

**PERSONAL DATA PROTECTION AND PRIVACY POLICY  
OF THE FIRM BINENBOJM, CYRINO, KOATZ &  
VORONOFF ADVOGADOS**

**Version 3.0 (updated on 07/29/2025)**

**I. INTRODUCTION**

1.1 The law firm BINENBOJM, CYRINO, KOATZ & VORONOFF ADVOGADOS (“BCKV”), a common denomination that encompasses the Rio de Janeiro, Brasília, and São Paulo offices, is committed to the privacy and protection of Personal Data collected and processed for the execution of its activities, in compliance with Law No. 13,709/2018, as amended by Law No. 13,853/2019.

1.2 This Personal Data Protection and Privacy Policy (“Data Policy”) aims to inform the subjects of the Personal Data (“Data Subjects”) about the measures implemented by the firm to ensure the proper collection, processing, and use of Personal Data.

1.3 Any questions regarding the applicable legislation or processes involving the processing of Personal Data by BCKV, including Sensitive Personal Data, should be directed to the Data Protection Officer, whose function is the supervision of the Data Protection Policy.

**II. APPLICABLE LEGISLATION**

2.1 Law No. 13,709/2018 (Lei Geral de Proteção de Dados – “General Data Protection Law” or simply “LGPD”), which provides for the protection of Personal Data and amends Law No. 12,965/2014 (Marco Civil da Internet – “Civil Framework for the Internet”);

2.2 Law No. 13,853/2019, which amends Law No. 13,709, of August 14, 2018, to provide for the protection of Personal Data and to create the National Data Protection Authority (“ANPD”); and makes other provisions;

2.3 Law No. 14,460/2022, which transforms the ANPD into a special nature autarchy and makes other provisions;

2.4 Law No. 8,906/1994, which provides for the Statute Governing the Practice of Law and of the Brazilian Bar Association (Estatuto da Advocacia e da OAB); and

2.5 CD/ANPD Resolution No. 1/2021, which approves the Regulation of the Inspection Process and the Administrative Sanctioning Process within the scope of the National Data Protection Authority, notably regarding the duties of regulated agents.

### **III. DEFINITIONS**

3.1 For the purposes of this Data Protection Policy, the terms below shall be defined as follows:

3.1.1 LGPD: General Personal Data Protection Law (Law No. 13,709/2018);

3.1.2 National Data Protection Authority: federal agency, which has attributions related to the protection of Personal Data;

3.1.3 Data Subject: natural person to whom the personal data that is object of the processing refers to;

3.1.4 Personal Data: information regarding an identified or identifiable natural person;

3.1.5 Sensitive Personal Data: personal data concerning racial or ethnic origin, religious belief, political opinion, affiliation to trade unions or to a religious, philosophical or political organization, data regarding health or sex life, genetic or biometric data, when related to a natural person.

3.1.6 Data Processing: any operation carried out with Personal Data, such as those referring to collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion, or extraction.

3.1.7 Firm Members: all professionals, from any area, admitted as employees, service providers, interns, associates, or partners of the firm;

3.1.8 Controller: natural person or legal entity of either public or private law in charge of making the decisions regarding the processing of personal data, a function which, for the purposes of this policy, will be exercised by BCKV;

3.1.9 Processor: a natural or legal person, of public or private law, who carries out the effective processing of Personal Data of the Subjects, in compliance with the controller's instructions;

3.1.10 Data Protection Officer (DPO): person indicated by the controller and processor to act as a communication channel among the controller, the Data Subjects, and the National Data Protection Authority.

#### **IV. PRINCIPLES**

4.1 The Processing of Personal Data under the responsibility of BCKV will be carried out according to the applicable legislation and this Data Protection Policy, observing good faith and the following legal principles:

4.1.1 Purpose: carrying out the processing for legitimate, specific, and explicit purposes informed to the subject, without the possibility of further processing in a manner incompatible with these purposes;

4.1.2 Adequacy: compatibility of the processing with the purposes informed to the subject, according to the context of the processing;

4.1.3 Necessity: limitation of the processing to the minimum necessary to achieve its purposes, encompassing data that is pertinent, proportional, and not excessive in relation to the purposes of the Data processing;

4.1.4 Free Access: guarantee to the subjects of facilitated and free consultation about the form and duration of the processing, as well as about the integrality of their Personal Data;

4.1.5 Data Quality: guarantee to the subjects of accuracy, clarity, relevance, and updating of the Data, according to the need and for the fulfillment of the purpose of their processing;

4.1.6 Transparency: guarantee to the subjects of clear, precise, and easily accessible information about the carrying out of the processing and the respective processing agents, subject to commercial and industrial secrecy;

4.1.7 Security: use of technical and administrative measures suitable to protect Personal Data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication, or diffusion;

4.1.8 Prevention: adoption of measures to prevent the occurrence of damages due to the processing of Personal Data;

4.1.9 Non-discrimination: impossibility of carrying out the processing for unlawful or abusive discriminatory purposes;

4.1.10 Accountability and Responsibility: demonstration, by the agent, of the adoption of effective measures capable of proving the observance and compliance with the Personal Data protection rules and, inclusively, of the effectiveness of these measures.

