



## **| PRIVACY POLICY**

# PRIVACY POLICY

We (referring to TIM and its subsidiaries) respect your privacy. We prioritize your Personal Data as much as delivering cutting-edge mobile, landline, and internet services of the highest quality.

This Privacy Policy aims to show you how We handle your Personal Data, explain your rights and how to exercise them, even if you have not hired any of our products or services. If you have any questions, please contact us through the channels informed in section 9 of this Privacy Policy.

**This Policy is organized into 10 sections for easy reading:**

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# Basic concepts: Understanding this Policy

To provide clarity and transparency regarding our data processing practices, we have compiled a glossary table that includes the main concepts used in this Policy. Throughout the text, any terms starting with capital letters have the meaning indicated below.

Term	Concept
Personal Data or Data	<p>Any information relating to a person that can identify him or her in a certain context. E.g.: name, ID, social security number, phone number, facial biometrics, among other identifiers.</p> <p>Picture this scenario: amidst a group of people, you are the sole person wearing a blue shirt: in this case, the color of your shirt is considered Personal Data because it distinguishes you from the rest of the group.</p>
Processing	<p>Data Processing refers to the range of actions performed with your Personal Data, such as data storage, collection, change, consultation, sharing, transfer, access, or deletion.</p>
Legal basis	<p>The legal justification for processing your Personal Data, which include, among others: consent, contract performance, and legal compliance. We provide further information about this topic in this Privacy Policy.</p>
You or Data Subject	<p>Individuals to whom the Personal Data relate.</p>
Website	<p>TIM website available at: <a href="https://www.tim.com.br/">https://www.tim.com.br/</a></p>
Meu TIM App	<p>“Meu TIM Consumer,” “Live,” and “Meu TIM Empresas” are applications that enable customers to access information about their contracted services and receive offers from anywhere, without consuming their internet data allowance.</p>

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Services	The services offered by TIM, including mobile, landline, internet, besides other services.
Cookies	<p>Small files that We send to your browser or device (mobile phone or tablet). Cookies allow us to recognize your browser or device, and track how and when people visit our webpages, products, and services. They also identify the number of people accessing our website, among other things.</p> <p>Cookies are also useful to enhance your browsing experience. For example, they enable us to optimize our website, to fit it to your screen, understand your preferences, and provide you with a more efficient service. To learn more about cookies, you can access the Cookie Policy in our Privacy Center.</p>
Device Access Data	Any data collected through Cookies or similar technologies, which includes your IP address, your access date and time, your access location (country, state, city), referral source, browser type, and how long you visited our websites.
TIM	TIM S.A. and its subsidiaries. A company headquartered at Rua Fonseca Teles, No. 18, A30, Block B, Ground Floor, São Cristóvão, City of Rio de Janeiro, State of Rio de Janeiro, with Corporate Taxpayer ID No. 02.421.421/0001-11.
Analytics Data	Any data collected from TIM website and "Meu TIM" App which help us understand your browsing behavior and how TIM website and "Meu TIM App" are used.
Products	All the services provided by TIM, both independently or in collaboration with our partners.

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Encryption	Data encoded using secret characters or ciphers.
Antivirus	A computer program designed to detect and prevent devices (computers and mobile phones) from being infected by malicious programs called viruses.
IP	Internet Protocol: a unique numerical identifier assigned to every device (computers, mobile phones, etc.) that is connected to the internet.
Server	A computer connected to a network of other computers and responsible for storing resources shared by the machines within the network.
Software	Computer programs consisting of an organized set of instructions stored in a physical medium, such as mobile phones or computers. They are designed to enable the device perform functions according to predefined purposes.
Anonymized data	Any information relating to an individual that has been processed or modified in a way that makes it impossible to identify the specific individual. This include aggregated data for statistical purposes.

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We collect your Personal Data directly from You, when You fill out forms, enter into contracts with Us, use and interact with Our Products and Services, and/or automatically through Cookies or similar technologies related to TIM website or Meu TIM App.

