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# PRIVACY

## NOTICE

V.tal wants to open up and maintain a transparent relationship!  
This Privacy Notice sets out how we protect Personal Data and  
preserve privacy when acting on behalf of telephony providers.

## WHO IS V.TAL?

We are V.tal Rede Neutra de Telecomunicações S/A, CNPJ 02.041.460/0001-93, and we are located at Rua Casa do Ator, 919, Vila Olímpia, São Paulo/SP, CEP 04546-003.

V.tal is a company that takes care of the internet infrastructure but does not directly sell the service to the end user. Instead, it provides its network for telephony providers to offer internet access. Thus, when the User (“User” or “You”) contracts broadband internet from a telephony provider, the provider takes advantage of V.tal’s infrastructure (including network terminals and IP addresses) to connect the User’s home or business to the internet.



## 1. DEFINITIONS

**Anonymization:** data relating to the Data subject that cannot be identified, considering the use of reasonable technical means available at the time of its Processing.

**Brazilian National Data Protection Authority (“ANPD”):** body responsible for ensuring, supervising, and implementing compliance with the provisions of the Law No. 13,709/2018, the Brazilian General Data Protection Law (“LGPD”) in the national territory.

**Controller:** natural or legal person, under public or private law, who is responsible for decisions regarding the Processing of Personal Data, in accordance with article 5, VI of the LGPD.

**Personal Data:** information related to an identified or identifiable natural person, in accordance with article 5, I, of the LGPD.

**Sensitive Personal Data:** Personal Data about racial or ethnic origin, religious conviction, political opinion, union membership or religious, philosophical or political organization, data related to health or sex life, genetic or biometric data, when linked to a natural person, in accordance with article 5, II of the LGPD.

**Data:** Personal Data and Sensitive Personal Data.

**Data Protection Officer (“DPO”):** person appointed by each of the Controller and the Processor to act as their respective communication channel between the Data Subjects, and the ANPD.

**Purpose:** carrying out the Processing for legitimate, specific, explicit and informed purposes to the Data subject, without the possibility of further Processing in a way that is incompatible with these purposes in accordance with article 6, I of the LGPD.

**Processor:** natural or legal person, under public or private law, who carries out the Processing of Personal Data on behalf of the Controller.

**Data subject:** natural person to whom the Personal Data that is subject to Processing refers, in accordance with article 5, V of the LGPD.

**International data transfer:** transfer of Personal Data to a foreign country or international organization of which the country is a member, in accordance with article 5, XV of the LGPD.

**Processing:** any operation carried out with Personal Data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction, in accordance with article 5, XI of the LGPD.

## 2. WHAT PERSONAL DATA DOES V.TAL USE AND HOW IS IT OBTAINED?

In the development of the services provided to telephony providers, we may use the following categories of Personal Data:

### Registration data

provided directly by the Data subject or by the telephony provider, including full name, signature and unique identifier that links you to the telephony provider;

### Contact data

provided directly by the Data subject or by the telephony provider, including home address, telephony and email;

### Service data

provided directly by the Data subject from services contracted with the telephony provider, including scheduling history, communications with technical assistance, activities carried out and any problems identified (such as in installations, repairs or changes of address);

### Connection data

automatically collected from the network endpoint, including network consumption information (such as bandwidth usage, latency, and packet loss) and connected devices (such as IP address and network name).

### 3. FOR WHAT PURPOSES DOES V.TAL USE PERSONAL DATA?

All Personal Data is used by V.tal on the basis of a valid and legitimate legal basis. In the table below, we detail the purposes for which we use the listed Personal Data:

#### **Purpose**

##### **Field services**

We may use Personal Data to confirm appointments and enable the provision of services, such as the construction, installation and repair of plants or terminals at addresses indicated by telephony providers.

##### **Support and service**

If any connectivity problems are identified or reported to us by telephony providers, we may use Personal Data to resolve them and provide service.

##### **Network management**

V.tal monitors and analyzes network performance to identify needs for optimizations and expansions, in order to avoid link congestion, reduced terminal performance, or even communicate cases of network misuse to providers.

##### **Record keeping**

Some data is collected when a V.tal terminal or application is used. This data is intended for compliance with legal and regulatory obligations related to record-keeping by connection providers.

