



PSafe Privacy Policy

Our Commitment to Privacy

PSafe respects the privacy of its users' information and protects its confidentiality. Personal information is our highest priority. We have created this Privacy Policy to demonstrate how we handle your personal data, and to inform you of your privacy rights and how the law protects you. Therefore, we recommend that you read this Privacy Policy carefully.

By visiting any part of our Sites (as defined below) or providing personal information to PSafe by any means, you accept and agree to the practices described in this Privacy Policy. This Policy is an integral part of the PSafe Terms of Use and License Agreement and applies to (i) <https://www.psafe.com/>, <https://enterprise.psafe.com>, and <https://www.dfndrlab.com> (and all respective subdomains) and all other website features, mobile applications, or online services that are owned or controlled by PSafe, and (ii) information you may submit to us through another channel, such as events you may attend (e.g., trade shows) or if you apply for a job.

By accepting the Terms of Use or the License Agreement, the user accepts the policies contained in this Privacy Policy. Thus, by using any of the Services, the user acknowledges that they have read and agreed to the terms and conditions of this Privacy Policy.

Objective

Our policy guides how we collect, use, share, and protect your personal data. We are committed to ensuring the security and privacy of this information, maintaining transparency, and complying with data protection laws.

Scope

This policy applies to all personal data we collect, whether through our website, applications, services, or direct interactions with users. It is valid for all our data processing operations, regardless of the user's location, and follows relevant data protection laws, such as the General Personal Data Protection Law (LGPD) in Brazil,



the California Consumer Privacy Act (CCPA) in the United States, and the General Data Protection Regulation (GDPR) in Europe.¹

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below.

I. IMPORTANT INFORMATION

II. WHAT INFORMATION DO WE COLLECT?

III. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

IV. THIRD-PARTY ANALYTICS PROVIDERS AND AD SERVERS; ONLINE TRACKING

V. HOW PSafe USES PERSONAL INFORMATION

VI. HOW WE SHARE PERSONAL INFORMATION

VII. CONFIGURE YOUR PRIVACY OPTIONS

VIII. DATA SECURITY

IX. NOTIFICATION OF INAPPROPRIATE CONTENT

X. A NOTE TO USERS OUTSIDE THE UNITED STATES

XI. CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

XII. EUROPEAN RESIDENTS – YOUR EUROPEAN PRIVACY RIGHTS

XIII. BRAZILIAN RESIDENTS – YOUR BRAZILIAN PRIVACY RIGHTS

XIV. HOW TO EXERCISE YOUR RIGHTS

XV. CONTACT INFORMATION

XVI. UPDATES

I. IMPORTANT INFORMATION

Compliance with Applicable Laws

PSafe strictly adheres to the General Personal Data Protection Law (LGPD), the California Consumer Privacy Act (CCPA), the General Data Protection Regulation (GDPR), and other current data protection laws, ensuring transparency in the collection, use, storage, and sharing of personal data.¹ In accordance with our ethical practices and privacy policy, we do not sell personal data to third parties under any circumstances. Our commitment to privacy is reflected in the requirement that our partners also protect this data, guaranteeing users control and visibility over their personal information.

Children

The Services and Sites are not designed for or directed at children under the age of 16, and PSafe does not intentionally collect information from individuals under 16 years of age. If PSafe discovers that it has inadvertently collected Personal Information from someone under the age of 16, we will take steps to delete that



user's Personal Information from our databases and to prevent the user from using the Services. If you are under 16, do not register for an account, make purchases, or submit any information about yourself to us, including your name, address, phone number, or email address. If you believe we might have any personal information from an individual under 16, please contact us at atendimento@psafe.com.

Updating Your Data

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information.

Third-Party Content, Links to Other Platforms, and PSafe Content Found Outside the Sites or Services

This Privacy Policy addresses only our use and disclosure of information we collect from and/or about you on the Sites or through the Services. If you disclose information to third parties, or authorize us to do the same under this Privacy Policy, the use and disclosure restrictions contained in this Privacy Policy will not apply to such third parties. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

The Sites and Services may contain content or links to other platforms that are not owned or controlled by us. We have no control over, do not review, and are not responsible for the privacy policies of or content displayed on such other platforms. When you click on such a link, you will leave our Sites or Services and go to another platform. During this process, another entity may collect your personal information or anonymous information. Please review the privacy policy of any new platform you visit.

