



Data Privacy Policy

MT4 TECNOLOGIA LTDA | senhasegura USA LLC

senhasegura.com

This Privacy Policy describes senhasegura policies and procedures on the collection, use and disclosure of Your information when You use senhasegura Service or Product and disclose to You about how senhasegura comply with Your privacy rights,

We from senhasegura use Your Personal data to provide and improve our Service and Product. By using the any one of our offered Service or Product, You agree to the collection and use of information in accordance with this agreement.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions, and the following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Policy:

You means the individual accessing or using the Service, or the company, or other legal entity which is accessing or using the Service, as applicable. Under General Data Protection Regulation, You can be referred to as the Data Subject or as the User.

Service refers to the Application or the Website or both provided by the Company.

Account means a unique account created for You to access our Service or parts of our Service.

Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for the election of directors or other managing authority. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

Application means the software program provided by the Company downloaded/activated/accessed by You on any electronic device.

Business, for the purpose of the CCPA (California Consumer Privacy Act), refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, that does business in the State of California.

Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) in the USA: senhasegura USA LLC; in Brazil: MT4 TECNOLOGIA LTDA.

Business Partner is understood to mean any person or entity other than the Consumer/You, which includes, but is not limited to, subsidiaries, affiliates, partners, suppliers or companies resulting from a merger, division or incorporation.

Consumer, for the purpose of the CCPA (California Consumer Privacy Act), means a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the USA for other than a temporary or transitory purpose and (2) every individual who is domiciled in the USA who is outside the USA for a temporary or transitory purpose, for the GDPR means.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country refers to the place and legislation of origin. Applicability: (1) CCPA: United States; (2) GDPR: European Union; (3) LGPD: Brazil.

Data Controller, for the purposes of the GDPR (General Data Protection Regulation) and LGPD (General Data Protection Law), refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

Device means any device that can access the Service such as a computer, a cell phone, a digital tablet or any other device energized and connected to a network.

Do Not Track (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing Internet users to control the tracking of their online activities across websites.

Personal Data is any information that relates to an identified or identifiable individual. Applicability:

For the purposes of GDPR and LGPD, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

For the purposes of the CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

Sensitive Data has particularities according to each legislation or regulation. Applicability:

- a. CCPA considers personal data: Name, social security number, email address, records of products purchased, internet browsing history, geolocation data, fingerprints, and inferences from other personal information that could create a profile about your preferences and characteristics.
- b. GDPR considers personal data: revealing racial or ethnic origin, political opinions, religious or philosophical beliefs; trade-union membership; genetic data, biometric data processed solely to identify a human being; health-related data; data concerning a person's sex life or sexual orientation.
- c. LGPD considers personal data: Ethnic, Political, Religious, Union, or Philosophical Beliefs, Health, Sex life or sexual orientation, Genetic, and Biometric data.

Sale, for the purpose of the CCPA (California Consumer Privacy Act), means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's personal information to another business or a third party for monetary or other valuable consideration.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the GDPR, Service Providers are considered Data Processors.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself.

Website refers to senhasegura, accessible from <https://senhasegura.com/> or any other domain and subdomain of senhasegura.

Collecting and Using Your Personal Data

We pride ourselves on being an organization that has a privacy-minded culture consistent with legal requirements. We will ensure that your personal data is:

Processed by senhasegura lawfully, fairly and transparently;

Only collected for clear and legitimate purposes;

Limited in scope and time to only the extent necessary for the purpose of that processing;

Kept accurate and up-to-date;

Secured against unauthorized or unlawful processing and against accidental loss, destruction or damage.

This privacy policy describes how senhasegura will process personal data in connection with Your use of senhasegura's Services, website and other technical applications, tools or services.

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally, identifiable information may include, but is not limited to:

Email address;

First name and last name;

Phone number;

Address, State, Province, ZIP/Postal code, City;

Company;

Job Role or Title;

Usage Data: Your Device's Internet Protocol address, browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers, user behavior, Your geolocation and other diagnostic data.

If You are Client, Business Partner of senhasegura, We also may collect additional information such as: Login, Password, Biometric information, Pictures and Payment data.

It is important that You, or the person authorized by you, fill in your personal data and enter only true and updated information, as We are not responsible for verification. The responsibility, in any case, civil and/or criminal, is yours for the veracity, accuracy and authenticity of the information included in our database.

If you are interested in our service, you can request a demonstration on our page <http://www.senhasegura.com>. Therefore, for this specific purpose, we may collect data.