Additionally, when You use third-party Products operated by our partners, We may receive Data from those Products, such as Your usage history and other Personal Data, as applicable. To provide our Services and Products, We may receive Personal Data from partner companies, but TIM always ensures that the sharing of such Personal Data is lawful. Therefore, our partners are only allowed to share legitimate and properly sourced Data.

To learn more about how Your Personal Data is collected and processed, it is important for You to review the Privacy Policy of each partner processing such Data, as indicated in the terms of use for each Product.



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# What types of Data TIM processes, and the purposes

The purpose and type of data We collect depend on Your interaction with us, i.e., as visitor, potential customer, or current customer.

Below, we have classified the key Data Processing activities carried out by TIM according to the specific situations, the processing purposes, and the legal bases that justify such processing.

Origin	Type of data collected	Purpose	Legal basis
TIM Website and Meu TIM App	Your browsing Data (IP, date and time) and your Access Device Data (e.g., IMEI, the model of your device, etc.)	<b>Website Operation:</b> to activate essential functionalities, such as the antivirus, and to fit the content to Your screen, among others.	Legitimate Interest
		<b>Legal Obligation:</b> to comply with TIM's legal obligations, such as record your IP, the date and time You accessed our Website	Compliance with Legal Obligation
		<b>Analytics:</b> to understand your browsing behavior, how TIM website and Meu TIM App is used, to improve users experience, and meet our customers' needs. We collect aggregated Data and, whenever possible, We anonymize the Data.	Legitimate Interest
		<b>Marketing:</b> to send You targeted content and advertising according to your profile and preferences.	Legitimate Interest



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<b>TIM Website, and Meu TIM App forms</b>	Your registration Data: email, name, telephone number, and model of your mobile device.	<b>Commercial Prospecting:</b> to contact You and offer our Products and Services, as well as Services and Products from our Partners	Consent
		<b>Use Meu TIM App:</b> to allow You to access the app's functionalities, recover the password of Meu TIM Empresas, among others	Consent
<b>Use of our Services and Meu TIM App</b>	Your Browsing Data and Access Device Data.	<b>Platform Operation:</b> to activate the essential functionalities, such as the antivirus software, to fit the content to your screen, among others.	Legitimate Interest and Contract Performance
		<b>Legal Obligation:</b> to comply with TIM's legal obligations, including recording your IP, and date and time of your access to Meu TIM App.	Compliance with TIM's Legal Obligations
		<b>Analytics:</b> to understand how you use our Services and Meu TIM App, so We can improve your experience and prevent frauds. We collect aggregated Data and, whenever possible, we anonymize the Data.	Legitimate Interest
<b>Contracted Services</b>	Facial recognition data: a photograph of your face provided by you, a photograph of your ID.	To verify your identity during the services contracting and request, exclusively to prevent fraud.	Fraud prevention

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Service Usage	<p><b>Information about Service usage</b>, including daily internet traffic; location data (country, city, state where the access or call is taking place); telephony records, SMS and MMS history; performance of our telecommunications network infrastructure.</p> <p><b>Payment data:</b> credit card information, mobile recharges, bank information required to provide our services; billing information and billing systems.</p> <p><b>Access Device Data (excluding the webpages visited)</b> We collect data when You contact our help center for assistance through, e.g., our call center, chatbot or other service channels. We collect profile data, such as: gender, age, geolocation, mobile plan, recharges, if applicable, use of applications (via SDK), device model.</p>	To enable, and evaluate the quality of our Services; to enhance user experience; to manage and protect our networks, services, and users; to detect and prevent fraud.	Legitimate Interest
		To create accounts and keep billing records; to provide help, answer questions about our services, and provide technical support.	Contract Performance
		To keep records of emergency calls or text messages to public service numbers.	Compliance with Regulatory Obligation
		To measure credit and payment risks.	Credit protection
		<b>Marketing:</b> to improve and customize our service; to determine user eligibility for new products and services; to tailor content and advertisements based on users profile and preferences; to conduct market surveys to evaluate if the advertising content is directed to user interests.	Consent and Legitimate Interest. For more information, visit our Privacy Center