Additionally, PSafe content (such as, but not limited to, advertising) may be included on web pages and sites or platforms that are not associated with PSafe and over which we have no control. These third parties may collect data through the use of their own cookies, pixel tags, or other technologies, independently collect information or solicit personal information, and may have the ability to track your use of their platforms, sites, and services. PSafe is not responsible for the

privacy practices or the content of any third parties.

II. WHAT INFORMATION DO WE COLLECT?

Personal information or personal data means any information about an individual from which that person can be identified, either directly or indirectly. It does not include information where the identity has been removed ("Anonymous Data").

We and our third-party service providers (such as, but not limited to, Google Play and the Apple App Store) may collect, use, store, and transfer different kinds of Personal Information about you, which we have grouped together as follows:

- **Identity Information** includes real name, nickname, username, email address, or similar identifier (including, if you have shared them with us, your user display name and/or user image thumbnail from online services).
- **Contact Information** includes billing address, postal code, delivery address, email address, and telephone numbers (and job title and company name, if applicable).
- **Financial Information** includes bank account and payment card details.
- **Transaction Information** includes details about payments to and from you and other details of products or services you have purchased from us.
- **Technical Information** includes internet protocol (IP) address; operating system/version/language and platform; device type; device manufacturer; device model; screen size/density; RAM size, storage size, free/unused storage; connection type (e.g., WiFi, 4G, etc.); carrier identifiers (SIM code, mobile country code, mobile network code); installed applications/apks and their versions (including local file path), permissions, publishers, and installation sources; browser package name; and visited websites/URLs (if you have enabled anti-phishing).
- **Online Identifiers** include an online identifier or other persistent identifier that can be used to recognize a person, family, or device, over time and across different services, including, but not limited to, a device identifier (such as IMEI); cookies, beacons, pixel tags, mobile ad identifiers (including Google Advertising ID) or similar technology; customer number/internal IDs, unique pseudonym or user "alias"; telephone numbers, or other forms of persistent or probabilistic identifiers (i.e., the identification of a person or device to a more-likely-than-not degree of certainty) that may be used to identify a particular person or device.
- **Internet or Network Information** includes browsing history (URLs), search



history, and information regarding a person's interaction with an internet website, application, or advertisement; also details of the connected WiFi network (if WiFi security has been enabled in some of our applications).

- **Profile Information** includes your email address and password, purchases or orders made by you, your interests, preferences, product feedback, and survey responses.
- **Usage Data** includes information about how you use our Services, products, and services, including all areas of our Services that you visit or use and the time of day you visited the Services, among other information.
- **Marketing and Communications Information** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Location Information** includes information collected or inferred about your location using a variety of technologies, such as IP address and connected or nearby Wi-Fi networks, or precise location derived from GPS coordinates or telemetry data (including latitude/longitude).

We also collect, use, and share **Aggregated Information**, such as statistical and demographic information, for the purposes of profiling our users and improving our tools, or offering tools that better serve our users. Aggregated Information may be derived from your Personal Information but is not considered Personal Information in law as this information does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Information with your Personal Information so that it can directly or indirectly identify you, we treat the combined information as Personal Information which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

III. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

The chart below summarizes how we collect, use, and share Personal Information with reference to the legal categories specified in the CCPA and describes our

practices during the 12 months preceding the effective date of this Privacy Policy.

Legal category of personal information (PI)	PI we collect	Source of PI	Purpose of collection	Categories of third parties to whom we "disclose" PI for business purposes	Categories of third parties to whom we "sell" PI
Identifiers	Identity information, Contact information, Profile information	You, Advertising partners, Public sources, Business partners, Our customers	Service delivery, Research and development, Marketing, Compliance and Operations	Internal Parties, Third Parties, Advertising Partners, Third-party service providers, Administrative and legal third parties, Business assignees	None
Commercial Information	Identity information, Contact information, Transaction information, Marketing and Communication information	You, Our customers, Advertising partners, Third-party service providers	Service delivery, Research and development, Marketing, Compliance and Operations	Internal Parties, Third-party service providers, Administrative and legal third parties, Business assignees	None
Financial information	Financial information	You, Public sources, Business partners, Our customers	Service delivery, Research and development, Marketing, Compliance and Operations	None	None