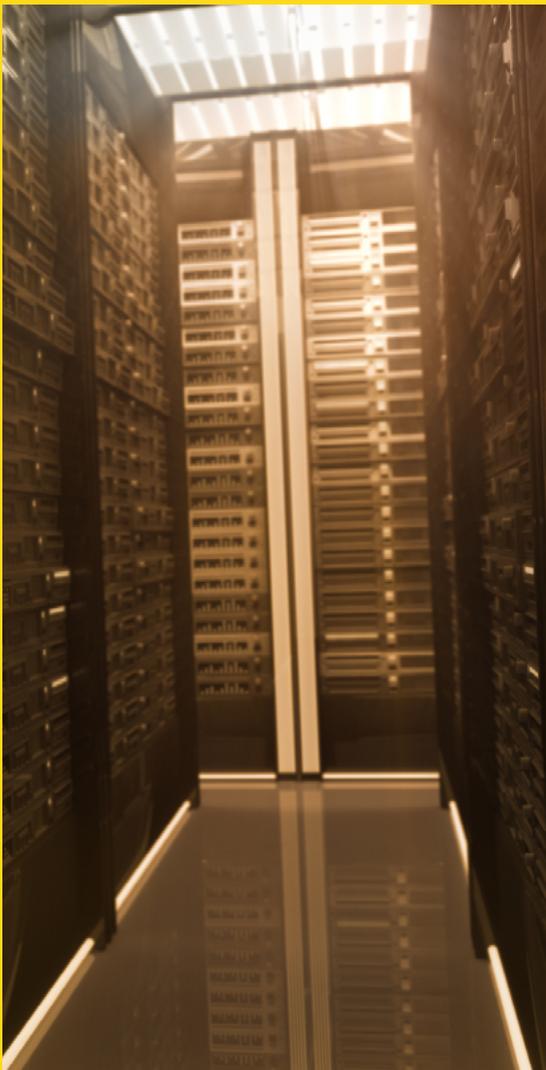
##### **Service Activation**

V.tal may use data from technicians and representatives of telephony providers and other partners for contract enablement, billing, collection, prospecting or after-sales activities and management of the commercial relationship with telephony providers and other partners.

##### **Business intelligence**

Data may be used in the aggregate to improve or develop our services. To preserve the privacy of the Data subject, this data will be, whenever possible, anonymized, in order to ensure that the Data subject cannot be identified.





## 4. V.TAL'S ROLE IN THE PROCESSING OF PERSONAL DATA

V.tal's role in the processing of Personal Data may vary according to the Purpose and nature of the activity performed.

In certain situations, especially when it acts under the guidelines and determinations of telephony providers to enable field services, support, service or record keeping, V.tal performs the function of Personal Data Processor processing the information according to the instructions received from the Controllers (telephony providers). On the other hand, in activities such as network management, service activation, business relationship management, billing, collection, prospecting, after-sales and business intelligence initiatives, the company can act as a Personal Data Controller, defining the Purposes and means of Processing this information.

Thus, the company's role, whether as Controller or Processor, will be determined according to the specific context of each Personal Data Processing operation, always in accordance with the applicable legislation.

## 5. WITH WHOM DOES V.TAL SHARE PERSONAL DATA?

In order for us to operate, certain Data may be shared with third parties. To illustrate this scenario, we provide below some situations in which data may be shared, always respecting the applicable legal parameters:

### Telephony Providers

As a neutral network operator, when we provide our infrastructure or connectivity services, including data communication solutions, we work with telephony providers. In these circumstances, we may share data limited to the provision of the services to, for example, enforce terms and conditions of use of the network, execute work orders and render accounts to such providers.

## Business Partners

We have a number of partners that make our operation viable, such as network service providers, legal firms, software providers and technical assistance. We may share Personal Data to the extent necessary to provide the services of these partners. We always carefully evaluate our partners' adherence to legislation and establish contractual obligations for information security and data protection with the aim of minimizing risks.

## Public Authorities

We have to comply with the law. Thus, if a competent authority such as Anatel, Procon or the Judiciary, requires the sharing of certain data, we will need to comply with this order. We will always evaluate such requests carefully to fulfill only legitimate requests and provide only the necessary data to fulfill the order.

## Affiliates and Subsidiaries

We may transfer Personal Data between companies in our economic group for the development of products or services, for compliance with applicable legal or regulatory obligations, or in the context of corporate transactions. Any transfer carried out in these circumstances will observe the pillars of confidentiality, secrecy and neutrality that guide all of V.tal's activities.

We also reserve the right to share any Personal Data that we believe is necessary to comply with a legal obligation, enforce our agreements, or protect the rights of V.tal, our employees, and our customers.

## 6. INTERNATIONAL TRANSFER OF PERSONAL DATA

The information used by V.tal may be stored and processed on servers located in Brazil and the United States. If we provide any information to companies located in other countries, we will take appropriate steps to ensure that those companies adequately protect the information in accordance with this Privacy Notice and the parameters of Brazilian data protection legislation, which may include, for example, entering into standard contractual clauses or implementing other transfer mechanisms provided by law to protect data.

