

## DATA SUBJECT RIGHTS POLICY

**Souto Correa Advogados**, (“Souto Correa”) is committed to ensure transparency in the information (“Personal Data”) it processes and, therefore, provides its users with this Data Subject Rights Policy (“Rights Policy”), which must be read alongside its Privacy Policy.

Law n. 13.709/2018 - General Data Protection Law (“LGPD”) guarantees the Data Subjects several rights (“Data Subject Rights” or “Rights”), which enables control as well as other prerogatives over their Personal Data. Throughout this policy, we provide the information regarding your rights and how you may exercise them.

### 1. Means of contact for requests

Souto Correa relies on professionals trained to carry out your requests. Contact us through the e-mail address [encarregadodedados@soutocorrea.com](mailto:encarregadodedados@soutocorrea.com) informing what rights listed below you would like to exercise.

### 2. Rights of the Data Subject

- **Confirmation of existing data processing:** This allows you to request and receive confirmation of whether or not Personal Data concerning you is being collected, stored, shared, or going through any other form of processing.
- **Access to personal data:** This allows you to request and receive a free and accessible copy of the Personal Data processed by Souto Correa.
- **Correction of incomplete, inaccurate, or outdated data:** In case you identify any inaccuracy in your Personal Data being processed by Souto Correa, you may ask for it to be corrected.
- **Anonymization, blocking or elimination of Personal Data that is unnecessary, excessive, or processed in noncompliance with the law:** This allows the Data Subject to request the anonymization, blocking or elimination of the Personal Data contained in Souto Correa’s database. Once the request is made, every Data collected will be anonymized, blocked, or deleted from our servers as soon as possible.
- **Portability:** Souto Correa allows you or an authorized third party to obtain the Personal Data processed in order to facilitate Data portability.
- **Withdrawing or not granting consent:** You are entitled to withdraw your consent, or, if applicable, to not grant your consent and be informed of the consequences of this refusal.

- **Revision of automated decisions:** You have the right to request the revision of decisions made solely based on automated Data Processing and to receive clear and adequate information regarding the criteria used in the decision, as long as it does not violate Souto Correa's commercial confidentiality.
- **Objection to processing:** You are also entitled to object to particular elements of Personal Data processing, such as receiving content associated with our services and with the performance of our practice areas (e.g: newsletters and client alerts).
- **Elimination of the personal data processed with the consent of the data subjects:** In case you have granted your consent for one specific purpose of Data Processing, you may request the elimination of the Personal Data that was collected and stored.

### **3. Request analysis**

Once the request is received, Souto Correa will properly analyze and respond to it, determining that: (i.) your request is legal and legitimate, and it will be accepted; or (ii.) your request was denied and will not be accepted for determined reasons. In both cases, we will communicate the decision to the person concerned in writing, either by e-mail or by post, depending on which mean of communication was first used to make the request.

It might be necessary to demand specific information in order to corroborate your identity and confirm that you are entitled to exercise your Rights. This is a security measure to ensure that your Data are not disclosed to any individual who does not hold the right to receive them.

A history of requests made by you will be maintained so that we can, if necessary, present it to the competent authorities as proof that we respond to demands in a timely and adequate manner, in compliance with the law.

### **4. Deadline for Response**

Once your demand is received, Souto Correa will respond in up to 15 (fifteen) days, with effect from the day the request was received on, except for data correction demands, in which case the rectification will be made in up to 2 (two) days. In the event of additional clarifications being necessary to treat your demand, we will send you questions to be able to answer your request in a satisfactory manner. In this instance, the deadlines will be suspended from the moment our questions are sent up until your answers are received.

### **5. Refusal of Rights**

Your rights are not unlimited. Below you can find a list of some of the situations that might lead to total or partial refusal of your demand.

- Protection of Souto Correa's trade secret and intellectual property.
- Violation of third parties' rights and freedom.
- Information that is anonymized and, consequently, is not Personal Data.
- Compliance with legal or regulatory obligations.
- Exercise of regular rights in legal proceedings, whether judicial, administrative, or arbitral.
- Souto Correa's legitimate interest.
- Repetitive demands that are either unfounded or excessive.

In any of these cases, we will respond to the request in a timely manner and inform you with clarity on the reasons that led to the refusal of your demand.

## **6. Questions**

In case of questions, comments, or suggestions relating to this Policy, you may contact Souto Correa's Data Protection Officer using the following means of contact:

**Data Protection Officer:** Paulo Dornelles

**Postal Address:** Av. Carlos Gomes, 700, 13º andar, Ed. Platinum Tower, Porto Alegre, RS, CEP 90480-000.

**E-mail Address:** [encarregadodedados@soutocorrea.com](mailto:encarregadodedados@soutocorrea.com)

## **7. Changes in the Rights Policy**

Souto Correa is always looking to improve its services and, therefore, this Rights Policy may be updated. Because of this, we recommend you visit this page from time to time in order to be aware of any alterations.

**Last modified on:** December 13th, 2021