



**AvenueCode**  
a compass.uol company

# Website Privacy Policy

## Avenue Code

**We value your privacy.** Please review this Privacy Policy to understand how we collect, use, communicate, and disclose your personal information as a visitor to our website.

Please note: all information in this privacy notice is applicable to you unless otherwise indicated and you and Avenue Code are subject to the applicable data protection laws depending on your residency.

We will provide additional privacy policies and information to you if we collect or process personal information under different circumstances so that you remain aware of how and why we are using such personal information.

Please note that our website may include links to websites of third parties whose privacy practices differ from those of Avenue Code; if you provide personal data to any of those websites, your data is governed by the privacy statements of such websites.

## 1. How we will use your personal information

**Purposes** We may collect different kinds of personal information for different purposes, as below stated:

- (i) **To aid in the ongoing operation of our website.**<sup>1</sup>

Our web servers may collect the following information to provide analytics and performance enhancement metrics: (a) IP addresses, (b) operating system details, (c) location details, (d) browsing details, (e) device and connectivity details, and/or (f) language settings.

<sup>1</sup>For purposes of the GDPR, the lawful basis for this processing is our legitimate interest in enabling and improving our website and online services, or your consent, where such consent is requested and obtained.

This information is aggregated to measure the number of site visits, average time spent on the site, pages viewed and similar information. We then use this information to improve content, ensure safety and security, and enhance performance and user experience.

We may also obtain data from third parties including social media networks, when you grant permission to us to access your data on one or more social media networks through our website; service providers that help us determine a location based on your IP address in order to customize offerings and content to your location; and partners with which we offer co-branded services or engage in joint marketing activities.

**(ii) To answer your inquiries, support requests, job opportunities and contact requests.<sup>2</sup>**

If you contact us with general inquiries, requests for more information about initiatives or products, or other support inquiries, we may need to collect information about you such as: (a) personal and contact details, like full name, company, email address; (b) demographic data; (c) qualifications and profession, and/or (d) the purpose and content of your messages to us. If you contact us and share your information in order to apply for open positions in Avenue Code, we may need to collect your curriculum information, covering all information and data mentioned above, and may also need to request more information in order to verify the conditions for that position. This information may be shared with Avenue Code's clients, to whom Avenue Code allocates consultants and who have agreed with Avenue Code's privacy standards and confidentiality.

**(iii) To manage promotional or marketing subscriptions.<sup>3</sup>**

If you sign up to receive promotional or marketing communications from Avenue Code we may send these communications by email, SMS/text messages, or any other appropriate method.

<sup>2</sup>For purposes of the GDPR, the lawful basis for this processing is our legitimate interest in providing exemplary customer service, for the performance of a contract with you or to take steps at your request before entering into a contract with you, or your consent, where such consent is requested and obtained.

<sup>3</sup>For purposes of the GDPR, the lawful basis for this processing is your consent, where such consent is requested and obtained.

**(iv) To administer events and initiatives.**<sup>4</sup>

Avenue Code frequently organizes public events and initiatives in-person or online. This privacy policy applies to both participants and speakers at such events and initiatives, along with any other supplementary information that participants may provide prior to or at each event. To facilitate participation in these events and initiatives (including ongoing communications relaying information about the event or initiative), we may be required to collect and process a limited amount of information from you, such as your: (a) full name, (b) company, job title and business email address, (c) telephone number, (d) location, and/or (e) pictures and/or video of you.

You will be informed prior to any picture or video recording at each event or initiative and made aware of any possibility that your image or likeness will be recorded. At or following certain events, we may request feedback or additional personal information from you in order to maintain ongoing communication and to further information about Avenue Code. In all such instances, we will obtain your consent prior to requesting any additional personal information.

We may also obtain attendee lists and other personal information from third party event organizers if an event is sponsored by Avenue Code. In those instances, the privacy policies of such third party event organizers to which you provide your personal information will apply to you.

**(v) To manage, administer and fulfill our contractual obligations.**<sup>5</sup>

If you, your employer, or your company enters into a contractual relationship with Avenue Code (apart from a direct employment relationship between you and Avenue Code), we may need to process your personal information for purposes of negotiating or establishing such contractual relationship. The personal information we collect at this time will usually be limited to your name, business contact details

<sup>4</sup>For purposes of the GDPR, the lawful bases for this processing is our legitimate interest in organizing and hosting promotional and education events and initiatives, or your consent, where such consent is requested and obtained.

<sup>5</sup>For purposes of the GDPR, the lawful bases for this processing may be for the performance of a contract with you or to take steps at your request before entering into a contract with you, our legitimate interest in providing services to your company or employer, legal obligation, your consent, where such consent is requested and obtained.

and job title in order to enter into and/or fulfill our obligations under the contract, such as providing or obtaining services.

We may also process such personal information for related tasks such as accounting, auditing, reporting (to government regulators and authorities) and to comply with all applicable regulations.

**(vi) To promote the Avenue Code brand, products, initiatives and values through marketing and other communications.<sup>6</sup>**

Avenue Code has a strong interest in promoting its brand, products, initiatives and values. We may send you marketing communications through different channels, such as email, texts, phone calls or regular mail, and to do so, we may use your contact details that were previously collected at an event, a query sent by you, or through the navigation on our websites.

We may also obtain your personal information from third parties, such as business partners, data brokers, social networks, publicly available sources and marketing companies. In such cases, we will also comply with any additional restrictions imposed by the source of the data. If required by applicable legislation, we will ask for your consent separately before sending any marketing communications.

If we use your name, statements, image, likeness, or recordings of you to promote the Avenue Code brand and activities, we will obtain your prior consent before

using such personal information.

