

Pr

Privacy Policy

Issuing department

Group Compliance

Target audience

Data subjects processed by Goyaz Consulting — website visitors, clients and partners

Approver

Executive Board of Goyaz Consulting Ltda.

Repository

All Goyaz Consulting Principles and Policies, Standards and Guidelines can be found in the Centre online repository at

<https://goyazconsulting.com/en/institucional>

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Section 01

Introduction

Goyaz Consulting recognizes that protecting personal data is essential to the trust that underpins its relationships with clients, business partners, and other stakeholders. As a consultancy dedicated to guiding internationalization projects for companies across different sectors and destinations — including destinations in the European Economic Area (EEA) — Goyaz Consulting processes strategic, financial, and personal information in the course of its work, and properly protecting that information is a non-negotiable condition for practicing its profession.

This Privacy Policy formalizes Goyaz Consulting's commitment to the ethical, transparent, and lawful processing of the personal data it collects and processes, in accordance with Brazil's General Personal Data Protection Law (Law No. 13,709/2018, the "LGPD") and, where applicable to data subjects located in the EEA, the EU General Data Protection Regulation (Regulation (EU) 2016/679, the "GDPR").

By interacting with Goyaz Consulting's website, engaging its services, or establishing any professional relationship with the firm, the data subject acknowledges the practices described here, without prejudice to the rights the law guarantees them.

Section 02

Scope and Application

This Policy applies to the processing of personal data carried out by Goyaz Consulting in connection with:

- Access to and browsing of Goyaz Consulting's institutional website (goyazconsulting.com) and other digital channels operated by the firm;
- Contact to request information, quotes, commercial proposals, or any other preliminary interaction;
- The engagement and provision of internationalization consulting services, including, without limitation, strategic assessments, the preparation of plans and financial models, liaison with local partners in destination countries, regulatory follow-up, and other related activities;
- The sending of institutional communications, newsletters, and informational materials, where expressly authorized by the data subject;
- The relationship with suppliers, service providers, business partners, and other third parties who interact with Goyaz Consulting in the course of its activities.

The following are expressly excluded from the scope of this Policy:

- The data processing practices of third parties to which Goyaz Consulting's channels may redirect the data subject, whose own policies should be consulted independently;
- Personal data processed by Goyaz Consulting's clients in relation to their own data subjects, in which case the client acts as the Data Controller and Goyaz Consulting, where applicable, as the Data Processor, under Article 5(VII) of the LGPD and, where applicable, Article 28 of the GDPR, with such processing governed by the contractual instrument entered into between the parties.

Section 03

Definitions

For the purposes of this Policy, the following definitions apply, drawn from the LGPD and, where a data subject is located in the EEA, the GDPR:

Personal Data: information related to an identified or identifiable individual (Article 5(I) LGPD; Article 4(1) GDPR).

Sensitive Personal Data / Special Category Data: personal data concerning racial or ethnic origin, religious belief, political opinion, union membership or membership in a religious, philosophical, or political organization, data concerning health or sex life, and genetic or biometric data, when linked to an individual (Article 5(II) LGPD; Article 9(1) GDPR, referred to there as "special category data").

Data Subject: the individual to whom the personal data being processed relates (Article 5(V) LGPD; Article 4(1) GDPR).

Data Controller: the individual or legal entity, whether governed by public or private law, responsible for decisions concerning the processing of personal data (Article 5(VI) LGPD; Article 4(7) GDPR).

Data Processor: the individual or legal entity, whether governed by public or private law, that processes personal data on behalf of the Data Controller (Article 5(VII) LGPD; Article 4(8) GDPR).

Processing: any operation carried out with personal data, including, among others, collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation, control, modification, communication, transfer, dissemination, or extraction (Article 5(X) LGPD; Article 4(2) GDPR).

Section 03

Definitions

Anonymization: the use of reasonable technical means available at the time of processing through which data loses the possibility of being associated, directly or indirectly, with an individual (Article 5(XI) LGPD).

Data Protection Officer (DPO): the individual appointed by the Data Controller to act as the point of contact between the Data Controller, data subjects, and the competent supervisory authority (Article 5(VIII) LGPD; Article 37 GDPR).

ANPD: Brazil's National Data Protection Authority, the federal government body responsible for enforcing, implementing, and overseeing compliance with the LGPD.

Supervisory Authority: for data subjects located in the EEA, the national data protection authority with jurisdiction over the data subject's habitual residence, place of work, or place of the alleged infringement (Article 4(21) GDPR).

Personal Data Breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data (Article 4(12) GDPR).

