

EXTERNAL PRIVACY POLICY OF YDUQS PARTICIPAÇÕES S.A.

1. INTRODUCTION:

Your information privacy is hugely important to us and, for that reason, we comply with strict policies that are continuously updated, geared towards ensuring and respecting data confidentiality as well as ensuring compliance with the respective rules and regulations.

Through this Policy, we present the general guidelines for the treatment of personal data of students, candidates, employees and visitors to YDUQS (“Company”) news portal, as well as to those of its subsidiaries and educational brands, showing our commitment and measures adopted to ensure protection of collected personal data.

Technical and organizational procedures are in effect to ensure your information is always safe. As part of these procedures, we train and raise awareness of our employees on a regular basis about the importance of maintaining, keeping safe and respecting your personal information. Breach of personal data privacy is a serious matter and, therefore, we established control methods and appropriate measures to mitigate possible risks.

2. CONCEPTS

- i. **ANPD:** Brazilian Data Protection Agency (“ANPD”), public agency responsible for overseeing, implementing and monitoring the compliance with the General Data Protection Law;
- ii. **Privacy Committee:** YDUQS’ internal permanent committee, responsible for providing information to the DPO and, on a last resort, the CEO, for the decision-making process related to strategies, policies and rules regarding the General Data Protection Act and the Company’s adequacy to its terms.
- iii. **Consent:** Free, informed and unmistakable manifestation of the Holder agreeing to the treatment of their personal data for a specific purpose;
- iv. **Cookies:** Within the scope of the HTTP communication protocol used on the Internet, it is a small computer file or data package sent by an Internet website to the user’s browser, when visiting a website;
- v. **Personal Data:** Information related to an identified or identifiable individual;

- vi. **Sensible Personal Data:** Personal data on race and ethnicity, religious beliefs, political opinion, affiliation to an union or religious, philosophical or political organization, data related to health or sex life, genetic or biometric data related to an individual;
- vii. **Person in Charge or DPO;** Person appointed by the Controller and Operator to act as a communication channel between the Controller, data holders and the Brazilian Data Protection Agency;
- viii. **Privacy Office:** A team comprised of a leader and privacy analysts focused on serving data protection demands, internal and external consultations. Responsible for the interaction with other departments to mitigate privacy incidents, reporting to the privacy committee.
- ix. **Purpose(s):** Legitimate, specific, explicit purposes, which are informed to the Holder, for the treatment of their Personal Data;
- x. **LGPD:** General Data Protection Act, Law no. 13.709/2018;
- xi. **Holder:** an individual whose personal data are subject to treatment;
- xii. **Data treatment:** Every operation performed on personal data, such as the information collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control as well as its modification, communication, transfer, dissemination or extraction;
- xiii. **Use of shared data:** Personal data communication, dissemination, international transfer, interconnection or shared treatment of personal data base by public agencies our entities in their legal duties, or between them and private entities, reciprocally, with specific authorization for one or more treatment types authorized by said public agencies or between private entities;
- xiv. **YDUQS:** YDUQS Participações S.A., its subsidiaries and educational brands.

2. DATA COLLECTION AND TREATMENT

2.1. Different Data Collection Methods

- YDUQS may collect personal data in different ways, including through access and filling, by the holder, of forms and surveys via e-mail, website, mail, apps, telephone, agreements or through submission of personal documents in situations including, for instance:
 - i. Having or intending to have an employment relationship with YDUQS;
 - ii. Requesting YDUQS products or services;
 - iii. Creating an account in our websites or apps;
 - iv. Hiring YDUQS services;
 - v. Requesting the remittance delivery of marketing or institutional information;
 - vi. Participating in promotions or surveys;

- vii. Contacting us to give feedback;
- viii. Via access data in our websites and apps; and
- ix. Via publicly available sources.

- Information collected from YDUQS' website users, through Cookies, include, among others:

- i. User's access browser;
- ii. Internet protocol address (IP);
- iii. Access date and time;
- iv. User location; and
- v. User's actions on the website.

Personal Data Holders can be associated to online identities provided by their devices, apps, tools and protocols, such as IP addresses and cookies. This information, when combined with single identities and other data received by the servers can be used to identify them.

Data is treated by YDUQS only for the Purposes set forth in this policy, upon the consent of the Holder or due to other legally determined hypothesis.

Based on the transparency principle, YDUQS informs that cookie collection upon accessing its applications shall be used to optimize the functionalities and personalize access, tailoring the Holder's experience, ensuring it shall be fully responsible for the data, and any Treatment other than what is established in this policy is forbidden.

