

Privacy Notice

Please read this Privacy Notice carefully to understand how Somos processes your Personal Data.

For **Somos** (referred to in this Notice as "**Somos**"), privacy, security and trust are fundamental factors in the relationship with the individuals (natural persons) who interact with our services - you. **Somos** is therefore committed to transparency in the processing of your personal data and complying with the General Data Protection Law ("LGPD"). We also seek to comply with the GDPR, the European Union's General Data Protection Regulation, and, where applicable, relevant US laws in order to protect the personal information and privacy of users.

This Notice applies to your interaction with **Somos** services and explains how your Personal Data, including Sensitive Data, is collected, used, and disclosed by **Somos** in order to bring greater transparency about how and for what purposes your data is used by **Somos**. It also informs how you can access and update your Personal Data and make certain decisions about how your Personal Data is used.

This Notice embodies our activities of collection, both online and offline, of Personal Data and Sensitive Data by **Somos** through our various channels, including - but not limited to - Websites, Apps, Third-Party social media, Customer Service, Service Points, Surveys and Events. Please note that **Somos** may aggregate Personal Data combined from diverse sources. Please note that **Somos** can combine Personal Data and Sensitive Data that was originally collected by different **Somos** entities or **Somos** partners. You can refer to the section "Your rights regarding Personal Data" for more information on how to oppose this.

In some specific cases, if you choose not to provide us with your Personal Data identified as necessary (**Somos** will indicate when this is the case, for example, by explicitly putting this information on our registration forms), **Somos** may not be able to provide you with our products and/or services.

How can your data be collected?

We collect your Personal Data through the following sources:

- **Somos Websites:** All of our websites may be used to collect personal data. This includes both websites that we operate directly through our domains and IP addresses and websites or pages that We establish on third-party services, such as Facebook, LinkedIn, Instagram, YouTube, Gupy, Indeed, and other third parties offering these types of services.
- **Email and instant messaging systems:** Services used to maintain electronic communications between you and Somos, including those provided directly by Somos, or third-party services such as WhatsApp, SMS (short message service) and similar.
- **Somos Mobile Applications:** Mobile applications provided directly by Somos, including the Client Portal, chatbot and questionnaires, or through third-party services such as LinkedIn, email servers and other third parties offering these types of services.
- **Call centres:** communications with you, in-person or remotely, through our call centres.
- **Ads, advertisements, and online forms:** Interactions with any type of Somos ads, advertisements, and online forms.
- **Offline records:** Records completed offline, distributed during events and other interactions with Somos.
- **Application of in-person and remote forms:** Data collection from the application of forms intended for clients and potential clients of the firms for which we provide service. These forms, hosted on third-party platforms such as Salesforce and Survey, can be completed in walk-in-centres or remotely by telephone or videoconference.
- **Data received from third parties:** These third parties include but are not limited to: Somos' partners; public sources; data received during the acquisition of other companies; data aggregator services, and third-party websites such as Facebook, Instagram, LinkedIn, YouTube, Gupy and similar.

- **Other ways of obtaining with the holder of the data:** Collection of data delivered directly by the data subject by any other physical or digital means.

What data can be collected?

During your interaction with **Somos**, using one of the previously mentioned collection sources, we may collect several types of personal data about you, as set out below:

