long personal data will be stored

Personal data collected by our company is stored and used for a period corresponding to that required to achieve the purposes set out in this document and considering the rights of its holders, the rights of the controller and the applicable legal or regulatory provisions.

Once the storage periods of personal data have expired, data will be removed from our databases or anonymized, except in cases where there is the possibility or need for storage by virtue of a legal or regulatory provision.

6. Legal basis for the processing of personal data

A legal basis for processing personal data is nothing more than a legal basis provided for by law, that justifies it. Therefore, each personal data processing operation must have a corresponding legal basis.

A) Non-sensitive personal data

We process the non-sensitive personal data of stakeholders in the following cases:

- With the consent of the holder of personal data;
- For compliance with a legal or regulatory obligation by the controller;
- For the performance of a contract or preliminary procedures relating to a contract to which the data subject is a party, at the request of the data subject;
- When necessary to meet the legitimate interests of the controller or a third party.

B) Sensitive personal data

We process the sensitive personal data of stakeholders in the following cases:

- With the consent of the holder of personal data.

C) Data from children and adolescents

Data from children and adolescents is processed on the basis of the consent of at least one of their parents or guardians.

Personal data may be collected from children without the consent mentioned in the previous paragraph when the collection is necessary to contact their parents or legal guardian, used only once and without storage, or for their protection.

D) Consent

Certain personal data processing operations performed by our company will depend on the prior agreement of the stakeholders, who must express this on a free, informed and unequivocal basis.

Stakeholders may revoke their consent at any time, and if there is no legal provision permitting or requiring the storage of data, any data provided with consent will be deleted.

Furthermore, stakeholders may, at their discretion, not agree to any personal data processing operation based on consent. In these cases, however, they may not be able to meet the requirements for assessment and/or hiring.

The consequences of not consenting to a specific activity are informed prior to processing.

E) Compliance with a legal or regulatory obligation by the controller

Some personal data processing operations, particularly data storage, will be performed so that we can comply with obligations provided for by law or other regulatory provisions applicable to our activities.

F. Performance of a contract

For the execution of any lease or provision of services signed between our company and stakeholders, other data related to or necessary for its execution may be collected and stored, including the content of any communications between the parties.

G. Legitimate interest

For certain personal data processing operations, we rely exclusively on our legitimate interest. To find out more about the specific cases in which we use this legal basis, or to obtain more information about the tests we run to make sure we can use it, please contact our Personal Data Protection Officer through one of the channels listed in this Privacy Policy, in the “How to contact us” section.

7. Rights of stakeholders

Stakeholders have the following rights under the Personal Data Protection Law:

- Confirmation of the existence of processing;
- Access to data;
- Correction of incomplete, inaccurate or outdated data;
- Anonymization, blocking or deletion of unnecessary, excessive data or data processed in breach of the law;
- Portability of data to another service or product provider, upon express request, in accordance with the regulations of the national authority, subject to compliance with commercial and industrial secrets;
- Deletion of personal data processed with the consent of the data subject, except in the cases provided for by law;
- Information on public and private entities with which the controller has shared data;
- Information on the possibility of not providing consent and the consequences of refusing to do so;
- Revocation of consent.

It is important to note that, under the terms of LGPD, there is no right to delete data processed on legal grounds other than consent, unless the data is unnecessary, excessive or processed in breach of the law.

A) How data subjects can exercise their rights

To ensure that the stakeholder wishing to exercise their rights is, in fact, the holder of the personal data subject to the request, we may ask for documents or other information that can assist in their correct identification, in order to safeguard our rights and the rights of third parties. This will only be done, however, if it is absolutely necessary, and the requestor will receive all related information.

8. Security measures in the processing of personal data

We use technical and organizational measures to protect personal data from unauthorized access, destruction, loss or modification.

The measures used by us are based on the nature of the data, the context and purpose of the processing, the risks that a potential breach would generate for the rights and freedoms of the stakeholders, and the standards currently used in the market by companies like ours.

The security measures adopted by us include the following:

- Our stakeholders' data is stored in a secure environment;
- We limit access to data so that unauthorized third parties cannot access it;
- We keep records of all those who have any contact with our data.

While we do everything within our control to prevent security incidents, a problem can occur that is caused exclusively by a third party - such as in the case of hacker or cracker attacks, or in the case of the sole fault of the stakeholder, which occurs, for example, when they themselves transfer their data to a third party.

Therefore, although we are generally responsible for the personal data we process, we disclaim liability in the event of an exceptional situation such as this, over which we have no control whatsoever.

In any case, should any type of security incident occur that could generate significant risk or damage to any of our stakeholders, we will notify those affected and the National Data Protection Authority of the incident, in accordance with the provisions of the General Data Protection Law.

9. Complaint to a control authority

Without prejudice to any other administrative or judicial remedy, personal data subjects who feel in any way aggrieved may lodge a complaint with the National Data Protection Authority.

10. Amendments to this policy

This version of this Privacy Policy was last updated in August 2023.

We reserve the right to amend these rules at any time, especially to adapt them to any changes made to our proposal for generating business value, either by making new services available or by removing or modifying existing ones.

Whenever there is a change, our stakeholders will be notified of the amendment.

11. How to contact us

If you have any questions about this Privacy Policy or the personal data we process, please contact our Personal Data Protection Officer through one of the channels mentioned below:

Email: kato@papaki.com.br

Mailing address: Rua Pedroso Alvarenga, 691, 4 Floor, Itaim Bibi, São Paulo, SP, ZIP CODE 04531-011