Application

While using Our Application, in order to provide features of Our Application, We may collect, with Your prior permission:

- Information regarding your location
- Date and time of access
- Your Name and Email address
- Your activity

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Our Cookies, You may not be able to use some parts of Our Service, Our Service may use Cookies. Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your

personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

Web Beacons. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related statistics.

User Behavior. Refer to Your behavior on the website, actions, decisions, and choices that individuals make when interacting with technology and online platforms.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies: The type of the Cookies are Session Cookies the purpose of these Cookies are essential to provide You with Our Services available through the Website and to enable You to use some of its features. They help to authenticate You and prevent fraudulent use of accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those Services.

Cookies Policy / Notice Acceptance Cookies: The Type of the Persistent Cookies, the Purpose of These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies: The Type of Persistent Cookies, the purpose of these Cookies allow Us to remember choices You make when You use the Website, such as remembering Your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Service.

If You do not accept Our Cookies, You may experience some inconvenience in your use of the Website and some features may not function properly.

In order to abstain from utilizing Cookies on this Website, you will need to take the following steps: disable Cookies in your web browser and clear out any Cookies associated with this Website that have been saved in your browser. This option is available to you at all times and will prevent the use of Cookies. If you wish to delete Cookies or direct your web browser to reject or delete them, please consult the help section of your web browser.

Usage

The Company may use Personal Data for the following purposes:

To provide and maintain our Service, including to monitor the usage of our Service.

To improve the usability and functionality of our products and services.

To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

To manage Your requests: To attend and manage Your requests to Us.

To deliver targeted advertising to You: We may use Your information to develop and display content and advertising (and work with third-party vendors who do so) tailored to Your interests and/or location and to measure its effectiveness.

For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

For other purposes: We may use Your information for other purposes, such as data analysis, prevent or investigate possible security incidents or fraud, identifying usage trends, determining the

effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to advertise on third party websites to You after You visited our Service, for payment processing, to contact You.

For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.

With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

With business partners: We may share Your information with Our business partners to offer You certain products, services or promotions.

With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.

With Your consent: We may disclose Your personal information for any other purpose with Your consent.

Treatment

We will be the **controller** of personal data in relations with our professionals. Likewise, you will be responsible for the processing of your personal data when they are entered by you through the website senhasegura.com or other subdomains of senhasegura.com captured by our portfolio. In these cases, it is Our responsibility to properly choose the legal bases in line with the purposes established in this policy, as well as to respond directly to your requests regarding the rights provided for in the legislation in force.

We may process Personal Data under the following conditions:

Consent: You have given Your consent for processing Personal Data for one or more specific purposes.

Performance of a contract: Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.

Legal obligations: Processing Personal Data is necessary for compliance with a legal obligation that falls on Us, as well as for legitimate company purposes that are authorized by the LGPD, GDPR, CCPA or other applicable regulations.

Vital interests: Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.

Public interests: Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.

Legitimate interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

Retention

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. We follow the following parameters to determine the security period of your personal data:

Period necessary to fulfill the purpose of the collection;

When You stop using Our website;

Revoke of consent or request for deletion of data by You, this only if and when the legal basis for the processing of data is consent;

Fulfillment of duties and obligations;

Legal deadlines, court decisions or determined by the ANPD;

Deadlines for compliance with legal or regulatory obligations by the controller;

Contract execution period;

Period for defense or exercise of rights by “senhasegura” and licensors;
Transfer to third parties, provided that the treatment requirements provided for in applicable legislation are complied with;
Exclusive use of the controller.
Access by a third party is prohibited, as long as it is anonymized data.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

Delete

You have the right to delete or request that We assist in deleting the Personal Data associated to You, that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal information.

You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us. Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

Disclosure

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation;
- Protect and defend the rights or property of the Company;
- Prevent or investigate possible wrongdoing in connection with the Service;
- Protect the personal safety of Users of the Service or the public;
- Legal liability.

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. To protect personal data in accordance with

the requirements and with the security of Our procedures, in accordance with the level of risk and the service provided, We have a team responsible for managing them in accordance with standards, procedures or other relevant factors that may influence data protection.

Due to the nature of the Internet, there is a risk that malicious third parties may improperly access information. If this occurs, We are liable within the limits provided for in the applicable legislation in force and may result in monetary compensation within the limit referring to the value of the contract.

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies.

If any intrusion, attempt, or activity is identified that violates or contravenes the laws of intellectual property rights and/or the provisions stipulated in this Policy, terms of use and/or applicable laws in force, the person responsible will be subject to applicable sanctions, such as are provided for by law or provided for in this document. The person responsible must also compensate for any damage caused.