Thus, the transfer will be carried out as long as the Purpose of the Processing of the Personal Data involved is necessary, as stipulated in this Notice.

V.tal is committed to adopting best practices in cybersecurity to protect Personal Data during international transfer, including the use of private connections and multi-factor authentication, requiring its partners to implement equivalent or superior measures and controls.

## 7. WHAT ARE THE RIGHTS OF THE PERSONAL DATA SUBJECT?

The data of the Data Subject belong only to him and, recognizing this, Brazilian legislation guarantees a series of rights, including:

- Request **access to the Personal Data** that V.tal uses and stores;
- Request correction of **incomplete, inaccurate, or outdated** Personal Data;
- Request the **anonymization, blocking or deletion** of Personal Data if Processed in violation of the law;
- Request that we carry out the **portability of Personal Data** to a third party;
- Know which companies **we share data with**;
- Object **to our uses** of Personal Data;
- Request the review of decisions made solely based on **automated data processing** and obtain information on the criteria and procedures used;
- Receive clear and complete information about the possibility and consequences of not **providing consent**, when it is requested by V.tal;
- Revoke the consent provided; and
- Request the full disclosure of the clauses used to carry out the **International Data Transfer**, respecting commercial and industrial secrets.



For security, whenever the Data subject submits a request to exercise rights, we may request some additional information or documents to **prove their identity**, seeking to prevent fraud. This is necessary to ensure the security and privacy of everyone, aiming at the non-disclosure of Personal Data to undue persons.

In addition, in certain circumstances, **some requests may not be fully accommodated**. These circumstances involve, for example, cases in which: (i) the service is technically impossible, considering the characteristics of V.tal; (ii) the service violates our intellectual property or trade secret; (iii) the service puts the rights of third parties at risk. The Data subject will always be informed of these circumstances.

## 8. HOW LONG DOES V.TAL STORE PERSONAL DATA?

V.tal has a Personal Data retention policy in line with Brazilian legislation.

Accordingly, we will keep your Personal Data: (i) for the period required by law; (ii) until the Processing of Personal Data is concluded, as mentioned below, or (iii) when one of the hypotheses provided for in article 16 of the LGPD is applicable. In this way, we will process your Personal Data, for example, during the applicable limitation periods or as long as it is necessary for compliance with legal or regulatory obligations.

The Processing of Personal Data will be terminated in the following cases:

- When the purpose for which the Personal Data was collected is achieved and/or the Personal Data collected is no longer necessary or relevant to achieve that purpose;
- When the Data Subject exercises their right to request the interruption of the Processing and the deletion of their Personal Data, when applicable; and
- When there is a legal order to that effect.

Whenever the Processing of Personal Data is terminated in accordance with the situations mentioned above, except in the cases of retention and/or storage provided for by the applicable legislation or by this Privacy Notice, the Personal Data will be deleted.



## 9. HOW DOES V.TAL PROTECT PERSONAL DATA?

Our responsibility is to take care of the Personal Data and use it in the manner informed to the Data Subject. To protect data, we adopt appropriate security practices for our activities, including encryption, data pseudonymization and anonymization, access controls, and network monitoring tools.

We work to protect privacy, but unfortunately, we can't completely eliminate the risk of potential security breaches. Defects in hardware or software that are not under our control and other factors may compromise the security of Personal Data and, therefore, we ask for everyone's help to maintain a safe environment. In the event of a breach of the Personal Data under our responsibility, we undertake to apply all necessary efforts to correct and mitigate the consequences of such an incident.

However, V.tal's liability will be limited to direct damages proven to be caused by failures in its security measures, and it will not be liable for indirect damage, loss of profits or any other losses arising from events beyond its reasonable control, such as cyber-attacks, failures of third-party systems or fortuitous events and force majeure.

By adopting good security practices in relation to equipment and Data (such as, for example, not sharing the password of your internet connection with third parties), the user contributes to everyone's security. If the user identifies or becomes aware of something that compromises the security of the data, he must inform V.tal immediately.

## 10. CHANGES TO THE PRIVACY NOTICE

Because we are always looking to improve our products and services, we may update this policy to reflect the improvements we make. If there are significant changes to this Privacy Notice, Users will be notified.

## 11. DATA PROTECTION OFFICER

If you have any questions or issues involving your Personal Data, please contact the DPO, Maria Cecília Oliveira Gomes, through the Data Protection channel:

[pp-privacidadevtal@vtal.com](mailto:pp-privacidadevtal@vtal.com).