

PRIVACY POLICY

The Datora Group makes public its commitment to ensure the proper processing of personal data for legitimate purposes in the provision of its services and product offering.

Without prejudice to any specific provision in a service contract or product offering, the Datora Group seeks, through this Privacy Policy, to ensure transparency to the way in which the collection, use, sharing and protection of the data provided by the customers, at the time of contracting products and services, and during the business relations with any of the Group companies.

1. WHEN AND HOW WE COLLECT YOUR PERSONAL DATA

We collect the personal data necessary for the provision of the activities inherent to our services and for the provision of products at the time of contracting (including temporarily or experimentally) and in the course of their enjoyment or use by the Customer.

We may also collect your personal information on the following occasions:

- When you use our social networks;
- When you register on our site to receive newsletters, alerts or news;
- When you contact us through any of the available communication channels or request information about a product or service.
- When you visit or browse our website, considering the Cookies Policy of each platform.

This data collection can be done directly by the Datora Group, as well as by its successors or contractors, as well as by its accredited business partners and service resellers, as well as by the data collection services providers, especially other telecommunications companies that use the Datora Group network or frequencies through mobile virtual network operations (called MVNOs).

Also, the Datora Group may share your data with third parties, including group companies abroad, subject to specific limits of purpose and necessity in providing services and offering products such. As other telecommunications operators related to the provision of mobile telephony services and national and international roaming obligations.

The Datora Group may also, eventually, share your data according to a reasoned order of competent authorities, under the terms of the Internet Civil Framework, especially regarding the provision of account data, or, also, in compliance with a court order for sending connection records and telephone records, or to detect, prevent or address fraud or security incidents, protect third party rights and the security of the network and its users.

2. TYPES OF PERSONAL DATA COLLECTED

We collect certain personal information to provide our products and/or services. Accordingly, when you submit personal data to us, you agree and authorize us to process your personal information in accordance with this Policy. If you provide us with personal information from third parties or when third parties provide us with your personal information, we will only use it for the specific reason that such information has been provided.

The personal information we may collect is:

Data that identifies or may identify an individual:

First name, last name, affiliation, date of birth, e-mail, Address, Mobile Number, CPF (SSN), Location Data, IP Address, IMEI number and connection logs.

Financial information for the purposes of collection for services or products: Credit card number, company, security code and expiration date.

Location data

We collect geographic location data from the SIM cards provided in the provision of services. Although collection is available for all SIM cards, access to data is restricted to the customer and technical support of the company, when contracting through the Portal or Integrated API.

Data related to Customer's account or contract:

We collect information from your account and contract, such as due or received payment dates, subscription and purchase history, bank details, technical service and ticket opening, passwords and security information used in authentication and provisioning of services, traffic data, connection logs and phone call records.

The Datora Group informs that it does not collect "sensitive data" about you, such as racial or ethnic origin, religious belief, political opinion, union membership or religious, philosophical or political organization, health or sexual life information, genetic or biometric data, except where we have your specific consent, to comply with any legal or regulatory obligation.

3. REASON FOR COLET AND PROCESSING OF YOUR PERSONAL DATA

The Personal Data Protection Act highlights that we may use your data for legitimate, specific, explicit and informed reasons. Here are the reasons why we treat your data:

To comply with legal and regulatory obligation

We collect, process, store, share and perform other personal data processing to comply with legal and regulatory obligations.

To improve the performance of our network and optimize our services and products

We map, through our own and third-party systems, the heat of our website/app, traffic optimization and data analysis and research, including analysis of consumption and behavioral profile.

To carry out financial transactions regarding our services and products offered

We collect your data to charge for our products or services. By making a purchase through our service channels, including our website, we manage your purchase until it is effectively delivered. We share data with carriers and third party service providers to ensure the delivery of your product or the installation of your service and the corresponding charge.

To provide customer support

We access your data through our various service channels to technically assist, answer questions and correct failures in the services, as well as enable new contracts of products or services and refunds that may be due.

For marketing policies

The Datora Group may send daily announcements and advertising messages to its registered users on its platforms, or Internet users in general, using all types of technologies and means of communication available, either by email, SMS, MMS, direct mail and others. To stop receiving these communications and messages, you need to send a request to dpo@datora.net

To help with strategic decisions

We use your data in plans, services and personalized offers even closer to your profile, as well as to redistribute connections and active users or to manage the service portfolio.