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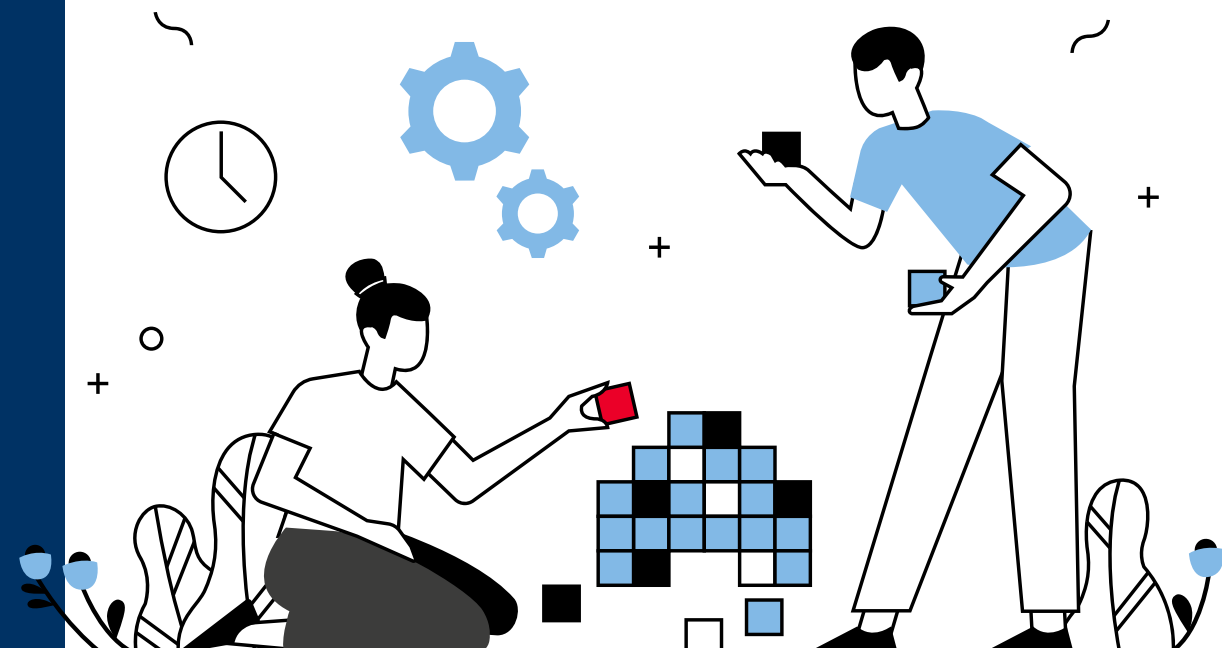
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<b>Point-of-sale Customer Registration Forms</b>	<b>Registration Data:</b> name, telephone number, date of birth, e-mail, mother's name, Individual Taxpayer ID, gender, ID, address.	To keep up-to-date Customer Registration Data.	Contract Performance
		To authenticate users.	Contract Performance
<b>TIM's or third- parties' surveys</b>	Data to be provided by the user, according to the research object.	To evaluate the performance of services provided by TIM or its partners, and measure advertising campaign engagement.  To provide relevant data to research institutes.	Consent

According to the law, legal capacity is essential for exercising valid acts such as purchasing, accepting, consenting, or engaging in other legal activities.



# Children's Data

TIM has strict policies regarding minors purchasing or engaging in other legal activities without authorization of their legal guardians.

TIM does not process personal data of individuals under 18 years old even if they are dependents of individuals over 18 years old.

However, in rare circumstances, We may process personal data of individuals under 18 years old for specific purposes, such as for commercial partnerships involving this audience. In such situations, We will provide clear and comprehensive information about the processing of personal data.