Section 04

Identification of the Data Controller

For the purposes of Article 5(VI) of the LGPD and, where applicable, Article 4(7) of the GDPR, Goyaz Consulting Ltda., a private legal entity enrolled with the Brazilian company registry (CNPJ) under No. 67.896.940/0001-81, with registered offices at Rua Pais Leme 215, Pinheiros, São Paulo - SP, CEP 05424-150, Brazil, acts as the Data Controller of the personal data processed in connection with the activities described in Section 02 of this Policy.

As Data Controller, Goyaz Consulting is responsible for decisions concerning the purposes and means of processing personal data collected through its own channels, as well as for compliance with the principles set out in Article 6 of the LGPD and, correspondingly, Article 5 of the GDPR, namely: purpose limitation, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination, and accountability.

Where Goyaz Consulting processes personal data on behalf of its clients, in the course of performing consulting services contracts, it acts under Article 5(VII) of the LGPD and, where applicable, Article 28 of the GDPR, subject to the instructions provided by the relevant Data Controller, as set out in the applicable contractual instrument.

GDPR Territorial Scope. Where a data subject is located in the EEA, the GDPR applies to Goyaz Consulting's processing of that individual's personal data under Article 3(2) of the GDPR. Goyaz Consulting maintains an established presence in the European Union through its Finnish entity, which the firm treats as an establishment in the Union for purposes of Article 27 of the GDPR.

Section 04

Identification of the Data Controller

To exercise the rights set out in this Policy, in the LGPD, and, where applicable, the GDPR, data subjects may contact Goyaz Consulting's Data Protection Officer.

Section 05

Personal Data We Collect

5.1 Identification and Contact Data

Collected directly from the data subject when they fill out contact forms available on the website, request information, send messages, or otherwise establish direct communication with Goyaz Consulting. This typically includes:

- Full name;
- Professional email address;
- Phone number and other communication channels provided by the data subject;
- The company the individual is professionally affiliated with, and their role or position;
- Country, city, and other location information provided voluntarily.

5.2 Professional and Corporate Data

Collected directly from the data subject or from client representatives, in the course of preparing commercial proposals and carrying out consulting projects. This includes, among others:

- Information about the client company's corporate structure, size, and history;
- Strategic objectives related to the internationalization project;
- Financial, accounting, tax, and commercial information relevant to the scope of the contracted project;
- Data of legal representatives, attorneys-in-fact, agents, and other individuals designated as points of contact for the project.

Section 05

Personal Data We Collect

5.3 Institutional Communications Data

Collected when the data subject expresses interest in receiving institutional communications, newsletters, or informational materials prepared by Goyaz Consulting. In addition to identification and contact data, this includes information about topic preferences, engagement with communications sent, and other related metrics.

5.4 Sensitive Data

Goyaz Consulting does not routinely collect sensitive personal data, as defined in Article 5(II) of the LGPD. Any processing of this nature will only take place in exceptional circumstances, duly justified by the purpose of the contracted service, in line with the situations set out in Article 11 of the LGPD, and, where applicable, subject to the data subject's specific and express consent.

Section 06

Purposes of Processing and Legal Basis

Purpose	LGPD Legal Basis	GDPR Legal Basis
<i>Responding to inquiries and preparing commercial proposals</i>	<i>Legitimate interest / pre-contractual procedures</i>	<i>Art. 6(1)(b) — pre-contractual steps taken at the data subject's request</i>
<i>Performance of service contracts</i>	<i>Contract performance</i>	<i>Art. 6(1)(b) — performance of a contract</i>
<i>Managing relationships with clients, suppliers, and partners</i>	<i>Legitimate interest</i>	<i>Art. 6(1)(f) — legitimate interests</i>
<i>Sending newsletters and institutional communications</i>	<i>Consent</i>	<i>Art. 6(1)(a) — consent</i>
<i>Information security and fraud prevention</i>	<i>Legitimate interest</i>	<i>Art. 6(1)(f) — legitimate interests</i>

6.1 Responding to Inquiries and Preparing Commercial Proposals

Use of the identification, contact, and professional information provided by the data subject to respond to inquiries, answer questions, prepare quotes and commercial proposals, and carry out other pre-contractual activities, including sending specifically requested institutional materials.

6.2 Performance of Service Contracts

Use of data collected in the course of providing internationalization consulting services, including preparing strategic assessments, market-entry plans, financial models, materials to support communication with partners and authorities in the destination country, and other deliverables set out in the contract.

Section 06

Purposes of Processing and Legal Basis

6.3 Managing Relationships with Clients, Suppliers, and Partners

Maintaining historical records of business interactions, managing active contracts, billing, collections, and other administrative activities inherent to running the business.

