



PRIVACY POLICY

Vox Soluções em TI

São Paulo, June 18, 2025

Responsible: Compliance Department

Version: 3.2025

PRIVACY POLICY AND DATA PROTECTION

Vox Soluções em TI

This Privacy Policy applies to the services provided by Vox Soluções em TI, including customer support systems, CRM platforms, call recording systems, internal operational systems, and website interactions.

1. Purpose

This Privacy and Personal Data Protection Policy (“Policy”) describes how Vox Soluções em TI collects, uses, stores, shares, and protects the personal data of its users, in compliance with the Brazilian General Data Protection Law (Law No. 13,709/2018 – “LGPD”).

1.1 Personal Data:

Refers to any information related to an identified or identifiable natural person, as defined by the LGPD.

1.2 Processing of Personal Data:

Refers to any operation performed on personal data, such as collection, storage, use, processing, sharing, and deletion.

2. Collection and Use of Personal Data

2.1 Purpose and Legal Basis:

We collect and use personal data in order to provide and improve our services, respond to user requests, and comply with contractual and legal obligations.

The processing of personal data by Vox Soluções em TI is based on the following legal bases, when applicable:

Performance of a contract: when processing is necessary to provide services requested by customers or to fulfill contractual obligations.

Compliance with legal obligations: when processing is required to comply with applicable laws and regulations.

Legitimate interest: when processing is necessary for the legitimate interests of Vox Soluções em TI, such as improving services, ensuring security, and managing business operations, provided that such interests do not override the rights and freedoms of the data subject.

Consent: when the data subject has provided explicit consent for the processing of their personal data, where required by law.

2.2 Types of Data Collected:

We may collect personal data such as name, email address, phone number, CPF or other identification numbers (when applicable), company information, and other information provided by users when using our services.

We may also collect technical data such as IP address, device information, location data, cookies, and browsing history related to the use of our website and services.

In the context of customer support and service operations, Vox Soluções em TI may process customer interaction data, including support requests, communication records, and call metadata. When applicable, call recordings and associated identifiers such as phone number, email address, or other identifiers provided during the interaction may also be processed.

2.3 Consent:

When required, we will request the express consent of users before collecting and using their personal data, clearly informing them about the purposes and rights related to their data.

2.4 Categories of Personal Data Processed

Vox Soluções em TI may process different categories of personal data depending on the services provided. These categories may include:

Identification data: such as name, CPF, or other identification numbers when applicable.

Contact data: such as email address, phone number, and company information.

Technical data: such as IP address, device information, system logs, cookies, and browsing data related to the use of our services or website.

Customer interaction data: such as support requests, communications, and service interaction records.

Call recordings and call metadata: including phone number and other identifiers associated with customer service calls when call recording services are used.

Employment data: such as personal and contractual information related to employees, processed for administrative, payroll, and legal compliance purposes.

3. Sharing of Personal Data

3.1 Third Parties:

We may share personal data with trusted third parties, such as service providers, business partners, cloud infrastructure providers, and government authorities, when necessary to fulfill the purposes described in this Privacy Policy and in compliance with the LGPD. These third parties may include providers of cloud hosting, IT infrastructure, customer support systems, and other business software platforms required for the operation of our services.

3.2 International Data Transfers:

In some cases, personal data may be transferred to foreign countries, provided that appropriate safeguards and data protection laws are respected.

4. Security Measures

4.1 Data Protection:

We implement technical and organizational security measures to protect personal data against unauthorized access, misuse, alteration, destruction, or unauthorized disclosure, in accordance with the LGPD.

4.2 Restricted Access:

Access to personal data is restricted to authorized employees and third parties who require such information to fulfill their contractual and legal obligations.

5. Rights of Data Subjects

5.1 Data Subject Rights:

In accordance with the Brazilian General Data Protection Law (LGPD) and other applicable data protection regulations, data subjects have the right to request information about the processing of their personal data and may exercise the following rights:

- **Right to be informed** about the collection and use of their personal data.
- **Right of access** to their personal data and information about how it is processed.
- **Right to rectification** of inaccurate or incomplete personal data.
- **Right to erasure** of personal data, when applicable under the law.
- **Right to restriction of processing**, when the accuracy or legality of the processing is contested.
- **Right to data portability**, where technically feasible and legally applicable.
- **Right to object** to the processing of personal data based on legitimate interests.
- **Right to revoke consent**, when processing is based on consent.

Data subjects may exercise these rights by contacting Vox Soluções em TI through the communication channels provided in this Privacy Policy.

Vox Soluções em TI does not perform automated decision-making or profiling that produces legal or similarly significant effects on data subjects.

5.2 Exercise of Rights:

Data subjects may exercise their rights by submitting a request to the Data Protection Officer (DPO) via email at wagner@voxsolucoes.com.br.

DPO – Data Protection Officer
Wagner Araújo – wagner@voxsolucoes.com.br

6. Data Retention

Vox Soluções em TI retains personal data only for as long as necessary to fulfill the purposes for which it was collected, including compliance with legal, contractual, and regulatory obligations. Retention periods may vary depending on the type of data and the applicable legal requirements.

The following table provides a general overview of retention periods applied by Vox Soluções em TI:

Data Type	Retention Period
Customer data	During the contractual relationship and as required by applicable laws
Call recordings and call metadata	According to contractual, operational, and service requirements
Website logs and technical data	Up to 12 months
Employee data	According to applicable labor, tax, and legal obligations

After the retention period expires, personal data is securely deleted or anonymized, unless further retention is required by law or regulatory obligations.

Next Review: jun/2026

This Privacy Policy is effective as of the approval date and must be read and understood by all members of Vox Soluções and its business partners.

Wagner Araújo

Wagner Araújo
São Paulo, June 18, 2025