

## Privacy Policy

### 1. General

At Nivelamento Online, we care about your personal data, so we have prepared this Privacy Policy to explain how we collect, use and share it.

This Privacy Policy details the personal data that the company Exatamente Soluções Educacionais LTDA receives about you, how we process it and your rights and obligations in relation to your personal data. Exatamente Soluções Educacionais LTDA is the company responsible for Nivelamento Online and is headquartered at Rua Frei Caneca 3159, Edifício Mônaco, in the city of Guarapuava/PR, Brazil, CEP 85015-220. This company is the data controller for the purposes of the General Data Protection Act.

By using Nivelamento Online, you agree to the terms of this Privacy Policy. We may make changes to this Privacy Policy to reflect changes in our data storage, collection, processing and sharing practices. Should this occur, we will post a notice of change to this Privacy Policy on the website <http://nio.exatamente-solucoes.com/> for at least 7 days before the changes are made and will indicate the date these terms were revised last time at the bottom of the Privacy Policy. Any revisions to this Privacy Policy will be effective at the end of that 7 day period.

### 2. Information we collect

This Privacy Policy explains how we collect, use and share your personal data.

#### Information you provide

Through the registration process, you will provide us with your name, date of birth and email address. You will also provide us with your payment transaction information if you choose to pay for the Nivelamento Online services.

#### Activity Data

When using Nivelamento Online, we will collect technical data from your involvement in activities and produce a performance report, which will be made available to you and the administrator of the “Sala do Mestre” (teacher/manager) that you voluntarily enroll through a code PIN.

When you use Nivelamento Online on our app or website, we use a service that records your activity. This gives us a dataset and a replay of your activity session in the form of a video. This allows us to help improve your experience.

We only collect the following data: name, date of birth, email, clicks, mouse movement, scrolling, device type, operating system, display size, script errors, ip address, browser, usage time, progress of the session, questions created, answers, number of correct answers and errors.

### 3. Cookies

When you enter the site, we collect your browser type and your IP address (a unique address that identifies your computer on the Internet). When you use our mobile app, we collect your device type, your device ID and your IP address.

In addition, we store certain information from your browser using "cookies". A cookie is data stored on the user's computer linked to information about the user. We use session ID cookies to confirm that users are logged in. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide certain features available on the website (eg personalized delivery of information).

#### 4. Information Obtained by Third Parties

To support and improve the service, we work with a variety of third-party advertising networks, marketing analytics service providers, and website analytics companies, such as Google and Facebook (collectively, "Third-Party Advertising Service Providers"). Third-party advertising service providers collect and use personal data about your visits and use of the website and mobile application, as well as other websites, to serve you with advertisements and content tailored to suit your preferences and likely interests or to understand better ad effectiveness. Aggregated demographics and interest data will also be used for market research purposes.

We use Google Analytics, which is a web analytics tool that helps us understand how users interact with the website. Like many services, Google Analytics uses first-party cookies to track user interactions, as in our case, where they are used to collect information about how users use our website. This information is used to compile reports and help us improve our website. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our website – for more information on how to opt out of being tracked by Google Analytics on every website you use, please visit this Google page: <https://tools.google.com/dlpage/gaoptout> .

You may opt out of receiving personalized ads from advertisers and ad networks that are members of the Network Advertising Initiative ("NAI") or that follow the DAA Self-Regulatory Principles for Online Behavioral Advertising using their respective opt-out tools. The NAI opt-out tool can be found here <http://www.networkadvertising.org/choices/> and the DAA opt-out tool can be found here <http://www.aboutads.info/choices/> .

In addition, your mobile devices may offer settings that allow you to make choices about the collection, use or transfer of information from mobile applications for online behavioral advertising (eg Apple iOS Advertising ID and Google Android Advertising ID). Please note that opting out does not prevent all ads from showing to you.

#### 5. Use of information obtained by Nivelamento Online

Nivelamento Online may occasionally send you service-related announcements and product changes through the general operation. We process your data to help provide the service and offer you personalized features, to understand and improve our service and to keep our service safe and secure.

Nivelamento Online may use or share anonymous data collected through the service, including Activity Data without limitation. As a company, it is critical that we fulfill our contract with you with the best possible service, and it is in our legitimate interest to perform these processing functions and enable service emails by default to keep your data secure and provide our service. You can opt out of receiving non-essential service emails at any time.

We may also use your contact information to send you notifications about new services, offers and promotions offered by Nivelamento Online if you affirmatively agree to receive such communications.

When you register for Nivelamento Online, some of your information is made public and made available in various places, including the overall ranking. This will include your Nivelamento Online profile and account data (name, location, username, User ID, Online Leveling subscription status); your learning progress (XP, coins, crystals, Daily Progress, progress level, study time). Your account email address is not publicly displayed. Third party websites may read, collect, and use your public information for their own purposes.

When creating a “Sala do Mestre”, the data from the questions produced in that environment are available to other users who have also created a “Sala do Mestre”. In addition, users who access a “Sala do Mestre” through a PIN, agree that their performance data, study time, progress, number of hits and errors, questions answered, name and email are shared with the creator of the respective “Sala do Mestre”.