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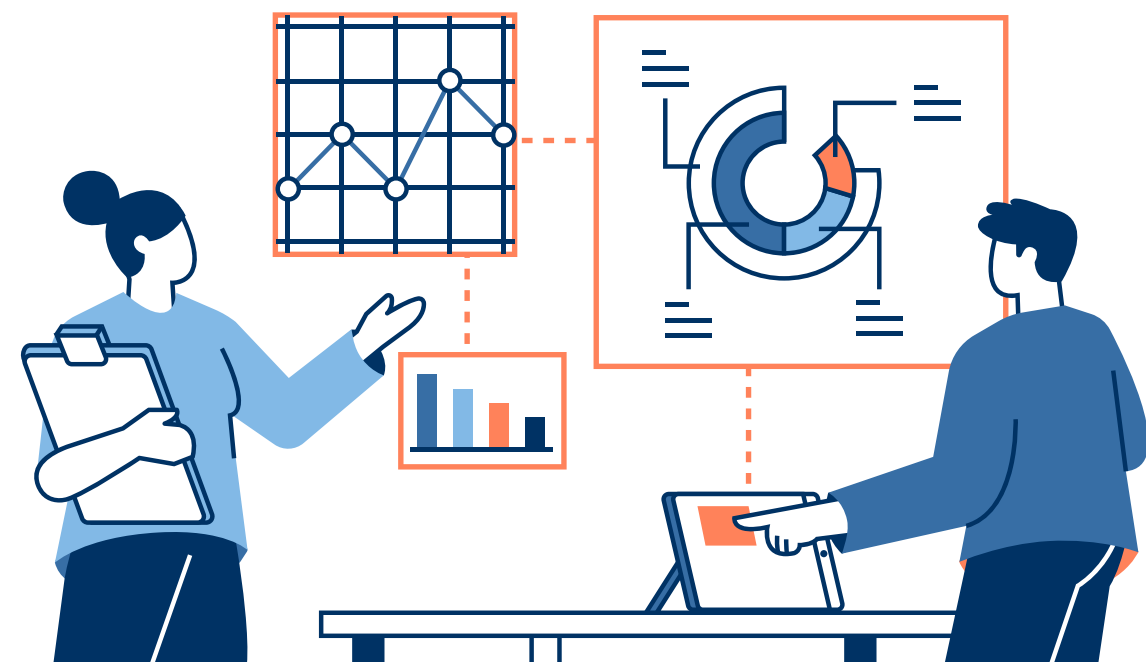
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To ensure the continued provision of TIM Products and Services for mobile, landline, and high-speed internet, We collaborate with partner companies that help us deliver these Services and/or Products, and improve our operational efficiency. In certain situations, it is necessary for us to share Data with these companies to enable them to provide us with the necessary support:

**Serviços de Tecnologia:** To ensure flawless operation of our Products and Services, We partner with various vendors who may process the Personal Data we collect on our behalf. For example, we use data hosting services to store our database, external payment services for processing our billing data, and suppliers assisting us with biometric analysis. Our partners are strictly authorized to use your Personal Data solely for the specific purposes outlined in their contracts with us. Therefore, they are prohibited to use your Personal Data for any purposes beyond what is necessary for the provision of the contracted services. In general, we share your data to meet our legitimate interests or fulfill our contractual obligations with you, as applicable. If, in a specific case, your consent is required to share your Data, TIM will contact you and request it. If you do not agree, We will not share your Data.





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**Performance analysis:** The data stored by TIM may be collected by third-party technology and used for statistical purposes (analytics) to learn who are the users of our Services, the visitors of TIM website and My TIM app, and those interacting with TIM in any way. This encrypted data is used for analysis and improvement purposes, without seeking to identify and/or make Data Subjects identifiable. It helps us understand how our Products and Services are used, and allows us to improve and customize them. We share such Data to serve our legitimate interests.

**Market surveys:** When you answer a market survey sent by TIM, We may share the results with our business partner responsible for such survey. This encrypted data aims to present the results of the answers provided in an aggregate form. It does not aim to identify individuals or make them identifiable. We share these Data based on your consent when You agree to participate in the research.

