



COMUNICAÇÃO
& ESTRATÉGIA

PERSONAL DATA PRIVACY POLICY

VERSION 01/2026

History of Versions:

Date	Version	Description	Author
06/17/2026	1.0	Personal Data Privacy Policy	Márcia do Amaral Moreira e Ludmila da Silva Bazilli Montenegro Data Protection Officers

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		Version 1.00	Approved by: Privacy Committee

1. INTRODUCTION

TORRE Comunicação e Estratégia Ltda., registered under CNPJ No. 19.054.870/0001-71, with its registered office at SHIS QL 12, Conjunto 11, Casa 4, Lago Sul, Brasília – DF, Brazil, email administrativo@torrece.com.br, and telephone +55 (61) 99682-6865, understands that the trust placed in **TORRE** by our clients, partners, and employees is our most valuable asset. As a Personal Data Controller, protecting the information entrusted to us is a fundamental pillar of our operations and an unwavering commitment.

This Privacy and Personal Data Protection Policy (“Policy”) reflects our commitment to information security and personal data privacy and has been developed in accordance with the highest technical and ethical standards. It aims to provide transparency regarding how we process and protect Personal Data, in strict compliance with Law No. 13,709/2018 – the Brazilian General Data Protection Law (Lei Geral de Proteção de Dados Pessoais – LGPD), and in alignment with international best practices for security and risk management, particularly ISO/IEC 27001 (Information Security Management System), ISO/IEC 27701 (Privacy Information Management System), and ISO 31000 (Risk Management).

2. PURPOSE AND SCOPE

2.1 Purpose: The primary purposes of this Policy are to:

- a) Inform** clearly and accessibly about the circumstances under which **TORRE** processes Personal Data.
- b) Ensure** that Data Subjects understand their rights and the mechanisms available for exercising them, as provided under the LGPD.
- c) Demonstrate** the adoption of a Privacy Information Management System (SGIP) based on ISO/IEC 27701, ensuring the implementation of robust technical and organizational controls for data protection.

2.2 Scope

This Policy applies to all Users, Visitors, Clients, Employees, and Partners who interact with the Company and its digital channels, including the website <https://torrece.com.br/>, and covers all Personal Data Processing activities carried out by the Company within Brazil.

3. KEY CONCEPTS

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For purposes of this Policy, the following concepts shall have the meanings established under the LGPD:

Concept	Definition (LGPD)
Personal Data	Information relating to an identified or identifiable natural person.
Sensitive Personal Data	Personal data on racial or ethnic origin, religious beliefs, political opinions, affiliation to trade unions or organizations of a religious, philosophical or political nature, data on health or sexual life, and genetic or biometric data when linked to a natural person.
Data Subject	The natural person to whom the Personal Data being processed relates.
Controller	A natural or legal person, under public or private law, responsible for decisions regarding the processing of Personal Data. In this case, TORRE.
Operator	A natural or legal person, under public or private law, who processes Personal Data on behalf of the Controller.
Processing	Any operation performed with Personal Data, including collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.
DPO / Data Protection Officer	The person appointed by the Controller and Processor to act as a communication channel between the Controller, Data Subjects, and the Brazilian National Data Protection Authority (ANPD).

4. PERSONAL DATA COLLECTED AND PURPOSES OF PROCESSING

The Company collects and processes only the Personal Data that is strictly necessary for specific and legitimate purposes, as detailed below.

4.1 Categories of Data Collected

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Data Subject Category	Examples of Data Collected
Individuals (Clients/Users)	Full name, CPF, ID number, email address, telephone number, address, date of birth, and banking information, where applicable.
Legal Entities (Representatives/Contacts)	Corporate name, CNPJ, name and CPF of the legal representative, email address, and contact telephone number.
Website Visitors	Browsing data, such as IP address, geolocation data, device type, and cookies.

4.2 Purposes and Legal Bases

Personal Data Processing is carried out based on the legal bases provided for under the LGPD (Articles 7 and 11), including:

Purpose of Processing	Legal Basis (LGPD)
Contract Performance	Necessary for the performance of a contract or for initial steps related to it, where Data Subject is a party.
Compliance with Legal or Regulatory Obligations	Necessary for compliance with a legal or regulatory obligation applicable to the Controller.
Legitimate Interests	Necessary to pursue the legitimate interests of the Controller or a third party, except where the fundamental rights and freedoms of the Data Subject prevail.
Consent	The Data Subject has provided consent for specific purposes.
Exercise of Rights	Necessary for the regular exercise of rights in judicial, administrative, or arbitral proceedings.

5. SHARING PERSONAL DATA

TORRE does not sell or commercially exploit your Personal Data. Personal Data is shared strictly when necessary to fulfill the purposes described in this Policy and always subject to contractual provisions requiring the same level of security and compliance adopted by us.

We may share your Personal Data with:

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- a) Service Providers and Partners:** To perform essential services, such as call center services, back-office services, IT consulting, and data hosting services.
- b) Public Authorities:** To comply with legal or regulatory obligations or judicial orders, including cooperation with the ANPD and national security authorities.
- c) Companies within the Same Economic Group:** For administrative and operational purposes, provided that the original purposes of processing and appropriate security safeguards are maintained.

