PRIVACY POLICY

Welcome to MOKI.

We are committed to providing a platform ("Platform") that serves as an efficient and reliable solution for managing field operations within your organization, enabling effective oversight and data-driven decision-making.

In order to continuously enhance our Platform and ensure the proper delivery of our services, **Moki** processes personal data. Acknowledging the importance of privacy and data protection, this Policy aims to inform the User (as well as the general public) regarding: (i) the procedures we adopt for processing personal data; (ii) the security measures in place to protect and safeguard such information; (iii) the rights granted under the General Data Protection Law; and (iv) the communication channel available for exercising those rights.

The Platform is not intended for use by minors. Therefore, you must not register or use the Platform if you are under 18 (eighteen) years of age.

Key Definitions:

Many of the terms used in this Privacy Policy ("Policy") are defined in Law No. 13,709/2018, known as the General Data Protection Law ("LGPD"). To facilitate understanding and ease of reading, we present the main terms used herein in the glossary below.
 When reading the terms listed below—whether in uppercase or lowercase, singular or plural, bold or not—they shall be interpreted as follows:

a) **Personal Data**: Information that identifies a natural person (i.e., an individual), either directly — such as name or CPF number — or indirectly — such as address or financial data;

b) **Sensitive Personal Data**: Data relating to racial or ethnic origin, religious beliefs, political opinions, membership in unions or organizations of a religious, philosophical or political nature, health or sex life, and genetic or biometric data, when linked to an individual;

c) **Database**: A structured set of data, including personal data, established in one or multiple locations, in either electronic or physical format;

d) **Data Subject**: The natural person to whom the personal data being processed refers;

e) **Controller**: The natural or legal person, whether public or private, who is responsible for decisions regarding the processing of personal data. In this case, the Controller of the Personal Data entered in the Platform is the Contracting Party, which holds the license to use the Platform;

f) **Processor**: The natural or legal person, whether public or private, who processes personal data on behalf of the Controller. In this context, **Moki** acts as the Processor of the personal data entered by its Users in the Platform;

g) **Processing**: Any operation performed with personal data, including but not limited to collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation, information control, modification, communication, transfer, dissemination, or extraction;

h) **Legal Bases**: The legal grounds that legitimize—or authorize—the processing of personal data.

If you wish to learn more about the General Data Protection Law, you can access it by clicking here. If you have any questions about a concept within this Policy and would like further clarification, you may contact us using the channel provided in the summary table.

1. General Terms

1.1 General. Moki (CALL NET SERVIÇOS DE INFORMÁTICA E INTERNET LTDA., registered under CNPJ No. 01.138.983/0001-90, headquartered at Rua Voluntários da Pátria, 286, Room 302, Botafogo, Rio de Janeiro, ZIP Code: 22270-014) considers the use of personal

data to be a matter of utmost importance and seriousness. For this reason, this Policy has been developed to communicate the practices related to the processing of personal data, particularly concerning the collection, use, and processing of information provided by Users through the Platform.

1.2 Authorization for Processing. By using the **Moki** Platform, the User authorizes the processing of their personal data and agrees to be bound by the terms of the Platform. If you do not agree with the practices and policies described in this document, you will not be permitted to use the Platform.

1.3 Regulation. Moki operates in accordance with Brazilian legislation, including, but not limited to, Law N°. 12,965/2014 ("Brazilian Internet Bill of Rights") and Law No. 13,709/2018, in addition to other applicable data protection regulations.

1.4 Contact. If you have any questions or suggestions regarding this Privacy Policy, the User may contact the Data Protection Officer ("DPO") at the following email address: dpo@moki.com.br

1.5 Information Management. This Policy outlines which personal data may be processed while the User utilizes the Platform's services, how such information may be used, and what safeguards are in place to prevent unauthorized access or misuse.