In addition, sending institutional communications, newsletters, event invitations, and informational materials related to Goyaz Consulting's activities, always subject to the data subject's prior expression of interest, and with the ability to unsubscribe at any time through the channels indicated in the communications themselves or by contacting the Data Protection Officer.

6.4 Information Security and Fraud Prevention

Processing of browsing data and access logs to safeguard the integrity of Goyaz Consulting's systems and to prevent fraud, cyberattacks, misuse of digital channels, and other potentially harmful conduct.

Section 07

Sharing of Personal Data

7.1 Service Providers and Data Processors

Goyaz Consulting engages service providers essential to its operations, who may, in certain cases, have access to personal data in order to carry out the services contracted. In these cases, such providers act as Data Processors, under Article 5(VII) of the LGPD and, where applicable, Article 28 of the GDPR, and are contractually required to:

- Process data solely in accordance with Goyaz Consulting's instructions;
- Adopt technical and administrative measures appropriate to protecting the data;
- Submit to audits and periodic reviews where relevant;
- Immediately report any security incident of which they become aware.

This category includes, among others, accounting and tax advisory providers, cloud hosting providers, business management and customer relationship tools, legal counsel, and communication and email delivery services.

7.2 Partners in the Internationalization Destination Country

In connection with carrying out internationalization consulting projects, Goyaz Consulting may share personal data with local partners, public authorities, sector associations, chambers of commerce, law firms, or commercial representatives established in the destination country of the contracted project, where such sharing is strictly necessary to fulfill the purpose of the contract.

In these cases, the client is informed in advance about the recipients of the data, the specific purposes of the sharing, and the applicable safeguards. Such sharing will also comply with the international data transfer regime described in Section 08 of this Policy.

Section 07

Sharing of Personal Data

7.3 Public Authorities

Goyaz Consulting may share personal data with the competent public authorities where such disclosure is required by law, regulation, court order, or administrative decision, or where necessary to exercise rights in judicial, administrative, or arbitration proceedings.

7.4 Specific Consent

Outside of the situations described above, personal data will only be shared with third parties with the data subject's specific and express consent, obtained in advance and on an informed basis.

Section 08

International Data Transfers

Given the nature of Goyaz Consulting's business, dedicated to advising on internationalization projects, personal data will, in certain situations, be transferred abroad. Every international data transfer complies with the situations and safeguards set out in Articles 33 through 36 of the LGPD and, where applicable, Chapter V of the GDPR, and with the regulations issued by the ANPD on this matter.

Since January 2026, Brazil and the European Union have held mutual adequacy status: the European Commission has recognized Brazil's data protection framework as offering a level of protection essentially equivalent to the GDPR, and Brazil's ANPD has reciprocally recognized the EU as offering an adequate level of protection under the LGPD. As a result, personal data may be transferred between Goyaz Consulting and parties located in the EEA without the need for additional safeguards such as Standard Contractual Clauses. For transfers to destination countries outside Brazil and the EEA (for example, in the course of an internationalization project involving a different jurisdiction), Goyaz Consulting will rely on the appropriate mechanism available under the LGPD and, where applicable, the GDPR, which may include Standard Contractual Clauses or another safeguard recognized by the ANPD or the European Commission.

8.1 Information Provided to the Data Subject

Whenever an international data transfer takes place in connection with a contracted project, the client will receive clear information about the destination country, the recipient of the data, the purpose of the transfer, and the applicable safeguards, prior to the transfer taking place.

Section 09

Information Security and Protective Measures

9.1 Technical Measures

The technical protective measures adopted by Goyaz Consulting include, without limitation:

- Storing data in a controlled environment, using cloud infrastructure that meets recognized information security standards;
- Using encryption for data in transit and, where applicable, for data at rest;
- Access controls based on individual credentials, applying the principle of least privilege;
- Multi-factor authentication for access to systems containing personal data in significant volume or of a sensitive nature;
- Maintaining access logs and processing activity records for audit purposes and to investigate any incidents;
- Performing periodic backups, with a defined data recovery procedure.

9.2 Administrative and Organizational Measures

In addition, Goyaz Consulting adopts administrative and organizational measures designed to preserve the integrity and confidentiality of personal data, including:

- Establishing an internal information security and personal data protection policy, mandatory for partners, employees, and service providers;
- Requiring confidentiality agreements from everyone who, because of their role, has access to personal data processed by Goyaz Consulting;
- Ongoing training for partners and employees on data protection matters;

Section 09

Information Security and Protective Measures

- Prior assessment of new suppliers and service providers who will process personal data on behalf of Goyaz Consulting;
- Periodic review of the security measures adopted, in light of technical developments, industry best practices, and guidance issued by the ANPD.

