



CINPAL CIA. INDUSTRIAL DE PEÇAS PARA AUTOMÓVEIS

Privacy Policy and Statement of Clarification

STATEMENT OF CLARIFICATION - Law 13.709/2018, General Data Protection Law (*Lei Geral de Proteção de Dados - LGPD*)

Cinpal - Cia. Industrial de Peças para Automóveis protects the confidentiality of personal and sensitive data entrusted to it by the website user and subject of such data.

To this end, it implements technical and administrative security measures to protect personal data against unauthorized access and accidental situations, or any form of inappropriate processing, as necessary for compliance with the General Data Protection Law (Law No. 13.709/2018).

Good practice and governance rules ensure that the processing of personal and sensitive data is lawful, fair, transparent and limited to the authorized purposes for which it is intended.

The collection of personal and sensitive data for processing is carried out by Cinpal - Cia. Industrial de Peças para Automóveis based on measures required to ensure accuracy, integrity and confidentiality, as well as respect for freedom, privacy, inviolability of intimacy, image, in short, all the rights of the data subjects, including the exercise of the right to request access, correction and deletion of personal and sensitive data stored on a database and digital system.

PRIVACY POLICY (Law 13.709)

Cinpal - Cia. Industrial de Peças para Automóveis

General information

This Privacy Policy contains information on the way we treat, in whole or in part, the personal data of users who access our website. Its purpose is to clarify the stakeholders about the types of data that are collected, the reasons for collection and how the user can update, manage or delete this information.

This Privacy Policy was prepared in compliance with Federal Law No. 12.965 of April 23, 2014 (*Marco Civil da Internet - Civil Rights Framework for the Internet*) and Federal Law n. 13.709 of August 14, 2018 (*Lei de Proteção de Dados Pessoais - Personal Data Protection Law*).

This Privacy Policy may be updated as a result of any regulatory update, for which reason we recommend that the user refer to this section from time to time.



User rights

The website undertakes to comply with the rules set forth in the LGPD, regarding the following principles:

- Users' personal data will be processed lawfully, fairly and transparently (lawfulness, fairness and transparency);
- Users' personal data will be collected only for specified, explicit and legitimate purposes and may not be further processed in any manner incompatible with those purposes (purpose limitation);
- Users' personal data will be collected in an appropriate, relevant manner, and will be limited to the needs of the purpose for which they are processed (data minimization);
- Users' personal data will be accurate and updated whenever necessary, so that inaccurate data be deleted or rectified whenever possible (accuracy);
- Users' personal data will be stored in such a way as to enable identification of data subjects for no longer than needed for the purposes for which they are processed (storage limitation);
- Users' personal data will be processed securely, protected from unauthorized or unlawful processing and against accidental loss, destruction or damage by means of adoption of the proper technical or organizational measures (integrity and confidentiality).

Users of the website have the following rights, conferred by the Personal Data Protection Law and the LGPD:

- Right to confirmation and access: a user's right to obtain confirmation from the website about whether their personal data are or not subject to processing. In case they are, the right to access their personal data;
- Right to rectification: a user's right to obtain from the website, without undue delay, the rectification of inaccurate personal data about them;
- Right to data erasure (the right to be forgotten): a user's right to have their data erased from the website, or to have unnecessary, excessive or improperly processed data anonymized, blocked or erased;
- Right to limit data processing: a user's right to limit the processing of their personal data, being able to obtain it when they contest the accuracy of such data, when the processing is unlawful, when the website no longer needs the data for the intended purposes and when they have objected to the processing of said data, as well as in case of processing of unnecessary data;
- Right to objection: a user's right to object at any time, for reasons relating to their particular situation, to the processing of personal data about them;
- Right to data portability: a user's right to receive the personal data about them that they have provided to the website in a structured, commonly used and machine-readable format, and the right to transmit these data to another website;



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– Right not to be subject to automated decisions: a user's right not to be subject to any decision made exclusively on the basis of automated processing, including profiling, which produces effect in the legal sphere or significantly affects them in a similar way.

- Right to withdraw consent.

Users may exercise their rights by means of written communication sent to the website with the subject "LGPD", specifying:

– Full name or corporate name, CPF (Brazilian Individual Tax ID) or CNPJ (Brazilian Corporate Tax ID), attaching their identity document, their email address and, if applicable, their representative's identity document and email address;

– The right they wish to exercise before the website;

– Date of request and user's signature;

– Any document that can demonstrate or justify the exercise of their right.

The request should be sent by email to: fabia.barros@cinpal.com, or by mail to the following address:

Cinpal – Cia. Industrial de Peças para Automóveis

Attn LGPD - Fabia Paes de Barros

Av. Paulo Ayres, 240 – Taboão da Serra (SP) – 06767-220.

Users will be informed in case their data is rectified or deleted.

Duty not to provide third party data

During the use of the website, with the purpose of safeguarding and protecting the rights of third parties, users must provide only their personal data, not those of third parties.

Information collected

The collection of user data will comply with the provisions of this Privacy Policy and depend on the user's consent, which may be waived only in the cases provided for in Art. 11, item II, of the Personal Data Protection Law.

Types of data collected

Data entered on the contact form

Any data entered by users on the contact form available on the website, including the content of the message sent, will be collected and stored, if provided with the user's consent or if the collection is permitted or imposed by law.



Legal basis for the processing of personal data

By using the website's services, users consent to this Privacy Policy and the collection, processing and use of the information.

