PRIVACY POLICY

Service provider:

- BOTCITY DESENVOLVIMENTO DE SISTEMAS LTDA
- CNPJ: 30.606.367/0001-14
- ADDRESS: Rua Capitão Augusto Sales Pupo, 93, Jardim Chapadão, Campinas/SP Brazil. CEP: 13070-114.
- Organized under the laws of Brazil.

Last update: September 22, 2021.

- I. It's very important that you <u>carefully</u> read this present PRIVACY POLICY (also referred to simply as the "Policy") before using BOTCITY's services.
- II. BOTCITY's principles are to preserve and protect your privacy and your data. Through this Privacy Policy we guarantee this commitment.
- III. By using our services, you agree and are aware of this Privacy Policy. Remembering that you can access it anytime you want, but it is essential that you read it before registering on the platform.
- IV. This Privacy Policy may change over time. Whenever it is changed, the date of last modification will be indicated in the text. In addition, you will also receive an email informing you of the changes made, with a link to access the full text.
- V. If you have any questions about this Privacy Policy, please contact us at ping@botcity.dev.
- VI. It is important to say that this Privacy Policy and the services provided by BOTCITY are in

accordance with the General Data Protection Regulation (GDPR). Just like this European Regulation, BOTCITY also wants to guarantee people's rights over their personal data.

- VII. So let's get to the point!
- VIII. Your data are collected, stored and used by BOTCITY in order to provide you with the best possible service.
- IX. That being said, in this Privacy Policy we explain, simply and directly:
 - What data is collected;
 - Why data is collected and what it is used for;
 - To whom and why your data is shared; and
 - How your data is stored and protected.
- X. Collecting data is nothing more than being able to access personal information provided by you. This information allows you to be identified by us.

1. WHAT DATA DO WE COLLECT?

- 1.1. We at BOTCITY have access to USERS' information when they fill our REGISTRATION FORM ("Form").
- 1.2. The Form requires the following information:
 - Full name:
 - Email;
 - Country;
 - Access password.
- 1.3. After filling out the Form, the user will have created a login and a password to access BOTCITY's services through the platform. You can access the platform by filling in the registered email and password.

- 1.4. If you ever lose your password, you can use the registered email to recover and create a new one. Through the platform, directly, you can redefine the access password.
- 1.5. Each time you make a request, data about the connection and the device used by you will be automatically collected, such as the number of clicks, language, location, IP address and browser.
- 1.6. Users can also register through their Facebook, Google, Twitter or Github account. By registering this way, the user authorizes the portability of their account data from the platform chosen to BOTCITY.
- 1.7. After registering, if the user wants to make a purchase on the platform on behalf of a company, they must provide the following information about that company:
 - Name of the company;
 - Name of the company's representative;
 - EIN;
 - Payment data;
 - Company's full address;
 - Company's phone number;
 - User's corporate email;
 - Name of the person responsible for the company's financial area;
 - Email of the person responsible for the company's financial area;

2. TO WHAT PURPOSES IS THIS DATA COLLECTED?

- 2.1. This data is collected for the following purposes:
 - Creating a minimum registration on the platform and making personalized contact with the user: full name; email; country; access password.
 - Providing the services and their improvement, providing support to users: number of clicks;
 language; localization; IP address; browser.
 - Identifying the user to approve the purchases made on the Platform: name of the company; name of the company's representative; EIN; payment data; company's full address; company's phone number; user's corporate email; name of the person responsible for the company's financial area; e-mail of the person responsible for the company's financial area.
- 2.2. This way we will be able to increasingly improve and customize the services for our users,

according to their preferences and needs, in addition to creating new services and functionalities for the BOTCITY platform.

2.3. It's important to mention that BOTCITY does not collect any kind of sensitive personal data (data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade-union membership; genetic data; biometric data processed solely to identify a human being; health-related data; and data concerning a person's sex life or sexual orientation).

3. ABOUT DATA STORAGE

- 3.1. It is important to say that when we ask for personal data, even if it is not sensitive, we will always ask if you consent to provide it and we will also indicate, at the time of the collection, for what purpose this information will be used, in a very clear and highlighted way.
- 3.2. If the purpose of data use changes, we will contact you to request a new consent.
- 3.3. It is worth noting that the website identifies and stores information about users and visitors through Cookies.
- 3.4. Although, the users are free to disable those Cookies. To do this, you will simply need to disable the option of saving and reading by Cookies, present in your browser's settings. It is also possible to prevent Cookies by the Antivirus system, if you have installed it on your computer or mobile phone.
- 3.5. Eventual external links on our pages pointing to other websites, platforms or social networks (such as Facebook and Google) are not covered by this Privacy Policy. Those links' addresses may collect different data about you for other purposes and in other ways that differ from our policy, so please carefully check those service's Privacy Policies and Terms of Service.