6. INTERNATIONAL TRANSFER OF PERSONAL DATA

Where it is necessary to transfer Personal Data to other countries or international organizations, **TORRE** will ensure that such transfers are made only to jurisdictions that provide an adequate level of protection for Personal Data as required under the LGPD, or through the adoption of one of the following safeguards:

- a) Standard Contractual Sections (CCPs):** Specific contractual sections governing the transfer, approved by the ANPD.
- b) Specific Contractual Sections:** Specific contractual sections between the Controller and the Processor, subject to verification of protection safeguards.
- c) Specific Consent:** The Data Subject's consent, provided after prior information regarding the international nature of the operation.

7. DATA RETENTION AND TERMINATION OF PROCESSING

Personal Data is stored in a secure environment and retained only for as long as necessary to fulfill the purposes for which it was collected, subject to the following criteria:

- a) **Legal or Regulatory Period:** For the period required by applicable law or regulation, such as tax records and access logs under the Brazilian Internet Civil Framework (Marco Civil da Internet).
- b) **Contractual Period:** For the duration of the applicable contract and any amendments thereto.
- c) **Legitimate Interest:** For the period necessary for the regular exercise of rights in judicial, administrative, or arbitral proceedings.

Once the applicable retention period and its legal basis have expired, Personal Data will be securely deleted or anonymized so that it can no longer be associated with the Data Subject.

8. DATA SUBJECT'S RIGHTS – LGPD

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Data Subjects have the following rights, which may be exercised at any time by submitting a request to the DPO / Data Protection Officer:

Right	Description
Confirmation and Access	Confirmation of Personal Data processing and access to such data.
Correction	Correction of incomplete, inaccurate or outdated data.
Anonymization, Blocking, or Deletion	Anonymization, blocking or deletion of unnecessary or excessive data or data processed in violation of the LGPD.
Data Portability	Portability of data to another service or product provider, upon express request.
Information about Data Sharing	Information about the public and private entities with which the Controller has shared Personal Data.
Withdrawal of Consent	Withdrawal of consent at any time, without affecting the lawfulness of processing carried out prior to its withdrawal.
Right to Object	The right to object to processing carried out on a basis for which consent is not required, where the processing does not comply with the LGPD.

Requests will be **handled...**

9. INFORMATION SECURITY AND RISK MANAGEMENT

The Company maintains a Risk Management Policy based on ISO 31000 and applies the principles of Privacy by Design and Security by Design across its operations.

10. SECURITY INCIDENT MANAGEMENT

In the event of a security incident that may cause relevant risk or harm to Data Subjects, **TORRE** maintains a Personal Data Security Incident Response Plan and is committed to:

- Notify the Brazilian National Data Protection Authority (ANPD).
- Notify the affected Data Subjects within a reasonable period, providing information regarding the nature of the incident, the data affected, the technical and security measures implemented, and the measures adopted to reverse or mitigate the harm.

11. DATA PROTECTION OFFICER (DPO)

TORRE has appointed Márcia do Amaral Moreira and Ludmila da Silva Bazilli Montenegro as its Data Protection Officers (DPOs), responsible for acting as a communication channel between the Company, Data Subjects, and the ANPD.

DPO	Márcia do Amaral Moreira
DPO	Ludmila da Silva Bazilli Montenegro

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Email	lgpd@torrece.com.br
Telephone	(12)93300-9925/(11)92008-2657

12. FINAL PROVISIONS

12.1 Updates to this Policy

This Policy may be updated from time to time. The revised version will be published through our digital channels, together with the date of the latest update. We recommend periodical review of this Policy.

12.2 Applicable Law and Venue

This Policy is governed by and construed in accordance with Brazilian law, including Law No. 13,709/2018 (LGPD). The court of the District of Brasília shall have jurisdiction to resolve any disputes arising from this document, without prejudice to the possibility of resolving disputes through mediation or arbitration.

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Exhibit 01 -

PRIVACY PROGRAM DOCUMENT APPROVAL STATEMENT

TORRE Comunicação e Estratégia Ltda., registered under CNPJ No. 19.054.870/0001-71, with its registered office at SHIS QL 12, Conjunto 11, Casa 4, Lago Sul – Brasília, Federal District, Brazil, hereby represented by its Data Protection Officers (DPOs), pursuant to Law No. 13,709/2018 – Brazilian General Data Protection Law (Lei Geral de Proteção de Dados Pessoais – LGPD), hereby formally establishes the adoption and effective validity of its Privacy Policies, Terms of Use, and Personal Data Protection Policies, under the following terms:

1. Purpose of this Approval Statement:

The purpose of this Statement is to formally establish the approval, implementation, and validity of the external policies governing the processing of Personal Data by **TORRE**, ensuring that the principles, safeguards, and technical and organizational measures required under the LGPD are fully implemented and observed.

2. Effective Date And Validity

The policies hereby approved shall take effect as of the date this Statement is executed and shall remain in force for an indefinite period, or until they are formally reviewed, updated, or replaced upon approval by the Company's privacy governance structure.

Márcia do Amaral Moreira

DPO Manager

Ludmila da Silva Bazilli
Montenegro

DPO Operational

Thiago Vitale

CEO