**To safeguard and protect TIM's rights:** We have the right to process the necessary data to comply with our legal and regulatory obligations, follow court orders, and exercise our rights in judicial, administrative or arbitration proceedings.

**Learn more about Data shared with third parties in our Privacy Center.**



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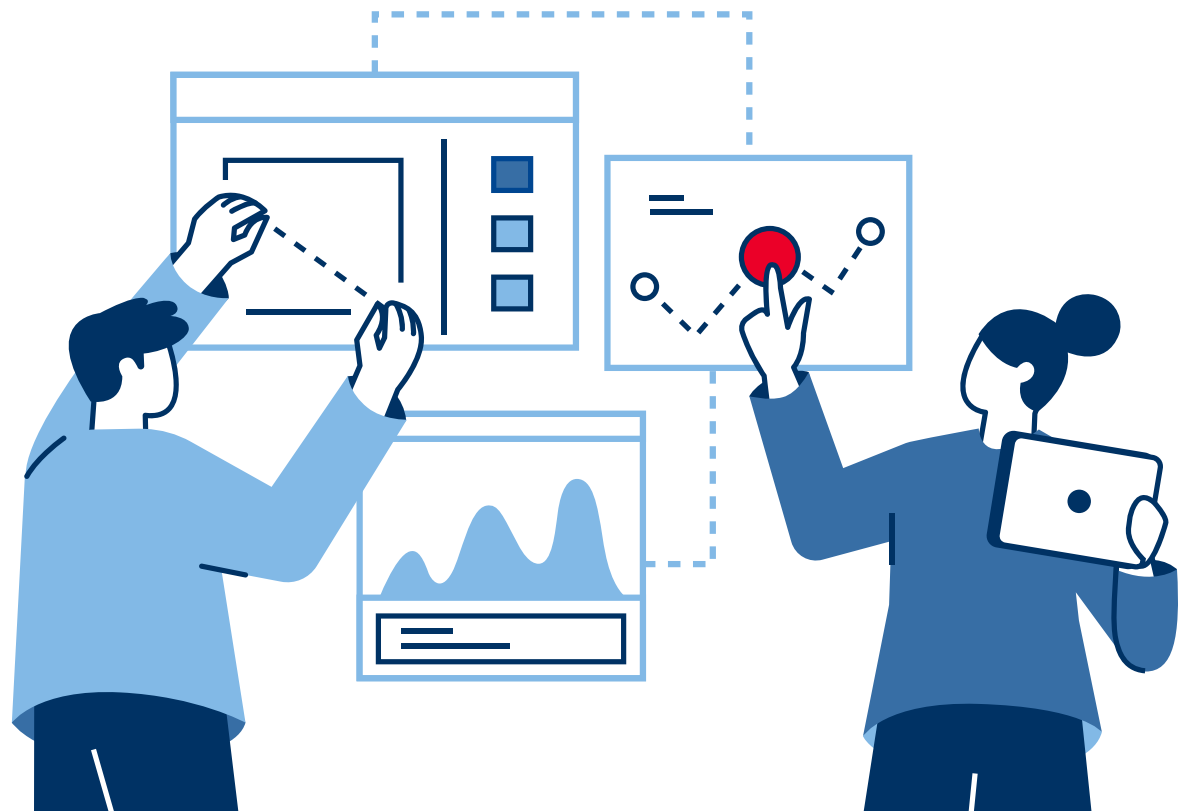
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TIM may transfer your data to third countries for storage purposes, including to servers located overseas, providing they have a level of data protection that complies with the applicable laws. Please note that your data may be subject to these countries' legislation and regulations. By interacting with our Products and Services, you agree to such international transfers of data, as deemed necessary for our service provision and contract performance, as per the applicable data protection laws in force.



# Data Subjects rights, and how to exercise them

The Brazilian General Data Protection Law (“LGPD”) provides ten Legal Bases for Processing Personal Data, which include, among others: consent, contract performance, and legitimate interest, provided these do not overlap the data subjects’ rights.

