



Privacy Policy

Escola Internacional de Alphaville

<https://www.escolainternacional.com.br>

rev 04112020

The website <https://escolainternacional.com.br> is maintained and operated by Escola Internacional de Alphaville, which hereby declares its privacy, data use, and protection policy for all intents and purposes.

We collect and use some personal data belonging to those who use our website. In doing so, we act as the **controller** of this data and are subject to the provisions of **Federal Law No. 13,709/2018** (General Personal Data Protection Law - LGPD).

We take care to protect your personal data and, therefore, we provide this privacy policy, which contains important information about:

- Who **should use our website**
- What data we collect and what we do with it
- Your rights in relation to your personal data
- How to contact us.

1. Data we collect and reasons for collection

Our website collects and uses certain personal data from our users, in accordance with the provisions of this section.

1.1 Personal data expressly provided by the user

Nós coletamos os seguintes dados pessoais que nossos usuários nos fornecem expressamente ao utilizar nosso site:

- Full name, email, cell phone, and contact preferences for parents or interested parties.
- Name and date of birth of children or prospective students.

This data is collected when you fill out and submit the electronic form to request visits and/or detailed information about the Escola Internacional de Alphaville.

The data provided by our users is collected for the purpose of personalizing and facilitating contact with Escola Internacional de Alphaville. It is also used to send marketing campaigns and/or information relevant to the data collected.



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1.2 Personal data obtained automatically

The following data is collected automatically, without the need for visitor intervention:

- IP address
- Geolocation
- Date and time of visit.

As this data is collected automatically, it occurs with every access to any page on the website. All that is required is for the pages to be displayed on the screen.

This data is used to provide visitors with a better browsing experience, security, and to facilitate contact when requested.

1.3 Sensitive data

No sensitive data will be collected from our users, as defined in Articles 11 and seq. of the Personal Data Protection Law. Thus, **no** data will be collected on racial or ethnic origin, religious beliefs, political opinions, union membership, or affiliation with religious, philosophical, or political organizations, data relating to health or sex life, or genetic or biometric data when linked to a natural person.

1.4 Data on children and adolescents

We collect the following data relating to children and adolescents, for the sole purpose of anticipating the information necessary to provide the most appropriate and informative in-person visit.

- Full name
- Date of birth

This data will always be collected via an electronic form to request a visit and/or detailed information about the Escola Internacional de Alphaville, together with the data of those responsible, as mentioned in 1.1.

The processing of data relating to children and adolescents is carried out in the best interests of the child or adolescent.



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2. Cookies

Cookies are small text files that are automatically downloaded to your device when you access and browse a website. They basically serve to identify devices, user activities, and preferences.

Cookies do not allow any files or information to be extracted from the user's hard drive, nor can they be used to access personal information that has not been provided by the user or through their use of the website's resources.

2.1 Third-party cookies

Some of our partners may set *cookies* on the devices of users who access our website.

These *cookies* generally aim to allow our partners to offer their content and services to users who access our website in a personalized way, by obtaining browsing data derived from their interaction with the website.

Users can obtain more information about third-party *cookies* and how the data obtained from them is processed, as well as access a description of the *cookies* used and their characteristics, through the following *links*:

Google Analytics

<https://developers.google.com/analytics/devguides/collection/gajs/cookie-usage>

Hubspot

<https://knowledge.hubspot.com/pt/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser#cookies-from-third-party-systems>

The entities responsible for collecting cookies may transfer the information obtained to third parties.

2.1 Cookie management

Users may object to the registration of *cookies* by the website by simply disabling this option in their browser. More information on how to do this in some of the main browsers currently in use can be accessed through the following *links*:

Internet Explorer:

<https://support.microsoft.com/pt-br/help/17442/windows-internet-explorer-delete-manage-cookies>

Safari:

<https://support.apple.com/pt-br/guide/safari/sfri11471/mac>

Google Chrome:

<https://support.google.com/chrome/answer/95647?hl=pt-BR&hlrm=pt>



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Mozilla Firefox:

<https://support.mozilla.org/pt-BR/kb/ativa-e-desativa-os-cookies-que-os-sites-usam>

Opera:

<https://www.opera.com/help/tutorials/security/privacy/>

However, disabling *cookies* may affect the availability of some tools and features on the website, compromising its proper and expected functioning. Another possible consequence is the removal of user preferences that may have been saved, impairing the browsing experience.

3. Collection of data not expressly provided for

Occasionally, other types of data not expressly provided for in this Privacy Policy may be collected, provided that they are supplied with the user's consent or that the collection is permitted based on another legal ground provided by law.

In any case, the collection of data and the resulting processing activities will be duly communicated to website users.