## **V. PURPOSES OF PERSONAL DATA PROCESSING**

5.1 In the case of the Firm's clients, the Processing of Personal Data has the purpose of formalizing contracts with BCKV, as well as invoicing and billing for services, whether the client is a natural person or a legal entity, in which case Personal Data of their legal representatives will be collected.

5.2 Personal Data necessary for the provision of the contracted legal services may be collected, both in the litigation and advisory scope, for the following purposes, among others:

5.2.1 Analysis of cases and other situations presented by clients for the preparation of legal advice, legal opinions, memorandums, or other similar documents;

5.2.2 Use in judicial, administrative, arbitral proceedings, mediations, or other forms of consensual dispute resolution, always for the defense of the client's interests;

5.2.3 Drafting, negotiation, or contractual review;

5.2.4 Intermediation of the client's relationship with authorities, organs, and governmental or non-governmental entities;

5.2.5 Sending institutional communications, which includes mailing; and

5.2.6 Disclosure of the proceedings indicated in item 5.2.2., including decisions rendered in these proceedings, on official social media or on BCKV's website, observing the deontological rules applicable to advocacy.

5.3. In the case of employees, partners, associate lawyers, service providers, and interns, linked under any title to BCKV, Personal Data necessary for the preparation of powers of attorney and subdelegation, drafting of contracts, making payments, as well as other Personal Data necessary to regulate the relationships maintained between such persons, natural or legal entities, and BCKV, may be collected.

5.4. In the case of candidates for job or internship positions at the firm, the Personal Data contained in the submitted resume may be stored in BCKV's database for the purpose of participating in future recruitment processes, provided there is express authorization from the Data Subject in this regard. Such resumes will not be made available to third parties without the prior consent of the Data Subject.

## **VI. PERSONAL DATA STORAGE AND PROTECTION**

6.1. The storage of Personal Data under the responsibility of BCKV is carried out securely. The firm adopts the best administrative and technical practices to ensure that Personal Data are not the object of unauthorized access, adulteration, loss, destruction, improper sharing, or any form of inadequate or illicit processing.

6.2. Personal Data are stored by the firm only for the time necessary to fulfill the purposes for which they were collected and may be kept for a longer time in case of legal or judicial imposition and for the regular exercise of rights.

6.3. All BCKV members are duly instructed regarding the rules for the processing of Personal Data, as well as the confidentiality of the collected information, under the terms of this Data Processing Policy and the Statute of Advocacy.

## **VII. SHARING OF PERSONAL DATA**

7.1. Personal Data under the responsibility of BCKV may be shared, always within the limits inherent to the services subject to the BCKV contract, in the following cases:

7.1.1 With service providers and assistants who need access to these data for the strict fulfillment of their contracts with BCKV, such as providers of software systems and cloud hosting services;

7.1.2 With BCKV's partners, such as experts, legal consultants, correspondents, partner firms, auditors, and financial institutions, provided there is a need for access to the data for the strict fulfillment of the object of the respective partnership;

7.1.3 With judicial, arbitral, police, governmental authorities, or other third parties, provided there is a legal obligation, regulatory norm, or judicial or arbitral order, upon prior communication to the Subject, when possible;

7.1.4 For other purposes, provided there is unequivocal and express consent from the Subject.

## **VIII. RIGHTS OF PERSONAL DATA SUBJECTS**

8.1 Under the terms of art. 18 of the LGPD, BCKV will guarantee to Personal Data Subjects, at any time and upon request, the rights to:

8.1.1 Confirm the existence of processing;

8.1.2 Access their data;

8.1.3 Correct incomplete, inaccurate, or outdated data;

8.1.4 Request the anonymization, blocking, or elimination of unnecessary, excessive data, or data processed in noncompliance with the provisions of this Law;

8.1.5 Portability of the data to another service or product provider, upon express request, in accordance with the regulation of the national authority, observing commercial and industrial secrets;

8.1.6 Elimination of Personal Data processed under legal terms, except in the hypotheses provided for in art. 16 of the LGPD;

8.1.7 Obtain information about the public and private entities with which the controller has shared data use;

8.1.8 Receive information about the possibility of not providing consent and about the consequences of the denial;

8.1.9 Revoke consent, under the terms of § 5 of art. 8 of the LGPD.

## **IX. DATA PROTECTION OFFICER**

9.1. Under the terms of article 41 of the LGPD, BCKV appoints as Data Protection Officer the partner Rafael Lorenzo-Fernandez Koatz, who can be contacted via the following electronic address: [rafael.koatz@bckv.com.br](mailto:rafael.koatz@bckv.com.br).

9.2. Any complaint or communication from Subjects should be directed to the Officer identified above.

9.3. The Officer is duly authorized by BCKV to provide clarifications and/or adopt measures regarding the Processing of Personal Data by the firm.

## **X. UPDATE**

10.1 BCKV reserves the right to update this Privacy Policy at any time, through prior communication via the website <http://www.binenbojm.com.br/> and/or electronic communication directed to its clients and Subjects.

10.2 This version of the Privacy Policy comes into effect on 07/29/2025.