



## **PRIVACY POLICY OF IL CAMPANÁRIO VILLAGIO RESORT COMPLEX**

### **1. OBJECTIVE**

The General Data Protection Law (Law 13,709/2018) was created with the aim of establishing clear rules regarding the processing of personal data and ensuring the fundamental rights of freedom, privacy, and the free development of the personality of the natural person.

For this reason, the Condominium has developed a Privacy Policy focusing on the principles of transparency and security, aiming to clarify how the processing of personal data and sensitive personal data of data subjects occurs within the company.

### **2. APPLICATION**

This Policy applies to the Il Campanário Tourist Resort Complex.

### **3. TERMS AND DEFINITIONS**

- **Anonymization:** The use of reasonable and available technical means at the time of processing, by which data loses the possibility of direct or indirect association with an individual.
- **National Data Protection Authority (ANPD):** A federal public administration agency, part of the Presidency of the Republic, which has, among other functions specified by Law No. 13.709/2018, the responsibility to ensure the protection of Personal Data, develop guidelines for the National Policy on Personal Data Protection and Privacy, inspect and apply sanctions in case of data processing in violation of the law, through an administrative process that ensures the right to a hearing, a full defense, the right to appeal, and promote public awareness of the norms and public policies on the protection of Personal Data and security measures.
- **Condominium:** Il Campanário Tourist Resort Complex;
- **Controller:** Natural or legal person, public or private, responsible for decisions regarding the processing of personal data;

- **Personal Data:** Information related to an identified or identifiable natural person, such as name, email, phone, among others;
- **Sensitive Personal Data:** Personal data about racial or ethnic origin, religious beliefs, political opinion, union membership, or membership in a religious, philosophical, or political organization, data related to health or sexual life, genetic or biometric data, when linked to a natural person;
- **Data Protection Officer:** A person appointed by the controller and operator to act as a communication channel between the controller, data subjects, and the National Data Protection Authority (ANPD);
- **Data Subject:** Natural person to whom the personal data being processed refers;
- **Processing:** Any operation performed with personal data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation, or control of information, modification, communication, transfer, dissemination, or extraction;
- **Shared Use of Data:** Communication, dissemination, international transfer, interconnection of personal data, or shared processing of personal databases by public bodies and entities in the fulfillment of their legal competencies or between these and private entities, reciprocally, with specific authorization, for one or more forms of processing allowed by these public entities or between private entities.

#### 4. COLLECTED DATA, PURPOSE OF PROCESSING, AND SHARED USE

Os Personal data and sensitive personal data provided directly by data subjects to the Condominium will be collected, processed, and potentially shared with third parties for the purposes described below:

Owner	Data	Purposes	Shared Use
<b>Customers/ Guests</b>	Name; Phone Number; Email; Address;	1) Providing hospitality services; 2) allowing the training of new receptionists; 3) managing and archiving	1) Performing guest data management through the management system; 2) enabling the control of apartment release activities; 3) ensuring the reservation of

	<p>ID (RG);</p> <p>CPF (Taxpayer Identification Number);</p> <p>Date of Birth;</p> <p>Credit Card Information;</p> <p>Gender;</p> <p>Image;</p> <p>Marital Status;</p> <p>Nationality;</p> <p>Occupation;</p> <p>Credit Card Information;</p> <p>Housing Unit;</p> <p>Consumption Data;</p> <p>Signature.</p>	<p>documents;</p> <p>4) storing lost items and sending them back to the guest;</p> <p>5) carrying out the preparation and formatting of proposals and contracts and fulfilling contractual obligations;</p> <p>6) conducting customer credit analysis;</p> <p>7) promoting events and maintaining contact with participants;</p> <p>8) sending marketing emails and newsletters and managing other marketing-related activities;</p> <p>9) conducting a persona study for Il Campanário for strategic Direction;</p> <p>10) managing the property rented via Booking and reporting occurrences to the owner.</p>	<p>parking spaces for the event;</p> <p>4) facilitating the management of social media content and customer service;</p> <p>5) managing and archiving data, contracts, and other legal instruments, as well as managing the budget;</p> <p>6) developing and managing marketing campaigns and engagement studies;</p> <p>7) facilitating reservations and informing owners about incidents in the apartment.</p>
<b>Under age (Customer)</b>	<p>Name;</p> <p>Gender;</p> <p>ID (RG);</p> <p>CPF (Taxpayer Identification Number);</p> <p>Date of Birth;</p> <p>School attendance certificate.</p>	<p>1) Conduct the selection process to hire new employees;</p> <p>2) Grant benefits to the employee;</p> <p>3) Manage the hotel and guest reception;</p> <p>4) Delegate tasks and monitor young apprentices;</p> <p>5) Support social initiatives in nearby communities;</p> <p>6) Develop advertising campaigns;</p>	<p>1) Carry out the job vacancy announcement and candidate hiring through a recruitment and selection platform;</p> <p>2) Shared use of data with meal and transportation voucher providers for benefits issuance;</p> <p>3) Perform guest data management;</p> <p>4) Shared use with a third-party security company to monitor the Jurere Open Shopping and public areas.</p>

