

GUPY PRIVACY POLICY

Here at Gupy we have a strong commitment to protect privacy and personal data. Therefore, we present this Privacy Policy which contains all information for you regarding Gupy's use of personal data collected on Gupy's Platform ("Platform"). It is worth mentioning that, for the purposes of this Policy, Personal Data are data related to an identified or identifiable natural person - thus, it does not apply to data of a legal entity.

When you register in the Platform, you will be requested to accept this Privacy Policy, which indicates that you are aware of and in accordance with the collection and treatment of your data by Gupy.

WHAT DATA IS COLLECTED? AND HOW?

We may collect data such as your name, identification document, address, contact information, information about your education and professional experiences, among others, when you participate in the recruitment process carried out by companies that use our Platform and integrate their talent pool. We only collect essential data for this activity under the legal basis of your interest in participating in such recruitment processes and integration of talent pools.

The data can be collected in the following ways:

- i. Personal data submitted by you on the Platform: to enable your participation in the recruitment process, we may request your data and it will be up to you to provide it to Gupy, through manual entry and submission. We can also use a tool named Parse, which automatically reads your resume and fills in the data in the Platform.

We only collect the essential data for these activities, which are: name, identification document, address, phone number, date of birth, gender, academic background, professional experience, and, in case you want to inform, profiles on LinkedIn and Facebook. We will use data considered sensitive, such as information that you are a disabled person and your photo, only with your consent, which can be removed at any time.

In addition, if you prefer, you can also import some of your data, such as name, email and photo, directly from social networks such as LinkedIn, Indeed and Facebook. This option only takes place if you choose it, and all data collected in this manner is displayed at the time of integration, according to the information recognized in the specific fields.

- ii. Data arising from the ordinary use of the site: we may also collect data through cookies and other similar technologies, during your navigation on the Platform. The data collected may involve information regarding your device, geolocation data, internet application access records (such as IP, date and time), platform usage time, access duration, clicks and search terms.

Companies interested in your profile may also enter some of your basic data to invite you, via e-mail, to register on the Gupy Platform and in one of their positions. If you do not express interest in up to 30 (thirty) days, your data will be deleted.

WHY DO YOU USE THE PERSONAL DATA COLLECTED?

We use the personal data collected for:

- Enable your participation in recruitment process(es);
- Include your data in the talent pool of the companies in whose recruitment processes you have enrolled;
- To contact you, due to the progress of the recruitment process you are taking part of or to inform you about new processes that may be of your interest;
- To analyze errors or failures in our operations by checking our services;
- To send questions or requests to our support or to the companies which interest in the recruitment process has been manifested by you;
- Suggest new Gupy products to you;
- Monitor our service and our interactions with you.

We will never sell your data for marketing purposes and we will not use your data for purposes other than those indicated above without your consent!

WE DO NOT TOLERATE DISCRIMINATION!

At Gupy, Candidates are not unlawfully discriminated in any way, regardless of the personal data that the platform collects or uses on them. Final hiring decisions, however, are made by the hiring company.

WITH WHOM DO WE SHARE THE COLLECTED DATA?

Your data will be shared only with those who need to be provided with it in order to enable your participation in the recruitment process. Thus, your data will be received by the company that is conducting a recruitment process for which you signed up and, if the position was opened through an HR consultancy, your data will be shared with the consultancy and the company for which the consultancy is conducting a recruitment process. Such companies may communicate directly with you to lead the recruitment process, to invite you to apply for other positions and for related topics.

It is worth pointing that it is possible that your data will be transferred internationally if one of these companies is located in another country. In case of international data transfer, the whole procedure will be done seeking the highest protection and security of your data.

Finally, you will also be able to receive your personal information from service providers we have hired to help us carry out our activities, whatever they may be:

- Amazon Web Services: cloud storage
- Parse: automatic reading of resumes
- Primeira Escolha: assessments
- Here: geolocation
- MailGun: sending emails
- Zendesk: support

Such providers have been carefully selected, have strict confidentiality agreements and obligations related to the protection of your data and may treat your data only for the purposes of providing the service contracted by Gupy.

Other specific legal demands may lead to the sharing of personal data, including for the eventual defense of our rights and interests in any kind of conflicts or for the fulfillment of determinations of competent authorities.

INFORMATION SECURITY MEASURES

Your information is stored in the cloud at Amazon Web Services, certified with the Privacy Shield certificate, which attests to the highest quality in information storage and security.

We work to implement security measures that protect our systems and databases with the best technologies available in the market. Among the security measures we adopt are the use of data encryption, information access control, the use of firewalls and the implementation of internal information security policy, architecture of the software solution with prevention of invasion and use of HTTPS.

However, despite our efforts, considering the nature and architecture of the Internet, which includes elements that are not under our control, it is impossible to guarantee that malicious agents will not be able to access or make improper use of personal data, since this is a risk inherent to the use of computerized systems.

HOW LONG WILL WE KEEP YOUR DATA?

Your personal data is collected also so that you can integrate talent pools of the companies in whose recruitment processes you have enrolled, but, at any time, you may request its deletion, as indicated in the item below. If you do not request deletion, but your account remains inactive for a period of one (1) year, we will ask you about your interest in keeping your data on the Platform.

WHAT ARE YOUR RIGHTS REGARDING THE PRIVACY OF YOUR DATA?

Here at Gupy your rights are taken seriously! You can at any time:

- Access your data: you have access to your data in your Gupy Platform profile;

- Correct your data: in case of incorrect data, you can make the change in your profile yourself; if you have any difficulties, open a ticket through <https://gupy.zendesk.com/hc/pt-br/requests/new>;
- Delete your account: you can also request the deletion of your data by opening a ticket through <https://gupy.zendesk.com/hc/pt-br/requests/new>. It is possible that after the request for deletion of your platform account, some data will remain stored, to prevent fraud to the system, for the purpose of fulfilling legal obligations or to protect the legal interests of Gupy or its business partners, especially in case of participation in recruitment processes;
- Portability: You may request the portability of your data stored in the platform, which means that if there is this type of request, Gupy will deliver to you a copy of your personal data in a common reading format, and the compatibility between such format and the technical configurations of other online recruitment platforms cannot be guaranteed.

If you experience any difficulty in exercising your rights under this Privacy Policy, please contact our Data Protection department via email: renata.benjamin@gupy.com.br. It will be a pleasure to help!

This Privacy Policy may be updated. Therefore, we recommend that you periodically visit this page to learn about the changes. In case relevant changes are made that require new authorizations from you, we will contact you via email.

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