

Privacy Policy – Bits A.I.

Last Updated: May 30, 2025

MARIK ASSESSORIA E TREINAMENTO LTDA (“Bits”) cares about your privacy and the protection of personal data belonging to visitors, users, and anyone interested in Bits A.I.

This Policy aims to explain how we collect, process, and protect the personal data of Data Subjects. Bits also seeks to ensure transparency for all relevant third parties, including: competent authorities, consumer protection agencies, investors, and others.

Your acceptance of our Policy will occur when you access or use Bits A.I.’s services. This indicates that you are aware of and fully agree with how we will use your information and data.

This document must be read in conjunction with our Terms of Use, which provides an overview of our platform.

If you have questions or need to address any matter related to this Policy, contact us at dpo@bitsacademy.com.br.

1. Definitions

For better understanding of this Policy, please note the following terms:

- a) Personal Data: any information capable of identifying a person or making them identifiable.
- b) Sensitive Personal Data: information that requires enhanced protection because it can result in discrimination against the Data Subject. Examples include racial or ethnic origin, religious beliefs, political opinions, trade union membership, philosophical or political organization affiliation, health or sexual life data, genetic or biometric data.
- c) Legal Basis: the lawful grounds that enable Bits A.I. to process personal data.
- d) Document: contract sent to Bits A.I. by the User.
- e) Data Subject: natural person to whom the processed personal data belongs.
- f) User: natural or legal person who acquires or uses a product or service as the end recipient.
- g) Processing of Personal Data: activities described in this Policy that Bits may carry out using personal data, such as collection, storage, sharing, among others.
- h) Controller: person or entity responsible for making decisions regarding how personal data is processed.
- i) Processor: person or entity that processes personal data on behalf of and in accordance with the Controller’s instructions.
- j) DPO or Data Protection Officer: person who acts as the communication channel between the Data Subject, Bits, and the National Data Protection Authority (“ANPD”).
- k) Third Parties: all natural or legal persons with whom we may interact, including service providers, suppliers, partners, contractors, or subcontractors.

2. Data We Collect

All your data and information are treated as confidential. We will use the information for the purposes described herein and as authorized by you.

Bits A.I. may collect the following data:

a) Information you provide to us: such as full name, email, and phone number. These are essential to deliver our services with quality.

⚠ Important: By using Bits A.I.'s resources, you may provide personal data of third parties. You are responsible for ensuring that the collection and processing of such data comply with applicable laws. You must obtain the free, explicit, and informed consent of such persons before submitting their data to the platform, and you assume all responsibility for sharing this information.

b) Information generated when you use our services or browse our website:

- Consumption Information: data that allows Bits to understand the User's usage patterns within Bits A.I., such as how often each feature is used.
- Technical Data about your device: we may collect information about the device you use to access Bits A.I. to improve platform responsiveness. This may include IP address, operating system, browser type and version, and, for mobile devices, device ID and location.

c) Information from other sources:

- Data collected from other platforms: Bits A.I. may interact with other platforms and services to achieve the purposes described in this Policy, such as form creation platforms and payment processors (e.g., Stripe). Some of these services may provide us with information about you, which we will collect to enhance your experience and improve our services.
Regarding payment processors, information will be collected directly by Stripe. Stripe will only indicate whether a User is up to date with payments. We do not store any credit card or other billing-related data.

⚠ Important: Bits A.I. DOES NOT collect or retain:

- The document uploaded by the User;
- Any information filled out by the User within any functionality of the platform;
- Documents and clauses generated by Bits A.I.

Information and documents entered by users in the Bits A.I. platform are used exclusively to perform the contracted functionalities at the time the activity is carried out.

Rest assured: Bits A.I. does not store or use the provided data for training, adjustment, monitoring, or improvement of the artificial intelligence models employed. The confidentiality and integrity of information are preserved in accordance with best information security practices.

3. Purposes of Data Collection

Users agree that we may use their data for the following purposes:

- Fulfillment of the contractual relationship, i.e., granting the User access to Bits A.I.;

- Communicating about products, services, promotions, news, updates, events, and other matters related to Bits A.I.;
- Analyzing how our platform is used;
- Detecting and preventing fraud, spam, and security incidents;
- Better understanding user behavior and building behavioral profiles;
- For any other purpose that you authorize at the time of data collection;
- Complying with legal obligations.

For these purposes, we rely on the legal bases of **compliance with legal obligations, contract performance, and legitimate interest**.