- **Contact Information:** Includes any type of information that may facilitate our contact with you, including your physical mailing address; telephone numbers; email addresses and websites and social media profiles.
- **Login Information:** Includes information to identify and authenticate you to services provided by Somos, including your registration name (login), password in unrecoverable (encrypted) format and, if applicable, security questions.
- **Demographic information and your interests:** Any information that can describe your demographics, habits, or behavioural characteristics, including items such as your birthday; date of birth; age or age range; gender; geographical location; hobbies and hobbies; other interests; and family or lifestyle information.
- **Information collected when using our websites and services.** Technical information may be collected about your computer or mobile device used to access one of our websites, services, or applications, including the type of device (desktop or mobile) and IP address. During your interaction with our websites and services, Somos uses automatic data collection technologies to capture information about the actions you take. This may include details such as which links you click on, which pages or content you view and for how long, and othersimilar information and statistics about your interactions. The geographic location of access, among other demographic data, may also be collected whenever allowed. This information is captured via automated technologies and also via third-party tracking. You are free to oppose the use of such technologies by referring to the details in the Section "Your Rights Regarding Personal Data".
- **Market research and customer feedback:** This is information shared voluntarily by Somos clients about their experiences with our products and services.
- **Client Generated Content:** Including any content that you create and share with Somos on third-party social media or by uploading to one of our websites, apps, and other online and offline services. Whenever allowed, we may collect information generated by clients and made public on social media and third-party platforms, respecting the law and the privacy policies of such third-party platforms. This data includes text, comments, articles, photos, videos, personal stories or other similar content and media.
- **Third-Party Social Media Information:** This is any data that you share publicly on a third-party social media or that forms part of your profile on a third-party social media (such as Facebook, Instagram, LinkedIn, and the like) and that you allow to be shared with Somos. This data may include details such as your basic account information (name, email address, gender, date of birth, current city, profile picture, user ID, friends list and similar information) and any other additional information or activities that you allow the third-party social media to share with us. We receive your third-party social media profile information (or parts thereof) whenever you download an item or interact with a **Somos** application or web service on a third-party social media, whenever you use a social media feature that is integrated into a **Somos** website or whenever you interact with Somos through a third-party social media. With respect to accessing data posted on third-party social media, the rules of the Privacy Notice of the respective social media apply. To learn more about how your information from a third-party social media is collected by **Somos** or to opt-out of sharing this social media information, please visit the social media site in question.
- **Payment and financial information:** Any data that **Somos** requires for the fulfilment of an order or that is used to conduct any financial transaction between you and **Somos**, such as debit or credit card information, or other forms of payment used. **Somos** or our payment service providers manage your financial and payment information in compliance with regulations and applicable security standards.

- **Professional qualification information:** Any data that is submitted by applicants to job openings offered by **Somos** through interviews, by filling out forms and submitting resumes - by email, LinkedIn or Gupy and Indeed platforms.
- **Contact with our Customer Service:** Your interactions with our Customer Service may be recorded or listened to, pursuant to the applicable laws, for the operational needs of **Somos**. Details of financial and payment information are not recorded. When required by law, you will be informed of the recording at the beginning of your call.
- **Information required for demand assessment:** When **Somos** applies or receives from partner law firms' surveys filled out by people interested in joining a class action, we may process data related to that specific case. This may include, as well as contact information, information about damage suffered as a result of a specific event, including photos of the holder and their documents for the purpose of establishing identity.
- **Sensitive Personal Data:** **Somos** may manage personal data considered sensitive when requested by a controller, following its policies. In such cases, the customer will be explicitly informed about this collection. For any voluntary processing, we will require your previous consent. For any other purposes, we will always rely on proper legal grounds.
- **Children and Teenagers' Personal Data:** **Somos** may collect personal data of children and teenagers from their parents or legal guardians, for a specific purpose, with explicit consent and pursuant to the applicable law. Except in those particular cases, **Somos** does not request, collect, process, store or share personal data of children and teenagers. In case we discover any non-intentional processing of such data, we will remove that child's or teenager's data from our files promptly.

Purposes and legal grounds of data processing

The items below describe the purposes for which **Somos** collects your Personal Data, and the diverse types of Personal Data that we collect for each purpose. Please, notice that **not all of the applications below will be relevant to all individuals, and may only apply to specific situations.**

- **Customer service:** Your Personal Data is used in order to respond to any doubts, questions, or suggestions you may have. This usually requires some personal contact information and information about the reason of your questioning, doubts, or suggestions, for example: your identity; what your claim is and if there is a technical problem, a complaint about services or questions in general.
 - **Reasons for the use of your personal data in this situation:**
 - To fulfil contractual obligations;
 - To fulfil legal obligations;
 - Our legitimate interests.
 - **Our legitimate interests in this situation:**
 - To continuously improve **Somos'** products and services;
 - To continuously improve the effectiveness of our customer service;
- **Execution of Marketing Campaigns:** With your consent (when required under applicable law), **Somos** uses your Personal Data to provide information about products or services, including marketing communications. This can be done through different media, including e-mail, advertisements, SMS, phone calls, and postal mailings (as allowed by legislation in force), in addition to our own websites and/others' websites and social networks. In this case, the

use of your Personal Data is completely voluntary, which means that you may object, or even withdraw your consent at any time.

