MAR ABERTO PRIVACY POLICY AND LGPD

Mar Aberto is committed to protecting your privacy and ensuring your rights.

In this Privacy Policy, in accordance with the General Data Protection Law (Federal Law No. 13,709/2018 – LGPD), we clarify what information is collected from users, how this data is handled, and what the rights of owners/advertisers of this information are.

The General Data Protection Law (LGPD) regulates the processing of personal data by companies and grants you a series of rights, which may be exercised at any time. These rights ensure transparency, access, and control over the practices of processing your personal data.

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1. DEFINITION OF USERS AND APPLICABILITY

For the purposes of this Privacy Policy, we shall consider as users:

- **Virtual Store Users:** buyer/advertiser users who access or interact with Mar Aberto's virtual store.
- **Buyers or End Customers:** users who have filled out forms or, in any way, entered data in Mar Aberto's virtual store and social media.

The policy applies to all customers who access or make conversions in the virtual stores, landing pages, social media, and other services provided by Mar Aberto and its affiliated companies.

If you do not agree with the terms of this document, it is important that you discontinue any use of our software, systems, tools, and virtual stores, and do not enter any personal information into our automatic data capture tools.

If you have any questions, please contact us at **atendimento@maraberto.app**; we will be pleased to assist you.

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2. CONTROL AND RESPONSIBILITY OVER DATA

Federal Law No. 13,709/2018 (General Data Protection Law) details two main agents:

a) Controller

This is the company that controls the data subjects' data. It is responsible for the collection and use of data in accordance with the data subject's permission and in accordance with the purposes of the law, being considered the primary party responsible for the data. Simply put, the controller decides what will be done with the data.

b) Operator

This is the company that the controller uses to perform specific data processing operations, such as storing and processing the collected information. The operator is considered the secondary party responsible for the data and executes the controller's decisions.

Mar Aberto is considered the Controller of its customers'/advertisers' data and responsible for the processing and protection of the information captured by this virtual store, its tools, lead magnets, or other forms in the digital environment.

Therefore, the exercise of your rights as a data subject must be carried out directly with Mar Aberto.

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3. DEFINITION OF CUSTOMER

For the purposes of this Privacy Policy, the term "Customer" refers to:

- **Virtual Store Users:** any individual or legal entity that interacts with the digital channels or shows interest in the products or services;
- **Buyers:** users who fill out forms or place orders.

By providing personal data to obtain information or contract services, the user shall be considered a buyer, subject to this Policy.

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4. WHAT DATA IS COLLECTED

4.1 Virtual Store Users

Browsing data:

- IP address
- Location (country)
- Pages visited
- Time spent
- Interactions and click tracking

Although Mar Aberto does not collect this information with the direct purpose of identification, it is possible to identify users directly or indirectly.

Cookies:

Small files stored on the user's device to improve navigation and recognize previous accesses.

4.2 Owners, Advertisers, and Buyers

Registration information:

- Full name
- CPF (Brazilian individual taxpayer registry)
- Telephone
- E-mail
- Experience or service details

- Payment information
- Data necessary for hosting the experience or acquisition

Attention (data of minors and sensitive data):

Depending on the contracted service, the following may be requested:

- Data of minors
- Sensitive personal data

In these cases, Mar Aberto ensures that:

- Processing shall be carried out in accordance with current legislation;
- The applicable legal bases shall be respected;
- Adequate security measures shall be adopted;
- When necessary, specific consent from the legal guardian shall be required.

4.3 Data collected – details

Customers:

- Name, e-mail, telephone, CPF
- Product or service of interest

Payments:

- Card number
- Cardholder name
- Expiration date
- Security code
- Card brand
- Installments
- Billing address

Owners:

- Bank details for transfers

Technical data:

- IP address
- Location
- Cookies

4.4 Browsing information

- Time spent

- Features accessed
- Interactions with the platform

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5. PURPOSE OF DATA PROCESSING

Data may be used for:

- Contract execution
- Identity verification
- Communication with users
- Sending commercial proposals
- Marketing and campaigns
- Improving the experience
- Compliance with legal obligations

Use of the virtual store depends on free, informed, and unequivocal consent.

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6. HOW DATA IS COLLECTED AND PROCESSED

Data may be processed:

- In physical or digital form
- Automatically or manually
- By e-mail, telephone, or systems

Mar Aberto adopts security measures to prevent:

- Unauthorized access
- Loss
- Alteration
- Improper disclosure

However, it is not possible to guarantee absolute security against external attacks.

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7. DATA SHARING

Virtual Store Users

Data shall not be disclosed without consent, except when necessary for:

- Legal compliance
- Court orders

- Contract execution

Third parties and partners

Data may be shared with:

- Technology providers
- Marketing companies
- Financial institutions

These third parties use the data only for the contracted purposes.

Group integration

Data may be integrated into the database of Mar Aberto brands.

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8. USE OF COOKIES – ASAAS

ASAAS acts as a data operator.

Cookies are used to:

- Identify users
- Improve navigation
- Personalize the experience

Types:

- Third-party cookies
- Session cookies
- Tracking cookies (UTM)

The user may manage cookies in the browser.

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9. DATA SUBJECT RIGHTS

The data subject may:

- Confirm processing
- Access data
- Correct data
- Request deletion
- Request portability
- Revoke consent
- Know with whom data was shared

Data shall be kept only for as long as necessary.

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10. HOW TO EXERCISE RIGHTS

Requests via:

atendimento@maraberto.app

Subject:

[LGPD] Data Subject's Name

Sending a document with photo is required.

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11. LIABILITY FOR THIRD PARTIES

Third parties that use data outside the scope provided shall be independently liable.

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12. UPDATES

The Policy may be updated at any time.

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13. CONTACT

atendimento@maraberto.app

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14. INTEGRATION WITH OTHER DOCUMENTS

This Privacy Policy must be read in conjunction with the Advertiser Agreement, the Cancellation Policy, and the Terms of Adhesion and Conditions of Use of Mar Aberto, which form an integral part of this document as annexes.

In the event of a conflict between the provisions of this Policy and the referenced policies, the wording most protective of the USER and the one that best reflects Mar Aberto's position as a mere intermediary shall prevail.