Email Marketing

We may use Your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt-out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

We may use Email Marketing Service Providers to manage and send emails to You.

Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g. payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy

Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Credit card

The available credit card may collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies, please refer to your credit card holder to review their privacy policy.

Sharing with Third-Party

These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies and to enable Us to:

- Measure and analyze traffic and browsing activity on Our Service

- Show advertisements for our products and/or services to You on third-party websites or apps

- Measure and analyze the performance of Our advertising campaigns

We may share information, such as hashed email addresses (if available) or other online identifiers collected on Our Service with these third-party vendors. This allows Our third-party vendors to recognize and deliver You ads across devices and browsers. To read more about the technologies used by these third-party vendors and their cross-device capabilities please refer to the Privacy Policy of each vendor listed below.

The third-party vendors We use are:

Google Ads (AdWords): Google Ads (AdWords) remarketing service is provided by Google Inc. For more information on the privacy practices of Google, please visit the [Google Privacy & Terms](#) web page.

Facebook: Facebook remarketing service is provided by Facebook Inc. You can learn more about interest-based advertising from [Facebook by visiting this page](#). For more information on the privacy practices of Facebook, please visit [Facebook's Data Policy](#).

LinkedIn: LinkedIn remarketing service is provided by LinkedIn Corporation. We can apply Retargeting using LinkedIn Insight Tag. For more information please visit [LinkedIn's Data Policy](#).

HubSpot: HubSpot's remarketing service may collect data when there is interaction with the website, product, or service. For more information about your rights, please access their [privacy practices](#).

FreshDesk: FreshDesk is a customer support software. The service is operated by Freshworks, Inc. FreshDesk service may collect information from Your Device. The information gathered by FreshDesk is held in accordance with its [Privacy Policy](#).

Some of these third-party vendors may use non-cookie technologies that may not be impacted by browser settings that block cookies. Your browser may not permit You to block such technologies. You can use the following third-party tools to decline the collection and use of information for the purpose of serving You interest-based advertising:

[NAI's opt-out](#)

[EDAA's opt-out](#)

[DAA's opt-out](#)

[Google Analytics's opt-out](#)

[Facebook's opt-out](#)

You may opt-out of all personalized advertising by enabling privacy features on Your mobile device such as Limit Ad Tracking (iOS) and Opt Out of Ads Personalization (Android). See Your mobile device Help system for more information.

LGPD Privacy

DPO

The DPO or person in charge, as described by the LGPD, is the person responsible indicated by the controller and operator to act as a communication channel between the controller, data subjects and the National Data Protection Authority (ANPD). (LGPD, art. 5, VIII).

We have a DPO, if you need to get in touch to respond to requests, request via email dataprivacy@senhasegura.com or request on the website: senhasegura.com/data-privacy-portal/.

Rights guaranteed by the LGPD

Confirm the existence of data processing, in a simplified way or in a clear and complete format.

Access your data, being able to request them in a legible copy in printed form or by electronic means, safe and suitable.

Correct your data, when requesting the edition, correction, or update of these.

Limit your data when unnecessary, excessive, or treated in breach of legislation through anonymization, blocking, or elimination.

Request the portability of your data, through a report of registration data that (simplified corporate name) deals with you.

Delete your data, processed from your consent, except in cases provided for by law.

Revoke your consent, disallowing the processing of your data.

To be informed about the possibility of not providing your consent and about the consequences of denial.

GDPR Privacy

Your Rights under the GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

Request access to Your Personal Data. The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. This also enables You to receive a copy of the Personal Data We hold about You.

Request correction of the Personal Data that We hold about You. You have the right to have any incomplete or inaccurate information We hold about You corrected.

Object to processing of Your Personal Data. This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.

Request erasure of Your Personal Data. You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.

Request the transfer of Your Personal Data. We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.

Withdraw Your consent. You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

In compliance with legal provisions, We provide access to requests through the email dataprivacy@senhasegura.com or request through the website: senhasegura.com/data-privacy-portal/. For more information read the topic “Our responsibility”.

CCPA Privacy

Your Rights under the CCPA

The CCPA provides California residents with specific rights regarding their personal information. If You are a resident of California, You have the following rights:

The right to notice. You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.

