

Privacy policy

Welcome! We know you care about how your Personal Data is used and want you to know we take your privacy seriously.

Lengio Corporation, as well as its subsidiaries, ("**Slang**"), are companies that are respectful of the Personal Data of third parties, and for this reason they are making the present Privacy Policy (the "**Policy**") available to their Users and its Stakeholders in order to inform them about the procedures related to the processing of their Personal Data, as well as the mechanisms available to the Data Owners to know, update, correct or delete their data, or revoke the authorization granted with the acceptance of this Policy.

The registration as a User on the Platform and/or the express acceptance of this Policy, implies the acceptance of the Policy by the Data Owners, and their authorization for the uses and other treatments described herein.

Slang reserves the right to modify this Policy from time to time as it deems necessary.

Definitions

For better understanding and compliance with this Policy, the following terms and definitions should be taken into account:

"Authorization": the prior, express and informed consent of the Data Owner to carry out the processing of Personal Data.

"Anonymized Data": data that does not personally identify the Data Owner or other Users of the Site, and may be used by Slang for management and statistical analysis.

"Privacy Notice": verbal or written communication to inform the Data Owners of the existence of the Policy and the purpose of data collection.

"Claim": request from the Data Owner to correct, update or delete their Personal Data or to warn that there is an alleged breach of the data protection regime.

"Cookies": a text file that is downloaded to your computer's hard drive or stored in your web browser's memory when you visit Slang's websites.

"Consultation": request from the Data Owner to know what information is held about them in Slang's Databases.

"Database": the organized set of Personal Data that are subject to Processing.

"Data Controller": natural or legal person who by themselves or in association with others, makes decisions about the database and/or the Processing of the data.

"Data Owner": natural person whose Personal Data is subject to Processing.

"Data Processor": person or entity that carries out the processing of Personal Data, based on a delegation from the Data Controller, receiving instructions about the way in which the data shall be managed.

"Personal Data": any information linked or linkable to one or more specific or determinable natural person(s).

"Public Data": all data that are not semi-private, private, or sensitive. Public data includes, among others, data related to the marital status of individuals, their profession, their status as merchants or public servants, and data that can be obtained without any confidentiality.

"Platform": Slang's web platforms and mobile apps.

"Processing": any operation or set of operations on Personal Data, such as the collection, storage, use, circulation, transfer, transmission, updating or deletion of Personal Data, among others.

"Sensitive data": data that affect the privacy of the Data Owner or whose improper use may generate discrimination, (e.g., data revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, as well as data relating to health, sexuality, and biometric data (such as fingerprints), among others).

"Transmission": processing of Personal Data that involves the communication of such data when its purpose is the performance of a Processing by the Processor on behalf of the Controller.

"Transfer": processing of Personal Data that takes place when the Controller and/or Processor sends the Personal Data to a recipient, who is also a Data Controller.

"User": any person using the Platform.

What types of personal data do we collect?

Our primary purpose in collecting Personal Information is to provide you with a safe, smooth, efficient, and personalized experience using our Services. This allows us to provide services and features that are likely meet your needs, and to customize our Services to make your experience easier and more productive. Slang may collect different types of Personal Data,

either because they have been provided by the Data Owner, by a third party, or because we create those data based on the User's interaction with the Platform.

Slang may collect the following types of Personal Data:

- Registration Data: if the User wants to access the services offered by Slang through the Platform, the User must register on the Platform by providing the following data: their email address, their full name, a username, and a password. Also, in the process of logging access to the Platform, Slang may collect the Internet Protocol (IP) address, the address of the web page visited before using the Platform, the type of browser, the date and time the services were used, information about browser settings and plug-ins, and language preferences. You may upload a photo to accompany your profile on the Website. Your photo will be visible to any person who is permitted to view your name in connection with the Services.
- Data provided by the Organization: if any organization to which you belong wants you to have access to Slang, the organization may provide us with certain Personal Data such as your full name, ID number, cell phone number, email address, name of the company you work for, position you hold, or place where you study.
- Payment Data: Users who purchase a paid version of the Services provide Slang (or its payment processors) with billing details such as credit card information, banking information, and/or a billing address. However, for security purposes, Slang does not store this information in its Databases.
- Content Data: Slang collects data from the content developed by the User on the Platform, as well as data from the courses (behavior and use of the product, comments, and projects created).
- Data from Suppliers and/or Contractors: Slang's suppliers or contractors who are natural persons may, for the execution of their contractual obligations, provide certain Personal Data such as full name, identification number and type, address for notification purposes, among others, as required by the fully executed contract.
- Cookies Data: Slang uses Cookies and similar technologies on its website to obtain Data.
- Surveys or Contests: We may provide you with the opportunity to participate in contests or surveys related to our Services. If you participate, we will request certain Personal Information from you. The requested information typically includes contact information (such as name and mailing address) and demographic information.
- Tell a friend: If you choose to use our referral service (if available) to tell a friend about our Services, we will ask you for your friend's name and email address or phone number

or other means of contact. We will automatically send your friend one or more message(s) inviting them to visit our Web Site. Slang uses this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Your friend may contact us at support@slangapp.com to request that we remove this information from our Database.