Online identifiers	Technical information, Usage data, Identity information	You, Our customers, Automatic Collection	Service delivery, Research and development, Marketing, Compliance and Operations	Internal Parties, Third-party service providers, Administrative and Legal Professionals, Business assignees	Advertising partners (to facilitate online advertising)
Internet or Network Information	Technical information, Usage data	You, Our customers, Automatic Collection	Service delivery, Research and development, Marketing, Compliance and Operations	Internal Parties, Third-party service providers, Administrative and legal third parties, Business assignees	Advertising partners (to facilitate online advertising)
Geolocation data	Geolocation data	Automatic Collection (when enabled by the user)	Service delivery, Research and development, Marketing, Compliance and Operations	Internal Parties, Third-party service providers, Administrative and legal third parties, Business assignees	Advertising partners (to facilitate online advertising)
Inferences	Can be derived from: Technical information, Usage data, Online identifiers, Location information and/or geolocation data	You, Automatic Collection	Service delivery, Research and development, Marketing, Compliance and Operations	Internal Parties, Third-party service providers, Administrative and legal third parties, Business assignees	Advertising partners (to facilitate online advertising)

Protected classification characteristics	We do not intentionally collect this information, but it may be inferred or revealed in identity data or other information we collect				None
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In addition, we and our third-party service providers use different methods to collect information from and about you, including through:

- **Direct Interactions.** You may choose to give us your Identity, Demographic, Contact, Financial, Profile, or Marketing and Communications Information by filling in forms. This includes personal information you provide when you:
 - purchase or subscribe to our products or services;
 - create an account through the services;
 - subscribe to emails or newsletters;
 - request services (including demos) or other information;
 - enter a competition, promotion, or survey;
 - register for an event or attend an event in which we participate; or
 - give us product, service, or site feedback.
- **Automated technologies or interactions.** As you interact with the Sites or Services, we may automatically collect Technical, Usage, and Location Information about your equipment, browsing actions, and patterns. We collect this personal information by using cookies, pixel tags, embedded scripts, and other similar technologies. Please see information on our cookie policies in Section VII.B for further details.
 - **Cookies.** Cookies are small data files that a website sends to your device while you are viewing the site and are stored on the device. Cookies can be used for a variety of purposes, including to monitor use of sites, to customize content specific to your interests, to ensure that you do not see the same ad repeatedly, to speed up your searches and purchases, and to recognize you when you return to the site and/or to store your username and password so you do not have to re-enter it each time you visit. You can refuse or accept cookies by activating the appropriate setting on your browser. However, if you choose to disable cookies on your Device, some features of the Sites, Services, or our content may not function properly.



- **Pixel Tags.** Pixel Tags (also called clear GIFs, 1×1 GIFs, or web bugs) are small graphic images or other web programming code that may be included in the Sites, Services, and our email messages. Unlike Cookies, which are stored on a user's device, Pixel Tags are embedded invisibly on web pages. Pixel Tags may be invisible to you, but any electronic image or other web programming code inserted into a web page or e-mail can act as a pixel tag. Pixel Tags or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Sites, to monitor how users navigate the Sites or use the Services, to count how many e-mails that were sent were actually opened or to count how many particular articles or links were actually viewed.
- **Embedded Scripts.** Embedded scripts are programming code that is designed to collect information about your interactions with the Sites and Services, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third-party service provider and is active only while you are connected to the Sites or Services.
- **Third parties or publicly available sources.** We may receive personal information about you from various third parties. We may also supplement the information we collect with outside records from third parties in order to provide you with information, services, or goods you have requested, to enhance our ability to serve you, and to tailor our content to you. We may combine the information we receive from these other sources with information we collect through the Services. In those cases, we will apply this Privacy Policy to the combined information. Examples of third-party sources include:
 - Technical Information from analytics providers;
 - Contact, Financial, and Transaction Information from providers of technical, payment, and delivery services.
 - Identity, Profile, and Contact Information from publicly available sources, including internet sites and forums.
- **Enabling additional features.** We may receive additional personal information about you if you choose to enable optional features or services as set forth below:
 - If you choose to enable the anti-theft functions in dfndr / PSafe DFNDR / DFNDR Security, PSafe may collect Location Information for purposes of providing the anti-theft functionality.
 - If you choose to use the Identity Theft Report function offered by dfndr security, we may collect your email address as detailed in the License Agreement.
 - If you choose to use the Wi-Fi Security or Wi-Fi Theft Protection functions



and their associated features, we may collect your categorizations of Wi-Fi networks and associated technical information (including, but not limited to, network/device names, IP address, or inferred geolocation), as well as technical information about devices connected to the Wi-Fi network. This information is stored only locally on your device to facilitate your use of the function.