4. INFORMATION AND DATA CORRECTION

4.1. According to the General Data Protection Regulation you can, whenever you wish, request BOTCITY to inform you which data about you we have.

- 4.2. You can also correct some data, change it or update it, and you have the right to request us to delete your data at any time, as long as you do not use or no longer want to use the BOTCITY platform.
- 4.3. In addition, you can also contact us for information about the processing of your data. We will give this information to you clearly and for free.
- 4.4. For information about your data, just contact us at ping@botcity.dev.
- 4.5. Through this same email address you can request data portability and withdraw your consent for data processing.

5. DATA STORAGE PERIOD AND INCIDENT INVOLVING DATA

- 5.1. All data collected by BOTCITY is stored for a period of 5 (five) years. That's the period we need to process this data and to fulfill the purposes of the treatment, especially to send assertive and effective advertisements, as well as to communicate and notify on a continuous and periodic basis the services that are being provided to our customers.
- 5.2. In case of an incident or accident involving data (data leakage, platform invasion, among others), we have an action procedure that consists of:
 - i) sending a notification to all people customers or not who ever provided us their data by filling the registration Form, in order to alert about the incident and about possible contacts and approaches that can be made on behalf of BOTCITY; and
 - ii) in addition, we will indicate the security measures that we will use to mitigate the damage and protect the data.

6. DATA STORAGE AND DATA SHARE

- 6.1. BOTCITY's goal is to establish a relationship of trust with its users, through a transparent action that aims to ensure the participation of the data's owner.
- 6.2. This way, it is important to mention that BOTCITY stores the data collected on a server in the cloud called Amazon Web Services (AWS). To access this server's Privacy Policy you can simply

access the following link:

https://d1.awsstatic.com/legal/privacypolicy/AWS_Privacy_Notice__Portuguese_Translation.pdf.

- 6.3. Data's integration is done via SSL, which creates an encrypted channel for data transfer both for collecting information and using the platform.
- 6.4. It is worth remembering that these data are stored for providing and maintaining a commercial and service relationship with the user.
- 6.5. In addition, it is also worth saying that BOTCITY only shares the collected data (whether personal or commercial) with companies responsible for the development of complementary solutions and that, therefore, need such data for their regular operation, such as:
 - Google Data Studio
 - Google Workspace
- 6.6. Personal data of platform users will never be publicized. However, in an unidentified way, the data may eventually be used for the purpose of advertising the platform, providing real examples of its use.
- 6.7. Users' personal data may be used in researches or investigations entirely internal to the BOTCITY team. Such information will never be disclosed in a way that allows the individual identification of users.

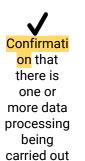
7. INTERNATIONAL DATA TRANSFER

- 7.1. Data collected by BOTCITY may be transferred to and maintained on servers located outside Europe, where data protection laws may differ from European legislation. In this sense, some of the interactions with other platforms, as provided for in this Policy, characterize an international transfer and will always be carried out in accordance with the General Data Protection Regulation.
- 7.2. We remind you that the international transfer is necessary in some cases, as the provider used by BOTCITY is located outside Europe. In any case, such transfer occurs with the only and exclusive purpose that BOTCITY performs the services and makes its products available, as agreed.

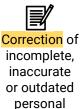
7.3. Thus, your consent to this Policy represents your agreement to those transfers.

8. YOUR RIGHTS AS A DATA OWNER

8.1. Finally, it is important to mention that you, the data owner, have your rights guaranteed by BOTCITY, as provided for in the General Data Protection Regulation, such as:

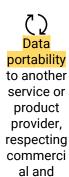


Access to stored personal data concerning you



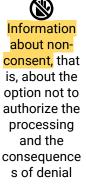
data

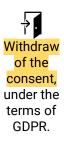
Elimination of unnecessary or excessive personal data or if its treatment is unlawful



Elimination of data (except when the processing is legal, even without the consent of the holder)



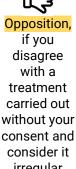




industrial

secrets





irregular

8.2. It is worth pointing out that the protection of commercial data collected by BOTCITY is better specified in the Terms of Service, in the chapter entitled THE CONFIDENTIALITY RELATIONSHIP

BETWEEN BOTCITY AND USER.	