Profile information is used by Nivelamento Online to be presented and edited by you when you access the service and to be presented to other users. Nivelamento Online uses this information to provide support, send essential notices, enforce our terms, conditions, and policies, communicate with you, administer the services, and for internal operations, including troubleshooting, data analysis, testing, statistical purposes, and of research.

## 6. Sharing your personal data with third parties

Nivelamento Online shares your personal data only when it is necessary to offer the service, legally required or permitted by you.

We will provide personal data to hosting providers like Amazon Web Services, search engine providers like Google and analytics providers like Hotjar.

These data processors help us provide the service to you. For example, we may share your information to detect where or how you encountered a bug when using our mobile app. In connection with these operations, our service providers will have access to personal data for a limited time. When we use service providers to process any personal data, we implement contractual protections that limit the use of that personal data to the provision of services to Nivelamento Online.

We will be required to access and disclose personal data in response to legal requests, such as subpoenas or court orders, or in compliance with applicable laws. In addition, we will access and share account or other personal data when we believe it is necessary to comply with the law, protect our interests or property, to prevent fraud or other illegal activities perpetrated through the service or using the Nivelamento Online name, or to prevent harm imminent. This will include accessing and sharing personal data with other companies, lawyers, agents, or government agencies.

If ownership of all or substantially all Nivelamento Online’s business, or individual business units or assets owned by Nivelamento Online related to the service changes, your personal data will be transferred to the new owner. In any transfer of information, your personal data will remain subject to this section.

Nivelamento Online will share aggregated or anonymized data collected through the service, including activity data, for purposes of understanding or improving the service.

#### 7. Data subject rights and data retention

You have the following rights in relation to the personal data we hold about you, unless otherwise provided by local law:

- To request access to or deletion of the personal data we hold about you.
- To request that we restrict the processing of the personal data we hold about you.
- To object to the processing of personal data relating to you.
- When you have given us consent to process your personal data, you have the right to withdraw that consent at any time.
- To export the personal data you have provided to Nivelamento Online in a format that can be transferred electronically to third parties.
- To delete your Nivelamento Online account by following the instructions available on the service.

Nivelamento Online will retain your data until your account is deleted, after which we will retain anonymous data collected through the service, including activity data, which may be used by Nivelamento Online and shared with third parties in any way.

Please note that some of these rights are not absolute. In some cases, we may refuse a request to exercise specific rights if doing so means that we can no longer fulfill our contractual obligation to provide specific products and services. We will keep you informed of actions we may take when you make your request.

You may also have the right to file a GDPR complaint with the relevant Supervisory Authority. If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. In some cases, our ability to maintain these rights for you may depend on our obligations to process personal information for security reasons, fraud prevention, compliance with regulatory or legal requirements, or because processing is necessary to provide the requested services. In that case, we will provide you with specific details in response to your request.

#### 8. Third-party websites and links

Please note that you may have cookies placed on your computer by third party websites that refer you to our service. While we do not share your personal data with these third-party websites unless reasonably necessary to provide the service, they may link certain non-personally identifiable information we transfer to them with personal data they have previously collected from you. Please review the privacy policies of each website you visit to better understand their privacy practices. In addition, Nivelamento Online would like to inform you that whenever you click on links (including advertising banners) that take you to third party websites, you will be subject to the privacy policies of the third party.

Our services contain links to other websites operated by third parties. Nivelamento Online does not control these other websites and is not responsible for their content, privacy policies or use of personal data, including any personal or financial information collected by our third-party

payment processor to process payments for in-app purchases. The inclusion of such links by Nivelamento Online does not imply any endorsement of the content of such sites or their owners or operators, except as disclosed on the services. Any information you send directly to these third parties is subject to that third party's privacy policy.

#### 9. Children under the age of digital consent

When a user tries to create a Nivelamento Online account, we collect their age and only allow those who are 14 and over.

With respect to the Children's Online Privacy Protection Rule ("COPPA"), Nivelamento Online only collects personal information from persons 14 years of age and older. If we discover that we have inadvertently collected additional personal information from these children, we will delete it. If you believe this is the case, please contact us at [contato@exatamente-solucoes.com](mailto:contato@exatamente-solucoes.com).

#### 10. Links

The service may contain links to other websites. We are not responsible for the privacy practices of other websites. We encourage users to be aware when they leave the service to read the privacy statements of other websites that collect personally identifiable information. This Privacy Policy only applies to information collected by Leveling Online through the service.

#### 11. Information security

Nivelamento Online has implemented administrative and technical safeguards that it believes are appropriate to protect the confidentiality, integrity and availability of your personal data, access credentials and performance reporting. However, with sufficient resources, a determined attacker can defeat these safeguards and, as a result, gain access to the data we seek to protect.

#### 12. Contact us

The company responsible for Nivelamento Online is Exatamente Soluções Educacionais LTDA, headquartered at Rua Frei Caneca 3159, Edif. Monaco, Guarapuava, Paraná, Brazil, zip code 85015-220. Phone +55 42 988658457.

For any questions about data privacy and any questions or concerns you have about this Privacy Policy, as well as support, inquiries, please contact [contato@exatamente-solucoes.com](mailto:contato@exatamente-solucoes.com).

**13 April 2022**