

GINGER PRIVACY AND PERSONAL DATA POLICY

1. OBJECTIVES

Inform all research participants, employees, customers, business partners and users in general who have a relationship with Ginger about the application of the General Data Protection Law - LGPD.

This Privacy Policy aims to inform how GINGER collects, uses, stores, protects and shares the personal data of our research participants, customers, employees and other individuals with whom we interact, ensuring compliance with current data protection legislation. data - LGPD.

2. SCOPE

It applies to all research participants, employees, customers, business partners and users in general who have a relationship with Ginger.

This policy applies to all personal data processed by GINGER, including data collected through surveys, websites, groups, applications, services and digital platforms, as well as through direct interactions with our representatives.

3. PROCESS DESCRIPTION

Personal data is collected, processed and stored according to a rigorous process that aims to guarantee the privacy and security of information, from initial collection to its deletion.

4. WHY?

Ginger is committed to protecting the security and privacy of its research participants. In this context, Ginger prepared this Privacy Policy, with the purpose of affirming its commitment and respect for the rules of privacy and protection of personal data.

Ginger needs to collect and process personal data from its participants as part of the provision of market research services. In this sense, this Ginger Privacy and Personal Data Policy (hereinafter "Privacy Policy") aims to help our participants understand what personal data we collect, how and why we use it, to whom we disclose it and how we protect their privacy when using our services.

Ginger seeks to respect the best practices in terms of security and protection of personal data, promoting and raising awareness among everyone about good practices in this area. It also seeks to improve systems in order to manage the

protection of data made available to it by its participants, in strict compliance of legal obligations.

Completing forms, participating in interviews and providing data directly or indirectly implies knowledge of the conditions of this Policy, and any other specific terms, policies and conditions relating to the services provided.

5. WHAT ARE PERSONAL DATA AND SENSITIVE PERSONAL DATA

Personal data

Personal data is understood as any information related to a natural, identified or identifiable person (data subject), such as name, address, e-mail, telephone number, behavioral information and preferences, among others.

Sensitive personal data

Sensitive personal data is information that, due to its nature, requires greater protection, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data relating to health or sexual life and sexual orientation, and data related to criminal convictions and infractions.

6. OTHER IMPORTANT DEFINITIONS

- i. Consent of the data subject – Expression of will, free, specific, informed and explicit, by which the data subject accepts, through a declaration or unequivocal positive act, that the personal data concerning him or her will be subject to processing;
- ii. Controller: Natural or legal person, governed by public or private law, who is responsible for decisions regarding the processing of personal data;
- iii. Operator: Natural or legal person, governed by public or private law, who processes personal data on behalf of the controller;
- iv. Data Protection Officer – “DPO” – person appointed to ensure, in an organization, compliance with the processing of personal data with the LGPD, ensuring efficient communication with data subjects and cooperation with data protection authorities’ control, also bridging the gap between the different areas of activity within Ginger. The DPO does not receive instructions regarding the performance of his duties, reporting directly to the management bodies of the entity that appointed him;
- v. Data holder or Data subject– identified or identifiable natural person to whom the personal data relate;
- vi. Processing – operation or set of operations carried out on personal data or on sets of personal data, by automated or non-automated means, such as collection, registration, organization, structuring, conservation, adaptation or alteration, retrieval, consultation, use, dissemination by transmission, diffusion

or any other form of making available, comparison or interconnection, limitation, erasure or destruction;

vii. Breach of personal data – breach of security that causes, accidentally or unlawfully, the unauthorized destruction, loss, alteration, disclosure or access to personal data transmitted, preserved or subject to any other type of processing;

viii. Anonymization – technique that results from the processing of personal data in order to remove sufficient elements so that it is no longer possible to identify the data subject, irreversibly. More precisely, the data must be processed in such a way that it can no longer be used to identify a natural person using all the means that could be reasonably used, either by the controller or by third parties.

ix. National Data Protection Authority (ANPD) – Public administration body responsible for ensuring, implementing and monitoring compliance with the law;

7. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

GINGER is responsible for the processing of personal data, defining the purposes and means of processing in accordance with data protection standards.

This Privacy Policy aims to inform participants about the terms of processing of their personal data used by GINGER, determining the purposes and means used in the context of providing services. Therefore, under the terms of the LGPD, GINGER must be considered as Controller.

