

PRIVACY POLICY PODE PERGUNTAR

Last update: April 3rd 2023

PODE PERGUNTAR SERVIÇOS DE TECNOLOGIA APLICADO À SAÚDE LTDA ("Pode Perguntar"; "We" and/or "Our") values the privacy of individuals ("users") who use our chatbot ("chatbot"; "tool"; "application" and /or "service").

For that reason, this Privacy Policy ("Policy") is intended to explain how we collect, process and share the personal data you provide while using our chatbot.

This policy also informs you about your rights as a data subject and how you can contact us for questions, complaints or concerns.

This Privacy Policy applies to personal data processed during the use of the chatbot controlled by "Pode Perguntar"

In addition to this policy, the use of our chatbot is also subject to our Terms of Use <https://privacy.podeperguntar.com/en-us/term-and-conditions.pdf>

1. Important Definitions

To help you better understand our privacy policy, we have provided below some important definitions that may be used:

- (a) "Personal Data": means any information related to an identified or identifiable natural person, such as name, identification numbers, online identifiers and others;
- (b) "Data Subject": means the natural person identified or identifiable, directly or indirectly, through personal data;
- (c) "Data Processing": means any operation or set of operations performed on personal data, such as collection, registration, organization, structuring, storage, alteration, retrieval, consultation, disclosure, erasure, combination and others;
- (d) "Controller": means the natural or legal person, public authority, agency or other body that determines the purposes and means of data processing;
- (e) "Legal Basis": means the hypotheses determined by law that authorize the processing of data;
- (f) "Consent": means the free, specific, informed and unequivocal indication of the data subject's wishes that imply in agreement with the processing of their personal data;
- (g) "Health Related Data": is personal data related to the physical or mental health of a natural person that reveals information about his state of health.
- (h) "Supervisory Authority": is a body or public authority responsible for overseeing, implementing, monitoring and enforcing data protection legislation in a territory.

2. What personal data do we collect from you and for what purpose?

Our chatbot has the purpose of providing qualified guidance and tips on pregnancy, breastfeeding, postpartum and related matters for those women who are trying to conceive or pregnant and postpartum women, according to information provided by the user, therefore, during the use of

our chatbot you can provide us with some data.

The data required are only those necessary to provide the necessary guidelines and are indispensable for us to properly provide our service. Therefore, if you choose not to provide your personal data, you will not be able to use our services correctly.

2.1 Data you may provide to us when chatting with our chatbot

Identification information. When you start a conversation with our chatbot, you provide us with your name. This information is used exclusively to identify your conversation in our database.

Confidential Personal Information. During your use of our chatbot, you may provide us with certain personal information, such as your current pregnancy status (pregnant, postpartum or trying to conceive); baby's date of birth; date of last menstrual period; probable date of delivery or week of pregnancy; newborn's life span; pre-existence of health conditions or habits that interfere with pregnancy (diabetes, hypertension, smoking, etc.) and health complaints related to your condition (bleeding, nausea, dizziness, etc.). This information is essential for our chatbot to be able to provide personalized guidance for your case, indicating the care to be taken and how these symptoms may be related to your condition.

Payment Information. When talking to our chatbot, you can choose to receive personalized guidance from a specialized professional, in these cases, the service will be paid and depending on the payment method used, you can provide us with some information by sending the proof of payment, including full name, CPF, bank branch and account. This information will be used exclusively for the validation of service fees payment. This information is only applicable if our paid services are available for your region.

Communications and Marketing. If you contact us through our communication channels, we may receive additional information about you, which may include your name, e-mail address, telephone number, the content of a message or attachments you send us, and other information that you choose to provide.

We may also collect data from you if you choose to receive marketing and promotional communications from us. In this case, we may send these materials via e-mail address, telephone and/or cell phone or other digital channels that you provide us. You are the owner of your data and can choose not to provide it or cancel your subscription and the sending of communication through these channels at any time.

