

PRIVACY POLICY
Nova Zona Azul Digital Platform

Dear User, welcome to the Nova Zona Azul Digital Platform!

The Nova Azul Digital Platform is a digital platform ("Platform"), available at www.estapar.com.br/nova-zona-azul-sp, made available and maintained by Z.A. Digital de São Paulo Sistema de Estacionamento Rotativo S.A., a private legal entity enrolled with the National Corporate Taxpayers' Register (CNPJ/ME) under No. 35.993.098-0001-00, headquartered in the city of São Paulo/SP, at Av. Presidente Juscelino Kubistchek, No. 1830, floor 2, block 3, Vila Nova Conceição, Postal Code: 04.543-000 ("**Z.A. Digital**").

This is the Platform's Privacy Policy ("Policy"), designed to show you how **Z.A. Digital** is committed to safeguarding your privacy and protecting your Personal Data (as defined below). This policy applies jointly to the Terms of Use, available at www.estapar.com.br/nova-zona-azul-sp.

It is important that You read this Privacy Policy and if you have any questions please contact us using the contact information in the section [How to speak with Z.A. Digital](http://www.estapar.com.br/nova-zona-azul-sp) (www.estapar.com.br/nova-zona-azul-sp). It will be a pleasure to serve you!

To facilitate your understanding, we have divided this Policy as follows:

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1. DEFINITIONS

In this Policy, capitalized terms have the following meaning:

- **“Legal Bases”**: are the authorizing circumstances for processing Personal Data.
- **“Controller”**: is the individual or legal entity, of public or private law, who is responsible for decisions regarding the processing of personal data.
- **“Personal Data”** (or just **“Data”**): is any information related to the identified or identifiable individual, that is, any data that, when combined with other information, is capable of identifying someone.
- **“Sensitive Data”**: are the Personal Data referring to racial or ethnic origin, religious belief, political opinion, union membership or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data, when linked to an individual.
- **“Estapar Group”**: means Allpark Empreendimentos, Participações e Serviços S.A. (CNPJ 60.537.263/0001-66) and all companies controlled by it, directly or indirectly, including **Z.A. Digital**.
- **“Operator”**: is the individual or legal entity, under public or private law, who performs the processing of personal data on behalf of the controller.
- **“Privacy Policy”** or **“Policy”**: This Privacy Policy, which informs Data Subjects how the company **Z.A. Digital** processes Personal Data.
- **“Platform”**: is the Nova Zona Azul Digital Platform.
- **“Services”**: are the features made available on the Platform
- **“Processing”**: every operation carried out with personal data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, erasure, evaluation or control of information, modification, communication, transfer, diffusion or extraction.
- • **“You”, “User”** or **“Data Subject”**: individual to whom the personal data that are the subject of processing refer. In this Policy, the term refers to both the Fleet User and the Common User, as defined in item 2 of the Terms of Use.

2. SUMMARY TABLE

| | |
|-------------------------|--|
| Processing Agent | Z.A. Digital de São Paulo Sistema de Estacionamento Rotativo S.A CNPJ: 35.993.098-0001-00 |
|-------------------------|--|

| | |
|--|---|
| | Address: Av. Presidente Juscelino Kubistchek, No. 1830, floor 2, block 3, Vila Nova Conceição, Postal Code: 04.543-000, São Paulo/SP |
| <i>Nature of the processed data</i> | Personal Data actively entered by the User to use the Services provided and data collected automatically from the User's access device. |
| <i>Role in processing</i> | Data controller |
| <i>Purposes as Controller</i> | <ul style="list-style-type: none"> ▪ Enable access and use of the Platform and its functionalities; ▪ Enable communication between Z.A. Digital and the User; ▪ Compliance with legal obligation. |
| <i>Sharing</i> | Company categories of item 5 of this Policy: Business partners, operators and service providers, |
| <i>Data Protection</i> | Security, technical and appropriate administrative measures. |
| <i>Your rights</i> | Confirmation of the existence of processing, access, correction, anonymization, portability, data erasure, revocation of consent, among others. |

