



## GUPY PRIVACY POLICY FOR COMPANIES

Gupy is strongly committed to the privacy and protection of your personal data.

Therefore, we present this Privacy Policy, which has all the information for you, COMPANY USER, regarding the use, by Gupy, 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 the identified or identifiable natural person - that is, it does not apply to data of legal entity.

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

Your data is always collected in accordance with this Privacy Notice and in compliance with relevant data protection legislation, in particular the Brazilian General Data Protection Law ("LGPD").

### WHO WE ARE?

GUPY TECNOLOGIA EM RECRUTAMENTO  
CNPJ nº 23.514.668/0001-52

Gupy is the owner of the Recruitment and Selection Platform entitled Gupy (the "Gupy Platform" or "Platform") and acts as the operator when processing your personal data.

### WHO IS THE DATA PROTECTION OFFICER (DPO)?

Name: Renata Benjamin  
E-mail: [privacidade@gupy.com.br](mailto:privacidade@gupy.com.br)

### WHAT DATA IS COLLECTED? AND HOW?

We may collect data such as your name, country of origin, identification document, email and language so that we can create your recruiter or manager profile to enable you to use the Platform according to the permissions you have been granted. You or your COMPANY can also inform us of the area, position and affiliate in which you operate and, if you wish, you can tell us what your interests in Gupy are and what is your role



in the Platform, and can also include a photo in your profile. Finally, you can be invited to take tests to help us determine the COMPANY's profile. We only collect data essential to our activity and under the legal basis of compliance with the contract signed between the COMPANY and GUPY for the use of the Platform to conduct recruitment processes of the COMPANY.

Data can be collected in the following ways:

**(i) Personal data entered by you in the Platform:** in order to make your use of the tool possible, we can request your data from you and from the COMPANY. Some data will be provided directly by you and others by the COMPANY. The data provided by the COMPANY will be the COMPANY's responsibility and any changes should be requested to the account administrator.

**(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 Gupy Platform. The data collected in this way 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.

## WHAT DO WE USE THE PERSONAL DATA COLLECTED FOR?

We use the personal data collected for:

- Allow your use of the Platform;
- To contact you, due to the ongoing recruitment process for which you are responsible;
- Analyze errors or failures in our operations by checking our services;
- Control permission and hide sensitive information according to your profile;
- Ensure a unique and secure registration of company users within Gupy;
- Reuse data from company users as candidate users or vice-versa (example: profile tests results);
- Enable Gupy integration with other people management software used by companies;



- Link product usage data with companies' hierarchical data (example: recruitment and selection indicators specific by company area);
- Guide your experience in the platform, according to what makes more sense to your needs;
- Forward doubts or requirements to support;
- 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.

## WITH WHOM DO WE SHARE THE COLLECTED DATA?

Your data will be shared (and only if strictly necessary) with some service providers we have hired to help us perform our activities, whatever they may be:

- Amazon Web Services: cloud storage
- Primeira Escolha: tests
- MailGun: sending e-mails
- Zendesk: support
- Metabase: analysis of company user behavior
- Sentry: application monitoring
- New Relic: application monitoring
- Google Analytics: using navigation data for analysis
- Hotjar: product research

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 and 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

We are very concerned about the privacy and protection of your personal data, so we have adopted technical and organizational security measures and best practices to protect our systems and databases, using the best technologies available in the market.

Among the security measures we adopt are the use of antivirus, data encryption, anonymization of personal data, access control, use of firewalls and implementation of internal information security policy, architecture of the software solution with intrusion prevention and use of HTTPS, institutional measures (Program and governance structure), protection against unauthorized access.

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.

## WHERE IS YOUR DATA STORED?

Your data is stored in the cloud by Amazon Web Services, whose server is located in the state of Virginia, in the United States, which will require transfer and/or processing of this data outside Brazil.

## FOR HOW LONG WILL WE KEEP YOUR DATA?

Your personal data will be kept only as long as (i) you are appointed by the COMPANY as a user of the Platform and (ii) the GUPY and the COMPANY have a current business relationship. Once such conditions cease to exist, your data will be deleted.

## WHAT ARE YOUR RIGHTS?

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 change some of them yourself in your profile. If the change is blocked, talk to your account administrator;
- Delete your account: your account is necessary to use the GUPY Platform, so your deletion will be done under the conditions mentioned above;
- 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 readable format, and the compatibility between such format and the technical settings of other online recruitment platforms cannot be guaranteed.

## HOW TO REQUEST THE FULFILLMENT OF A RIGHT?

To exercise any of your rights provided in the item above, open a request by clicking on the link: [Gupy's Privacy Portal](#)

If you feel any difficulty in exercising your rights under this Privacy Notice, please contact our Data Protection department via e-mail: [renata.benjamin@gupy.com.br](mailto:renata.benjamin@gupy.com.br). It will be a pleasure to help.

This Privacy Notice may be updated at any time, such changes will be posted on our services and can be checked at any time. Therefore, we recommend that you visit this page periodically so that you are aware of the changes. If any relevant changes are made that require further consent from you, you will be notified through the platform.

Last updated: December 7th, 2022.