



COMUNICAÇÃO
& ESTRATÉGIA

COOKIE POLICY

VERSION 01/2026

History of Versions:

Date	Version	Description	Author
06/17/2026	1.0	Cookie Policy	Márcia do Amaral Moreira and Ludmila da Silva Bazilli Montenegro DPOs

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Código		Version 1.00	Approved by: Privacy Committee

1. INTRODUCTION

This Cookie Policy establishes the guidelines and procedures for the collection, use, storage, and management of cookies and tracking technologies by **TORRE Comunicação e Estratégia**. Its purpose is to ensure compliance with the Brazilian General Data Protection Law (Lei Geral de Proteção de Dados Pessoais – LGPD), the Cookie Guidelines issued by the Brazilian National Data Protection Authority (ANPD), and the international standards ABNT NBR ISO/IEC 27701:2019 (Privacy Information Management System) and ABNT NBR ISO 31000:2018 (Risk Management).

2. SCOPE AND COVERAGE

This Policy applies to all **TORRE** websites, applications, and digital services that use cookies or tracking technologies. It covers all users and visitors who interact with these digital assets, as well as **TORRE**'s employees involved in the management and development of these platforms.

3. REGULATORY REFERENCES

- Law No. 13,709 of August 14, 2018 – Brazilian General Data Protection Law (LGPD).
- Guidelines for Processing Agents: Cookies. Agência Nacional de Proteção de Dados (ANPD).
- ABNT NBR ISO/IEC 27701:2019 – Security techniques – Extension to ABNT NBR ISO/IEC 27001 and I ABNT NBR ISO/IEC 27002 for privacy information management.
- ABNT NBR ISO 31000:2018 – Risk Management – Guidelines.

4. DEFINITIONS

For the purposes of this Policy, the definitions established under the LGPD shall apply, together with the following additional definitions:

- 4.1. Cookie: A small text file stored in a user's browser by a website that contains information about browsing activity and preferences.

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- 4.2. Granular Consent: A mechanism that allows Data Subjects to accept or reject specific categories of cookies rather than being required to accept or reject all cookies as a whole.
- 4.3. Dark Patterns: Interface elements that may induce user into making decisions they would not otherwise make, particularly with regard to privacy.
- 4.4. PII (Personally Identifiable Information): Personally Identifiable Information, as defined by ISO/IEC 27701, referring to information that can identify an individual.

5. COOKIE POLICY PRINCIPLES

This Policy is guided by the following principles, in accordance with Article 6 of the LGPD and Section 6.2 of ISO/IEC 27701:

- **5.1. Transparency:** Provide clear and accessible information about the use of cookies.
- **5.2. Purpose:** Collect and use cookies only for legitimate, specific, and clearly communicated purposes.
- **5.3. Free Access:** Ensure that Data Subjects have easy access to information regarding the processing of their Personal Data.
- **5.4. Security:** Adopt technical and administrative measures to protect data collected through cookies.
- **5.5. Non-Discrimination:** Ensure that Personal Data is not processed in a discriminatory manner.
- **5.6. Accountability:** Demonstrate the adoption of effective measures capable of evidencing compliance with applicable Personal Data protection requirements.

6. GUIDELINES FOR THE USE OF COOKIES

6.1. Cookie Categories and Legal Bases

TORRE classifies the cookies used on its domains into the following categories, together with their respective legal bases, in accordance with the ANPD Cookie Guidelines:

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Cookie Category	Description	Legal Basis (LGPD)	Consent Required?	Retention Period (Example)
6.1.1. Necessary	Essential for the basic operation of the website, (security, navigation, access to secure areas, shopping cart functionality). Cannot be disabled without affecting website functionality.	Legitimate Interest (Article 7, IX) [1]	No (Opt-out through browser)	Session or up to 1 year
6.1.2. Functional	Allow the website to remember choices made by the user, such as language, region, or username, providing a more customized experience.	Consent (Article 7, I) [1]	Yes (Opt-in)	Up to 2 years.
6.1.3. Analytics / Performance	Collect information about how visitors use the website (pages visited, time spent on the website, errors), helping to improve its performance and design. Data is generally anonymized.	Consent (Article 7, I) [1]	Yes (Opt-in)	Up to 2 years.
6.1.4. Marketing / Advertising	Used to track user behavior across different websites and create interest profiles in order to deliver relevant and personalized advertising.	Consent (Article 7, I) [1]	Yes (Opt-in)	Up to 1 year.