IV. THIRD-PARTY ANALYTICS PROVIDERS AND AD SERVERS; ONLINE TRACKING

PSafe works with third parties (including network advertisers, advertising agencies, and analytics companies, collectively “Advertising Partners” and each an “Advertising Partner”) to provide us with information regarding traffic on the Services, to serve advertisements, including our advertisements elsewhere online, and to provide us with information regarding the use of the Services and the effectiveness of our advertisements. These third parties may use Technical Information, Online Identifiers, Internet and Network Information, Profile Information, Usage Data, Marketing and Communications Information, Location Information, and related information to compile reports on user activity. For example, if you clicked on one of our advertisements that led you to our Sites or Services, our service provider(s) may be able to tell us which advertisement you clicked on and where you were viewing the advertisement.

These third parties may set and access their own tracking technologies (including cookies, embedded scripts, and pixel tags) and may otherwise collect or have access to your Technical Information, Online Identifiers, Internet and Network Information, Profile Information, Usage Data, Marketing and Communications Information, Location Information, and related information about you. Cookies and pixel tags, including those set by third-party network advertisers, may be used, among other things, to target advertisements, prevent you from seeing the same advertisements too many times, conduct research regarding the usefulness of certain advertisements to you, and assist in providing analytics. These third parties may also transfer information collected about you to other third parties where required to do so by law, or where such third parties process analytics information on their behalf. The ability of each of these third parties to use and share information collected about you is restricted by their respective Terms of Use and Privacy Policy. By using our Services, you consent to the processing of data about you by these third parties in the manner and for the purposes set out above. For a



full list of third-party analytics services, please contact us at atendimento@psafe.com.

We may share Technical Information, Online Identifiers, Internet and Network Information, Profile Information, Usage Data, Marketing and Communications Information, Location Information, and related information about visitors with third-party advertising companies, analytics providers, and other vendors to help analyze how users use the Sites and Services. These analytics services may use their own software development kits (SDKs) to collect information such as how often and which features of the Sites and Services users use. We use this information to improve the Sites and Services. The ability of analytics services to use and share information collected by them is restricted by their respective terms of use and privacy policy, which you should refer to for more information about how these entities use this information and how you can opt out of their use of such information.

While we may use a variety of service providers to perform advertising and analytics services, some of these companies may be members of the Network Advertising Initiative (“NAI”) or the Digital Advertising Alliance (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. For additional information regarding targeted advertising and the “opt-out” procedures of NAI members and DAA Self-Regulatory Program participating companies, you may visit:

- NAI opt-out tool: https://www.networkadvertising.org/managing/opt_out.asp
- DAA Consumer Choice (for website users): <http://optout.aboutads.info>
- DAA AppChoices (for mobile app users): <https://youradchoices.com/appchoices>
- EDAA opt-out (for European web-based data): <http://www.youonlinechoices.eu>

Please note that opting out through these mechanisms does not opt you out of being served advertising. You will continue to receive generic ads while visiting the Services and elsewhere online.

Some third parties may collect Personal Information about your online activities over time and across different websites. Your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services you visit. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, the Websites and Services do not currently respond to or alter their practices when they receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not



Track,” you may visit <https://www.allaboutdnt.com>.

V. HOW PSafe USES PERSONAL INFORMATION

We use the Personal Information we collect to offer services and features that can be tailored to users' needs, and further allow us to customize the Services to make users' experiences with PSafe as helpful and enjoyable as possible. We (and our third-party service providers) use Personal Information, including Usage Data, as follows:

- **Service Delivery:**
 - to provide you with our Services and related customer service;
 - to process your registration and account creation on the Services, including verifying that your contact information is active and valid;
 - to identify you as a user in our system;
 - to provide you with information, products, or services that you have requested or agreed to receive;
 - to provide improved administration of our Sites and Services;
 - to process transactions you initiate, process payments, and provide accurate billing and shipping.
- **Compliance and Operations:**
 - to send you administrative email notifications, such as order confirmations, order status updates, security, or support and maintenance advisories;
 - for compliance fraud prevention and safety, including enforcing our terms of service and this Privacy Policy, protecting our rights privacy, safety, or property, and/or that of you or others, and protecting against, investigating, or deterring fraudulent, harmful, unauthorized, unethical, or illegal activity;
 - to fulfill our obligations and enforce our rights arising from any contracts entered into between you and us;
 - to notify you about changes to our Sites or Services;
 - to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
 - to create Anonymous Data by excluding information that makes it personally identifiable to you;
 - to contact you with regard to your use of the Sites or Services and, in our discretion, about changes to our Sites' or Services' policies or functionality;
 - to process your application (and perform other recruitment-related functions) if you apply for a job with us;
 - to perform other functions as described at the time of collection, with your



consent, or as further described in this Privacy Policy.

