

## GLOBAL PRIVACY POLICY

### 1. Introduction

We would like to thank you for choosing Sant'Anna International School (Sant'Anna)!

The Global Privacy Policy ("Policy") explains all essential details of students' ("Students"), parents' and legal and financial guardians' ("Representatives") personal data, as well as Sant'Anna's prospective students ("Prospective Students").

The Policy applies to all Sant'Anna's educational services and any other associate services ("Educational Services", "Services", "Sant'Anna Portal", or "App"). The terms that bind the Educational Services are defined in the Educational Services Agreement ("Educational Agreement"). As the service agreements are sign virtually, a copy of the contract is automatically sent to the financial representative.

Eventually, we may develop new services or offer additional services and, if introducing them changes how we collect or treat the User's personal information data, the current policy will be updated. Unless otherwise stated, when introducing new services or additional functions on Sant'Anna Portal and App, these will be subject to the current Policy.

The current Policy has as purpose:

- Explain to the User the respective rights related to the personal data collected and treated by us, and in which way we protect its privacy.
- Ensure that the User understands which personal data is collected, the reason why the data is collected and used, and also to whom we share it with.

We hope that the current Policy enables the User to comprehend our commitment towards privacy.

### 2. Definitions

To the means of this Policy, the following expressions will have the following meaning:

"Teenagers" refer to Sant'Anna students that are older than 12 years of age until incompleting 18 years of age;

"Students" refers to students enrolled in Sant'Anna, which includes Children or Teenagers;

"Sant'Anna" refers to Sant'Anna international School;

"Children" refers to Sant'Anna students until incompleting 12 years of age;

"Sensitive Personal Data" refers to personal information regarding race or ethnicity, religious belief, political opinion, union membership, or to any religious, philosophical, or political organization, any information regarding health or sexual life, genetic or biometric information when bonded to a natural person.

"Personal Data" refers to information related to the person identified, which corresponds to Students, Representatives, and Prospective Students data.

“Legitimate Interest” refers to the legal grounds on the Personal Data treatment provided by the articles 7th, IX and 10 from the Data Protection General Law (“*Lei Geral de Proteção de Dados - LGPD*”);

“DPGL” refers to the Data Protection General Law (Brazilian law nº 13.709/2018);

“Representatives” refers to the parents, legal and financial guardians from Students or Prospective Students;

“Policy” refers to the current privacy policy that intends to regulate Sant’Anna’s rights and duties regarding Personal and Sensitive Data protection;

“Data Holder” refers to the person in which personal data are being collected.

“Sant’Anna Portal” and “App” refer to the platform that gives access to Sant’Anna’s system; the place where Representatives can also update Students’ registration and their Personal and Sensitive Personal Data;

“Student Area” refers to the access platform to the grades system, absences, and student information;

“Prospective Students” refers to the individuals who aren’t enrolled in Sant’Anna, but are in the pre-enrollment phase, or getting to know Sant’Anna’s services;

“Services” refers to education services provided by Sant’Anna;

“User” refers to the combination of Students, Representatives, and Prospective Students;

### 3. Data Holder Rights

The LGPD provides Data Holders rights on their personal data. As provided in the legislation terms applicable and unless limited by it, the rights provided to the individuals are the following:

- Right to confirm the existence of treatment;
- Data Access Right;
- Right to the correction of incomplete, inaccurate, or out of date data;
- Right to the anonymization, blockage, or elimination of data that is unnecessary, excessive, or nonconformity with the DPGL.
- Right to data portability to another provider, keeping Sant’Anna’s business confidential data sheltered;
- Right to personal data elimination with the holder’s consent, except in the hypothesis of legal custody and others arranged in the DPGL;
- Right to information regarding the private and public entities Sant’Anna has shared data with;
- Right to information about the possibility of not providing consent and the negative consequences of this choice;
- Right to revoke consent, according to DPGL terms.

#### Forms and conditions of exercise.

The rights mentioned above will be assured and may be executed by the User in the exact terms described in the DPGL. Any request, complaint, and information request and right to exercise for the Data Holder can be made by written request to [secretaria@santanna.g12.br](mailto:secretaria@santanna.g12.br), by phone (19) 3113-3777, or in person at Sant’Anna’s Head Office. In each situation, the Data Holder must inform, at least, the following information and documentation:

- a) Full name of the Data Holder;
- b) RG and CPF numbers from the Data Holder;
- c) Email address;
- d) Copy from RG and CPF;

Eventually, other information or documentation may be requested to complete the requisition if there is any doubt related to the information given or about the User's identity.

#### **4. Ways of Collecting Personal Data**

Data provided directly by the Representative.

We collect the User's personal data in the following ways:

- a) When the Representative fills in the registration form (online or offline) with Sant'Anna's Admissions Department, via telephone or Sant'Anna's website, showing interest in hiring Sant'Anna's services;
- b) When the Representative enrolls the Student in Sant'Anna or fills in the documents regarding enrollment;
- c) When the Representative access Sant'Anna's Portal or App;
- d) When the Representative updates the Student's information, via form, Sant'Anna's portal, or App;
- e) By Students and/or Representatives daily such as reports, assessments, and others.

