 <p><b>arco</b> Educar é criar valores</p>	<b>POLICY</b>	<b>CODE:</b> <b>POL-JUR-01</b>
	<b>INFORMATION CLASSIFICATION:</b> <b>Internal use</b>	<b>DATE: 07/29/2020</b>
<b>PRIVACY POLICY</b>		<b>REVISION DATE: 07/29/2020</b>
<b>PREPARED BY:</b> <b>Batista Luz Advogados</b>	<b>REVISED BY:</b> <b>Legal Department</b>	<b>REVISION No.: 01</b>
		<b>NEXT REVIEW: 07/29/2021</b>

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## PRIVACY POLICY

At Arco Platform Ltd. (“Arco” or “We”), We develop educational solutions guided by our own methodology which is underpinned by specialist content, technology and services. We offer solutions for every segment of basic education, from kindergarten to high school. With complete platforms and agents engaged in the educational ecosystem, We have created tools and methods whereby students, parents and schools act together to achieve more dynamic and effective learning. In this context, technology has a place as an important tool both for management and for the educational process of the teaching institutions that are our partners (“Teaching Institutions”), connecting school staff, students and guardians and providing learning trails that are increasingly personalized and adapted.

We have prepared this document to regulate the privacy and data protection of our users (“You”). When You access or interact with our websites or app and use our products and services (“Platforms”), We may keep some information (“Data” or “Personal Data”) about You. We have created this Privacy Policy (“Policy”) in order to explain how your Personal Data may be collected, used, shared and stored by Arco.

You will indicate your acceptance of this Policy when You use our products, access or interact with our Platforms or, upon request, expressly agree with the use of your Personal Data for each of the purposes described herein. Accordingly, You will be aware of and in total agreement with the way We will use your information and your Personal Data. If You do not agree with this Policy, please do not continue to use our Platforms. We ask only that You explain the reason for your disagreement, so that We can improve our products and services. You can contact us by email at [encarregado@arcoeducacao.com.br](mailto:encarregado@arcoeducacao.com.br).

### **1. How do We use your Personal Data?**

The amount and type of information We collect varies according to the use You make of the Platforms. We will collect different data, for example, if You are accessing a specific Platform or are simply visiting our websites.

To explain these differences more clearly, We are listing below some of the purposes for which We may use your Data, depending on your intentions and the page You access.

#### **1.1. Arco Platform website**

If You access our main website, some of your Data may be collected. In this case, We will collect and use your Personal Data as shown below, according to the legal basis indicated:


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Purpose	Personal data	Legal basis
Access to the site (institutional information on ARCO)	IP, date and time of access, cookies, duration of visit and pages visited.	Legitimate interest   Compliance with a legal or regulatory obligation
Registering a Resumé	<p><b>Personal data:</b> Full name, date of birth, gender, individual taxpayer number (CPF), email address, phone numbers, social network profile (LinkedIn, Facebook, Skype), address, salary expectation, professional experience, academic qualifications, languages, professional references, whether indicated internally; CV attached will be kept on file.</p> <p><b>Sensitive data:</b> disabilities and medical reports.</p>	Consent
Contact through Ethics Channel	Name, job or relationship with the company, email address, phone or cellphone number, type of incident and description, protocol of previous incident and attached file.	Consent

## 1.2. Investor Relations Portal

If You are an investor or want more information and access our Investor Relations portal, some data may be collected. In this case, We will collect and use your Personal Data as shown below, according to the legal basis indicated:

Purpose	Personal data	Legal basis
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Access to Investor Relations Portal	IP, date and time of access, cookies, duration of visit and pages visited.	Legitimate interest   Compliance with a legal or regulatory obligation
Sending alerts by email	Email address	Consent
Investor contact	Name, email address, subject and comments.	Consent

## 2. How do We use cookies?

### 2.1. What is a cookie?

Cookies are small text files stored in your browser or device, which permit certain functions to be implemented in our Platforms. They can be used to collect different information about users. For example, cookies enable us to recognize your preferences and adapt our Platforms to your specific needs. It is by using a cookie that We keep You logged into your account for subsequent visits to our Platforms, even when You close your browser.

Cookies usually have an expiry date, which may vary. Some cookies are automatically deleted when You close the browser (session cookies), while others can be stored on the device for longer, until being manually deleted (persistent cookies).

### 2.2. Why do We use cookies?

We use the following types of cookie in our products:

- (i) **strictly necessary cookies**, for our Platforms to function correctly, authenticating logins, for example. Therefore, You cannot refuse the storage of these cookies if You want to visit our Platforms;
- (ii) **analytics cookies**, used to improve the content of our Platforms and your experience as a user, and to help us design new products and services. These cookies automatically collect certain Personal Data to supply information on how the Platforms are being used, for instance how many times a particular page has been visited; and
- (iii) **marketing cookies**, so that We can offer the best products and services to the user, depending on their interests.