Also, under the LGPD, individuals have several rights over their Personal Data. Below, We show a list of these rights, as well as how to exercise them. However, it is important to note that these rights regarding your personal data are not absolute: when We receive your request, we may need to ask additional information to assess whether We can fulfill your request or not. In any case, We will keep You informed of our decision within reasonable time.

To exercise your rights, You can access our Privacy Center or contact us via email using the provided channels at the end of this Policy.

Right	Conceito
Right to confirm the processing of your Data, and right of access	You have the right to confirm if We are Processing Your Personal Data, and request a copy of it.
Right to rectification	You have the right to request the correction of your Personal Data, at any time, if you believe it is incorrect, inaccurate, or outdated.
Right to Object	The law allows Processing Personal Data even without your consent or valid contract. In these cases, it is necessary to demonstrate a legitimate reason for processing your Data, such as fraud prevention or to improve communication with You. If you disagree with the processing, You have the right to object and request its interruption.
Right to request data anonymization, blocking or erasure	This right enables You to request the following actions: (a) anonymization of your data, making it no longer related to You and, therefore, no longer considered Personal Data; (b) temporary block your Data, suspending the Processing; (c) delete your Data. In this case, We will permanently delete all your Data without the possibility of reversal, unless required by law.

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Right to data portability	You can ask TIM to provide You or any third- party elected by You with a copy of Your Personal Data in a structured and interoperable format. Likewise, You can ask other data controllers to send TIM your Personal Data to facilitate contracting our Services, for example.
Right to withdraw consent	You have the right to withdraw your consent for Processing activities based on consent. However, this will not affect the legality of previous processing activities. However, if You withdraw your consent, some Services may not be available to You, but we will inform You in advance.
Right to information about the shared use of Data	We regularly update our policy, and the list of partners with whom we share Data. If You have questions or need more information, You have the right to request it from us.
Right to deny consent	Your consent, when required, should be freely given and informed. This means that You have the choice to withhold your consent, although, in these cases, it may limit the availability of our Services that rely on your consent.

To exercise your Data Subject rights , You may access the link provided in our Privacy Center which includes a specific form to facilitate your request process.

If you have any questions, feel free to contact us through the channels provided at the end of this Policy.