3. WHICH DATA WE PROCESS AND WHY

| <i>How we obtained personal data</i> | <i>Which data</i> | <i>For what purpose</i> |
|---|--------------------------|--|
| <i>You provided us</i> | Login password | <input type="checkbox"/> Enable access and use of the Services available on the Platform. <input type="checkbox"/> Enable creation of the Platform access Account. Legal basis: Agreement execution between You and Z.A. Digital. |

| | | |
|--|--|--|
| | <p>Full name Individual Taxpayers' Register (CPF) or Corporate Taxpayers' Register (CNPJ) Street, district, city, state, postal code Cell phone Email Vehicle type and license plate Birthdate</p> | <p><input type="checkbox"/> Enable access and use of the Platform and its Services. <input type="checkbox"/> Enable communication between Z.A. Digital and the User;</p> <p>Legal basis: Agreement execution between You and Z.A. Digital.</p> |
| Automatically collected by using the Platform | <p>Information about the IP number, date and time of access to the Platform.</p> | <p>Legal basis: Compliance with legal obligation. Such data are kept for a minimum period of six (06) months.</p> |
| | <p>Geolocation</p> | <p><input type="checkbox"/> Enable the use of Services involving location of the vehicle or parking spaces</p> <p>Legal basis: Consent</p> |
| | <p>Cookies</p> | <p>Facilitate navigation and allow the Platform to be accessed more quickly by You.</p> <p>Legal basis: Consent.</p> |
| Obtained through Partners | <p>User data available on public databases</p> | <p>Check and confirm the registration data, in order to prevent fraud.</p> <p>Legal basis: Legitimate interest</p> |

4. HOW Z.A. DIGITAL HANDLES YOUR DATA

All Personal Data You provide to us through the use of the Platform is confidential and shall only be shared within the limits set out in this Policy.

According to the permissions You give us, **Z.A. Digital** can use your Personal Data to:

- Assure the Platform's technical functionality and development;
- Enable communication between **Z.A. Digital** and the User;
- Provide the due Services offered by the Platform;
- Advertising purposes, such as sending information on brands, products, services and promotions offered by **Z.A. Digital** and by partners, dissemination of events and satisfaction surveys;
- Keep some basic access registration data to the Platform, including, but not limited to the IP address of the originating connection, with date and time. Such data are kept for a minimum period of six (06) months;
- Store data for compliance with legal obligations, such as those related to Users and formal complaints about the provision of services by **Z.A. Digital**;
- Defend itself in judicial or extrajudicial conflicts, always in accordance with Brazilian law, based on the judicial defense of interests - except in cases where the User's fundamental rights and guarantees prevail.

In addition, the Personal Data collected shall be stored in a database that shall be used for the purpose of composing your profile. We will collect, organize, analyze and cross-check information, in order to develop customized and modular solutions, which shall contribute to its improvement and better use the Platform.

We will not:

- Access, copy, use, sell, share or in any way disseminate the images, videos, audios and other files stored on your device to access the Platform, or in the Platform, for any purpose other than the specific purpose of providing the Services contained on the Platform and as provided in the Platform Terms of Use and Privacy Policy;
- Share, sell, publish or disclose any information with third parties, except as provided in this Policy or to the extent necessary for the performance of the Services; and
- Have access to applications, information, data, videos and other information stored on your mobile device, which are not strictly related to the Platform.

5. HOW WE USE COOKIES

Cookies are files or information that may be stored on your devices when You visit the Platform. Generally, a cookie contains the name of the website that originated it, its lifetime and a value, which is generated randomly.

The Platform may use cookies to facilitate use and better adapt the Platform to your interests and needs, as well as to compile information about the use of the Platform and services, helping to improve its structures and content. Cookies can also be used to speed up your future activities and experiences on the Platform. The types of cookies used by the Platform are:

| Types of Cookies | What they do? |
|--------------------|--|
| Required | These <i>Cookies</i> are essential for the Platform to load correctly and allow the User to browse and make use of all available features. |
| Performance | These <i>Cookies</i> help us understand how visitors interact with the Platform, providing information about the areas visited, the visit time to the Platform and any problems encountered, such as error messages. |
| Functional | These <i>Cookies</i> allow the Platform to remember your choices to provide a more personalized experience. They, also, allow the User to watch videos and use social tools, fields for comments, forums, among others. |
| Marketing | <p>These <i>Cookies</i> are used to provide more relevant content and of interest to the User. They can be used to present more targeted advertising or to limit the number that it is placed on the Platform. They also allow measurement of an advertising campaign effectiveness.</p> <p>Furthermore, these <i>Cookies</i> can be used to indicate the websites the User has visited and be shared with third parties, such as contracted advertising agencies.</p> |

After the User consents to the use of cookies, when using the Platform, a cookie shall be stored on your device to remember this in the next session.