2. Personal Data Processed

2.1 Processing of Users' Personal Data. Moki may process the following information and/or personal data from Users:

a) Full name;

b) Valid email address;

c) Phone number;

d) Company of employment;

e) Job title;

f) Department;

g) Country/State;

h) Photo.

2.2 <u>Other Data Processed.</u> Moki may also collect, store, and use the following information:

a) Database records of any files or information uploaded to the Platform by data subjects;

b) KPIs entered into the Platform by companies that acquire a **Moki** usage license, which may include, but are not limited to, salaries, targets, variable compensation, and performance indicators;

c) Records of any communication, such as file transfers or uploaded information within the Platform, including interactions between Users;

d) Details of visits to the Platform and the features accessed by Users;

e) Information about the access device used, including but not limited to hardware model, operating system and version, file names and versions based on data generated or handled by Users, preferred language, unique device identifier, advertising identifiers, serial number, device motion data, and network-related information;

f) Access log data (including device IP address, date, and time), browsing characteristics, browser type, and access method;

g) Preference data regarding how Users interact with the Platform and the selected settings. In some cases, cookies, pixel tags, and similar technologies are used to create and maintain unique identifiers.

3. How Moki Uses the Processed Data

3.1 Use. By accepting this Policy, Users agree that **Moki** may process the data collected through the Platform for the purpose of:

a) Identifying and registering Users on the Platform and providing the services contracted by the Client;

b) Ensuring that the Platform's content is presented in the most efficient way for Users;

c) Supporting general improvements to the Platform;

d) Processing the data collected through various internal algorithms of the service contracted by the Client;

e) Contacting and notifying Users about changes to the Platform or its policies and terms of use, when necessary;

f) Sending newsletters and informational emails.

3.2 Purpose of Data Collection. The personal data collected by **Moki** falls under the following purposes and legal bases:

DATA PROCESSED	PURPOSE	LEGAL BASIS
Full name Company of employment Job title Department Phone number Country/State	Identification of Users; Customization of reports, menus, and screen layouts; Definition of access permissions."	Contract execution (Art. 7, V of the LGPD)
Photo	Service customization	Consent or Contract performance (Art. 7, I and V, of the LGPD)
Email address	Send communications and informational content to Platform Users	Contract performance (Art. 7, V, of the LGPD)

3.3 Personal Data Processor. With regard to the personal data of Users or third parties entered into the Platform by them at the request of the Client, it is important to highlight

that **Moki** acts as a data processor. This means that **Moki** does not determine the purposes or objectives for processing such data. The responsibility for these decisions lies entirely with the Client, who acts as the Controller of the personal data entered by its Users into the Platform.

3.3.1 <u>**Limitation of liability.**</u> As a personal data processor, **Moki** is committed to protecting the security and privacy of the personal data it processes. Appropriate technical and organizational measures are implemented to prevent unauthorized access, disclosure, alteration, or destruction of personal data. However, it is essential that the Client, as the Data Controller, assumes responsibility for defining the purposes and legal grounds for processing such information in compliance with applicable laws.

4. Sharing of Processed Personal Data

4.1 <u>Sharing.</u> **Moki** does not disclose any personal data provided by Users through the **Moki** Platform to third parties, except in the following situations:

a) When **Moki** is required to disclose or share processed personal data in order to comply with a court order, or for purposes of fraud prevention or other crimes, as well as in response to information requests made by competent authorities, provided such disclosure complies with applicable laws, regulations, or legal procedures;

b) To protect the rights, property, or safety of **Moki** and the Platform;

c) With law enforcement and/or governmental authorities if their actions are deemed inconsistent with the provisions of our terms of use, or to protect the rights, property, or safety of **Moki**, its Users, or others;

d) At the User's own initiative;

e) In the event of a partial or total sale of the business or its assets, or as part of any business reorganization, restructuring, merger, spin-off, or acquisition, **Moki** may share User information with third parties involved in such operations, taking necessary steps to ensure privacy rights continue to be protected as outlined in this Policy.