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6.2. Consent Management (ABNT NBR ISO/IEC 27701:2019 – Clause 7.3.2)

TORRE adopts a consent management model designed to ensure that Data Subjects are able to freely exercise choices, in accordance with the ANPD Cookie Guidelines.

- 6.2.1. Consent Banner: Upon the user's first visit to the website, a clear and visible consent banner will be displayed informing the user about the use of cookies and providing the following options:
 - Accept All: Provides consent to all cookie categories (except Necessary Cookies, which are enabled by default).
 - Reject All: Rejects all non-essential cookie categories.
 - Manage Preferences: Allows users to individually select the categories of cookies they wish to accept.
- 6.2.2 Withdrawal of Consent: Data Subjects may change or withdraw their consent at any time, easily and free of charge, through a permanent link ("Cookie Settings" or a similar option) available in the website footer.
- 6.2.3. Consent Records: **TORRE** will keep records of consents provided and withdrawn for accountability purposes.

6.3 Third-party Cookies

TORRE may use third-party cookies (Google Analytics or Facebook Pixel) for analytics and marketing purposes. The use of such cookies is also subject to the privacy policies of the respective third parties. **TORRE** is committed to:

- 6.3.1. Partner Selection: Prioritize partners that comply with the LGPD and applicable information security standards.
- 6.3.2. Transparency: Clearly inform which third parties may place cookies and provide links to their respective privacy policies.
- 6.3.3. Audit: Perform periodic audits to identify and manage unauthorized third-party cookies or cookies that exceed the purposes communicated.

6.4. Data Retention and Disposal (LGPD Article 15 and ISO 27701 A.7.4.1)

Data collected through cookies will be retained only for as long as necessary to fulfill the purposes for which it was collected, subject to applicable legal and regulatory periods. Upon

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termination of processing, the data will be securely deleted or anonymized, in accordance with **TORRE's** Data Retention Policy.

7. RISK MANAGEMENT (ABNT NBR ISO 31000:2018)

TORRE adopts a risk-based approach to cookie management, with the objective of identifying, analyzing, assessing, treating, and monitoring risks associated with the processing of Personal Data through tracking technologies. Key risk mitigation measures include:

7.1. Data Protection Impact Assessment (RIPD): Data Protection Impact Assessments (RIPD) for processing activities that may pose a high risk to Data Subjects, including the use of third-party marketing cookies.

7.2. Security Controls: Information security controls to protect data collected through cookies against unauthorized access, loss or alteration.

8. CONTINUOUS IMPROVEMENT AND REVIEW

This Policy will be reviewed annually or whenever there are significant changes to applicable legislation, ANPD guidelines, tracking technologies, or **TORRE's** business processes. The purpose of this review is to ensure the continuous improvement of the Privacy Information Management System.

9. CONTACTING THE DPO

If you have any questions regarding this Policy or wish to exercise your rights as a Data Subject, please contact **TORRE's** Data Protection Officers (DPOs) at:

DPO	Márcia do Amaral Moreira
DPO	Ludmila da Silva Bazilli Montenegro
Email	[lgpd@torrece.com.br]
Telephone	(12)93300-9925/(11)92008-2657

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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 Officer (DPO), 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.

Approval Date:	06/17/2026
City:	Brasília

Márcia do Amaral Moreira	Ludmila da Silva Bazilli Montenegro	Aloísio Puppín
DPO Manager	DPO Operational	Contact