		7) Conduct a persona study for Il Campanário.	
<b>External Public</b>	E-mail; image.	1) Manage the website and the content to be published.	1) Enable the provision of the website's layout structure.
<b>Job applicants</b>	Name; Email; Phone; Address; Educational level; Other information provided in the resume.	1) Advertise job vacancies and conduct interviews and other stages of the selection process; 2) Interview candidates for job openings; 3) Carry out the hiring procedure.	1) Advertise job vacancies; 2) Share data with a platform for recruiting and selecting new employees; 3) Schedule pre-employment medical examinations; 4) Complete the hiring process for the candidate.
<b>Employees</b>	Name; Image; Phone; Address; Gender; Email; Position; ID (RG); CPF (Taxpayer Identification Number); Date of Birth; Work Card (CTPS)	1) Conduct the hiring and onboarding process; 2) Grant benefits to the employee; 3) Advocate for the condominium in legal proceedings.	1) Shared use of data with meal and transportation voucher providers for the provision of benefits; 2) Manage employee data in the management system; 3) Send relevant documents to the third-party legal advisory for defense in labor lawsuits.

<b>Suppliers/ Service Providers</b>	Name; Address; ID (RG); CPF (Taxpayer Identification Number); Email; Phone; Signature; Image.	1) Formalize, execute, and manage contracts;  2) Obtain price quotes for materials and services from external suppliers;  3) Support photo and video productions;  4) Control invoices and administrative processes;  5) Update channels with the promotion of ventures.	1) Manage supplier data for obtaining material quotes;  2) Share data with marketing agencies to produce photos and videos;  3) Control invoices and administrative processes;  4) Store contracts, terms, and email formalizations for image usage;  5) Use TOTVS and BClegal to register supplier data in the tools.
<b>Owners/Condominium Members</b>	Name; Phone; Consumer Unit details; Email; Banking information; CPF (Taxpayer Identification Number); ID (RG); Address; Occupation; Image.	1) Control guest and owner balances;  2) Receive and deliver packages to guests/owners;  3) Maintain the units;  4) Prepare reports for analysis of campaign results and marketing actions;  5) Record, verify, and process payments;  6) Provide support to owners and perform registrations.	1) Store data of owners and condominium members in the management system;  2) Allow the management of service orders;  3) Enable the sending of marketing emails through the tool;  4) Perform billing for accounts payable.

## 5. DATA RETENTION PERIOD

The Company will retain personal data: a) For the time required by law; b) Until the completion of personal data processing, i.e., when the purpose is achieved or when the data is no longer necessary or relevant to the purpose, or when the data subject is within their right to request the



termination of processing and deletion of their data, or when there is a legal requirement to do so; c) For the time necessary to preserve the legitimate interests of the Company, as the case may be; d) For the time necessary to safeguard the regular exercise of the Company's rights..

## **6. DATA PROTECTION OFFICER**

The person responsible for data protection, as the Data Protection Officer, is the company **RTC CONSULTORIA EM TECNOLOGIA DA INFORMAÇÃO LTDA.**, registered with CNPJ under number 36.570.041/0001-60, which can be contacted via email at [dpo@rtcprivacy.com.br](mailto:dpo@rtcprivacy.com.br).

## **7. RIGHTS OF THE DATA SUBJECT REGARDING PERSONAL DATA**

The data subject has various rights regarding their personal data, including:

- a) Confirmation of the existence of processing;
- b) Access to their data;
- c) Correction of incomplete, inaccurate, or outdated data;
- d) Anonymization, blocking, or deletion of unnecessary, excessive, or data processed in violation of the informed purpose;
- e) Data portability to another service or product provider, upon express request;
- f) Information about data sharing;
- g) Information about the possibility of not providing or withdrawing consent, as well as the consequences of these actions;
- h) Deletion of Personal Data.

## **8. STORAGE AND SECURITY**

The Company informs that the provided Personal Data will be stored securely and confidentially, observing the principles of security and prevention, ensuring the use of measures capable of hindering unauthorized access and incidents that may cause harm.

When there is no stipulated time period by law, Personal Data will be stored for as long as necessary to fulfill the purposes for which they were collected. Anonymized data, those without the possibility of association with the Data Subject, may be kept indefinitely.

Data may be stored on national and/or international servers, and in compliance with the security principle, we guarantee that all security, technical, and administrative measures will be taken to protect Personal Data from accidental or unlawful situations. Finally, as the Data Controller, the



Company will notify the National Data Protection Authority (ANPD) and the Data Subject of any security incidents that may pose a relevant risk or damage to the Data Subjects.

## 9. COMMUNICATION CHANNELS

For questions, comments, or suggestions, please contact us via email at [dpo@ilcampanario.com.br](mailto:dpo@ilcampanario.com.br). If you wish to make any requests related to the exercise of your rights, access the Request Form on the Company's website at <https://www.ilcampanario.com.br/>.

## 10. APPROVAL

This policy was approved on August 1, 2023.

## 11. CHANGES

The Company may modify this Privacy Policy at any time. Changes will be disclosed on our website and will take effect on the date of publication, aiming to ensure the proper processing of Personal Data carried out by us.

This Privacy Policy comes into effect on August 1, 2023.

## 12. HISTÓRICO

Version	Date	Description	Approval
1.0	01/08/2023	Rascunho da Política	