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It is important to note that We take no responsibility for the use of cookies by third parties. Watch out for this, because cookies placed by third parties may possibly continue to monitor your online activities even after You have left our website; therefore We recommend that You delete your browsing history regularly.

If You do not want us to collect Data about You by the storage of cookies You can adjust your browser’s privacy preferences. For more information on managing cookies in browsers:

- 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>


Finally, please note that if You do not accept certain cookies on Arco’s pages, certain services may not function as they should.

### **3. Whom do We share your Data with?**

We may work with other companies in various ways, including cloud storage, analytics, consultancy and new software development. We therefore reserve the right to share your information, including Personal Data, in the circumstances listed below. We will, as far as possible, adopt mechanisms for anonymisation and pseudonymisation of your Data and We shall include strict conditions in our contracts in order to preserve your privacy to the maximum.

We may share your Personal Data with the following companies:

**Our Suppliers:** We have a series of suppliers that We have to engage to operate the Platforms and provide our services, and some of them may handle the Personal Data We collect from you. For example, We use cloud storage services; We engage entities that provide credit card processing services; and so on. We make every effort to protect the privacy of your Personal Data, but

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unfortunately We cannot guarantee that it will be correctly handled by third parties who use, disclose and protect Personal Data in accordance with their own Privacy Policies.

**Teaching Institutions:** Our products are directed to teaching institutions, which, in turn, provide our Platforms to the users. We may therefore share some Personal Data with these institutions in order, for example, to provide maintenance and support services in connection with our products, as well as information on the results of tests/mock exams and monitoring of activities undertaken to help teachers/coordinators of the Teaching Institutions. In these cases, We only provide the Platforms to the Teaching Institutions, which will decide on the method of processing the Personal Data, according to the learning requirements established by the Teaching Institution for its students and for monitoring its teachers/coordinators. In these cases, We have no responsibility for what Data is handled by the teaching institution. If You have any questions about how these teaching institutions use your Data, We recommend that You read their Privacy Policies.


**Marketing Agencies:** We share some Data with marketing companies to behavioral analysis and communications' delivery. There is a proper legal basis for all Personal Data shared, justifying this type of processing, being either your consent or a legitimate interest of Arco. In any event, during this process, We always take into account your privacy and, when applicable, your right to challenge the use of this Data.

**Market intelligence:** Some information obtained by the customers' service, such as the results of satisfaction surveys, may be shared with specialist firms to help us optimize our procedures. The information shared is limited to only the necessary for the analysis. Whenever possible We will anonymise your Personal Data so that You cannot be identified.

**Analytics:** The Data stored by Arco may be used for statistical purposes (analytics), so that We can understand who visits our Platforms and how. This Data is supplied with a pseudonym and its sole purpose is to enable a better understanding of how people access the Platforms, so that We can improve the services We provide and direct products more adequate with users' interests.

**To safeguard and protect Arco's rights:** We reserve the right to access, read, preserve and disclose any Data that We believe to be necessary to comply with any legal requirement or a court order, and/or to ensure that people comply with this Privacy Policy, our contracts with teaching institutions and other agreements, and/or and to protect the rights, property and security of Arco, our staff, users and third parties.

**Arco Group companies:** Companies belonging to the Arco Group may transfer Data among them to improve their products and services. All Arco Group companies are subject to contractual

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obligations binding them to handle your Personal Data with the same level of security and in accordance with the law.

**4. Where is your Data stored and where is it sent?**


Arco has its headquarters in Brazil and the Data We collect is subject to Brazilian law. The Data is stored in servers of **Corpflex, Energy and AWS**, located in **Ceará-BRA (Energy), São Paulo-BRA (Corpflex)** and **North Virginia-USA (AWS)**.

**5. What are your rights as a data owner?**

You may at any time opt not to disclose your Personal Data to Arco, but You should bear in mind that this may be necessary for You to enjoy some of the resources available on our Platforms. Regardless, You will always have rights relating to the privacy and protection of your Personal Data, and in addition to our concern for the security of this Data, We also want to make sure that You have access to and acknowledge all your rights relating to the handling of your Personal Data.

Accordingly, We give below a brief explanation and some examples of these rights:

Right	Concept
<b>Request for access to your Personal Data</b>	This right allows You to request information on the processing of your Data and to receive, in certain situations, a copy of the Personal Data We are holding about You.
<b>Request for rectification of your Personal Data</b>	This right allows You at any time to ask for the correction and/or rectification of your Personal Data, if You find any mistaken information. However, to proceed with such correction, We may have to check the validity of the Data You are supplying us.