4. Sharing personal data with third parties

We do not share your personal data with third parties. Nevertheless, we may do so in order to comply with a legal or regulatory requirement or to comply with an order issued by a public authority.

5. How long your personal data will be stored

The personal data collected by the website is stored and used for a period of time corresponding to what is necessary to achieve the purposes set forth in this document, considering the rights of the data subjects, the rights of the website controller, and applicable legal or regulatory provisions.

Once the retention periods for personal data have expired, such data is deleted from our databases or anonymized, except in cases where storage is possible or required by legal or regulatory provisions.

6. Legal bases for the processing of personal data

A legal basis for the processing of personal data is nothing more than a legal ground provided by law that justifies it. Thus, each personal data processing operation must have a corresponding legal basis.

6.1. Non-sensitive personal data

We process our users' non-sensitive personal data in the following cases:

- To comply with a legal or regulatory obligation by the controller;
- When necessary to meet the legitimate interests of the controller or of a third party.



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6.2 Data of children and adolescents

The processing of data relating to children and adolescents is carried out based on the consent of at least one of their parents or legal guardians.

Personal data of children may be collected without such consent when collection is necessary to contact the parents or legal guardian, used only once and without storage, or for the protection of the child.

7. Compliance with legal or regulatory obligations by the controller

Certain personal data processing operations, particularly data storage, are carried out to enable us to comply with obligations provided for by law or other regulatory provisions applicable to our activities.

8. Legitimate interest

For certain personal data processing operations, we rely exclusively on our legitimate interest. To learn more about the specific cases in which we use this legal basis, or to obtain further information about the assessments we conduct to ensure that its use is appropriate, please contact our Data Protection Officer through one of the channels indicated in this Privacy Policy, in the section "How to contact us."

9. User rights

Website users have the following rights, as provided by the General Data Protection Law (LGPD):

- Confirmation of the existence of processing;
- Access to data;
- Correction of incomplete, inaccurate, or outdated data;
- Anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- Data portability to another service or product provider, upon express request, in accordance with the regulations of the national authority and respecting commercial and industrial secrets;
- Deletion of personal data processed with the consent of the data subject, except in cases provided by law;
- Information about public and private entities with which the controller has shared data;
- Information about the possibility of not providing consent and the consequences of refusal;
- Revocation of consent.

It is important to note that, under the LGPD, there is no right to deletion of data processed on legal grounds other than consent, unless such data is unnecessary, excessive, or processed in violation of the law.



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9.1 How data subjects can exercise their rights

To ensure that the user who intends to exercise their rights is indeed the data subject of the personal data subject to the request, we may request documents or other information that can help verify their identity, in order to protect our rights and the rights of third parties. However, this will only be done if strictly necessary, and the applicant will receive all related information.

10. Security measures in the processing of personal data

We employ technical and organizational measures to protect personal data from unauthorized access and from situations of destruction, loss, misplacement, or alteration.

The measures we use take into account the nature of the data, the context and purpose of the processing, the risks that a potential breach could pose to the user's rights and freedoms, and the standards currently used in the market by companies similar to ours.

Among the security measures we have adopted, we highlight the following:

- Our users' data is stored in a secure environment;
- We limit access to user data so that unauthorized third parties cannot access it;
- We use SSL (Secure Socket Layer) and TLS (Transport Layer Security) certificates so that data transmission between users' devices and our servers is encrypted;
- We keep records of all individuals who have any type of contact with our data.

Although we do everything in our power to prevent security incidents, it is possible that a problem may occur due exclusively to a third party — such as in the case of *hacker* or *cracker* attacks — or even due to the user's own fault, for example, when the user transfers their data to a third party. Thus, although we are generally responsible for the personal data we process, we disclaim responsibility in exceptional situations over which we have no control.

In any case, if any type of security incident occurs that may pose risk or significant harm to any of our users, we will notify the affected parties and the National Data Protection Authority about the incident, in accordance with the General Data Protection Law (LGPD).

11. Complaints to a supervisory authority

Without prejudice to any other administrative or judicial remedy, data subjects who feel harmed in any way may file a complaint with the National Data Protection Authority.



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12. Changes to this policy

This version of the Privacy Policy was last updated on **November 4, 2020**.

We reserve the right to modify these rules at any time, especially to adapt them to any changes made to our website, whether by the inclusion of new functionalities or by the removal or modification of existing ones.

Whenever there is a modification, our users will be notified of the change.

13. How to contact us

If you have any questions about this Privacy Policy or about the personal data we process, please contact our Data Protection Officer through one of the following channels:

Email: dpo-escolainternacional@escolainternacional.com.br

Phone: +55-11-4134-6686