- **Marketing:**

- to send newsletters, surveys, offers, and other promotional materials related to our Services and for other PSafe marketing purposes;
- to market our products or services, including recommending products or Services that may be of interest to you.

- **Research and Development:**

- to improve our Sites and Services;
- to present the content of our Sites and Services in a suitable and effective manner for you and for your computer; and
- to improve the quality of experience when you interact with our Sites and Services for internal business purposes.

In addition to the above, we may use Anonymous Data to analyze request and usage patterns so that we may enhance the content of our services and improve navigation on the Services. We reserve the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties in our sole discretion.

EMAIL COMMUNICATIONS

You will receive our newsletters or marketing communications if you have requested information from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you consented to receiving marketing communications at that time.

FEEDBACK

If you provide feedback to us, we may use and disclose such feedback in accordance with the terms of our Terms of Use and/or License Agreement, provided that we do not associate such feedback with your Personal Information. We may post user feedback from time to time, provided that we obtain your consent prior to posting any feedback associated with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy, provided that we may contact you regarding such feedback.

COOKIES

A cookie is a data file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that directly identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies are used to better understand how individuals are using our Sites and Services and will not be used for other purposes unrelated to P-Safe’s operations. Most browsers allow you to refuse all or some browser cookies or to alert you when websites set or access cookies. The methods for doing so vary from browser to browser, and from version to version. You can, however, obtain information about blocking and deleting cookies for some commonly used browsers via the links below:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=pt;>
- Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy;>
- Firefox: [https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences;](https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences)
- Internet Explorer: [https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies;](https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies)
- Opera: [https://www.opera.com/help/tutorials/security/cookies/;](https://www.opera.com/help/tutorials/security/cookies/) and
- Safari: [https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac.](https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac)

Please be aware that blocking all cookies will have a negative impact upon the usability of many websites, and if you choose to block cookies, you may not be able to use all the features on our Websites or Services. In addition, cookies or other similar systems installed by third parties may be found on certain pages of the Sites or Services. It is understood that this Privacy Policy covers the use of cookies by the Sites or Services and not the use of cookies by advertisers. P-Safe does not



control the use of cookies by third parties.

INFORMATION MADE PUBLIC

The services may offer publicly accessible areas such as blogs or comment threads. This includes, but is not limited to, comments on the PSafe blog. You should be aware that any information you provide in these areas may be read, collected, accessed, and used by others who access them, including third parties.

VI. HOW WE SHARE YOUR PERSONAL INFORMATION

PSafe may share Personal Information, as disclosed at the time you provide your information, with your consent, as follows:

INTERNAL THIRD PARTIES

We may share some or all of users' Personal Information with our parent company, subsidiaries, joint ventures, or other companies under common control for a variety of purposes, including for business, operational, and marketing purposes. PSafe may, and reserves the right to, share your information with any other company that is not currently, but becomes, a parent, subsidiary, or affiliate of PSafe. You may be given the opportunity to receive information and/or marketing offers from PSafe and our affiliated companies, partners, and agents. If you agree at that time to receive such communications, your Personal Information will be disclosed to that third party (or parties). For more information, please see the Marketing Communications section.

EXTERNAL THIRD PARTIES

Administrative and Legal Third Parties

PSafe cooperates with competent authorities and third parties to ensure compliance with the law, for example in areas such as protection of industrial and



intellectual property rights, privacy and personal data protection, fraud prevention, and others. We may transfer and disclose information, including Personal Information, to third parties:

- to comply with a valid investigation, inquiry, or legal process, such as a search warrant, subpoena, statute, or court order, or if in our opinion such disclosure is required by law;
- to obtain or maintain insurance coverage, manage risks, obtain professional advice, or establish, exercise or defend legal claims, whether in court proceedings or in an administrative or out-of-court procedure;
- to protect the safety, interests, rights, property, or security of PSafe, you, or any third party;
- to respond to a breach or attempted breach of the security of our Sites or Services;
- to defend or enforce our legal rights under any of the Terms of Use, any policies applicable to the Services, or any other agreement you may have with PSafe; or
- at the request of government authorities conducting an investigation.