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<b>Request for deletion or cancellation of your Personal Data</b>	This right allows You to ask for your Personal Data to be deleted from our database. The Data collected will be removed from our servers when You so request, or when it is no longer relevant or required for us to offer your our services and products; unless there is some other reason for us to keep it, such as a legal obligation to retain Data, or a need to preserve it to safeguard Arco's rights.
<b>Right to contest the processing of Personal Data</b>	You also have the right to contest where and in what context We are using your Personal Data for different purposes. In certain situations, We may have legitimate reasons for using your Data, which may overrule your rights, if they are essential for the functioning of our Platforms, for example.
<b>Data Portability</b>	We will give You, or a third party nominated by You, your Personal Data in a structured and interoperable format.
<b>Right to withdraw your consent at any time</b>	You have the right to withdraw your consent, but this will not affect the legality of any Data processing prior to such withdrawal. If You withdraw your consent, We may not be able to supply certain services and products. If this happens, We will inform You.

In certain situations where using Personal Data is essential for the Platform We provide to teaching institutions, the requirement to exercise rights, in particular the rights to deletion or cancellation, to object and to withdraw consent, must be addressed to the teaching institutions themselves, according to the terms of their privacy policies.

It may be necessary to ask You for specific information to help Arco confirm your identity and guarantee your right of access to your Personal Data (or to exercise your other rights). This is a security measure to ensure that Personal Data is not disclosed to anyone who is not entitled to



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receive it. We may also contact You for more information about your request, to speed up our response.

We try to reply to all legitimate requests within 15 business days. It may occasionally take longer if your request is particularly complex or if You have submitted more than one. In this case We will notify You and keep You updated about the progress of your request.

**6. For how long will your Personal Data be stored?**

We will keep your Personal Data only for the time necessary to fulfill the purposes for which it was collected, and to comply with any legal obligations (for example, the Brazilian Internet Act, Brazilian Law nº 12.965/2014, which requires us to store access records, contracts, accounts reporting and requisitions from the applicable authorities for six (6) months.

To determine the right period for retaining Personal Data, We take into account the quantity, the purpose of processing, the nature and sensitivity of the Data, the potential harm risk arising from unauthorized use or disclosure of your Personal Data, the purpose of processing and whether We can achieve our ends by other means, and the applicable legal requirements.

After fulfilling all the purposes that justified the use of the Data on the Platforms, this Data about You will be eliminated, through the available technical means, within sixty (60) days.

**7. How do We protect your Data?**

We use technical, administrative and organizational measures to protect your Personal Data against loss and unauthorized use or access. The Data is stored in a secure operating environment not available to the public.

To ensure the safety of your Personal Data in our products, We use the best available information security practices, including:

- Standard market methods with SOC2 certification for the security of the Data We collect, such as management and control of access to the data bases and encryption of passwords;
- Protection against unauthorized access to systems, such as a temporary block in the event of a suspicious access and regular review of access privileges;

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- The people We authorize to handle your Personal Data are bound by a strict duty of confidentiality. Breach of this confidentiality will be subject to civil liability under Brazilian law; and
- The adoption of preventive procedures against information security incidents such as constant monitoring of systems and equipment, and awareness campaigns.

We make every effort to protect the privacy of your account and other Personal Data We hold in our records, but unfortunately We cannot guarantee total security. Unauthorized access to or operation of an account, failures of hardware or software and other factors may jeopardize the security of your Personal Data at any time; and so We ask You to help Arco keep its environment safe for everyone. As well as adopting good security practices for your account and your Data, if You identify or become aware of anything that might affect the security of your Data, please contact us.

#### **8. How to talk to us?**

If You have any questions about how We use your Data, or comments or suggestions related to this Policy, or if You think that your Personal Data may have been used in a manner incompatible with this Privacy Policy or with your choices as its owner, please contact our team at:

**Privacy committee:**

Mariana Alves Pacini (Leader)  
Alexandre Nakamaru  
Renata Ferraz de Toledo Machado  
Henrique Gherardi Junior

**Mailing Address:** encarregado@arcoeducacao.com.br

#### **9. Changes in the Privacy Policy**

We are always seeking to enhance our Platforms, and so this Privacy Policy may have to be updated. We therefore recommend that You visit this page from time to time so that You are aware of any changes. If there are important amendments that need You to renew your consent, We will publish the update and ask You for your confirmation.

**Latest amendment:** July 29, 2020.