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Information security

# PP001 – PRIVACY POLICY

**Classification:** Public

Version 1.0

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## SUMMARY

1. AIM.....	Erro! Indicador não definido.
2. WHAT DO WE DO? .....	4
3. WHICH INFORMATION DO WE PROCESS AND COLLECT? .....	4
4.1. COOKIES .....	6
4.2. TO CUSTOMER SEVICE .....	Erro! Indicador não definido.
4.3. TO IMPROVE OUR SERVICES, OFFER THEM AND DEVELOP OUR TOOLS.....	Erro! Indicador não definido.
5. WHO HAS ACCESS? .....	8
7. HOW LONG DO WE KEEP PERSONAL INFORMATION? .....	9
9. DOCUMENT REVIEWS.....	Erro! Indicador não definido.
10. APPENDIX 1 – DOCUMENT APPROVAL.....	Erro! Indicador não definido.

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## 1. AIM

When our customers use our services, it is up to **LG LUGAR DE GENTE** to meet the trust given by customers! To this end, the Data Processing of Clients and their employees is carried out with the utmost care, protection and transparency, observing the internal rules of information security and the applying legislation.

Therefore, this Policy aims to present the principles, guidelines and how **LG LUGAR DE GENTE** collects, processes, stores and protects personal information in the context of our services ("Data Processing"), as well as the reasons for such Data Processing, besides demonstrating how you can have access to your information, how you can contact us and solve your doubts, etc.

Do not worry; this Policy covers all business units, systems, products, services, employees, service providers, partners and suppliers of **LG LUGAR DE GENTE**.

## 2. WHAT DO WE DO?

**LG LUGAR DE GENTE** provides the following services to its customers:

- a) **Suite Gen.te cloud**: cloud platform for Human Resource management.

For further information, visit our website: <https://www.lg.com.br/produtos>

## 3. WHICH INFORMATION DO WE PROCESS AND COLLECT?

In order to provide the services indicated above, **LG LUGAR DE GENTE** performs the Personal Data Processing of employees and collaborators of its clients, including its own customers:

- a) Full name, age, gender, function / position, tax code, ID, financial and salary information, benefits received, as well as other information related to the Client's Human Resources;
- b) Information related to feedbacks given to you, assessments, goals and performances of your clients' collaborators;
- c) From customers, CNPJ registration number, e-mails, IP data, geographical information, financial information, files provided about you, passwords and other security information for authentication, records of access activities and use of the systems, in addition to date, time, and referrer URL of your request;

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- d) When customers visit and access our website or the Customer Portal, we may use cookies to improve the usability of the site.

This data is used only and exclusively in accordance with the provisions of this Privacy Policy, in order to obey the obligations of **LG LUGAR DE GENTE** established in the agreements signed with its customers.

The information and data, mentioned above, are inserted and informed by **LG's** own customer in the systems and services marketed by **LG LUGAR DE GENTE**.

**For instance:** You are an employee of a company that uses the "Suite Gent.te Cloud" platform offered by LG LUGAR DE GENTE. Another professional from the company you work will be responsible for posting payroll information to the system, which will have your personal information (full name, tax code, ID, earnings, etc.). Such information is necessary for the service provided by **LG LUGAR DE GENTE**.

We will collect personal information about you through outsourced such as your employer, co-workers, partners and service providers who work with us by providing services directly to you or to our customers, who can be your employer!

**However, LG LUGAR DE GENTE has no responsibility** in how to guarantee the truthfulness and content of such data and information, misuse of services, and such responsibilities are solely and exclusively of the Customers themselves, as explained in the Agreements signed with them.

Yet, **LG LUGAR DE GENTE** has communication channels to receive any or all information and / or suspected misuse and / or improper from its customers, in order to assist them to solve and correct it.

In other situations, the activities of the users (here, you or our customers' employees) are recorded in our Systems, such as access to the system, execution of commands, tasks, and such information may be used for purposes of audit.

### **3.1. OTHER IMPORTANT INFORMATION ABOUT DATA COLLECTION**

It is important to make clear that **LG LUGAR DE GENTE** uses outsourced software and entrusts storage to trading partners offering cloud service such as AGE Technology and NORBER so that the information handled, collected and stored follow strict standards of confidentiality, integrity.