4.2 <u>Service Providers.</u> **Moki** also shares personal data with third-party business partners in order to enable Platform functionalities and to store and back up information (for example, through cloud-based storage solutions on selected servers).

4.2.1 These partners, in accordance with the LGPD, act as data processors or sub-processors and are required to handle personal data solely for the purposes outlined in this Policy. In other words, partners may not use personal data in any way or for purposes other than those specified herein.

4.2.2 Prior to entering into any partnership, **Moki** conducts a thorough review of the business partner to ensure they meet the security standards deemed appropriate for handling personal data. Additionally, whenever possible, **Moki** includes specific contractual clauses to safeguard the confidentiality of your personal data.

5. Access and Correction of Personal Data

5.1 <u>**Access and Rectification of Personal Data.**</u> The User has the right to access their personal data processed by **Moki**, as determined by the LGPD, by contacting the DPO at **dpo@moki.com.br**. Inquiries will be answered during business hours, Monday through Friday, from 8 a.m. to 8 p.m., within fifteen (15) days. Responses may be sent via email or letter, as provided in Article 9 of the LGPD, in order to ensure the following rights:

a) **Right to confirmation of processing:** the right to request confirmation as to whether personal data is being processed, including clear information on the source of the data, whether a record exists, the criteria used, and the purpose of the processing.

b) **Right of access:** the right to be informed and request access to personal data processed by **Moki**.

c) **Right to rectification:** the right to request that **Moki** modify or update personal data when it is incorrect or incomplete.

d) **Right to erasure:** the right to request the deletion of personal data, or, if deletion is not possible (due to legal retention obligations), to have it stored in an inactive database for the duration specified by law.

e) **Right to data portability:** the right to request the transfer of personal data to another service provider.

f) **Review of automated decisions:** the right to request a review of decisions made solely through automated processing.

5.2 <u>**Exception to Deletion Request.**</u> Users have the right to request the deletion of their personal data stored on the Platform at any time, except in cases where legal obligations or court orders require the continued retention of such data, pursuant to Articles 18, VI and 16, I of the LGPD.

5.3 <u>**Inaccurate Information.**</u> It is the User's responsibility to keep their information up to date. In case of inaccuracies, **Moki** may update or delete the information, except when retention is necessary for legitimate business or legal purposes.

5.4 <u>**Necessary Protection Measures.**</u> **Moki** implements the necessary security measures to safeguard Users' personal data and protect it from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

5.5 <u>**Password Protection.**</u> Users are also responsible for taking appropriate steps to protect their passwords, usernames, and other access credentials to their personal accounts on the Platform.

6. Notification of Changes to the Privacy Policy

6.1 <u>**Changes to the Privacy Policy.**</u> **Moki** may update this Policy from time to time. The use of processed information is subject to the Privacy Policy in effect at that time. If **Moki** changes the way it handles personal data, it will notify Users via email.

6.2 <u>**Implied Acceptance.**</u> Minor adjustments to this Policy that do not significantly impact the way **Moki** handles personal data may be made without notification.

7. Communication

7.1. <u>**Sending Communications.**</u> By registering, Users agree that **Moki** may send notifications, advertisements, service updates, and important information regarding the use of the Platform to their email address.

    7.1.1. <u>**Opt-Out Option.**</u> Upon receiving an email on behalf of **Moki**, the User will have the option to unsubscribe by using the opt-out link or by requesting removal via email.

7.2. <u>**Anti-Spam Policy.**</u> The Platform takes the necessary precautions to prevent the sending of unsolicited emails.

7.3. <u>**Confidentiality.**</u> The highest level of confidentiality is ensured in the handling of data such as the email list during **Moki's** regular administrative tasks.

8. Retention and Storage of Personal Data

8.1 <u>**Retention and Storage.**</u> The LGPD does not establish a specific period for the retention of personal data. However, it requires that data be stored for a reasonable period. **Moki** will store User data for as long as the User's account remains active.