If you decide to subscribe and register for our partners' marketing campaigns, you can provide them with data for communication, such as e-mail, telephone and/or cell phone and other digital channels. This information, when collected, will be used to generate leads and provide you with personalized offers. The information you provide directly to our partners is governed by their own Privacy Policies.

Search data. We may carry out some questionnaires and surveys in our application. If you choose to participate, we may collect some of your data including, your responses to our questions, your opinion and experience about using our application, and other information about

your pregnancy, breastfeeding and maternal care. This information will only be used for research purposes and understanding about the use of our application and user experience.

Research data may be combined with other information provided by you for the purpose of gaining a better understanding of our audience and the functioning of our services.

In some cases, these surveys may be conducted jointly with our business partners, but when this occurs, only insights about our surveys will be shared. We will not share personal data collected in our partner surveys.

2.1. Data we collect while you chat with our chatbot

Usage Information. We automatically receive information about your interactions with our services, including the amount, timing and return of hits, most searched topics, satisfaction with the conversation, links displayed during your conversation with our chatbot and clicks on ads. All this information is strictly used to improve our chatbot and to check points for improvement.

Device information. From your access to our chatbot we collect information about the device and software you use to access our Services, including IP address, web browser type, operating system version. This information is collected to verify your interaction with our chatbot and to carry out technical improvement of our platform according to the operational requirements used.

Cookie Information. Cookies are small pieces of data that a website can send to your internet browser and which are stored on your computer. They help our chatbot to recognize users and authenticate them. In addition, we may use cookies for advertising customization and analysis (see item 2.4).

2.1. Sensitive Personal Data

The guidance provided by our chatbot relates to the confidential personal information you provide us. Therefore, when initiating a conversation with our chatbot we will inform you and collect your consent to the processing of this data.

You can withdraw your consent at any time without this interfering with the legality of the previous processing carried out while your consent was in force (see item 8).

The sensitive personal data we collect are only those that relate to your status as a trying to conceive, pregnant or postpartum woman. For that reason, we kindly ask that you do not provide us with other sensitive data (e.g. religion, ethnic or racial origin, political opinions, genetics-related issues or health data unrelated to the questions asked by our chatbot).

2.1. Use of cookies

Our chatbot uses cookies to collect information about you. Cookies are small files or data packets sent to the user's browser when visiting our chatbot. The cookies we use are:

- **Session Cookies:** these cookies are used to make our chatbot remember you, allowing you to authenticate each time you return to our chatbot. Through them you can return to the same conversation with our chatbot, without having to answer the preliminary

questions again at each new access.

- **Analytics Cookies:** These cookies help us collect information about your use of our chatbot and allow us to improve how our chatbot works by observing how our application has performed on your device.

You have the option to change your preferences regarding the use of cookies in your browser settings. If you refuse the use of cookies, you may not be able to use some features of our application.

How do cookies relate to our ads?

Our chatbot does not use cookies for the purpose of delivering advertising.

We may collect, for example, information about your access device, browser used, the areas of our chatbot you access and clicks on advertisements. This data will only serve to evaluate the performance of our application and the advertisements provided. You will still receive advertisements, but they will be established based on contextual targeting, i.e. they will relate to the areas of our chatbot that you access, but not your interests and preferences.

When an advertisement located on our chatbot directs you to one of our partner websites, cookies may be used to collect anonymous information about how you interact with the advertisement and the suggested website and to gather insights to measure the effectiveness of our advertising.

3. Legal bases used for processing

We only process your information on valid legal grounds set out in the General Data Protection Regulation (GDPR), including:

- **Consent.** When you consent to the use of your data, for example for the provision of health-related data and for the purposes of use cookies and similar Technologies
- **Contract.** When the use of your data is essential to provide our services (use of our chatbot), for example, to respond to your questions.
- **Legal Obligation.** When the use of your data arises from a legal obligation to which we are bound, for example, to comply with local, state and federal laws.
- **Legitimate interest.** When we or a third party have a legitimate interest in using your data, for example, for the purposes of analyzing the performance of our chatbot or to improve the security of our services. These interests will only be used to process your data when these interests are not overruled by your individual rights and guarantees.