We may also use Technical Information to identify users, and to do so in cooperation with copyright owners, internet service providers, wireless service providers, or law enforcement agencies, in our discretion.

Third-Party Service Providers

We may share users' Personal Information with service providers or "outsourced" companies that enhance or facilitate PSafe's operations or provide services on our behalf, such as (but not limited to) transportation services, call centers, or loyalty programs, among others. Notwithstanding, the user agrees that PSafe shall not be liable for the misuse of the user's personal information by these companies or websites. In some cases, these service providers collect information directly from the user (for example, in the case of purchases through app stores, or requests to conduct surveys or studies). In such cases, the user will receive a notification about the participation of a service provider in such activities, and the user will have full discretion over what information they wish to provide. To facilitate such situations and to take care of any additional information provided directly to these service providers, these providers will use the information in accordance with their own privacy policies.



Third-Party Payment Processing

As of the date of this Privacy Policy, all online payments for the Services will be made by Google Play (<https://play.google.com/store>) depending on the user's device. We do not process, record, or maintain your credit card or bank account information, and all transactions made on Google Play and the App Store are subject to their respective terms of service available at https://play.google.com/intl/en_us/about/play-terms.html and <https://www.apple.com/legal/internet-services/itunes/us/terms.html>. For more information on how payments are handled, or to understand the data security and privacy afforded for such information, please see <https://www.google.com/intl/en/policies/privacy/> (for Android devices) or <https://www.apple.com/legal/privacy/en-ww/> (for Apple devices).

Promotions or Contests

The winners of any commercial promotions and/or contests held by PSafe, or persons who participate in PSafe's loyalty programs, expressly authorize PSafe to share their names, personal data provided to PSafe for participation in the promotion, contest, or program, and images (photos), in the ways it deems fit, for advertising and/or promotional purposes, without right to any remuneration.

SHARING AMONG PSafe COMPANIES AND BUSINESS TRANSFERS

We may share and disclose some or all of users' Personal Information in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Information collected by us and will assume the rights and obligations regarding users' Personal Information as described in this Privacy Policy. These transfers and disclosures may be carried out without notice to you.

VII. CONFIGURE YOUR PRIVACY OPTIONS



YOU CAN STOP ALL COLLECTION OF INFORMATION BY OUR APPLICATIONS BY UNINSTALLING THE RELEVANT APPLICATION. In addition, you have several choices regarding the use of information on our Sites and Services:

A. OPT-OUT

We will primarily communicate with you in the form of emails. You can manage the frequency of and/or opt-out from receiving these communications by clicking the “Unsubscribe” link at the bottom of each email. Please note that even if you unsubscribe or opt-out, we may still send you service-related communications, including notices of any updates to our Terms of Use or Privacy Policy. You may also contact support@psafe.com to register an “exclusion” request which removes your email from visibility in Identity Theft Report searches, rather than permanently deleting it (to ensure that if the email address appears in subsequent Data Breach information obtained by PSafe, it cannot be searched again); please note that an email address subject to an “exclusion” request may become searchable if you complete a standard email verification process related to that specific email address.

B. COOKIES

If you decide at any time that you no longer wish to accept cookies from the Sites and/or Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser’s technical information and review the information in Section V.C for more information on how to do so. If you do not accept cookies, however, you may not be able to use all portions of the Sites and/or Services or all functionality of the Sites and/or Services.

C. ACCESSING, UPDATING, CORRECTING, OR DELETING INFORMATION

You may review, change, update, or correct your Personal Information by contacting us at privacidade@psafe.com. You authorize us to use and disclose any new or modified information that you provide in accordance with this Privacy Policy. You may request the deletion of your personal information that PSafe has obtained up to the date of your deletion request from our systems. To do so, simply contact



us at dpo@psafe.com. Please note that even if you request that we delete your Personal Information, we may be required (by law or otherwise, such as to prevent fraud, resolve disputes, troubleshoot problems, or enforce our Terms of Use and/or Privacy Policy) to keep this information and not delete it (or to keep this information for a certain time), in which case we will inform you of the reasons why we cannot fulfill your request. We may also retain an archived copy of your records as required by law or for legitimate business purposes. Certain users (e.g., California residents) have additional rights detailed in Section XI below.

Please remember, however, that if we have already disclosed some of your Personal Information to third parties, we can no longer access that Personal Information and cannot force the deletion or modification of such information by the parties to whom we have made those disclosures. Certain information is necessary in order for us to provide the Services; therefore, if you delete such necessary information, you may not be able to use the Services. When we delete Personal Information, it will be deleted from the active database, but may remain in our archives based on legal requirements the company is obligated to respect.