- **Reasons for the use of your personal data in this situation:**
 - To fulfil contractual obligations;
 - Our legitimate interests;
 - Somos obtained your consent (when necessary).

- **Our legitimate interests in this situation:**
 - To provide information about our services to manifestly interested clients;
 - Understand which of our products and services may interest you and provide information about them;
 - To define customers for new products or services.

- **Social media and third-party sites:** We use your Personal Data when you interact with social media functions and other websites, such as "like", to provide advertisements and interact with you on other social media. The way those interactions work, the profile data **Somos** obtains about you, and the cancellation options, if available, are thoroughly explained in the Privacy Notices directly on the respective social networks and other websites.

- **Reasons for the use of your personal data in this situation:**
 - Our legitimate interests;
 - Somos obtained your consent (when necessary).

- **Our legitimate interests in this situation**
 - Understand which of our products and services may interest you and provide information about them;
 - To define customers for new products or services.

- **Managing your requests:** We use your Personal Data to fulfil your requests, in addition to inform you about the status of your claim, to amend contact information, and to conduct identity verification and other fraud verification activities.

- **Reasons for the use of your personal data in this situation:**
 - To fulfil contractual obligations;
 - To fulfil legal obligations;
 - Our legitimate interests;
 - Somos obtained your consent (when necessary).

- **Our legitimate interests in this situation:**
 - Keep clients updated and informed about the progress of their claims;
 - To be more efficient in fulfilling their requests;
 - Fully comply with legal obligations.

- **Collective Claims Management:** **Somos** is a company focused on collective claims management. In cases where the client is a law firm, **Somos** will be authorised to collect, transfer, and/or receive from the law firm the data

of clients and potential clients in order to manage the claim. The purpose of this processing is to assist the foreign law firm in the operationalisation of the claim through the supply of our products and services. The information received or collected will consist of what is needed for the management of the case, and the eventual filing of a claim.

- **Reasons for the use of your personal data in this situation:**
 - To fulfil contractual obligations;
 - To fulfil legal obligations;
 - Our legitimate interests.

- **Our legitimate interests in this situation:**
 - Execute the business activity;
 - Providing products and services to partner law firms;
 - Identity proof of the holder of the data.

- **Legal or merger/acquisition reasons: If Somos** or our assets become part of, or merges with, another company, including by reason of bankruptcy, we will share your Personal Data with our legal successors, in compliance with applicable law. We will also share your Personal Data with others when: (i) when required by applicable law; (ii) in response to legal proceedings; (iii) in response to a request from the legal authority; (iv) to protect our rights, privacy, safety or property; (v) to enforce the terms of any agreement or the terms of our website, products and services, in accordance with applicable law.

- **Reasons for the use of your personal data in this situation**
 - Legal obligations
 - Our legitimate interests.

- **Our legitimate interests in this situation**
 - Fully comply with legal obligations;
 - Preserve business functionality;
 - Protect our systems, assets, and employees.

- **Other purposes and general situations:** In compliance with current legislation, Somos uses your Personal Data for other general business purposes, such as maintaining your account, conducting internal or market research, and measuring the effectiveness of our advertising campaigns. We also use your Personal Data to manage and operate our internal communications, IT, and data protection and security systems.

- **Reasons for the use of your personal data in this situation**
 - To fulfil contractual obligations;
 - To fulfil legal obligations
 - Our legitimate interests.
 - Somos obtained your consent (when necessary).

- **Our legitimate interests in this situation**
 - Improve and develop new products and services;
 - Be more efficient in fulfilling your orders;

- Protect our systems, networks, and employees.
- Fully comply with legal obligations.