4. With whom do we share your data?

The security and confidentiality of your data is very important to us. However, the viability of certain activities, necessary for the functioning and availability of our chatbot, only occur with the sharing of some data.

Therefore, *Pode Perguntar* may need to share your data with third parties, including business partners and service providers. When this occurs, it will be done following the provisions of this policy and applicable legislation.

4.1. Service Providers

Pode Perguntar works with some essential service providers to help run, operate, update, customize and improve our chatbot.

We may share your personal data with the following service providers:

Cloud storage and processing servers. These servers are essential for us to store your personal data in a secure environment and ensure the functioning of our chatbot.

- Google Cloud Platform and Workspace. They are providers of cloud resources used to develop, deploy and operate our application and also to manage and store information.

Performance analysis servers. These providers are necessary to provide performance analysis of our service that serve as a basis for improving the functioning of our chatbot.

- Google Analytics. We use this Google service to obtain analytical reports on the performance of our chatbot. Through it we can understand how you interact with our chatbot and how it runs on your device. Through this data, we are able to identify failures, fix problems and promote functionality changes or implementations to improve your experience with our services.

Payment Gateway. Payment gateways are a digital payment technology that enables safe and responsible data transmission between customers, companies and banks. *Pode Perguntar* uses *PagSeguro* to carry out its purchases in our chatbot. This platform uses the standards defined by the PCI-DSS that help to guarantee the security of the transactions carried out. Card information or related payment data is not stored in our system and the entire payment approval process is done directly with the credit card companies. For more information, please check PagSeguro website: <http://www.pagseuro.com.br/>. This sharing is only applicable if our paid services are available for your region.

IT service providers. These service providers develop our chatbot by implementing features and fixing bugs or other technical issues. Only contracted IT developers have access to your personal data.

Professional Consultants. We may share your data with professionals, contractually linked to *Pode Perguntar*, when you require this type of service. This sharing will only be applicable if this type of service is available for your region.

In sharing your data with our service providers, we take care to demand that the same level of security and protection of your data that we provide is maintained. Furthermore, the data transferred is only strictly necessary to fulfill the aforementioned sharing purposes.

Advertising Partners. We may use ad services to advertising in our application, these services use specific methods to collect information. This process should be based on this Privacy Policy, but we emphasize that we have no control over the technology and operation of third parties.

4.2. Public and Government Authorities

Whenever necessary *Pode Perguntar* may share your data with these authorities to protect our rights or under legal requirements of public and governmental authorities.

5. How does the protection of my data work when accessing third-party links?

While using our chatbot, you may come across some links that direct you to other sites related to our work. These sites are not controlled by *Pode Perguntar* and the data you provide to them will be governed by the respective Privacy Policy of those sites.

6. Is my data transferred internationally?

You are aware that when using our chatbot your data may be processed in any country where our service providers are located.

By providing your data you acknowledge and agree that it may be transferred to other countries across national borders.

Pode Perguntar clarifies and guarantees that it complies with the legal requirements applicable to the international transfer of data that are only carried out with countries that have data protection legislation similar to the General Data Protection Regulation (GDPR) and rely on Privacy Shield certifications from third parties, when applicable.

When international data transfer takes place, this will be safeguarded by the adoption of a standard data protection clause and certification mechanism by the data processor (Google), which can be consulted here : <http://policies.google.com/privacy/frameworks?hl=pt-BR>.

7. How long do we retain your data?

Pode Perguntar only processes user data for the length of time necessary to fulfill the purposes set out in this policy. To determine the length of time, we took into account the following criteria:

- The amount of time the user uses our chatbot, and the number of times accessed per week by the user;
- If there are any legal obligations or laws which we need to obey.