D. CHOOSING NOT TO SHARE PERSONAL INFORMATION

You may choose not to provide us with any Personal Information. In such a case, you may still be able to access and use our Sites and Services; however, you may not be able to access and use those portions of the Sites or Services that require your Personal Information. Where we need to collect Personal Information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with Services). In this case, we may have to cancel a product or service you have requested from us, but we will notify you at the time if this is the case.

E. MARKETING COMMUNICATIONS

We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising. You can opt-out of such communications as described in Section A above. However, you may continue to receive service-related and other non-marketing communications.



VIII. DATA SECURITY

PSafe uses commercially reasonable security measures to help protect your Personal Information from accidental loss and from unauthorized use, access, alteration, or disclosure. In addition, we limit access to your personal information to those employees, agents, service providers, and other third parties who have a business need to know. However, please note that no system can be completely secure, and while PSafe makes all reasonable efforts to protect the integrity of the information you provide, you are also responsible for your data and should exercise due care.

Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

IX. NOTIFICATION OF INAPPROPRIATE CONTENT

Should the user find that any content they consider inappropriate has been inserted by third parties on the Sites or Services, the user must send a written notification to PSafe indicating the content considered inappropriate, providing sufficient information to allow for the specific identification of the alleged inappropriate material, to one of the emails below:

- Portuguese: atendimento@psafe.com or
- English: support@psafe.com

X. A NOTE TO USERS OUTSIDE THE UNITED STATES

If you are a user of the Sites or Services from outside the U.S., by visiting the Sites or using the Services and providing us with information, you acknowledge and agree that your Personal Information may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Information will be stored in a database located in Brazil and/or the United States (via Amazon Web Services), may



be processed in the country in which it was collected under the authority of the General Personal Data Protection Law and the California Consumer Privacy Act (CCPA), and in other countries where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your data, you consent to such transfer.

XI. CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

This section applies only to California residents. It describes how we collect, use, and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this section, “**Personal Information**” has the meaning given in the California Consumer Privacy Act of 2018 (“CCPA”) but does not include information exempted from the scope of the CCPA.³

Your California Privacy Rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

Your Rights	Explanation
Information	You can request the following information about how we have collected and used your Personal Information during the past 12 months: • The categories of Personal Information we have collected. • The categories of sources from which we collected Personal Information. • The business or commercial purpose for collecting and/or selling Personal Information. • The categories of third parties with whom we share Personal Information. • Whether we have disclosed your Personal Information for a business purpose and if so, the categories of Personal Information received by each category of third-party recipient. • Whether we have sold your Personal Information and if so, the categories of Personal Information received by each category of third-party recipient.



Access	You can request a copy of the Personal Information that we have collected about you during the past 12 months.
Deletion	You can ask us to delete the Personal Information that we have collected from you.
Opt-out of sales	If we sell your Personal Information, you can opt-out. Further, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California's "Shine the Light" law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.
Opt-in	If we know you are under 16 years old, we will ask for your permission (or if you are under 13, your parent's or guardian's permission) to sell your Personal Information before we do so.
Non-discrimination	You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as denying you services; increasing the price/rate of services; decreasing service quality; or suggesting that we may penalize you as described above for exercising your rights.

With respect to deletion and opt-out requests, please note that our applications automatically collect certain data and share it with advertising networks to personalize the ads you see in the applications. If you submit such a request, we will stop sharing the data we have collected to date; however, if you do not uninstall the application(s) after submitting such a request, or if you reinstall the application(s) in the future, the application(s) will share data collected during future uses.

XII. EUROPEAN RESIDENTS – YOUR EUROPEAN PRIVACY RIGHTS

We are committed to complying with the rights of personal data subjects, which are

provided for in Articles 13 to 22 of the GDPR. First, learn what they are:

Your Rights	Explanation
Right to be Informed (Art. 13 & 14)	You have the right to receive clear and transparent information about the processing of your personal data, including the purposes of processing, categories of data involved, retention period, and other relevant information.
Right of Access (Art. 15)	You can request a copy of the Personal Information we have collected about you, such as: • the purposes of the processing; • the categories of personal data concerned; • the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; • where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; • the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; • the right to lodge a complaint with a supervisory authority; • where the personal data are not collected from the data subject, any available information as to their source; • the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
Right to Rectification (Art. 16)	You can ask us to rectify your personal data that is processed by the Organization.
Right to Erasure (Art. 17)	You can request the erasure of your personal data, and it will be erased when: • the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; • the data subject withdraws consent on which the

	processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing; • the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); • the personal data have been unlawfully processed; • the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; • the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).
Right to Restriction of Processing (Art. 18)	You may request the restriction of processing where one of the following applies: • the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; • the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; • the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; • the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.
Right to Data Portability (Art. 20)	You may request to receive your data in a structured format, and you may request that your data be transmitted directly from one controller to another, where technically feasible.
Right to Object (Art. 21)	You may object to the processing of your personal data, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) of the GDPR, including profiling based on those provisions.