At any time, the User may revoke the consent regarding cookies, using the settings of its preferred browser. For more information on how to proceed with the management of cookies in browsers, we provide the links below:

- Internet Explorer: <https://support.microsoft.com/pt-br/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <https://support.mozilla.org/pt-BR/kb/ative-e-desative-os-cookies-que-os-sites-usam>

- Google Chrome: <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=pt-BR>
- Safari: <https://support.apple.com/pt-br/guide/safari/sfri11471/mac>
- Microsoft Edge: <https://support.microsoft.com/pt-br/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

Finally, we remind you that if the User does not allow the use of some cookies, certain services may not work optimally.

6. SHARING PERSONAL DATA

To better deliver our Services, we can operate in conjunction with other companies. For this reason, we reserve the right to share your Personal Data, such as registration information and use of the Platform only for the categories of companies listed below:

- **Our partners: Z.A. Digital** also contracts third-party services for the development and/or implementation and/or achievement of its products, so we may share your Personal Data with them so that it is possible to provide the Platform Services to you. For example, we use data hosting services to store our database and share your information with partner establishments. Our Partners are only authorized to use Personal Data for the specific purposes for which they were contracted, therefore, they will not use your Personal Data for other purposes, other than the provision of services provided for contractually.
- **To safeguard and protect Z.A. Digital's rights:** We reserve the right to access, read, preserve and disclose any Data that we believe is necessary to (i) comply with a legal obligation or court order; (ii) enforce or apply our terms and other agreements; (iii) or protect the rights, property or security of **Z.A. Digital**, our employees, our users or others.
- **Business operations with partners and service providers: Z.A. Digital** may transfer your Personal Data to third parties who take over the data processing of the Platform, always being the successor of **Z.A. Digital** linked to the provisions of this Privacy Policy, assuming full responsibility for the processing of Personal Data. Likewise, **Z.A. Digital** can transfer your Personal Data to companies of Estapar Group, always maintaining the commitments of security and respect for the purposes of processing.

7. WHAT ARE YOUR RIGHTS?

Below, we summarize the rights you have in accordance with the Brazilian Civil Rights Framework for the Internet ("Law No. 12.965/14" or "MCI"), with the General Data

Protection Law ("Law No. 13.709/18" or "LGPD"), and with other Brazilian sectoral laws related to data protection, namely:

- **Confirmation of the existence of Personal Data Processing:** allows You to request a confirmation of the existence of your Personal Data Processing by **Z.A. Digital**;
- **Access to Personal Data:** allows You to receive a copy of your Personal Data collected and processed by **Z.A. Digital**;
- **Rectification of your Personal Data:** allows You to request the correction and/or rectification of your Personal Data, at any time, if You identify that some of them are incomplete, inaccurate or out of date;
- **Anonymizing, blocking or erasing Personal Data that is unnecessary, excessive or processed in non-compliance with the LGPD:** allows You to ask **Z.A. Digital** to cease the Processing of your Personal Data, and the measure that will be taken (anonymization, blocking or erasure) shall be evaluated and chosen according to each case, and the processing may be continued if we have legitimate and legal reasons for doing so;
- **Right to erase Personal Data processed with the consent of the Personal Data Subject:** allows You to request the erasure of your Personal Data from the Platform when the Processing of your Personal Data is based on your Consent. In this situation, the Platform shall be out of use for the subject of the erased Personal Data. Thus, You are aware that all Personal Data collected shall be erased from the servers of **Z.A. Digital** when You request it or when they are no longer necessary or relevant for the use of the Platform, except if the Data maintenance is necessary for (i) compliance with legal or regulatory obligation; (ii) study by a research body, guaranteeing, whenever possible, the anonymization of Personal Data; (iii) transfer to a third party; or (iv) exclusive use of **Z.A. Digital**, with prohibited access to third party, and provided the Data is anonymized;
- **Right to information about the sharing of Personal Data:** allows you to request information from public and private entities with which your Personal Data was shared;
- **Right to revoke consent at any time and the right not to provide it:** allows You to revoke your consent at any time, which shall not affect the legality of any Processing carried out before that.
If You revoke or do not want to provide your consent, You will no longer be able to use the Platform.