4. Data Retention Period

Data will be stored for the following periods:

- **5 years**, counted from the end of the obligation, to comply with legal or contractual obligations or if necessary for investigations or legal proceedings;
- **10 years** after the end of the contractual obligation to maintain necessary business and financial records, pursuant to Article 206 of the Brazilian Civil Code.

5. Data Subject Rights

As a Data Subject, you have the following rights:

a) **Right of Access:** You may request and receive a copy of the personal data we hold about you.

b) **Right to Rectification:** You may request the correction of your personal data if you identify that any information is incorrect. To complete the correction, we will verify your identity. Requests can be made via **dpo@bitsacademy.com.br**.

c) **Right to Erasure:** You may request the deletion of your personal data. All collected data will be deleted from our servers and platforms, unless there is a legal reason for retention.

To change or delete your personal information from our database, go to:

edit account > my account > cancel subscription.

⚠ Warning: This action is irreversible. All workspaces, documents, and data will be permanently removed from our database.

If there is an active subscription linked to your account, it will be automatically canceled upon data deletion. You will lose access to any remaining subscription benefits.

d) **Right to Object to Processing:** You may contest the processing of your personal data. In certain cases, we may demonstrate that we have legitimate grounds to continue processing, which override your rights — for example, when the data is essential to provide our applications.

e) **Right to Request Anonymization, Blocking, or Deletion:** You may suspend the processing of your personal data in the following cases:

- i) When you want us to verify the accuracy of the data;
- ii) When you require data retention even if it is no longer needed by us, for establishing, exercising, or defending legal claims;
- iii) When you have objected to our use of your data, but we need to verify whether we have legitimate grounds to process it.

f) **Right to Data Portability:** We will provide you, or a third party you choose, with your personal data in a structured and interoperable format.

g) **Right to Withdraw Consent:** You may withdraw your consent to this Privacy Policy at any time. This will not affect the legality of any processing carried out before the withdrawal. However, certain services may no longer be available if consent is withdrawn.

h) **Right to Review of Automated Decisions:** You may request a review of decisions made solely through automated processing of your personal data that affect your interests, including profiling decisions relating to personal, professional, consumer, or credit aspects, and/or aspects of your personality.

We may request information to confirm your identity and ensure that personal data is not disclosed to unauthorized persons. This is a security measure to protect your data.

We may also contact you to request additional details about your request to expedite our response.

Response Timeframe

We strive to respond to all requests within **5 business days**. If your request is complex or you have made multiple requests, it may take longer than 5 days. In such cases, we will keep you informed of the progress.

If you have any questions about these rights or how to exercise them, feel free to contact us at **dpo@bitsacademy.com.br**.

6. Platform Monitoring

Bits A.I. reserves the right to monitor the entire platform, particularly to ensure that the rules described in our **Terms of Use** are being followed, and to verify that there is no violation or abuse of applicable laws.

7. User Deletion

Bits reserves the right to delete any user account, regardless of type, if this Privacy Policy or the Terms of Use are not respected.

Since we value maintaining good relationships with our users, we recognize that they have the right to understand the reasons for such action and even contest it, which can be done by contacting: **dpo@bitsacademy.com.br**.

8. Data Sharing

All data, information, and content about you may be considered assets in the event of corporate transactions involving Bits A.I. Therefore, we reserve the right, for example, to include your data among the company's assets if it is sold, acquired, or merged with another entity. By accepting this Policy, you acknowledge and agree to this possibility.

Bits A.I. also reserves the right to disclose your data and information, including your interactions, if required by court order, as a necessary act to ensure compliance with national laws, or if you expressly authorize such disclosure.

9. Data Security

Bits A.I. considers your privacy extremely important and will take all reasonable measures to protect it.

Your data is confidential and will only be accessed by authorized persons. The use of such data will follow our Privacy Policy. Furthermore, we will make every reasonable commercial effort to ensure the security of our systems and your data.

Our servers are located in different locations to ensure stability and security, and they can only be accessed through pre-authorized communication channels.

All your information will be encrypted whenever possible. You may request a copy of your data stored in our systems at any time.

We will retain the data only for as long as necessary to fulfill the purposes of this Policy, to comply with legal obligations, or to preserve Bits A.I.'s legitimate interests.

10. Use of Cookies

10.1. What Are Cookies?

Cookies are small text files stored in your browser that allow us to recognize and remember your browsing preferences.

These files save information so that when you visit Bits A.I. again, your browser is recognized and your preferences are preserved — such as keeping your account logged in or remembering your credentials.

