

COMPLIANCE PROGRAM – GENERAL PERSONAL DATA PROTECTION LAW



PRIVACY POLICY

1. OBJECTIVE OF THIS POLICY

FLASH INDUSTRIA E COMERCIO DE PRODUTOS E SISTEMAS ELETROELETRONICOS LTDA, hereinafter

referred to as "FLASH ENGENHARIA" (CNPJ No. 04.844.206/0001-59), headquartered at Rua Professora Celia Cangro Marques Mendes, No. 1000 - Alto da Boa Vista - Sorocaba, SP - CEP 18.087-171, is the Data Controller for personal data.

- The company employs its best efforts to provide adequate protection measures in all operations and to implement consistent, effective, and rigorous policies and procedures.
- Recognizing the importance of privacy, this Policy informs users regarding the conditions under which Personal Data is Processed and Protected.
- It describes your rights and how to exercise them, or how to contact the company with questions regarding data protection.
- The terms apply to Users and/or Visitors of the website <https://flashengenharia.com.br>, also known as DIGITAL CHANNELS.

2. ORIGIN OF PERSONAL DATA

FLASH ENGENHARIA collects and processes Personal Data that may be provided:

- I. By the company that contracts FLASH ENGENHARIA's services on your behalf.
- II. Through information collection from other reliable sources.

Information collected includes:

- a) For natural persons: name, CPF (Tax ID), RG (ID), email, marital status, telephone and cell phone numbers, address, and date of birth.
- b) For legal entities: corporate name, CNPJ (Corporate Tax ID), name of the legal representative, RG and CPF of the representative, number of employees, revenue, complete address, and telephone number.

3. PURPOSES FOR WHICH WE USE PERSONAL DATA

Data is used to provide services, ensure expected performance, improve services, and enhance reliability and security. Specifically, FLASH ENGENHARIA may use data to:

- Administer and provide services and fulfill contractual obligations.
- Inform users about news, services, features, benefits, promotions, and relevant relationship events.
- Create action plans for service and product improvement.
- Collaborate with or comply with court orders or requests from administrative authorities.
- Any other purpose informed at the time of collection.
- FLASH ENGENHARIA does not sell or commercialize identifiable information.

4. LEGAL BASIS FOR PROCESSING PERSONAL DATA

Processing is performed as part of the performance and management of the contractual relationship with you or the contracting company, for legitimate interests (of the company or third parties), to comply with legal/regulatory obligations, or for the regular exercise of rights in judicial, administrative, or arbitration proceedings. Processing may also be based on prior consent if requested under certain circumstances.

5. SHARING PERSONAL DATA

Access is restricted to authorized professionals who require such knowledge to process requests or provide services. Data is not disclosed to unauthorized third parties, but may be shared with:

- Entities within the client group.
- Authorized service providers (e.g., Call Centers, relationship agents, BackOffice services, IT and technology consultants) for the purpose of rendering services.
- Sharing occurs only for legitimate, specific, and explicit purposes informed to the user.
- Data may also be shared to comply with laws, regulations, or court orders ; respond to regulatory or police requests ; protect the rights and property of FLASH ENGENHARIA (including fraud investigation and security threat prevention) ; or protect the legitimate interests of third parties and employee safety.

6. STORAGE OF YOUR PERSONAL DATA

Data is stored in secure environments, ensuring secrecy and confidentiality, only for the time necessary to fulfill the purposes of collection, observing legal periods and the need for legal defense. Data may be kept longer if required by law or regulation. Once the period ends, data is deleted using secure disposal methods or anonymized for statistical purposes.

7. INTERNATIONAL TRANSFER OF PERSONAL DATA

Personal Data may eventually be transferred to recipients outside of Brazil authorized to perform services on the company's behalf. In such cases, measures will be adopted to ensure adequate protection guarantees in accordance with the LGPD.

8. EXERCISING YOUR RIGHTS UNDER THE LGPD

FLASH ENGENHARIA respects and enables the exercise of data subject rights in accordance with Article 18 of Law No. 13.709/2018. To exercise these rights, refer to Section 12: CONTACT US. Identity verification may be required for security and fraud prevention.

9. APPLICABLE SECURITY FOR DATA PROTECTION

The company implements technical and administrative market best practices to protect Personal Data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication, or dissemination.

10. ACCESS AND UPDATES TO OUR PRIVACY POLICY

By accessing DIGITAL CHANNELS, you expressly agree to this Policy. Users must ensure they have read and understood all conditions. By accepting, you agree to provide only true, current, and accurate data; you are solely responsible for false or imprecise information.

- Changes will be published on DIGITAL CHANNELS with the revision date.
- Modifications take effect immediately upon publication.
- Previous versions can be requested via email.

11. APPLICABLE LAW AND JURISDICTION

This Policy is governed by Brazilian law. The Forum of the District of Sorocaba is elected to resolve litigation, except for specific legal competencies. For matters outside the state, JUSPRO – Justiça Sem Processo Mediação e Conciliação S/S Ltda. is appointed as the Mediation Chamber.

12. CONTACT US REGARDING YOUR LGPD RIGHTS

FLASH ENGENHARIA has appointed Mr. Henrique Rodrigues and Ms. Jessica Rodrigues as Data Protection Officers (DPO). These practices will be implemented starting in November 2025.

- Direct Line: (47) 93300-8431 (DPO Manager) | (47) 93300-9607 (DPO Operational).
- Email: lgpd@flashengenharia.com.br.
- Physical Address for Requests: Rua Professora Celia Cangro Marques Mendes, No. 1000 - Alto da Boa Vista - Sorocaba, SP - CEP 18.087-171.
 - *Requests via mail must include a Return Receipt (AR).*

13. LAST UPDATE AND PREVIOUS VERSIONS

The last update to this Privacy Policy was made on December 11, 2025.