- Employee data: for the recruitment of its employees and fulfillment of labor obligations, Slang must process Personal Data of both potential employee candidates and current employees.
- Shareholder data: personal information will be collected from the company's shareholders to facilitate compliance with legal, corporate, tax, and financial obligations, as well as those agreed to in the company's bylaws.

Slang may request other Personal Data as it deems appropriate from time to time.

What rights do you have as the data owner?

- To know, update, and ensure the accuracy of your Personal Data before the Data Controller or Processor.
- Request proof of the Authorization granted, unless the Applicable Law indicates that such Authorization is not necessary.
- Submit requests to the Data Controller or Processor regarding the use that has been made of your Personal Data.
- File complaints before the Competent Authority for infringements to the Applicable Law.
- Revoke Authorization and/or request the deletion of Personal Data from the databases.
- Request access to your Personal Data that have been subject to Processing.
- Have easy access to the text of this Policy and its modifications.

Sensitive personal data and data of minors

Slang will not collect or process Sensitive Personal Data or the personal data of minors.

For what purpose is personal data collected?

Slang will process the data that is strictly necessary for the fulfillment of the following purposes:

- Compliance with Slang's applicable legal obligations.
- Compliance with the agreed upon terms of service, which are published on the Platform in the "Legal Hub" section.
- Carrying out the necessary steps to register, and update the User's information and for purposes of safeguarding the security of your information.
- Promoting and offering the benefits associated with professional training programs and presenting information about events, discounts, promotions, new products, satisfaction surveys, and improving the Slang User experience.
- Providing support to the User and answer their questions regarding the Services.
- Sending the User Slang's own and/or third party advertising.
- Performing consumer habits profiling.
- Developing behavioral and predictive models for statistical, historical, and market-research purposes, among others, in which case your data will be used as much as possible in Anonymized form, that is, making it impossible to identify the identity of the person to whom they belong.
- Slang may, in some cases, record telephone conversations, store logs, and keep such conversations and logs in order to ensure the quality of services, verify instructions, and prevent fraud.
- Complying with the purpose of the commercial or civil relationship acquired with the Data Owners.
- Maintaining direct communication with the Data Owners for contractual, informative, or commercial purposes.
- Complying with the value proposition and the level of service offered to each segment of customers and suppliers.
- Transmitting, transferring and providing the information and Personal Data of the Data Owners to Slang's subsidiaries or affiliates, commercial partners, or other national and/or international companies or persons that the Company commissions to carry out the processing of information in compliance with the purposes described in this Policy and the purpose of the commercial or civil relationship with the Data Owners, or for such third parties to offer their products or services that may, in Slang's opinion, be of interest to the Data Owners.
- Transmitting, transferring, and providing the information and personal data of the Data Owners to national and/or international third parties, in such cases in which the

Company participates in processes of mergers, integrations, spin-offs, liquidation, acquisitions, and/or disposal of assets.

- Defining consumption profiles of its customers, in order to perform statistical analysis or improve the marketing and sales processes of Slang's services and/or products.
- Making reports to the databases of credit information operators.
- Making invitations to events, improve services, and all those activities associated with the current or potential business relationship.
- Auditing, studying, and analyzing the information in the databases to design commercial strategies and increase and/or improve the products and/or services offered by the Company, along with designing, implementing, and developing programs, projects, and events.
- Managing our Sites and the accounts of registered users, as well as analyzing trends and improve the functionality of our Site.

Slang will only process the Personal Data and other information of the Data Owners for the purposes described and the uses authorized in this Policy. In addition to what is mentioned in other sections, the Data Owners expressly authorize Slang to process their Personal Data.

Who is the data controller?

Slang, as a general rule, acts as the Controller for the Processing of Personal Data, however in some cases it may act as Processor, in which case, will carry out the processing in accordance with the guidelines established by the person responsible for such processing. In any case, Slang guarantees that, even when acting in the capacity of Data Processor, it will do so in compliance with applicable laws and ensure that it obtains authorization from the Data Owner.

Authorization for the processing of personal data

At the time of voluntarily providing their data and/or granting express authorization, the Data Owner:

- Expressly and unequivocally authorizes Slang to carry out the Processing of their Personal Data in accordance with this Policy.
- Was informed and understands the security measures that Slang implements to provide protection to the collected personal data and, therefore, accepts them.