If you have any questions about how you can exercise these rights, feel free to contact us in the section [How to talk to Z.A. Digital](http://www.estapar.com.br/nova-zona-azul-sp) (www.estapar.com.br/nova-zona-azul-sp).

8. INTERNATIONAL TRANSFER

Personal Data collected during the use of the Platform and available Services may be processed by **Z.A. Digital** and/or by subcontractors, always according to the applicable legislation. **Z.A. Digital** is headquartered in Brazil, but our subcontractors or partners may be headquartered or may process Personal Data in countries other than Brazil. **In that case, we guarantee that our subcontractors shall also be subject to the obligations of this Privacy Policy.** Thus, by accepting this Privacy Policy, You also agree that Personal Data may be transferred to subcontractors or partners of **Z.A. Digital** outside Brazil and is aware of all guarantees applicable to the processing abroad, in accordance with this Privacy Policy.

9. SECURITY AT Z.A. DIGITAL

Z.A. Digital is committed to keeping your Data stored on a technological platform that is safe, protected and in accordance with the law, as well as making every reasonable effort in the market to guarantee the security of your systems in the safekeeping of your Personal Data. By way of example, **Z.A. Digital** adopts, among others, the following security measures:

- Application of standard and market methods to encrypt and, whenever feasible, anonymize Personal Data collected, as well as standard forms of encryption to guarantee its inviolability;
- Restriction of access to data, granted only to specific employees on a need-to-know basis, with limited authorizations (reading, editing, erasure, etc.) for each employee.
- Access to processed data only through authentication, double authentication or another solution.
- Records of access and processing performed on the data, containing the moment, duration, employee's identity and the file accessed, maintained for at least six (6) months.

Equipment or mobile device failures. **Z.A Digital** cannot guarantee the absolute security, integrity and confidentiality of the data, personal or not, inserted in the Platform, if the mobile or fixed devices used to access the Platform present, by themselves, security vulnerabilities, due to accidental reasons (errors, bugs, etc.). or intentionally, caused by a third party (malware, code breach, cyber-attacks) or by You (through procedures that decrease the security of the device, such as jailbreak or root access), or even no update or obsolescence of the device.

Z.A. Digital is committed to protecting its privacy and your Personal Data in accordance with the best practices and protocols available on the market, but unfortunately cannot guarantee total security. Unauthorized account entry or use, hardware or software failure and other factors can compromise the security of your Personal Data at any time, so please help us maintain a safe environment for everyone. In addition to adopting good security practices in relation to your account

and your Data, if you identify or become aware of something that compromises the security of your Data, please contact us.

10. APPLICABLE LAW AND JURISDICTION

This Policy is governed, interpreted and regulated by Brazilian law, and the User's jurisdiction has competence to settle any questions, issues and/or disputes arising from this Policy, with parties waiving any other jurisdiction, however privileged it may be.

11. CHANGES TO THE PRIVACY POLICY

Z.A. Digital may unilaterally modify this Policy at any time. Whenever there is a material change to this Policy, You will be notified via the email provided by You. In the notice sent, You will have access to the new text of the Policy, as well as a summary of the changes made. The updated version of this Policy shall always be available at: www.estapar.com.br/nova-zona-azul-sp

12. OTHER INFORMATION

Tolerance. Any omissions or mere tolerances by the parties in not requiring strict and full compliance with this Policy and/or the prerogatives resulting from it or the law shall not constitute novation or waiver, nor affect the exercise of any rights provided herein, which may be fully and completely exercised at anytime.

Severability of the sections. If a provision is found to be null, the remaining provisions of this Policy shall remain in full force and a valid term shall replace the null term, reflecting our intention as much as possible.

13. HOW TO SPEAK TO Z.A. DIGITAL

If you have any questions and/or the need to address any matter related to Zona Azul Digital, please contact us through the Customer Service at SP 156 of the Municipality of São Paulo.

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