The right to request. Under CCPA, You have the right to request that We disclose information to You about Our collection, use, sale, disclosure for business purposes and share of personal information. Once We receive and confirm Your request, We will disclose to You:

The categories of personal information We collected about You;

The categories of sources for the personal information We collected about You;

Our business or commercial purpose for collecting or selling that personal information;

The categories of third parties with whom We share that personal information;

The specific pieces of personal information We collected about You;

If we sold or disclosed Your personal information for a business purpose, We will disclose to You:

- a. The categories of personal information categories sold;
- b. The categories of personal information categories disclosed.

The right to say no to the sale of Personal Data (opt-out). You have the right to direct Us to not sell Your personal information. To submit an opt-out request please contact Us.

The right to delete Personal Data. You have the right to request the deletion of Your Personal Data, subject to certain exceptions. Once We receive and confirm Your request, We will delete (and direct Our Service Providers to delete) Your personal information from our records, unless an exception applies. We may deny Your deletion request if retaining the information is necessary for Us or Our Service Providers to:

Complete the transaction for which We collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.

Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

Debug products to identify and repair errors that impair existing intended functionality.

Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).

Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.

Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with Us.

Comply with a legal obligation.

Make other internal and lawful uses of that information that are compatible with the context in which You provided it.

The right not to be discriminated against. You have the right not to be discriminated against for exercising any of Your consumer's rights, including by:

Denying goods or services to You

Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties

Providing a different level or quality of goods or services to You

Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services

In compliance with legal provisions, We provide access to requests through the email dataprivacy@senhasegura.com or request through the website: senhasegura.com/data-privacy-portal/. For more information read the topic "Our responsibility".

Sale of Personal Information

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

senhasegura does not sell Your data, they may be shared with Our partners to improve Our services, before carrying out we will first obtain your consent.

Do Not Sell My Personal Information

You have the right to opt-out of the sale of Your personal information. Once We receive and confirm a verifiable consumer request from You, we will stop selling Your personal information. To exercise Your right to opt-out, please contact Us.

The Service Providers we partner with (for example, our analytics or advertising partners) may use technology on the Service that sells personal information. If you wish to opt out of the use of Your personal information for interest-based advertising purposes and these potential sales as defined under CCPA law, you may do so by following the instructions below.

Please note that any opt out is specific to the browser You use. You may need to opt out on every browser that You use.

Website

You can opt out of receiving ads that are personalized as served by our Service Providers by following our instructions presented on the Service:

The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>

The EDAA's opt-out platform <http://www.youronlinechoices.com/>

The DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

The opt out will place a cookie on Your computer that is unique to the browser You use to opt out. If you change browsers or delete the cookies saved by your browser, You will need to opt out again.

Mobile Devices

Your mobile device may give You the ability to opt out of the use of information about the apps You use in order to serve You ads that are targeted to Your interests:

"Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices

"Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from Your mobile device by changing the preferences on Your mobile device.

Privacy Rights for Minor Users

Our services are designed for users above the age of 16 or 18, depending on the applicable legislation. We do not sell the personal information of our customers who are minors, unless we receive affirmative authorization (the "right to opt-in"). Consumers who opt-in to the sale of personal information may opt-out of future sales at any time by submitting a request to us.

Additionally, we do not knowingly collect personal information from minors under the age of 18 or 16, depending on the jurisdiction, through our service. However, we acknowledge that certain third-party websites that we link to may collect and sell personal information of minors. We encourage parents and legal guardians to monitor their children's internet usage and instruct their children to never provide information on other websites without their permission.

If you are a California resident under the age of 18 and a registered user of our online site, service, or application, you may request and obtain removal of content or information that you have publicly posted. To request removal of such data, please contact us using the contact information provided below. However, please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online, and the law may not permit or require removal in certain circumstances.

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Service does not respond to Do Not Track signals.

However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if You are a California resident, You can contact Us using the contact information provided below on topic "Our responsibility".

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Our responsibility

Honor requests and provision them in simple, straightforward language.

Compliance with the deadline for responding to any request within 45 calendar days. The term may be extended for another 45 days, notifying the holder.

Provide "mandatory notices" prior to information collection, covering the categories and purposes of personal information.

Make privacy policies available, including information on consumers' privacy rights and how to exercise them: right to know, exclusion and non-discrimination.

Enable and periodically verify security methods to protect personal and/or sensitive data.

Communicate as soon as possible, if a violation is found, to the competent authorities and the data subject.

In compliance with legal provisions, We provide access to requests through the email dataprivacy@senhasegura.com or request through the website: senhasegura.com/data-privacy-portal/. You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data.

If You request to Us, you must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative
- Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to Your request or provide You with the required information if We cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

By email: dataprivacy@senhasegura.com

By Our website: senhasegura.com/data-privacy-portal/