10.2. What Happens If Cookies Are Not Accepted?

If you reject the use of cookies, some functionalities may not work properly.

We use cookies, and you will always have the option to adjust your browser settings to disable or delete them. If cookies are enabled, Bits A.I. may issue cookies from the moment you interact with our platform.

Rest assured, we only collect essential data through cookies for the operation of our platform and to measure access metrics. We do not share this data with third parties other than those responsible for the cookies themselves. We also do not perform profiling or identify you based on cookies.

11. Updates to the Privacy Policy

Bits A.I. reserves the right to change this Policy as often as necessary to provide you with greater security, convenience, and to continuously improve your experience. This is why it is important to access our Policy periodically.

To make it easier, we indicate the date of the latest update at the beginning of the document. If material changes are made that require renewed consent, we will publish a new Privacy Policy, subject again to your agreement.

12. Governing Law

This document is governed by and must be interpreted in accordance with the laws of the Federative Republic of Brazil.

The Court of the Judicial District of São Paulo, State of São Paulo, is hereby chosen as the competent jurisdiction to settle any disputes arising from this document, with express waiver of any other jurisdiction, no matter how privileged it may be.

International Compliance Addendum – Cross-Border Data Protection

To ensure compliance with the applicable privacy and data protection laws in all jurisdictions where Bits A.I. operates or where its users are located, the following provisions apply in addition to the core Privacy Policy:

a. European Union / European Economic Area (GDPR) & United Kingdom (UK GDPR / Data Protection Act 2018)

- Data Subjects have the right to request access, rectification, erasure, restriction of processing, objection, and data portability.
- International transfers of personal data will only occur under adequate safeguards, such as **Standard Contractual Clauses** or adequacy decisions.
- For sensitive personal data, explicit and informed consent will be obtained before processing.

b. United States – California (California Consumer Privacy Act – CCPA / California Privacy Rights Act – CPRA)

- California residents have the right to know what personal data is collected, request deletion, and opt out of the sale or sharing of their personal data.
- Bits A.I. does not sell personal data.
- Verified consumer requests will be handled within the timeframes required under California law.

b. Canada (Personal Information Protection and Electronic Documents Act – PIPEDA)

- Individuals have the right to access, correct, and withdraw consent for the processing of their personal information at any time, subject to legal or contractual restrictions.

- Personal data is retained only as long as necessary for the purposes for which it was collected, after which it will be securely deleted or anonymized.

c. Argentina (Ley de Protección de Datos Personales – Ley 25.326)

- Users have the right to access their personal data, request rectification, updating, and deletion, and withdraw consent at any time.
- International transfers of personal data are permitted only to countries or organizations providing adequate protection, or with the Data Subject’s express consent.

d. Mexico (Ley Federal de Protección de Datos Personales en Posesión de los Particulares – LFPDPPP)

- Users may exercise their **ARCO rights** (Access, Rectification, Cancellation, and Opposition) by contacting the Data Protection Officer as indicated in this Policy.
- Processing of personal data will always comply with the principles of legality, consent, information, quality, purpose, loyalty, proportionality, and responsibility.

e. Colombia (Ley Estatutaria 1581 de 2012 & Decreto 1377 de 2013)

- Processing of personal data requires prior, express, and informed authorization from the Data Subject.
- Data Subjects may request proof of authorization, information on how their data is used, and request updates, correction, or deletion.
- Sensitive personal data will only be processed with explicit consent or in the cases permitted by law.

f. Chile (Ley 19.628 sobre Protección de la Vida Privada – under reform)

- Individuals have the right to know, update, and rectify their personal data.
- The use of personal data for purposes other than those for which it was collected requires the Data Subject’s consent.
- Bits A.I. commits to complying with forthcoming reforms to Chile’s data protection framework, which are expected to introduce enhanced rights and stronger enforcement mechanisms.

Integration with the Privacy Policy:

This Addendum forms an integral part of the Bits A.I. Privacy Policy and shall prevail, in case of conflict, over any provisions that may contradict mandatory requirements under the laws of the jurisdictions listed above. Where local laws grant stronger rights or impose stricter obligations, Bits A.I. will comply with those local requirements.

13. Contact Information

Any matter relating to personal data should be communicated to: **dpo@bitsacademy.com.br**

Data Protection Officer: Lorena Cristina Dutra Cardoso

Deputy Data Protection Officer: Erik Fontenele Nybo