

Privacy Policies

PDG understands that privacy should be preserved for all users of its website, customers and others affected by its services. We hereby provide you with information on how we collect and use your personal data when you access our website. We will never sell your data, nor permit third parties to have access to your data without proper authorization, as explained in this policy.

About us

PDG REALTY S/A EMPREENDIMENTOS E PARTICIPAÇÕES - UNDER JUDICIAL REORGANIZATION is a Brazilian company, enrolled in the Corporate Taxpayers' ID (CNPJ) under no. 02.950.811/0001-89 and headquartered at Av. Doutor Cardoso de Melo, nº 1955, 6º andar, Vila Olímpia, São Paulo/SP.

What data do we collect through our website and for which purposes do we use your data?

We generally may use the information collected from you to answer your questions and complaints, to update you on our products and services through SMS, MMS, direct mail and communication applications (e.g. WhatsApp, Telegram, WeChat, Facebook Messenger, Instagram Messenger) among other features, to analyze the acceptance of our method of conducting business in order to improve our internal processes and approach to current and potential customers, and to use it for analytical and statistical purposes.

When you use our website to access our services, we collect technical access data and information about your browsing behavior on the website through cookies (see below). We also collect contact information if you need to contact us or attend one of our conferences by filling in your name, e-mail address, city, state, and phone number.

Visitors' personal and contact information are used to establish communication with you, to get back to you, and to perform our services, for example, to establish contact with one of our online brokers and to direct the forwarding of content about real estate offerings. Please note that you may also be contacted by brokers without interacting with us through our website, should any of our partners disclose their contact information to us, considering our rightful interest in pursuing new customers and new markets in a reasonable manner and considering the privacy expectations of our target audience.

If you submit your consent, we may also send you marketing e-mails about our brands, products, promotions, events, as well as communications about company updates, such as notices to the market and material facts, via e-mail, telephone, SMS or messages via communication applications (such as WhatsApp and Telegram). In such cases, your consent may be cancelled at any time, upon request.

Other information is automatically obtained by just accessing and browsing our website, including through cookies, for purposes related to ensuring the security of our connections and processing information for website usage analysis, in order to be able to improve the website's attractiveness and usability for new users. This includes collecting the device's access characteristics, IP number (with

date and time), IP source, information about clicks, pages visited, search terms typed in our portals, among others.

We also store registers of all accesses to our website for a period of 6 (six) months from collection, pursuant to the Brazilian Civil Rights Framework for the Internet (Law No. 12,965/2014).

How do we use cookies?

When you access our website, your computer receives some "cookies", which are text files through which some information is automatically collected and stored by us and companies we work with. The website uses its own and third party cookies to establish and maintain browsing sessions, which are deleted at the end of each session, and also to analyze your behavior as a user of our website so that we can identify suspicious network behavior for security assurance, and identify misused links, browsing difficulties, unfriendly features, among other problems for our customers' experience on our website. These cookies can last for a period of up to two years, as defined by the companies in charge, and we only have access to non-identified (i.e. anonymous) data, which is adequate for our analyses.

Your browser can be configured to decline the receipt of cookies and offers features to remove them at any time. Check the options and tools available in the respective menu.

What data do we collect from our customers?

We collect identification and contact data, directly from our customers or through our brokers and partners, to formalize contracts and open tax files related to the purchase, sale and financing of real estate.

We may also request data from our customers' income tax returns to, in addition to score analysis and credit record obtained from credit protection institutions, analyze the customers' credit in order to be able to establish contractual terms.

If one of our customers wishes to register on our Customer Portal to use its features, such as requesting technical assistance or issuing a duplicate invoice, we will also collect through the site, in addition to your identification and contact information, your birth date, individual taxpayer ID and passport (for foreigners), information about your income, civil status, and information regarding your employment (such as employment status and professional). The registration is made upon the clients' will and can be cancelled at any time, upon request.

How do we store the personal data we collect?

Your data will be protected on our servers and in the cloud that hosts our website, managed by companies located at Brazil and duly contracted by us for the processing of personal data on our website.

We use necessary security procedures to prevent the loss or leakage of your data and control access to the information we hold about you by the use of technical and managerial measures adequate for the sensitivity of the information we control.

Does anyone else have access to your personal data?

We also may share website user data with third parties to the extent necessary to meet the specific purposes of our website, namely the technology companies responsible for the cookies used to analyze website usage and the companies contracted to host and manage the website.

Our customers' data may be shared with other companies in our economic group for management purposes, to perform joint tasks inherent to our activities and to benefit from synergies and common systems, as well as with the following third parties, always in connection with the legitimate purposes of our business: with auditing companies, with public authorities and government entities for the fulfillment of legal and regulatory obligations or for the defense of our rights, with service providers and partner companies for the performance of outsourced or distributed administrative activities, including the operation and hosting of systems, applications and databases, with brokers and partners involved in bringing customers for the sale of the properties, with financial institutions for the operationalization of purchase and sale agreements and property financing, and with credit analysis and rating agencies for monitoring and eventual collection resulting from non-compliance with contracts.

What are your rights regarding the collection and use of my data?

We grant you the following rights regarding the collection and use of data from users of our website and from our customers, in addition to other rights under applicable law:

- the verification of processing of your personal data.
- access to the data held by this company.
- the rectification of any incomplete, inaccurate, or outdated data.
- the blocking, removal or anonymization of data that is unnecessary, excessive or handled in violation of the law, as well as the objection to the data processing in these same situations.
- the transfer of your personal data to another company, as required by official regulations on the subject.
- the deletion, when requested, of the personal data collected with your consent, in accordance with the applicable law.
- information from the public and private entities who shared their data with.
- information about the option of not providing consent and the negative consequences of refusal, in cases where your data is collected and processed with consent.
- the cancellation of your consent for data collection and processing in these same cases.

your rights can be exercised by contacting our service channels listed below. When we receive a request to exercise any of your rights, we will consider the most efficient method of complying with

your request, but we may not comply with your request, in whole or in part, for justified reasons, such as legal or regulatory requirements. If there is no adequate response, the law ensures you the right to complain to the National Data Protection Authority (ANPD).

How might we change our privacy practices?

Our policies and practices regarding privacy and data protection are subject to ongoing review and updating to comply with the highest national and international standards, and may be changed at any time. Our policies and privacy notices will be updated on our website to reflect such changes, and the latest versions will be published on this page.

The latest update to this policy was on June 28, 2021.

How can you contact us?

If you have any questions about our privacy policy, the data we hold about you, or any other requests or complaints regarding your privacy or your rights related to this website, please contact our Personal Data Controller, through the following channels:

PDG REALTY S/A EMPREENDIMENTOS E PARTICIPAÇÕES - UNDER COURT-SUPERVISED REORGANIZATION

C/o Personal Data Controller

Name: Ana Carolina Locatelli Cordeiro

Email: dpo@pdg.com.br

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