You can opt-out of receiving such communications at any time by responding directly to such communications, by clicking the unsubscribe link at the bottom of any emails, by contacting our security team at [dpo@avenuecode.com](mailto:dpo@avenuecode.com), or by any other method provided from time to time in relation to such communications.

**Disclaimer** We will only use your personal information for the purposes for which we collected it or for another reason that is compatible with such original purpose. Prior to using your personal information for any unrelated purpose, we will notify you and explain the legal basis for such unrelated purpose. Please note that we may process your personal information

<sup>6</sup>For purposes of the GDPR, the lawful bases for this processing is for Avenue Code's legitimate interest in promoting its brand, products, initiatives and values, or you consent, where requested and obtained.

without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 2. How we will share your personal information

**With whom** We may share your personal information with third parties, including third-party service providers and our affiliates in other countries. Please note that we require all third parties to respect the security of your personal information and to abide by all applicable data security laws. We do not allow our third-party service providers to use your personal data for their own purposes.

Where required by law, we will request your consent before transferring your personal information to third parties that are not affiliates of Avenue Code.

Under all circumstances, Avenue Code will not buy or sell your personal information from or to any third party. Avenue Code does not use your personal information for any reason other than for a legitimate business purpose.

**Circumstances** We may share your personal information with third parties: (a) Where required by law; (b) Where it is necessary for one of the activities mentioned above or (c) Where we have another legal, legitimate basis in doing so.

Third parties may use your personal information for the following activities: (a) Hosting and other internet services; (b) Data storage and analytics; (c) Marketing research and campaign management; (d) Event organization; (e) As part of government audit or enforcement as required by law.

**Affiliates** We may share your personal information with the following affiliates as part of our regular reporting activities on company performance, in the context of a business reorganization or group restructuring exercise, for system maintenance support and hosting of data and when it is required to do so in order to perform one of the activities listed above. Avenue Code requires all of its affiliates to take appropriate security measures to protect your personal data in line with our policies.

<b>Legal Name:</b> Avenue Code Desenvolvimento de Software Ltda.
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**Address:** Rua Antonio de Albuquerque, 330, 4th Floor, Belo Horizonte, Minas Gerais, Brazil

<b>Legal Name:</b> Avenue Code S.A.
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<b>Address:</b> 1000 Peel Street, Ste. 320, Montreal, QC, H3C 1B3 Canada
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<b>Legal Name:</b> Avenue Code LLC.
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<b>Address:</b> 26 O'Farrell Street, Ste. 600, San Francisco, CA 94108
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<b>Legal Name:</b> Avenue Code Portugal Unipessoal LDA.
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<b>Address:</b> Avenida Eng. Duarte Pacheco, Amoreiras, Torre 2, 15 <sup>o</sup> -A, Lisbon, Portugal 1070 102
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### 3. How we will keep your information safe

**Technical Measures and Strategies to Protect your Data** We have put in place appropriate technical, organizational and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data in accordance with our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 4. How long we will keep your information

**Storage Rules** We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, and all other relevant legal requirements. In some circumstances we may remove all identifying aspects of your personal information so that it can no longer be associated with you such that we may use the information without further notice to you.

## 5. Data Privacy Rights

**Your Rights** You are entitled to the rights listed below.

- **Request access to your personal data.** You have a right to receive a copy of the personal information we hold about you.
- **Request correction of the personal data that we hold about you.** We will correct any incomplete or inaccurate information we hold about you subject to your request.
- **Request erasure of your personal data.** You may ask us to delete or remove personal data where there is no good reason for us to continue processing or holding it. You may also ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Disclosure regarding the sale of personal information or use for business purpose.** You have a right to receive from us information about the categories of personal information and sources from which we have collected such personal information from you. Likewise, you have a right to receive information about the categories of third parties we disclose personal information.
- **Object to processing of your personal data.** Although we may have a legitimate interest (or the legitimate interest of a third party) to process your personal

information, you may object to such processing under certain circumstances.

- **Request to restrict the processing of your personal data.** You may ask us to suspend the processing of your personal information under certain circumstances, including to establish the information's accuracy or the reason for processing it.
- **Right to withdraw consent.** If you have consented to Avenue Code's collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our security team at [dpo@avenuecode.com](mailto:dpo@avenuecode.com). Once we have learned of your consent withdrawal, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so.
- **Data portability.** You may ask us to provide you with the personal information we hold about you in a structured, commonly used and machine-readable format or to transmit the personal information that you have provided to us to another party.
- **Automated decision-making.** The right not to be subject to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.
- **Right to non-discrimination.** Avenue Code will not discriminate against you in any way or under any circumstance for exercising your rights.

To ensure our compliance under such circumstances, we may need to request specific information from you to help us confirm your identity and your right to make such a request.

## 6. Data Transference

If you are a resident of the European Union ("EU"), we may transfer your personal information to one or more countries outside the EU in order to perform one of the activities listed above (see "How we will use your personal information "). If the European Commission has not issued an adequacy decision regarding any country to which we transfer your personal information, we have put in place the appropriate measures to ensure that your personal data will be secure. If you require further information about these protective measures, you can request it from our security team at [dpo@avenuecode.com](mailto:dpo@avenuecode.com).

## 7. How to contact us

If you have a concern, complaint or question regarding this privacy policy, please direct it to our security team and our Data Protection Officer, Alexander Thiago de Assis Oliveira Carvalho, at [dpo@avenuecode.com](mailto:dpo@avenuecode.com)

## **8. Changes to this Privacy Policy**

We reserve the right to update this privacy notice at any time and will provide you with an updated privacy notice if we make any substantial changes to our privacy policies. We may also notify you separately from time to time about the processing of your personal information.