If after 12 (twelve) months the user has not accessed our chatbot, the conversations may be kept anonymously (not identifying the user), for the purpose of training our artificial intelligence and gather non-identifiable group statistics.

8. Your rights as a data subject

Pode Perguntar recognizes and respects your rights as a data subject. If you are a resident of the European Union, these rights include: right of access, rectification, erasure, restriction, opposition and portability (copying your data in an accessible format for transmission purposes).

If you are a resident in Brazil, your rights include confirmation of existence; access; correction; anonymization, blocking or elimination of unnecessary, excessive or processed data in violation of the law; portability; elimination; sharing information; revocation of consent and information about non-provision and its consequences.

Therefore, if you wish to enjoy one of these rights, please contact us at privacysecurity@podeperguntar.com.

We will respond to all your requests in accordance with applicable law, but for your protection it may be necessary for us to pre-check your information to ensure that you are the data subject.

When making your request, please clarify which of the aforementioned rights you intend to exercise and on which data. Also, if possible, let us know the approximate date and time of your contact with our chatbot.

Considering that our chatbot provides guidance for pregnant, trying to conceive and postpartum women based on the data provided by the user, if you do not provide us with your data, it is possible that our service will not work properly for you.

Furthermore, in cases when your consent is required, you have the right to withdraw it at any time without this interfering with the lawfulness of the processing carried out under your consent.

We care and are concerned about guaranteeing your rights. However, if you have any unresolved concerns, it is your right to file a complaint with the supervisory authority at your place of residence or where the incident occurred.

9. **Automated decision making and profiling**

Although the technology used by *Pode Perguntar* includes the application of certain automatic rules to establish what guidance should be provided to you based on the data you have provided to us, the decision on how to proceed is made by you. We do not profile or make automated decisions based on the data you provide to us.

10. **Our care to ensure the security of your data**

Pode Perguntar is concerned about the integrity and confidentiality of your personal data, so we take commercially reasonable precautions to protect your personal data, including physical and electronic safeguards designed to ensure the security of the data we hold. We guarantee that all technical and operational measures within our reach are carried out to prevent your data from being exposed to accidental or unauthorized access, alteration, loss or misuse.

11. **Data from Children**

Our services are not intended for or directed at children under the age of sixteen (16). Therefore, we ask that our users, in no way, provide information about children without first obtaining parental consent or from his or her legal guardian.

If you learn that a child has provided us with personal data without parental or guardian consent, please contact us at privacysecurity@podeperguntar.com. If we become aware that a child has used our platform and provided us with personal data, we will delete their data from our database.

12. Contact us

If you have any questions, concerns or recommendations about how we process your personal data, please contact us at privacysecurity@podeperguntar.com.

If you prefer, you can contact our data protection officer directly at privacysecurity@podeperguntar.com.

MVB Health Consulting

Av. Dr. Arthur da Costa Filho, 1903, Sala 2- Sumaré, Caraguatatuba - SP, 11661-090

13. Changes to our privacy policy

We reserve the right to change this policy at any time. Changes will be posted on this page and the revised version will take effect upon posting.

In the event of substantial changes to this policy, we will indicate through our application the existence of the change. Continuing to use our chatbot after the changes means that you are kept informed about the updates made.



Additional Information for Residents of California

Pode Perguntar

This policy is in addition to our Privacy Policy for individuals protected by California law. California residents have certain additional rights with respect to their Personal Information under the California Consumer Privacy Act ("CCPA").

Under the CCPA, "Personal Information" is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be associated with, a particular California resident or family.

Below we provide the following details about the Personal Information categories we collect and process about California residents through our platform:

1. Collection and Disclosure of Personal Information

The Personal Information we may collect from California consumers is listed in item 2 of our Privacy Policy. In reference to item 2, we may collect the following information: identification; confidential personnel; Payment; Communications and Marketing; Search data; Usage information of the device and Cookies.

Below we provide a list of which categories of Personal Information about California residents we plan to collect and disclose for our business and operational purposes.