Rights related to Automated Decision-making and Profiling (Art. 22)	You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
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XIII. BRAZILIAN RESIDENTS – YOUR BRAZILIAN PRIVACY RIGHTS

The LGPD provides for the rights of the data subject in its Art. 18, which are:

Your Rights	Explanation
Confirmation and Access	You can request confirmation from PSafe about the existence of processing of your Personal Data so that, if positive, you can access it, including by requesting copies of the records we have about you.
Correction	You can request the correction of your Personal Data if it is incomplete, inaccurate, or outdated.
Anonymization, blocking, or deletion	You can request (a) the anonymization of your Personal Data, so that it can no longer be related to you and, therefore, cease to be Personal Data; (b) the blocking of your Personal Data, temporarily suspending our ability to process it for certain purposes; and (c) the deletion of your Personal Data, in which case all your Personal Data will be erased without possibility of reversal.
Portability	You can request that PSafe provide your Personal Data in a structured and interoperable format for transfer to a third party, provided that such transfer does not violate the Company's intellectual property or trade secrets.
Information about sharing	You have the right to know which public and private entities PSafe shares your Personal Data with. We will maintain, in the "data sharing" section of this Policy, an indication of our relationships with third parties that may involve the sharing of Personal Data. In any case, if you have questions or want more details, you have the right to request this information from us.

	Depending on the case, we may limit the information provided to you if its disclosure could violate PSafe's intellectual property or trade secrets.
Revocation of consent	If you have consented to any purpose for processing your Personal Data, you can always choose to withdraw your consent. However, this will not affect the lawfulness of any processing carried out prior to the revocation. If you withdraw your consent, we may be unable to provide certain services to you, but we will advise you when this occurs.
Information on the possibility of not consenting	You have the right to receive clear and complete information about the possibility and consequences of not providing consent when it is requested by PSafe. Your consent, when necessary, must be free and informed. Therefore, whenever we ask for your consent, you will be free to deny it – in such cases, it is possible that some services cannot be provided.
Opposition	The law authorizes the processing of Personal Data even without your consent or a contract with us. In these situations, we will only process your Personal Data if we have legitimate reasons to do so, for example, when necessary to ensure security in our services. If you do not agree with any purpose of processing your Personal Data, you may present an opposition, requesting its interruption.

XIV. HOW TO EXERCISE YOUR RIGHTS

If you have any questions about our Privacy Policy or our data collection or processing practices, or if you want to request any of your rights, please contact our DPO at dpo@psafe.com.

We will need to confirm your identity to process your requests to exercise your rights of information, access, or deletion. We will not be able to process your request if you do not provide us with sufficient details to allow us to understand and respond to it.

XV. WHO IS OUR DPO?

PSafe, in observance of Art. 41 of the LGPD, has appointed as Data Protection Officer (DPO):

DPO: GEP Soluções em Compliance
Responsible Person: Maurício José Ribeiro Rotta
Email: dpo@psafe.com

XVI. APPROVAL AND EFFECTIVE DATE

This Privacy Policy is approved by PSafe's Management and becomes effective on the date of its publication, to be reviewed annually to ensure its effectiveness and compliance.

We reserve the right, at any time and without prior notice, to add to, change, update, or modify this Privacy Policy, simply by posting such change, update, or modification on the Sites. Any such change, update, or modification will be effective immediately upon posting on the Sites. If we make material changes to this Privacy Policy, we will notify you by email or by posting a notice of such changes at <https://www.psafe.com/privacy-policy/> and will change the "Last Updated" date above. We recommend visiting this page periodically so that you are aware of the modifications made.

Version	Publication Date	Responsible Party
1.0	07/20/2022	GEP Soluções em Compliance
2.0	03/06/2024	GEP Soluções em Compliance
3.0	05/07/2025	GEP Soluções em Compliance