Sharing of personal data

Persons who may access your Personal Data: Your Personal Data will be processed by our employees or authorized representatives, as long as they need to have access to such information, in accordance with the specific purposes for which we have collected your Personal Data.

In addition to the entities that are part of Somos, we may share your Personal Data with the following other types of organizations:

- **Law firms to which Somos provides services:** When data is treated with the purpose of case analysis, or to enable the execution of extrajudicial settlements or the filing of a legal claim at the holder's request.
- **Service providers:** When hired by Somos to assist in specific tasks that require the receipt and processing of data.
- **Credit analysis, debt collection, and financial services agencies:** As permitted by applicable law, credit review and/or debt collection agencies are outside companies that Somos may use to assist us in checking your credit status or to collect overdue payments.
- **Other companies that use Personal Data for their own marketing purposes:** Except for situations where you have given your specific consent, Somos will not license or sell your Personal Data to other companies for their own marketing purposes. In cases where this kind of sharing does occur, the identity of these other companies will be revealed before your consent is obtained.
- **Third parties who use your Personal Data for legal reasons or due to merger/acquisition:** We will disclose your Personal Data to third parties for legal reasons or in the context of a merger or acquisition of Somos.

International Transfer of Personal Data

Whereas **Somos** is a company which provides claims management services to foreign law firms, the data processed by **Somos** may be transferred across borders to such firms for analysis, facilitation, and execution of the claims. The international transfer may also occur for other types of personal data, including sensitive data, when necessary for a specific purpose, always pursuant to the provisions established by the applicable laws.

Duration of Data Processing

Pursuant to the legislation in force, **Somos** uses your Personal Data for as long as necessary to fulfil the purposes for which your Personal Data was collected, as described in this Policy, or to comply with applicable legal requirements.

Personal data used to provide a personalised experience to you shall be retained only for as long as permitted under legislation in force. You can obtain further details about the retention of your Personal Data through the communication channels detailed in this Policy.

At the end of the processing of your Personal Data, it shall be deleted within the scope and technical limits of the activities, and conservation shall be authorised in the situations provided for in the legislation in force.

Data Security Measures

In order to keep your personal information secure, **Somos** adopts an appropriate Data Security Policy and use of physical, electronic and management tools to safeguard your privacy. The measures adopted include (but are not limited to):

- The storage of your Personal Data in operating environments that use reasonable security measures, both technical and administrative, to prevent any unauthorised access.
- The establishment of strict controls over the processing of personal data.
- The provision of access authentication systems, in order to ensure the individualisation of the person responsible for processing the records.
- The creation of a detailed inventory of accesses to connection and application access logs, containing the time, duration, identity of the employee or person responsible for the designated access and the file accessed.
- The use of solutions to manage the records using techniques that ensure the inviolability of the data, such as encryption or equivalent protection measures, without prejudice to the adoption of other technical standards set by the incumbent authorities.

All of our partners, employees, and national or international third-party services who have or may have access to your personal data are instructed to undertake data protection measures and are subject to secrecy obligations.

Roles and Responsibilities

Somos undertakes the responsibility to observe the data protection principles set forth in the LGPD and GDPR and to comply with all legislation for the correct use of your personal data, in order to preserve the privacy of such data, as well as to ensure all your legal rights and guarantees.

It is **Somos'** responsibility, as a data processing agent:

- Ensure that all those who interact with **Somos'** services know and respect the guidelines of this Privacy Notice.
- Oversee the strategies used for data protection.
- Provide appropriate training for professionals who engage by any means with the analysis or processing of data.
- Establish the liability of agents that act in the data processing procedures.
- Monitor the procedures that involve the data to verify the need for improvement in the data processing; and seek technical and organisational conditions that are securely able to protect the entire data processing procedure.
- Develop tools that promote improvements regarding your security.