Personal Information Categories	Disclosed to which categories of third parties for business operations purposes
Identifiers: such as name, contact information, IP address and other online identifiers.	Our trusted service providers business partners; in accordance with item 4 ("Who do we share your data with?") of this Privacy Policy.
Personal information defined in California customer records law: such as name and contact information.	Our trusted service providers; service providers; business partners; in accordance with item 4 ("Who do we share your data with?") of this Privacy Policy.
Characteristics of classifications protected under California or federal law: such as age, medical conditions	Our trusted service providers; service providers and consultants; in accordance with item 4 ("Who do we share your data with?") of this Privacy Policy.
Information about Internet or network activities: such as browsing history and interactions with our online services	Our trusted service providers; business partners; in accordance with item 4 ("Who do we share your data with?") of this Privacy Policy.

It should be noted that the categories listed above are those defined in the CCPA. This does not mean that all examples in this category of personal information are in fact disclosed or collected, but it reflects our good faith, to the best of our knowledge, that some of this applicable category information may be or has been disclosed or collected.

2. Purposes of Use of Personal Information

All Personal Information collected by *Pode Perguntar* California consumers is used strictly for the purposes of operating, managing and maintaining our business, providing our products and services, and carrying out our business purposes and objectives in accordance with the purposes set forth in this Policy, as described in item 2 ("What personal data do we collect from you and for what purpose?").

Pode Perguntar does not sell your Personal Information and has not sold Personal Information in the last 12 months, as "sale" is defined in the CCPA. We also do not sell personal information to anyone under the age of 16.

3. Collection sources

The Personal Information we collect from California consumers derives from our interactions with those users through our platform. This information can be provided:

- **Directly from you** during the normal course of your relationship with our platform (chatbot interaction, purchases, participation in our surveys, among others);
- **Automatically from you** through the use of cookies that we set on your while you browse our Service. Your cookie preferences can be changed at any time in your

browser settings

- **From Service Providers.** For example, third-party vendors to monitor and analyze your use of our Service, third-party vendors for processing payments, or other third-party vendors we use to provide the Service to you.

4. California Consumer Rights

If you are a California resident, you have the right to:

- Request the disclosure of the following information:
 - The categories of Personal Information collected or disclosed for commercial purposes about you;
 - The categories of sources from which the information is collected;
 - The business purpose to collect or sell information;
 - The categories of third parties with which the company shares personal information;
 - The specific personal information we collect about you.
- Request the deletion of any Personal Information concerning you;
- Say no to the sale of your Personal Information (opt-out). We do not sell your Personal Information, so this right does not apply to data we collect from you.

You have the right to be free from unlawful discrimination by exercising your rights under the CCPA.

If you wish to make a request for the rights described above, please contact us at privacysecurity@podeperguntar.com or via our contact form on our website www.podeperguntar.com

To verify your request, we may request additional information reasonably related to your request, taking into account the type and sensitivity of the Personal Information subject to the request.

Where your rights can be exercised by authorized agents as provided in the CCPA, you may use the submission methods noted above. We may ask the authorized agent to provide us with written permission signed by you to make requests on your behalf, and the authorized agent must also be able to respond to additional information that we request.

5. Responding to Do Not Track Signals

Certain web browsers may allow you to enable a "do not track" option that sends signals to the websites you visit indicating that you do not want your online activities to be tracked. There is still no standard on how companies should respond to "do not track" signals, although one could be adopted in the future. We do not currently respond to "do not track" signals. If we do this in the future, we will amend this Policy accordingly.

6. California's Shine the Light Act

California resident consumers may request and obtain from us, once a year, free of charge, information about personal information that we disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If you are a California resident and would like to

make such a request, please email us at privacysecurity@podeperguntar.com specifying your request.

7. Last Update Date and Changes to this Policy

Our Policy was last updated as of the date indicated at the beginning of this Privacy Policy.



Pode Perguntar