9.3 Incident Notification

Where a security incident occurs that may pose a relevant risk or cause relevant harm to data subjects, Goyaz Consulting will notify the ANPD and the affected data subjects within a reasonable period, in accordance with Article 48 of the LGPD and applicable regulations. Where a Personal Data Breach affects data subjects located in the EEA, Goyaz Consulting will additionally notify the competent Supervisory Authority without undue delay and, where feasible, within 72 hours of becoming aware of the breach, in accordance with Article 33 of the GDPR, and will notify affected data subjects directly where the breach is likely to result in a high risk to their rights and freedoms, in accordance with Article 34 of the GDPR.

The notification will indicate the nature of the personal data affected, information about the data subjects involved, a description of the technical and security measures used to protect the data (subject to trade secret and confidentiality considerations), the risks related to the incident, the reasons for any delay, and the measures taken or planned to reverse or mitigate the harm.

Section 10

Cookies and Tracking Technologies

Cookies are small text files stored on a user's device when they access a website, which allow the device to be recognized on subsequent visits, preferences to be stored, and information about use of the digital channel to be collected.

Equivalent technologies refers to other local storage, device identification, and browsing behavior tracking mechanisms that produce effects similar to cookies, such as pixels, web beacons, and local storage.

Goyaz Consulting's digital channels use cookies and equivalent technologies to enable essential functionality, improve the user's browsing experience, and obtain statistical information about use of the website, always in accordance with this Policy and applicable law.

10.2 Categories of Cookies Used

A Goyaz Consulting emprega as seguintes categorias de cookies em seus canais digitais:

Category	Purpose
<i>Strictly Necessary</i>	<i>Cookies essential to the basic operation of the website, including session authentication, security, and request routing</i>
<i>Performance *</i>	<i>Cookies used to collect aggregated information about use of the website, including most-visited pages, average time on site, and traffic source.</i>
<i>Functionality *</i>	<i>Cookies that store user preferences, such as display language and browsing settings.</i>

Section 11

Data Retention and Deletion

Personal data processed by Goyaz Consulting is retained for the period strictly necessary to fulfill the purposes that justified its collection, in accordance with the principles of necessity and purpose limitation set out in Article 6 of the LGPD and Article 5(1) (e) of the GDPR (storage limitation), and the legal grounds for retention set out in Article 16 of the LGPD.

Section 12

Data Subject Rights

Subject to the conditions and exceptions set out in applicable law, data subjects may:

- Confirm the existence of processing and request access to their personal data;
- Request correction of incomplete, inaccurate, or outdated data;
- Request the anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- Request the portability of their data to another service or product provider;
- Request the deletion of personal data processed with their consent, except where retention is required by law;
- Obtain information about the public and private entities with which Goyaz Consulting has shared their data;
- Be informed of the possibility of, and the consequences of, denying consent, where applicable;
- Withdraw consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal;
- Request a review of decisions made solely on the basis of automated processing of personal data, where applicable.

Data subjects may also lodge a complaint with the ANPD, in addition to any rights available under the GDPR for data subjects located in the EEA.

Data subjects located in the EEA additionally have the right, under the GDPR, to:

- Object to processing carried out on the basis of legitimate interest;

Section 12

Data Subject Rights

- Restrict processing under the circumstances set out in Article 18 GDPR;
- Lodge a complaint with the Supervisory Authority of their habitual residence, place of work, or place of the alleged infringement.

Requests may be directed to Goyaz Consulting's Data Protection Officer. Goyaz Consulting will respond within the timeframe set out in applicable law, and may request additional information to confirm the identity of the requester.

Section 13

Amendments and Effective Date

The version of this Policy currently in force is always the one published on Goyaz Consulting's official digital channels, and data subjects are responsible for reviewing it periodically. The history of previous versions may be made available upon request to the Data Protection Officer.

This Privacy Policy has been in effect since July 19, 2026, and will remain in force for a period of up to 12 months, at which point it will be replaced by an updated version published by Goyaz Consulting.

Should any provision of this Policy be found invalid, unlawful, or unenforceable, the remaining provisions will remain in full force and effect, and the affected provision will be interpreted or replaced in a manner that preserves, to the extent possible, the original intent of the parties.

Data subjects may contact Goyaz Consulting through the general institutional channels available on its official digital channels for clarifications, suggestions, or additional information regarding this Policy.



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