Data collected directly from Student.

We gather Users personal information in the following ways:

- a) From the student, throughout Educational Services provision, through assessments, tests, mock tests, classroom notes, behavior observations and analysis, interviews and meetings with faculty and Sant'Anna's coordinators, and any other usual means for this purpose;
- b) From the student, through files, forms, questionnaires, application forms, attendance lists, and other documents usual for educational services and associated services.

Data provided to have access to Sant'Anna's building

We collect personal information from all people that access or would like to access Sant'Anna's private space, via temporary (in case of occasional visitors) or permanent registration (Representatives and Students, while the Services are provided) in the front gate or Head Office.

Data collected automatically via Sant'Anna's Portal or App.

It's possible to have some technical information collected automatically via Sant'Anna's Portal and App, including but not limited to, type of device used to access Sant'Anna's portal and App, connection IP address (with date and time of access), approximate geolocation, devices ID number, Sant'Anna Portal or APP use information, software or browser used to access Sant'Anna Portal or App, operational system and version of the device used, and others.

Data provided by third parties

Due to the Service provided, we also collect Student personal information from third parties authorized by the Representatives such as, for example, specialists, doctors, therapists, speech therapists, and other health professionals or that assist Student development in a private matter that is authorized and able to share this personal information with Sant'Anna, always having the Child's and Teenager's best interest at heart.

## 5. Personal data Collected By Sant'Anna

In the following chart, we've organized the groups of Personal Data and Sensitive Personal Data that Sant'Anna collects from Users.

| Group of Personal Data                               | Personal Data   | Sensitive Personal Data   |
|--|---|---|
| <b>Students (Children and Teenagers)</b>             | Full name, gender, marital status, date of birth, place of birth, state, nationality, RG (RNM for foreigners), CPF, birth certificate, passport, telephone number, email address, zip code, full address, information regarding school performance (observations, assessments, tests, and others), information regarding behavior and personal development (observations, evaluations, parents, teachers and specialists reports) | Social or ethnic background, health information, and student photo. |
| <b>Representatives</b>                               | Full name, marital status, date of birth, place of birth, nationality, RG, CPF, phone number, email address, full address, zip code, state, company, role, profession.  | Parents' or legal guardians' photos.                                |
| <b>Prospective Students (Children and Teenagers)</b> | Full name, gender, marital status, date of birth, place of birth, state, nationality, RG (RNM for foreigners), CPF, birth certificate, passport, telephone number, email address, zip code, full address, information regarding previous schools such as grades, report cards, school records and in some cases, school reports.  | Social or ethnic background.  |
| Prospective Students' Representative                 | Full name, marital status, date of birth, place of birth, nationality, RG, CPF, phone number, email address, full address, zip code, state, company, role, profession.  | N/A   |

## 6. Treatment Purposes

In the chart below, we state the reason we treat Personal User Data, the associate legal foundations we are based on, and that legally allow us to treat Personal User Data:

| Group of Personal Data | Personal Data             | Sensitive Personal Data                             |
|------------------------|---------------------------|---|
| <b>Pre-enrollment</b>  | Children Data             | <b>Consent</b> (Legal guardian)                     |
|                        | Teenagers Data            | Required to sign the Educational Services Agreement |
|                        | Legal Representative Data | Required to sign the Educational Services Agreement |



|   |  |   |
|---|--|---|
| <b>Enrollment via Sant'Anna Portal or App</b>   | Children Data<br>(Including Sensitive Personal Data)           | <b>Consent</b> (Legal guardian)                                     |
|   | Teenagers Data<br>(Including Sensitive Personal Data)          | Required to sign the Educational Services Agreement                 |
|   | Legal Representative Data                                      | Required to sign the Educational Services Agreement                 |
| <b>Educational Services Provision, including planning and directing educational didactic-pedagogical actions</b>  | Children Data<br>(Including Sensitive Personal Data)           | <b>Consent</b> (Legal guardian)                                     |
|   | Teenagers Data<br>(Including Sensitive Personal Data)          | Required to sign the Enrollment Agreement                           |
|   | Legal Representative Data                                      | Required to sign the Enrollment Agreement                           |
| <b>Use of medical data for emergency care</b>   | Children Data<br>(Including Sensitive Personal Data)           | <b>Consent</b> (Legal guardian)                                     |
|   | Teenagers Data<br>(Including Sensitive Personal Data)          | <b>Consent</b> (Teenager + Legal guardian)                          |
| <b>Communication channel between Sant'Anna, Parents, and Students</b>   | Children Data<br>(excluding Sensitive Personal Data)           | <b>Consent</b> (Legal guardian)                                     |
|   | Teenagers Data<br>(excluding Sensitive Personal Data)          | Legitimate interest (from Sant'Anna and the Student)                |
|   | Legal Representative Data                                      | Legitimate interest *   |
| <b>Commercial Communications - Current Students</b>   | Legal Representative Data                                      | Legitimate interest *   |
| <b>General business communications</b>  | Legal Representative Data<br>(current or prospective students) | Legitimate interest *   |
| <b>Tribute to Students approved in universities</b>   | Teenagers Data<br>(excluding Sensitive Personal Data)          | <b>Consent</b> (Legal guardian)                                     |
| <b>Maintenance of mandatory records regarding School Record</b>   | Children Data<br>(excluding Sensitive Personal Data)           | <b>Consent</b> (Legal guardian)                                     |
|   | Teenagers Data<br>(excluding Sensitive Personal Data)          | Legal obligation and Regular exercise of rights in judicial process |
|   | Legal Representative Data                                      | Legal obligation and Regular exercise of rights in judicial process |
| <b>Communication to third parties for the legal defense of Sant'Anna's interests (collection, execution, and other legal actions or extrajudicial measures)</b> | Children Data  | <b>Consent</b> (Legal guardian)                                     |
|   | Teenagers Data   | Regular exercise of rights in judicial process                      |
|   | Legal Representative Data                                      | Regular exercise of rights in judicial process                      |