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In addition, **LG LUGAR DE GENTE** uses physical and logical access controls, always paying attention to the ethical and legal standards plus the storage of data collected by **LG LUGAR DE GENTE**, demanding similar patterns from its partners indicated above.

For example, **LG lugar de gente** has a Security Management of Information structure, and with the support of Senior Management, establishes criteria and controls for the use of information internally, always with a sense of responsibility, ethically and only for the exclusive purposes of the businesses and services offered by **LG LUGAR DE GENTE**.

### **3.2. WHAT ARE THE PURPOSES?**

**LG LUGAR DE GENTE** uses personal information collected in compliance with applicable law, which may require, for example, a certain period of information storage, as well as use of personal information for the legitimate purposes and interests of **LG LUGAR DE GENTE**, such as provided in this Privacy Policy, also observing the following:

- a) Whenever there is an Agreement signed with a customer of **LG LUGAR DE GENTE** that has powers and rights to inform us of his personal information, just to meet this agreement;
- b) The data may be used for the legitimate interest of **LG LUGAR DE GENTE** or our outsourced, as specified in this Privacy Policy;
- c) When you agree, in accordance with the law, with the use of your personal information; processing;
- d) To obey the law;

## **4. OTHER WAYS OF PROCESSING DATA AND ITS FAIR USE**

**LG LUGAR DE GENTE** may also use the processed, collected and stored data in the way and for the other purposes indicated below:

### **4.1. COOKIES**

Our Site and / or System may use "cookies" to improve the experience of customers and users, aiming for greater security during navigation, usability and interactivity.

Cookies are mechanisms through which websites store in your browser, while you use the internet, information that helps and personalizes your access. But you can choose

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to set your machine to refuse cookies or to alert you when cookies are sent. In this case, some parts of the site may not work properly.

## **4.2. TO THE CUSTOMER SERVICE**

The information and data made available to **LG LUGAR DE GENTE** by its customers or even by you, when directly use any of our tools and / or services, can be used to service and feedback to the customer support requests, by CSC, directly by **LG LUGAR DE GENTE** or through its service providers, partners and / or outsourced.

We want to manage our relationship with you and our client, provide technical assistance, support and training, verify your identity and provide information about our services.

## **4.3. TO IMPROVE OUR SERVICES, OFFER THEM AND DEVELOP OUR TOOLS**

We may use the feedback provided by you or by our customers to improve our products and services and release their respective experiences about our services and products.

In addition, the information and data can be used to offer our customers adapted content such as news, surveys, reports, technical information and use of the systems, always aiming at a better experience of our services. We may also review the use of our services and website to suggest other resources, services that may be of interest to you or to our customers.

The information and data available to **LG LUGAR DE GENTE** may be used to develop new services and functionalities, statistical purposes, assessment and guidance of administrative, financial and commercial performance of **LG LUGAR DE GENTE**. In the latter cases, there will be no unique identification of each data or set of data, and it is LG's responsibility to anonymize your and our customers' data.

## **4.4. TO PERFORM MARKETING EFFORTS AND SIMILAR**

Some personal data may be used directly by **LG LUGAR DE GENTE** or by duly authorized and instructed outsourced to send information, e-mails, invitations, etc., forms, interviews, feedbacks.

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If our customer (your employer) decides that your information will be part of our mailing list, you can receive emails that may include company news, updates, products or service information, etc.

Anyone may cancel the receiving of these emails through our service channel indicated at the end of this Privacy Policy.

#### **4.5. TO LEGAL AND MANDATORY PURPOSES**

To perform internal and external audits, for the fulfilment of our obligations of information security, observing when it is applying the anonymity and confidentiality of such data.

To carry on the Agreements signed by LG LUGAR DE GENTE and its clients;

To obey the law or the competent authority determination, regulatory bodies and law enforcement authorities, including for the prevention, detection or investigation of a breach of law, data protection, a crime, in order to prevent loss and / or fraud;

To defend our rights, our privacy, security, systems, our property infrastructure or our business partners' property infrastructure;

#### **5. WHO HAS ACCESS?**

Only **LG LUGAR DE GENTE** employees, as well as our business partners, outsourced service providers, our service providers, partners and duly authorized suppliers, through their Systems and Services, can have access to personal information and data provided to **LG LUGAR DE GENTE**.