Therefore, when contacted by an independent third party, on behalf of and ordered by GINGER, this third party will be considered an Operator, under the terms of the LGPD.

If there is any type of question regarding the privacy of the participant's data, the third party must be indicated for the purpose of investigating possible infringement, intent, negligence, imprudence or malpractice.

Information received through reports, interviews, videos, experiences, testimonials, among other methods of collecting information for research are processed by Ginger and reported to its contractors, who will not be able to use or transfer any personal data received, in addition to the results established in the research and participant interviews, which are usually sent anonymously, that is, without personal identification.

Under the terms of this Policy, Ginger's contractors are aware of the responsibility in handling personal data and sensitive personal data of participants, which they receive from Ginger for the services provided in preparing market research reports.

8. WHAT PERSONAL DATA DO WE COLLECT AND THROUGH WHAT MEANS?

We collect data such as name, email, telephone, demographic, behavioral, navigation data, opinions and evaluations. This data is collected through questionnaires, online forms, interactions on social networks, website visits, interviews and other forms of direct interaction.

Ginger collects personal information provided by the participant, information capable of identifying him or her. This information collected may vary according to the need for the research, as well as the type of information the participant chooses to provide us.

9. CATEGORY OF DATA PROCESSED, MEANS AND FORMS OF COLLECTION

Any personal data of the participant may be collected, processed and stored for the purposes of the services provided by Ginger, including data presented during interview or group sessions, such as:

- Identification data: Name, email, telephone, address.
- Demographic data: Age, gender, location, social classification.
- Behavioral data: Preferences, purchasing and consumption habits.
- Attitudinal data: Opinions, Motivations, Expectations
- Browsing data: History of visits and online interactions.

10. WHAT ARE THE PURPOSES OF COLLECTING YOUR PERSONAL DATA?

Participants' personal data is processed to offer content and materials of interest to Ginger's contractors. For this to happen, it is often necessary to cross-check the data collected, so that marketing actions are directed to what the contractor expects to receive from Ginger.

In this sense, Ginger uses personal data to communicate and manage relationship with the participant. This way, we may contact the participant by letter, e-mail, social media or SMS, for administrative or operational reasons, for example, in order to send him news that may be of interest to him. We will also use your personal data to respond to your requests, suggestions or contacts, to improve our services and your experience as a Ginger participant.

11. ON WHAT BASIS DO WE PROCESS YOUR PERSONAL DATA?

The LGPD requires, for the processing of personal data to be lawful, that there be an adequate lawfulness basis for each specific processing. We process personal data based on the following grounds:

- Consent of the data subject.

- Execution of contracts.
- Compliance with legal obligations.
- GINGER's legitimate interests.

Regarding the processing of participants' data carried out by Ginger to improve our services and meet our administrative and quality objectives, the appropriate basis of lawfulness will be the pursuit of the Controller's legitimate interests, as well as Contractual Compliance, when applicable, in addition to the participant consent. This implies that data subjects may object to the processing of their data for the purposes referred to above, if they present valid reasons related to their particular situation. In such an eventuality, the Controller may present legitimate reasons that justify the continuation of such processing, in which case it reserves the right to continue processing your data for these purposes, as well as in cases where such processing is necessary for declaration purposes, exercise or defense of a right in legal proceedings.

Regarding data processing carried out by Ginger in the context of compliance with legal obligations, the lawful basis for carrying out such processing – mostly data communications to external entities – will be the need for processing for the purpose of complying with legal obligations of the Controller.

12. WHICH GINGER PROFESSIONALS HAVE ACCESS TO YOUR DATA?

Personal data is only accessed by authorized and trained GINGER professionals, who need this information to perform their functions.

When processing the participant's personal data, Ginger observes, at all times, the principles of data protection by design. Such a commitment implies, among other aspects, that your personal data will have limited access to people who need to know them in the exercise of their functions, to the strictest extent necessary to pursue the processing purposes that we have already listed above.

13. HOW LONG IS YOUR PERSONAL DATA STORED?

The participants' personal data, which may include videos and images, that Ginger collects are processed in strict compliance with applicable legislation and are stored in a specific database. Such data is kept in a format that allows the identification of data subjects only for the period necessary for the purposes for which they are processed.