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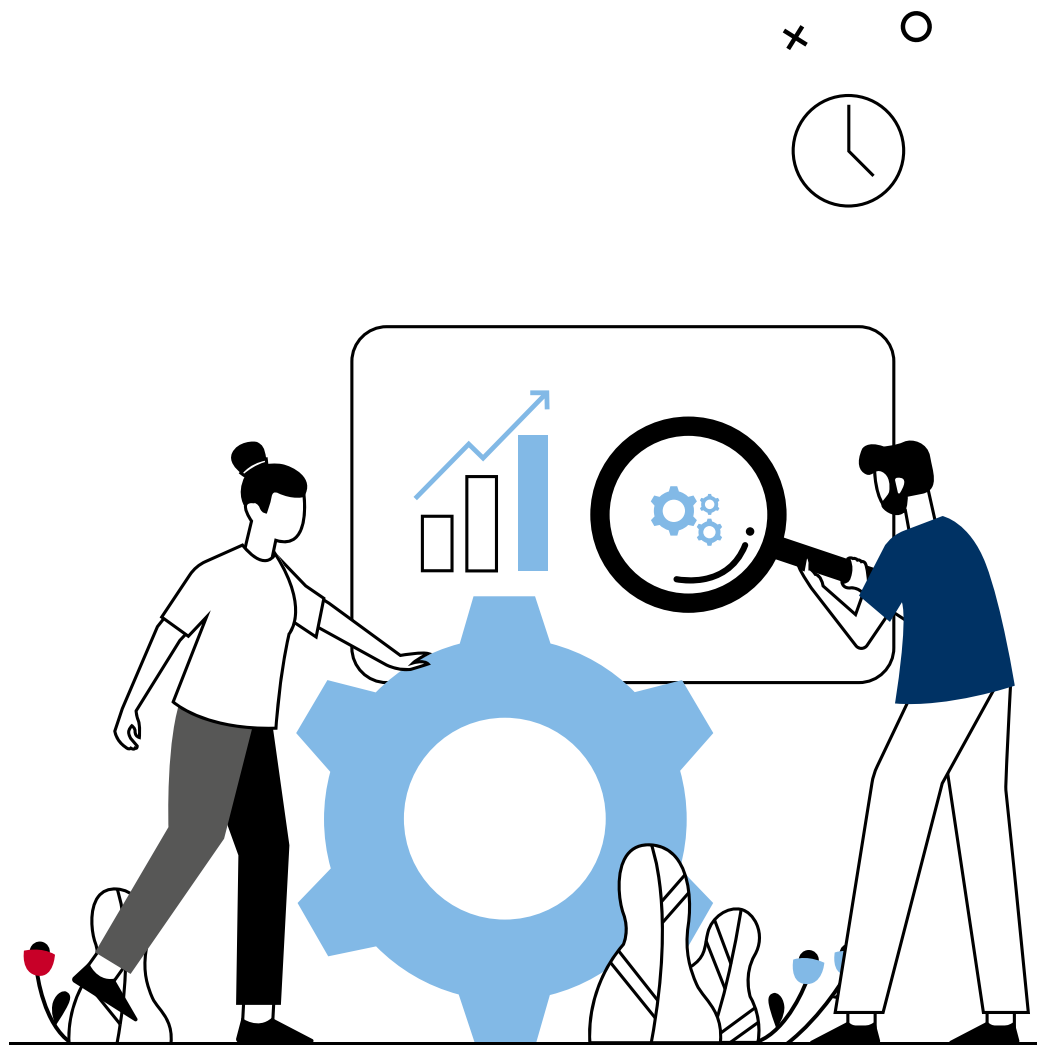
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We retain your Personal Data only for the necessary time to fulfill the purposes for which they were collected, including meeting legal, contractual, accountability obligations or fulfilling requests from competent authorities.

In order to determine the relevant Data retention times, besides the statute of limitations, We consider factors such as the amount, nature, and sensitivity of Data, the potential risks of unauthorized use or disclosure, the Data Processing purposes, the alternative means of achieving such purposes, and the applicable legal requirements. For example, according to the Civil Rights Framework for the Internet, any Data related to your IP, and date and time of your internet connections, need to be retained at least 12 months when TIM is responsible for providing the access. As for the applications created by Tim, the relevant data needs to be retained for a minimum of 6 months.

For more information about Data retention times, please access our Privacy Notice “Where and how long TIM stores data”.





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# TIM's responsibilities and how TIM protects your Data

We prioritize the protection of your privacy and the security of your Data. We adopt advanced security practices, including encryption techniques, access control, record management, and other relevant technical and administrative information security measures, as well as reasonable precautions according to the sensitivity of the information. These measures are designed to prevent and minimize risks associated with data processing activities.

Our systems for processing personal data are designed to meet rigorous security requirements, high standards of good practice and governance, in compliance with the general principles set forth in the applicable laws and regulations, to ensure the protection of your information.

Despite all our efforts to protect your personal data, it is important to know that We are not exempt from the possibility of unauthorized access or use, or other security risks. Malicious third parties, hardware or software failures, and other factors may compromise the security of your Personal Data. So We rely on your assistance to help us maintain a safe environment for everyone.



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To ensure the security of your account and Data, in addition to adopting good security practices (such as not sharing your password with third parties), if you notice or become aware of any issues that may compromise the security of your Data, please contact us through the communication channels provided at the end of this Policy. We emphasize that we are constantly monitoring the security of our technologies and databases. In the event of any failures or security breaches, We will promptly inform You and the competent authorities.