- The User may choose not to be contacted in the situation marked with the asterisk above. Besides that, in order to choose not to receive emails and other Sant'Anna messages, just get in touch with Sant'Anna on the email address mentioned in item 12, further in this document.

## 7. Communication and Shared Use

The following Personal Data will be shared based on the chart below:

|  |   |
|--|---|
| <b>Educational Services Provision</b>  | <p>Sant'Anna may share the Personal Data of Students, Prospective Students and Representatives in order to provide the Services, with additional service providers, complementary or directly related to Educational Services, such as educational output service companies, travel insurance companies, pedagogical assessment companies, other educational institutions, government agencies, and supervisory bodies, or other international higher education institutions for selection processes, in this case at the request of the Student or their Representatives.</p>  |
| <b>Technology and Marketing Service Providers</b>  | <p>We use technical service providers that operate the technical infrastructure we need to provide the Sant'Anna Portal and the App and also to host the Sant'Anna systems, in particular providers that host, store, manage and maintain the Sant'Anna Portal and the App, its content, and the data we process.</p> <p>We use technical service providers to help us communicate with Representatives. We use marketing and advertising partners to show Representatives personalized content.</p>  |
| <b>Compliance with the Law, compliance with a court order, and/or National Authority of Protection of Data</b> | <p>We will share the User's Personal Data when we believe, in good faith, that it is necessary to fulfill a legal obligation under applicable law or to respond to a valid legal process, such as a search warrant, a court order, or a subpoena.</p> <p>We will also share the User's personal data if we believe, in good faith, to be necessary for our legitimate interest, or that of third parties, in matters of national security, law enforcement, litigation, criminal investigation, protection of the safety of anyone, or to prevent death or imminent physical damage, provided that we consider that such interest does not prevail over the interests or fundamental rights and freedoms of the User that require the protection of the User's personal data.</p> |
| <b>Student Emergency Service</b>   | <p>Students' Sensitive Personal Data may be shared with Hospitals in emergency care when necessary.</p>   |

## 8. Conservation and Deletion of Personal Data

At the request of the Student Representative, Potential Student Representatives and/or Alumni Representatives (who presumably are already of legal age), Sant'Anna will delete or anonymize your Personal Data and/or Sensitive Personal Data in a manner that does not identify, unless it is legally permissible or mandatory to retain certain personal data. The deletion of data stored by Sant'Anna may be requested, under the conditions established by the DPGL, through the e-mail [secretaria@santanna.com.br](mailto:secretaria@santanna.com.br).

Sant'Anna is committed to using its best efforts to respond to all requests for exclusion, when applicable, as soon as possible. However, Sant'Anna may keep the Personal Data it deems necessary, to comply with its legal obligations, including concerning the maintenance of mandatory school records, or for the possible exercise of rights or defense in legal proceedings, as well as, for the exercise of legitimate interest, as defined by the DPGL.

## 9. Data Safety

We are committed to protecting the Personal Data and Sensitive Personal Data of our Users, keeping them safe, secure, and confidential. We implement technical and organizational measures to help protect the security of your data. However, the User must be aware that no system is completely secure.

## 10. International transfers

Personal Data and Sensitive Personal Data collected by Sant'Anna will always be treated on the basis of the LGPD. Sant'Anna is based in Brazil, but our subcontractors or partners may also be based or may process data in countries other than Brazil. In this case, we guarantee that our affiliates and subcontractors will also be subject to the obligations of this Privacy Policy. Thus, by agreeing to this Privacy Policy, the User also agrees that Personal Data and Sensitive Personal Data may be subject to international transfers and declares to be aware of all guarantees applicable to processing abroad, in accordance with this Privacy Policy.

## 11. Privacy Policy Updates

When we make material changes to this Policy, we will make a noticeable and appropriate communication in accordance with the circumstances, such as submitting a notice on the Sant'Anna Portal and in the App or on the Sant'Anna website <https://www.santanna.g12.br>, or by sending an email to the User through the official Sant'Anna channels. We may also send a notice in advance to the "User".

Thus, the "User" must make sure to read any notification carefully.

If you want to know more about this Policy, please contact us at: [secretaria@santanna.g12.br](mailto:secretaria@santanna.g12.br)