The period during which data is stored and preserved varies according to the purpose for which the information is used. There are, however, legal requirements that require data to be kept for a certain period. We take as a reference for determining the appropriate retention period the various deliberations of the data protection control authorities, namely the National Data Protection Authority - ANPD, as well as under the terms of the ABEP Code of Ethics.

14. WHAT ARE THE RIGHTS OF DATA SUBJECTS?

In accordance with applicable legislation, the data subject may request, at any time, access to personal data, correction of incomplete, inaccurate or outdated data, deletion, restriction and opposition to the processing/treatment of data relating to him/her directly via email dpo@ginger.com.br

15. WHAT ARE THE SAFETY MEASURES ADOPTED BY GINGER?

Ginger is committed to ensuring the confidentiality, protection and security of its participants' personal data, through the implementation of appropriate technical and organizational measures to protect their data against any form of improper or illegitimate processing and against any accidental loss or destruction of this data. To this end, we have systems and teams designed to guarantee the security of personal data processed, creating and updating procedures that prevent unauthorized access, accidental loss and/or destruction of personal data, committing to respect the legislation relating to the protection of participants' personal data and to process this data only for the purposes for which it was collected, as well as ensuring that this data is treated with adequate levels of security and confidentiality.

Ginger may, in some cases, transmit your personal data to third parties. Ginger has defined clear contractual rules for the processing of personal data with its operators and requires them to adopt appropriate technical and organizational measures to protect your personal data. However, in some cases, we may be required by law to disclose your personal data to third parties (such as supervisory authorities) over whom we have limited control over the protection of personal data.

The information database formed by Ginger may be made available to strategic business partners for the benefit and generation of mutual results, such as the provision or improvement of our products, services and advertising.

It may be necessary - by law, legal process, litigation and/or requests from public and government authorities within or outside your country of residence - for Ginger to disclose your personal information. We may also disclose your information if we determine that for purposes of national security, law enforcement or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose your information if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger or sale, we may transfer any and all personal information we collect to the relevant third party.

16. UNDER WHAT CIRCUMSTANCES IS DATA COMMUNICATION TO OTHER ENTITIES?

Personal data may be shared with third parties only in the following circumstances:

- With service providers acting on behalf of GINGER
- To comply with legal obligations or respond to legal proceedings.
- With the consent of the data subject.

Ginger uses other entities to provide certain services. Eventually, this provision of services may involve access, by these entities, to the personal data of the participants. This will be the case for entities that provide support services to Ginger.

Therefore, any entity that characterizes itself as a Ginger Operator will process the personal data of our participants, in our name and on our behalf, under the strict obligation to follow our instructions. Ginger ensures that such entities that are characterized as Operators offer sufficient guarantees for the execution of appropriate technical and organizational measures so that the processing satisfies the requirements of applicable law and ensures the security and protection of the rights of data subjects, in accordance with the subcontracting agreement signed with said Operators.

Ginger may transmit your personal data to any Public Entity, the Courts, Solicitors, criminal police bodies or the Public Prosecutor's Office when notified to this effect or when this is necessary to comply with legal obligations, as legally provided.

In any of the situations mentioned above, Ginger undertakes to take all reasonable measures to ensure the effective protection of the personal data it processes.

17. CONTACT US

You may contact Ginger's Data Protection Officer ("DPO") for more information about the processing of your personal data, as well as any questions related to the exercise of the rights attributed to you by applicable legislation and, in particular, those referred to in this Privacy Policy, through the following contacts:
email: dpo@ginger.com.br


18. HOW DO I FIND OUT OF ANY CHANGES TO THE GINGER PRIVACY POLICY?

Ginger reserves the right, at any time, to make changes or updates to this Privacy Policy, with these changes being duly updated on our Platforms. We suggest that you consult them regularly to be aware of any changes.

The logo for 'ginger' is located in the top right corner. It consists of the word 'ginger' in a lowercase, sans-serif font, with a stylized orange swirl graphic behind the letters 'i' and 'n'.

ginger

strategic research

The page is decorated with several thin, flowing orange lines that create a sense of movement and organic form. These lines start from the top right, near the logo, and sweep across the page in various directions, some looping back on themselves.