It is your responsibility, as the holder of personal data, to know and respect the guidelines of this Privacy Notice. In this regard, you undertake the responsibility of:

- Read, understand, and fully comply with the terms of the Privacy Notice.
- Send any questions and/or requests for clarification on the **Somos'** Policy Notice to the communication channels detailed in this Policy.
- Provide truthful information in the records required for the use of **Somos'** services.
- If you have login accounts in **Somos'** systems, choose a strong password to prevent unauthorised parties from discovering it. Never reveal or share your password with others. You are solely responsible for keeping this password confidential and for any actions taken through your account on **Somos** websites and compatible services.
- If you are using a shared or public computer, never opt for the system to remember your login, e-mail address or password, and ensure you have logged out of your account each time you leave the computer.

In case you, as an individual interacting with **Somos'** services, breach this Privacy Notice, **Somos** may restrict your access to our platforms due to misconduct.

Your rights regarding personal data

You are entitled to confirm the existence, access, review, modify and/or request an electronic copy of the information of your Personal Data that is processed by **Somos**.

You also have the right to request details about the origin of your Personal Data or the sharing of such data with third parties.

At any time, you may also limit the use and disclosure of, or withdraw consent to, any of your Personal Data, except where provided for in the legislation in force, including where **Somos** has legitimate legal grounds to continue processing.

These rights may be exercised through the communication channels detailed in this Policy, being necessary to validate your identity by providing a copy of your ID or equivalent means of identification, pursuant to the legislation in force.

Whenever a request is submitted without providing the evidence necessary to prove the legitimacy of the holder of personal data, the request shall be automatically rejected. Please note that any identification provided to **Somos** in order to enforce the rights of the holder of personal data shall only be processed for that purpose and to the extent permitted by the law in force.

In certain cases, we may not be able to delete your Personal Data without jeopardising the services provided to you, in some situations we may even have to end them. Additionally, some situations require that we retain your Personal Data after you request its removal, to satisfy legal or contractual obligations.

Somos does its best to address any concerns you may have about the way we process your Personal Data. Nevertheless, if you have unresolved concerns, you have the right to present a complaint before the relevant data protection authorities.

Cookies Policy

Cookies are small text files that may be placed on your computer or portable device by websites or services on the web that you use. They may be used to ensure the proper functioning of websites and other services, as well as to provide information to the owners of the website or service about how visitors use them.

Somos does not currently use cookies on this website in order to collect information from users for itself.

In addition to cookies, **Somos'** websites and platforms may use web bugs (also known as web beacons), including through Google Analytics. Web bugs are small sequences of code that allow the delivery of a graphic image on a web page for the purpose of transferring data back to **Somos**. The web bugs used on our websites may provide us with information about the actions you take within them, including the pages of our website that you access and the length of stay on each page.

Changes to our Privacy Notice

At any time that **Somos** changes the way your Personal Data is managed, this Notice shall be updated. Somos reserve the right to amend and update our practices and this Notice at any time provided that Somos remains in compliance with the legislation in force.

Somos encourages you to check back frequently, or whenever you have any questions, to see any updates or changes we have made to our Privacy Notice.

How to contact Somos

You can contact Somos to:

- Ask questions or make comments about this Policy and our privacy practices and protection of Personal Data;
- Make a complaint;
- Confirm the existence of processing of your Personal Data;
- Obtain information on how to access your Personal Data;
- Correct incomplete, inaccurate or outdated Personal Data;
- Obtain information on the anonymisation, blocking or removal of unnecessary and excessive data or data processed in violation of the provisions of the legislation in force;
- Obtain information about the portability of your Personal Data to another service or product provider, upon express request, pursuant to the legislation in force;
- Request the removal of personal data processed with your consent, except in the cases provided for in the legislation in force;
- Request details of the public and private entities with which we share your Personal Data;
- Obtain information about the possibility of not consenting and the consequences of this refusal;
- Revoke consent to the processing of your Personal Data, except in the cases provided for in the legislation in force;
- Other rights of the holder of personal data, pursuant to the legislation in force;

To do so, we request you to contact us through the following contact channel:

- **Personal Data Handler:**
 - o Rafael de Morais Ferreira
 - o lgpd@somos.us

Somos shall receive, investigate, and respond, within a reasonable time, to any request or complaint regarding our handling of your Personal Data, including claims regarding the violation of your rights provided for in privacy and personal data protection laws in force.

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