As a TIM customer, your access to the restricted area is secured with a personal and non-transferable password. You must take measures to prevent unauthorized access by third parties, so You should chose a strong password and protect this password and other connection mechanisms appropriately. You should also limit access to your computer or device, browser, and remember to log out by clicking on "exit" after You end each session to protect your Personal Data. If your device is lost or stolen, you must contact TIM immediately and request the blocking of your line or device, as well as the suspension of the possibility of access without credentials to the Meu TIM App or Website, if you have enabled this access format.

TIM will never contact You to request your personal information such as credit card details or passwords.



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If you suspect that your Data has been used in disagreement with this Privacy Policy or if you have any other questions, suggestions or comments regarding this Policy, please contact us. Our Data Protection Officer is available at the following addresses:

**Data Protection Officer (DPO):**

Piero Formica

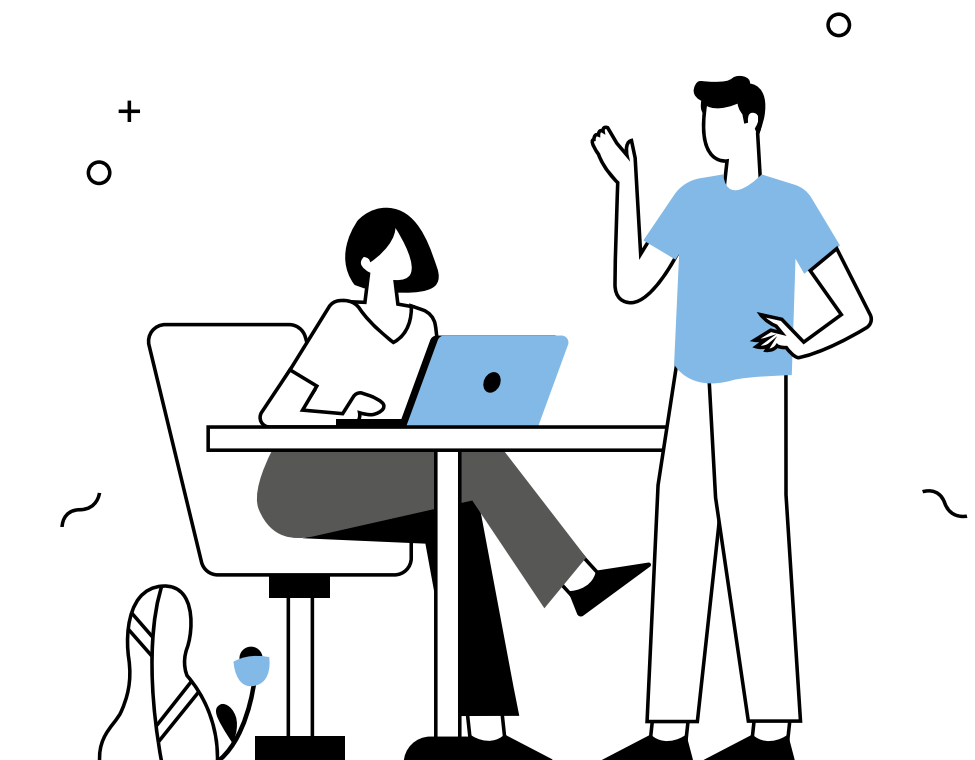
**Mailing address:**

Av. João Cabral de Mello Neto, 850 - Barra da Tijuca, CEP: 22775-057, in the City of Rio de Janeiro, State of Rio de Janeiro

**Email para contato:**

[dpo@timbrasil.com.br](mailto:dpo@timbrasil.com.br)

The list of other contacts of the DPO can be consulted on the Privacy Center page <https://www.tim.com.br>



# Changes to this Policy

We may update this Privacy Policy as necessary to reflect changes in our Services, and to offer new features, as part of our permanent strive for improvement. We will give you reasonable notice before any material changes are effective, but You should always check the latest version of this Policy on our website.

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With whom TIM  
shares your Data

Data transfers to  
third countries

Data Subjects  
rights, and how to  
exercise them

How long Data is  
stored

TIM's  
responsibilities and  
how TIM protects  
your Data

How to contact  
TIM regarding your  
Data

► Changes to this  
Policy