Users have the right to withdraw their consent at any time, without compromising the lawfulness of the processing of their personal data before said withdrawal. Consent may be withdrawn by email: fabia.barros@cinpal.com, or by mail to the following address:

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The consent of those relatively or absolutely incompetent, especially children under sixteen (16) years old, can only be given, respectively, if properly assisted or represented.

The processing of personal data without the user's consent will only be carried out due to a legitimate interest or when provided for by law, i.e., due to the following provisions, among others:

- for compliance with a legal or regulatory obligation by the data controller;
- when needed for the execution of a contract or for preliminary procedures related to a contract to which the user is a party, at the request of the data subject;
- for the regular exercise of rights in judicial, administrative or arbitration proceedings, the latter pursuant to Law No. 9.307 of September 23, 1996 (Arbitration Law);
- for the protection of the life or physical safety of the data subject or of a third party;

Purposes for processing personal data

Users' personal data collected by the website are intended to facilitate, expedite and comply with the commitments established with the user and to enforce requests made by filling out forms.

Personal data may also be used for a commercial purpose, to customize the content offered to the user, as well as providing subsidies for improvement of the quality and operation of the website and its services.

The processing of personal data for purposes not provided for in this Privacy Policy will only occur upon prior notice to the user, and, in any case, the rights and obligations set forth herein will remain applicable.

Period of retention of personal data on the website



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Users' personal data will be retained for a period that should not exceed that required to fulfill the purposes for which they are processed.

The data retention period is defined according to the following criteria:

The data will be stored for the time needed to provide the services posted on the Website.

Users' personal data may only be retained subsequently to the end of their processing in the following events:

- for compliance with a legal or regulatory obligation by the controller;
- for a study to be conducted by a research agency, anonymization of the personal data being ensured, whenever possible;
- for transfer by a third party, provided that the data processing requirements set forth in the legislation are complied with;
- for the exclusive use of the controller, their access by a third party being prohibited, and provided that the data are anonymized.

Recipients and transfer of personal data

Users' personal data will not be shared with other people or companies, and the website is committed to ensuring the protection of data in accordance with the appropriate level of protection of such users' data.

Processing of personal data

Data controller

The data controller, who is responsible for the processing of users' personal data, is the individual or legal entity, the public authority, the agency or any other body that individually or collectively determines the purposes and means for the processing of personal data.

Data protection officer

The data protection officer is the professional in charge of informing, advising and monitoring the data controller, as well as the operators who process the data, regarding the website's obligations under the terms of the RGDP, the Personal Data Protection Law and other data protection provisions set forth in national and international law, in cooperation with the proper supervisory authority.

At this company, the data protection officer is Ms. Fabia Paes de Barros. She can be contacted by email: fabia.barros@cinpal.com, or by mail to the following address:

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Security in the processing of the users' personal data

The website undertakes to apply technical and organizational measures to protect personal data from unauthorized access and from situations of destruction, loss, modification, communication or dissemination of such data.

To guarantee security, solutions will be adopted that take into account: the appropriate techniques; the application costs; the nature, scope, context and purposes of the processing; and the risks to users' rights and liberties.

However, the website disclaims any liability for the sole fault of a third party, as in the case of a hacker or cracker attack, or for the sole fault of the users, as in the case where they themselves transfer their data to a third party. The website also undertakes to notify the user within an appropriate period of time in the event of any type of violation of the security of their personal data that could pose a high risk to their personal rights and liberties.

A breach of personal data is a breach of security that causes, accidentally or unlawfully, the destruction, loss, modification, disclosure or unauthorized access to personal data transmitted, stored or subject to any other type of processing.

Finally, the website undertakes to treat users' personal data in a confidential manner, within the legal limits.

Cookies

Cookies are small text files sent by the website to the user's computer and stored on it, with information related to the website's browsing activities.

Through cookies, small amounts of information are stored by the user's browser so that our server can read it later. For example, data about the device used by the users can be stored, as well as their location and time of access to the website.

Cookies do not allow any file or information to be extracted from the user's hard drive, and it is not possible, through them, to access personal information that did not come from the users or from the way they use the website's resources.

It is important to stress that not every cookie contains information that enables the identification of the user, and certain types of cookies might be used simply for the website to load correctly or for its functionalities to work as expected.

Any information stored in cookies that enable the identification of a user is considered personal data. Therefore, all rules provided for in this Privacy Policy are also applicable to them.



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Cookies management and browser settings

We want to improve your browsing experience on our website and to this end we use cookies. By continuing to use this website, you agree to the use of cookies. If you prefer, you can object to the registration of cookies by the website by simply disabling this option in your own browser or device.

Disabling cookies, however, may affect the availability of some tools and features of the website, compromising its proper and expected operation.

Complaint to a supervisory authority

Without prejudice to any other means of administrative or judicial proceedings, all data subjects are entitled to file a complaint with a supervisory authority. The complaint may be made to the authority of the head office of the website's, of the user's country of frequent residence, their place of work or the place where the alleged infringement was committed.

Modifications

This version of this Privacy Policy was last updated on: July 05, 2021.

The editor reserves the right to modify these rules at any time, especially to adjust them to the evolution of the website, either by making new functionalities available, or by suppressing or modifying existing ones.

The user will be expressly notified of any changes to this policy .

By using the service after possible changes, the user shows their agreement with the new rules. If they disagree with any of the changes, they must immediately stop accessing the website and present their objection to the customer service, if they so wish.

Applicable law and jurisdiction

For the settlement of disputes arising from this instrument, Brazilian law will fully apply. Any disputes must be filed in the jurisdiction of São Paulo (State of São Paulo).