2.2. Reasons to collect and use personal data:

- YDUQS may use your personal information for the following purposes:

- a. To send contents:

E-mail address and telephone number are used to send content requested by you when filling out forms. They can also be used to send newsletters, to make contact via WhatsApp contact, call, message service and e-mail communication, always with information related to the subjects within the website's general scope and, usually, related to the user's interests.

Finally, e-mail address and telephone number shall be also used to communicate the launch of new courses, events and general news on YDUQS and its subsidiaries. Our team can contact you via e-mail or telephone to present products and services.

b. Marketing:

Upon your consent, we can use your personal data to send marketing information via e-mail, telephone or other previously authorized forms (including social media campaign) to ensure you are always aware of our products and services.

c. To ensure property safety and your physical integrity:

If you visit our facilities, we can record your image through our monitoring system for safety reasons. Personal information is also collected to provide your access credentials, in order to maintain a safe work environment. This is a procedure created to offer technological safety, preventing potential crimes, securing our assets and taking measures against invasion.

3. CONSENT

- Should personal data treatment require your Consent, this shall be freely expressed by you, in an informed and unmistakable way and for a defined purpose, through our websites and apps.

4. SHARING OF PERSONAL DATA

- In compliance with the terms of this Policy, YDUQS shall not disclose personal data of its students, candidates and visitors to a third party, except for:
 - i. Legal and regulatory compliance;
 - ii. Shared data treatment necessary for public authorities, to execute public policies set forth by law or regulations
 - iii. Studies conducted by research bodies, ensuring, whenever possible, personal data are anonymous;
 - iv. Executing contracts or preliminary procedures related to the contract to which the Holder is a party, upon request of the data Holder;
 - v. Regular exercise of rights, including in contracts and court, administrative and arbitration procedures (pursuant to Law 9.307 of September 23, 1996 – Arbitration Act);
 - vi. Protection of health, exclusively in procedures performed by health care professionals, health services and sanitary agencies;
 - vii. Protection of the Holder's or other's life or safety;

- viii. Whenever necessary, to comply with legitimate interests of the Controller or a third party, except for the cases in which the Holder's fundamental rights and freedom require protection of personal data;
 - ix. Credit protection, including what is set forth in the respective legislation.
- Third parties with whom personal information can eventually be shared pursuant to the above provisions, shall process information in a way to comply with legal obligations. Even so, we require that such organizations handling or obtaining such personal data, acknowledge how critical these information are and respect all individual privacy rights and comply with all data protection laws. Third parties can represent, without being limited to:
 - i. Other YDUQS Group companies, within the limits of this policy;
 - ii. Service providers and specialized consultants hired for administrative, financial, legal, security, research, payment generation and control services, as well as other services;
 - iii. Third-party entities performing Audit works;
 - iv. Any person or company provided that we have your Consent;
 - v. In case we disclose your personal data to companies, such as payment companies, so they can perform the requested services, said companies may store your information to comply with the terms of the LGPD;
 - Candidates, students and visitors accept and consent to a possible analysis of data collected when accessing our websites and apps or by other means mentioned in this Policy, for purposes of statistics to improve and enhance our services.

5. INTERNATIONAL TRANSFER OF DATA

- YDUQS treats your information domestically and in countries with similar or equivalent legislation. Furthermore, it has specific clauses to ensure the correct treatment, in accordance with the law in the destination country and Brazilian regulations.

6. PERSONAL DATA SAFETY AND PRIVACY

- Any information transferred by users to YDUQS shall be collected through legal and ethical means, kept in accordance with strict safety and confidentiality standards, and may be used for one or more purposes, about which users shall be previously informed.

7. PERSONAL INFORMATION STORAGE AND STORAGE PERIOD:

- YDUQS shall keep your personal information for the time needed to achieve its purpose or for other legally authorized reasons.

8. RIGHTS OF THE HOLDERS

- The Company undertakes, before the candidate, student and visitor, except in cases of legal impediment, to safe keep their rights to access data pertaining to them, as well as to correct it, delete it, limit its treatment and also the right to oppose to treatment, data portability and to withdraw their consent. For such, the Holder must inform YDUQS, via Privacy Portal, about any of the rights above, as well as their possible lack of interest in receiving advertisement, including via e-mail (opt-out). As for the cancellation of the newsletters and marketing emails, the Holder can exercise their rights through the unsubscribe option available at the bottom of the e-mails.

9. DISCLAIMER

- YDUQS is not liable for the improper use or loss of personal data over which it does not have access or control. We are also exempt from any liability for illegal and unauthorized use of this information as a consequence of improper use or misappropriation of your access credentials, reckless or mischievous behavior, acts or omissions by you or your representative.