The term of the Authorization for the Processing of Personal Data will be from the date the Authorization is granted until the date Slang is dissolved and liquidated, or until the purpose for

which the Personal Data was collected is completed.

The authorization of the Data Subject will not be necessary when it corresponds to:

- Data of a public nature.
- Cases of medical or health emergency.
- Processing of information authorized by law for historical, statistical, or scientific purposes.
- Data related to the Civil Registry of Persons.

International data transfer

The servers, vendors, and/or computers used by Slang to provide its services may be located outside the country or under another governmental jurisdiction. The Data Owner authorizes Slang to transfer, store, and process his/her Personal Data internationally, for which they give their prior, informed, free, express and unequivocal consent.

Security measures for the protection of personal data

Slang's security measures are intended to protect the Owners' data with the aim of preventing their adulteration, loss, unauthorized access, or unauthorized use. To this end, Slang diligently implements human, administrative, and technical protection measures that are reasonably within its reach. The Data Owner expressly accepts this form of protection and declares that they consider it convenient and sufficient for all purposes.

Suppression of personal data

Once the purpose of the Processing has been fulfilled, Slang will proceed to eliminate the Personal Data. Slang will review the information of the Data Owners every six months, and according to its characteristics and status, will proceed to choose those Data that it considers at its discretion as warranting deletion. For this purpose, Slang will take into account whether there are rights held by the Data Owners or whether there are legal, contractual, or constitutional duties that require the data to remain in the Databases.

Use of cookies

The Data Owner accepts that Slang may use Cookies and other similar technologies, both on the Platform, its contents, services, as well as in the emails sent to the Data Owners, with the

purpose of, among others, authentication, recording activities on the Platform, improving Platform functionality, optimizing the products or services offered, analyzing market trends, analyzing demographic information of those who visit the Platform and make use of the services it offers, evaluating the effectiveness of advertising or the consumption behavior of users of the Platform and the result of the activities carried out there, determining who has opened emails sent from the Platform. These tools allow Slang to obtain, among others, information regarding the type of browser and operating system used, the IP address, the time spent on the Platform, the number of visits made to the Platform, and the use of the Platform, among others.

The Owners may configure their browser to disable and delete Cookies, in which case access to certain features of the Platform may be restricted.

Procedure for exercising habeas data rights

In case the Data Owner wishes to exercise their habeas data rights (*i.e.*, consultation, complaint, request for modification, rectification or update, request for deletion, notification of infringement), they must send an email to legal@slangapp.com, which will be attended to by Slang's data officer. Such email must be addressed to Slang and must specify: (i) name and identification of the Data Owner or the person entitled; (ii) precise and complete description of the facts that give rise to the claim; (iii) claims; (iv) physical or electronic address to send the response; and (v) documents and other relevant evidence that the Data Owner may want to assert.

Slang will respond to the request within a maximum period of fifteen (15) business days.

If the claim is incomplete, Slang may require the interested party to correct the deficiencies. After two (2) months from the date of the requirement, without the applicant submitting the required information, it will be understood that the claim has been abandoned.

In the event that Slang is not the appropriate authority to resolve the claim, it will transfer the claim to the appropriate person within a maximum period of two (2) business days and inform the Data Owner of the situation, which will relieve it of any claim or liability for the use, rectification or deletion of the data.

The request for deletion of data will not proceed when there is a contractual or legal obligation on Slang's behalf that prevents it from doing so.

The Data Owner may only file a complaint before the appropriate authority once the consultation or complaint process has been exhausted before Slang in the terms established in the Policy.

Application of guarantees and rights of EU Regulation 2016/679 and brazilian law no. 13.709 (LGDP)

Slang, as the Data Controller, will guarantee the exercise of the prerogatives and rights conferred by Regulation (EU) 2016/679 and/or Law 13.709 of Brazil, for Data Owners to whom any of these jurisdictions are applicable. For such purposes, the Data Owner shall state the reasons that support the request for application of such regimes. Likewise, prior to using the Platform, the Data Owner must inform Slang of any such situation. In any case, in application of the aforementioned regime, Slang will guarantee the exercise of the rights of restriction and portability of personal data, when requested by the Data Owner and in the events of their origin according to the regulation.

Confidentiality of personal data

Slang is respectful of the rights to privacy and freedom of expression, and of the good name of the Data Holders, which is why, in order to guarantee such rights, Slang will not disclose confidential information to any person who has not been previously authorized and will instruct all those who may eventually have access to confidential information on how to handle, use, manage security measures, and others, so that such information remains properly managed and protected.

Validity of the policy

This policy is effective as of April 2023 and will be reviewed and updated annually.

Any substantial change in the Policy will be communicated to the Data Owners through publication on the Slang's web portals.

Contact us

If you have any questions or suggestions regarding this Policy, please contact us at:

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