To evaluate demand by geographic region

We use location services to evaluate demand according to the geographic region of our users, in a safe way, to improve our service.

For the regular exercise of rights in judicial, administrative, or arbitral proceedings

We collect, process, store, share and process personal data for the regular exercise of rights in judicial, administrative, or arbitral proceedings.

4. YOUR CHOICES AND RIGHTS**Your choices**

You can choose not to provide us with personal data and continue to use our website and browse our pages. For more detailed information, please visit the Cookies Policy of each Datora Group Platform.

Although you may expressly request that your personal data not be used for marketing purposes by sending an email to dpo@datora.net, you are aware that all other assumptions of data use are essential for the Datora Group to process transactions and offer its products and services.

Your rights:

You can have your questions answered and exercise your rights by sending an e-mail to dpo@datora.net, especially regarding:

Rectification

You have the right to correct, rectify and update any inaccurate, incorrect or outdated personal data about you.

Opposition

You can object to the processing of personal data on the basis of legitimate interest or any other legal basis. We emphasize that, depending on the nature of your opposition, the availability of the product/service may be impracticable in part or in full.

Portability

You can request the portability of your personal data to another supplier or company. If you request us and if it is technically possible, we will transfer your personal information to you.

In this case, we will send you a copy in CSV so that you can provide them to another company. We clarify that the portability request may not involve third-party data and will always be subject to technical analysis by the Datora Group.

Exclusion

You have the right to request the deletion of the personal data we hold about you. We will do so provided that there is no law or regulation that obliges us to store this data, or when it is no longer necessary to store it or if data is collected in excess and without need for the Datora Group.

Petition

You may file a complaint with the National Personal Data Protection Authority or consumer protection bodies. However, please inform us first in an attempt to solve your demand. We stand by the good relationship with our customers and are confident that we can help you.

In cases of impossibility of execution or response of your requests or questions, within five (5) business days or regulatory deadline, whichever is greater, the Datora Group will indicate the reasons of fact or law that prevent the immediate adoption of the action.

5. SECURITY OF PERSONAL DATA

We implement physical, electronic, and managerial procedures to seek best efforts regarding the safety of your personal data and any other information we collect and process, always observing the state of the available technique.

For more information about our efforts to ensure that your data is secure, you can send a direct email to dpo@datora.net.

And remember:

- You are also responsible for the personal data you provide, so be careful with logins, passwords, confidential information, among others. Keep them secure and safe;
- Keep your internet access devices and use of the services offered by the Datora Group always up to date and remember to keep your preferred antivirus solution up to date as well;
- If you believe that your privacy has been violated, please contact dpo@datora.net immediately.

6. MINORS

The Datora Group does not block or discriminate access to the content visited on the site. However, services can only be purchased by persons older than 18 years of age who enjoy full civil capacity.

7. WHERE WE STORE YOUR DATA

The personal data we collect, and all our data processing activities are conducted by the Datora Group at our offices in Brazil and in facilities for data processing activities processed by partner and accredited operators, i.e., by third parties who provide services with us or for us.

8. HOW LONG WE STORE YOUR DATA

We store your personal data only during the period in which the processing of personal data is necessary for the performance of our activities. After the end of the processing, the personal data will be deleted, subject to technical limitations, being authorized the conservation for some specific purposes.

We will retain and use your personal data to the extent necessary to comply with our legal obligations, such as: Where it is necessary to retain your data for issues related to legal and/or regulatory oversight and/or obligations, to resolve legal disputes and/or enforce our agreements, while this is in effect.

We also retain personal data related to the use of our services and purchases made, always to improve and develop our activities, including personalized services and products for you.

9. MAKING THIS POLICY USEFUL TO YOU

The Datora Group sought to make this Privacy Policy to be clear and transparent regarding the processing of your personal data. If you have any questions, please contact us at dpo@datora.net.

This Privacy Policy will be revised and updated from time to time. Only substantial changes will be highlighted on our website.

The Datora Group is not responsible for damages arising from interruptions or unavailability of its websites and platforms, as well as for the loss or improper use of information submitted.

By continuing to access or use the Services or products offered by the Datora Group, you accept and agree to the updated version of the Privacy Policy.