8.2 <u>**Retention Period.**</u> Personal data will be stored for a period considered appropriate under applicable Brazilian law, specifically:
 a) 6 (six) months for activity logs on the Platform, in accordance with Article 15 of the Brazilian Internet Bill of Rights (Marco Civil da Internet);
 b) 5 (five) years for information related to the processing of personal data, as this is the period during which **Moki** may be subject to audits or legal claims.

8.2.1. In cases where **Moki** acts as a Data Processor, personal data will be retained according to the period defined by the Data Controller.

8.2.2. When retention is required, the data subject will be informed of the impossibility of deletion, if requested, and the data will not be used for purposes other than those outlined in this section.

8.3 <u>**Data Characteristics.**</u> Retention includes User registration and usage data, as well as records of interactions and related information, which will be stored for 6 (six) years from:
 (i) the cancellation of the User's account; or (ii) the provision of personal data by the data subject (when not a User of the Platform) through contact forms or similar.

8.3.1. It is important to note that, in the event of an ongoing administrative or judicial proceeding, regulatory investigation, or audit, **Moki** may extend this retention period until the end of the respective process.

9. Security in the Processing of Personal Data

9.1   **Storage.** The personal data from your account and all Platform information are stored and transmitted securely. Only **Moki's** authorized employees have access to your personal data, and they are strictly bound by duties of confidentiality, professional secrecy, and full respect for privacy, in accordance with this Policy and applicable regulations.

9.2   **Information Security.** Personal data is transmitted and stored on Google Cloud Platform servers located in Brazil (São Paulo). All transactions carried out on the Platform — including those involving the transfer and sharing of information with public authorities — are encrypted and subject to data backup, monitoring tools, security policies, and employee access controls, using up-to-date security software.

9.3   **Notification.** If **Moki** becomes aware of any security breach — either within its own systems or those of its hosting providers — including intrusions, data leaks, or any other information security incident, it will notify the competent authorities and any affected Users. The notification will include as much detail as possible regarding the nature, extent of the breach, and the data compromised, within a reasonable timeframe, in accordance with Article 48, §1 of the LGPD.

10. Our Official Support Channels

10.1   **Questions or Suggestions.** If you have any questions or suggestions regarding this Privacy Policy or any other related information, the User may request support via WhatsApp message at (+55) (21) 3179-0594, or by email at: help@mokisolutions.com.

10.2   **Support Hours.** Support is available from 8:00 AM to 8:00 PM, Brasília time (GMT-3). Our support team aims not only to resolve issues quickly and efficiently but also to find a friendly and collaborative solution.

11. General Provisions

11.1 <u>**User Responsibility.**</u> Users shall be held responsible for compensating **Moki** for any costs or damages incurred as a result of a violation of this Privacy Policy caused by them.

11.2 <u>**Cooperation with Authorities.**</u> **Moki** fully cooperates with any authorities or courts that may request the disclosure of the identity or location of any person who has posted material on the Platform that violates the provisions set forth in this Policy.

11.3 <u>**Cookies.**</u> **Moki** processes cookies on its website and app. Our Cookie Policy can be accessed via this link.

11.4 <u>**Governing Law and Jurisdiction.**</u> This Privacy Policy is governed by Brazilian law, and the courts of the District of Rio de Janeiro are designated as having jurisdiction to settle any disputes arising from it, to the exclusion of any other, no matter how privileged, always prioritizing resolution through conciliation or mediation whenever possible.

11.5 <u>**Limitation of Liability.**</u> This Privacy Policy applies only to the processing of personal data provided on the Platform. If the User shares their information on third-party websites, different rules may apply regarding the use of their data.

Revision Control:

VERSION	DATE	REVIEWED ITEMS
1.1	05/19/2023	Review of this document

Thank you,

Moki Team