When we say "they can have access" it means that these accesses are not released or allowed to such people, as indicated above, at any time or in any way. Personal information and information about you, as a rule inserted by an authorized outsourced (your employer) is confidential and stored in a confidential way.

Thus, in addition to the legitimate purposes indicated above, only in exceptional situations, for a fixed time and with the consent of **LG LUGAR DE GENTE**, such access will be made, so that the person who accesses will be responsible for accessing and using the information accessed. In addition, authorized outsourced (such as your employer) who uses the **LG LUGAR DE GENTE** services will have access to your personal information.

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## 6. HOW DO WE PROTECT THE PERSONAL DATA?

**LG LUGAR DE GENTE** is aware of the importance of personal information they have access to, which it stores (directly or through outsourced partner providers) and process.

Because of this, **LG PLACE OF PLACE** uses good governance practices and adopts strict technical and administrative security measures to protect personal data against unauthorized access, misuse and incidental, lawful or illegal situations. For example:

- a) We have an Information Security Committee composed of members of the senior management, legal and technical team responsible for implementing the best practices of Information Security at **LG LUGAR DE GENTE**;
- b) Our information security policies and procedures are aligned with national and international standards, so that we have appropriate information security controls;
- c) We constantly seek certifications in the area of information security, as well as we update our information security policies, technical measures, software to the best governance and security practices applying to our business;
- d) We backup periodically, we use extremely secure and certified providers, our systems and machines are encrypted, with the best antivirus systems.
- e) At any risk, suspicion or incidents that can affect the information security, the Information Security area, by the channel **security@lg.com.br**, shall be immediately notified to take the necessary measures and inform the situation to the authorities, to you and to the customer.

## 7. HOW LONG DO WE KEEP THE PERSONAL INFORMATION?

The information and personal data will be kept by **LG LUGAR DE GENTE** during the validity of the Agreements signed with the clients and will be excluded in the term also provided in these Agreements, as a rule, within ninety (90) days after termination of the Agreement, unless stipulated contractual or otherwise.

After this period or other legal period, that requires the storage of certain information and / or personnel for a longer time, the data will be completely erased and / or anonymised.

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This does not prevent some data from being changed and / or deleted before the expiration of the Agreement. Both our customer and you can make the request to change and delete information, so that **LG LUGAR DE GENTE** can make the necessary adjustments, observing the legislation and contractual obligations assigned to it.

## 8. RIGHTS

Our clients or you have the right to access the personal information made available to **LG lugar de gente** so that they can correct them, erase them, revoke the consent previously given, restrict certain use or require the portability of the information.

To do so, always with respect to other people's rights, legal and contractual obligations, **LG LUGAR DE GENTE** will guarantee the following to you:

- a) To access your personal data, for the purpose of rectifying, altering, removing certain personal data, and / or obtaining information about these data, for whom they are shared, who informed their data to **LG LUGAR DE GENTE**;
- b) Certain use of the data, as indicated in this Policy, may be restricted by you, as long as it does not prejudice certain legal and / or contractual obligations of **LG LUGAR DE GENTE**;
- c) At any time, if you receive marketing information from **LG LUGAR DE GENTE**, you can request the cancellation of the registration, according to the guidelines provided in the communication you have received.
- d) You may also request personal information that has been made available to us to be transferred to you in a readable way by a machine and / or software.
- e) Your consent may be cancelled at any time, without affecting the legality of our prior use to such request.

But we must clarify that these rights are not absolute and **LG LUGAR DE GENTE** may not always meet all or part of their claims. In such cases, **LG LUGAR DE GENTE** will provide all the clarifications necessary to justify the reasons for non-attendance, either in whole or in part.

Finally, in order to exercise your rights, you must use one of the following means of communication:

556235459000

sac@lg.com.br

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<http://www.lg.com.br>

Whenever you contact us through any of these channels, we will need to validate your identity, as directed by those who serve you, and we will likely contact you to a better understanding of your request.