Privacy policy

RWS Ltda., a company enrolled with the CNPJ under No. 46.231.982/0001-23, with its registered office at Av. Santo Amaro, 1047, São Paulo, SP, Brazil ("RWS", "we" or "our"), values the privacy and the protection of the personal data of the users of the website "www.rwsintegration.com" (the "Site").

This Privacy Policy (the "Policy") describes how RWS collects, uses, stores, shares and protects the personal data processed in connection with access to and use of the Site, in compliance with Federal Law No. 13,709/2018 (the Brazilian General Data Protection Law, "LGPD") and other Applicable Laws.

This Policy applies exclusively to the processing of personal data in which RWS acts as Controller. The processing of personal data carried out by RWS in the context of providing integration services (in which RWS acts as Processor) is governed by the agreement entered into with the respective customer (Terms of use, rwsintegration.com/pt-br/legal/terms) and by the Data Processing Addendum (DPA, rwsintegration.com/pt-br/legal/dpa), and not by this Policy. The sub-processors used in those services are listed at rwsintegration.com/pt-br/legal/subprocessors and the security measures of the platform are described in the Security Policy, at rwsintegration.com/pt-br/legal/security.

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RWS

1. Definitions

For the purposes of this Policy, the definitions set out in the LGPD apply, in particular:

Personal data: information related to an identified or identifiable natural person.

Sensitive personal data: personal data concerning racial or ethnic origin, religious belief, political opinion, membership of a trade union or of a religious, philosophical or political organization, data concerning health or sex life, or genetic or biometric data, when linked to a natural person.

Data Subject: the natural person to whom the personal data undergoing processing refer.

Processing: any operation carried out with personal data, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation, control, modification, communication, transfer, dissemination or extraction.

Controller: the natural or legal person responsible for the decisions concerning the processing of personal data.

Processor: the natural or legal person that processes personal data on behalf of the Controller.

Data Protection Officer (DPO): the person appointed by the Controller and Processor to act as a communication channel between the Controller, the Data Subjects and the Brazilian National Data Protection Authority (ANPD).

2. What personal data we collect

2.1. RWS collects the following personal data through the Site:

(a) Data provided directly by the Data Subject

Category	Examples
Identification data	Full name
Contact data	Corporate email, telephone
Professional data	Job title, company, field of activity
Message content	Messages sent through contact, demo or sales support forms

(b) Data collected automatically

Category	Examples
Browsing data	IP address, browser type and version, operating system, device
Site usage data	Pages visited, time spent, access source (referer), interactions with page elements
Cookie and similar technology data	Session identifiers, preferences, analytics data (as described in Section 10 of this Policy)

(c) Data obtained from external sources

In outbound sales prospecting, RWS may collect professional data publicly available on professional social networks (e.g. LinkedIn) or obtained from B2B database providers (e.g. Apollo.io), such as name, job title, company and corporate email, always observing legal limits and the reasonable expectations of the Data Subject.

3. What we use the data for (Purposes)

3.1. Personal data are processed for the following purposes:

- responding to contact, demo and sales proposal requests;
- conducting the qualification and sales process for our services;
- carrying out active outbound prospecting with professionals at companies potentially interested in our services, based on legitimate interest in the context of B2B relationships;
- sending marketing communications about RWS products, content and events, subject to the applicable legal basis and the Data Subject's right to object;
- operating, maintaining, monitoring and improving the Site, including usage and performance analytics;
- ensuring information security, preventing fraud and abuse, and investigating incidents;
- complying with legal and regulatory obligations and orders from competent authorities; and
- exercising rights in judicial, administrative or arbitration proceedings.

4. Legal bases for processing

4.1. RWS processes personal data on the following legal bases provided for in art. 7 of the LGPD:

Legal basis	When it applies
Consent (art. 7, I)	Sending marketing communications after express opt-in; non-essential cookies; other

Legal basis	When it applies
	cases in which consent is required.
Performance of a contract or preliminary procedures (art. 7, V)	Handling demo requests, sales proposals and other interactions initiated by the Data Subject.
Compliance with a legal or regulatory obligation (art. 7, II)	Meeting tax, accounting, labor and regulatory obligations.
Regular exercise of rights (art. 7, VI)	Defense in judicial, administrative or arbitration proceedings.
Legitimate interest (art. 7, IX)	B2B sales prospecting with professionals whose role is compatible with our services; information security; Site performance analytics; product improvements.

4.2. Whenever RWS processes data on the basis of legitimate interest, it will carry out the appropriate balancing test (Legitimate Interest Assessment, LIA), which may be made available upon request to the Data Protection Officer.

5. Sharing of personal data

5.1. RWS may share personal data with the following categories of third parties, always within the necessary limits and subject to appropriate contractual safeguards:

- Cloud infrastructure and hosting providers (e.g. cloud computing providers used to operate the Site);
- Providers of marketing, sales automation, CRM and analytics tools (e.g. email marketing, CRM and analytics tools);
- Communication and support providers (e.g. messaging, meeting scheduling and video conferencing tools);
- Consultants, lawyers, auditors and accountants, in the exercise of their duties;
- Public authorities and regulators, when required by law, court order or a legitimate regulatory process; and
- Companies involved in corporate transactions (mergers, acquisitions, reorganizations), subject to legal requirements.

5.2. RWS does not sell personal data to third parties.

5.3. The sub-processors used in the provision of the integration services, in which RWS acts as Processor on behalf of its customers, are listed at rwsintegration.com/pt-br/legal/subprocessors.

6. International data transfer

6.1. Some of the providers engaged by RWS are located or process data outside Brazil, in particular in the United States. That is the case of the hosting, corporate email, CRM, marketing automation, scheduling and video conferencing providers.

6.2. These transfers are carried out on the basis of art. 33 of the LGPD and ANPD Resolution CD/ANPD No. 19/2024, through the standard contractual clauses approved by the ANPD, where incorporated into the agreements with those providers, or another mechanism provided for in art. 33 of the LGPD.

6.3. The Data Subject may ask the Data Protection Officer (dpo@rwsintegration.com) for information about the destination countries and the mechanism adopted, as well as a copy of the applicable clauses, which will be provided within the time limits of the ANPD regulations.

6.4. The international transfer of data of RWS customers processed in the provision of the integration services (in which RWS acts as Processor) is described in Annex IV of the DPA, at rwsintegration.com/pt-br/legal/dpa.

7. Retention and deletion

7.1. Personal data will be retained for as long as necessary to fulfill the purposes for which they were collected, subject to applicable legal and regulatory time limits.

7.2. The main retention periods observed are:

- Business contact and lead data: up to 2 years after the last relevant contact, unless a longer period applies due to a legal obligation or the regular exercise of rights;
- Browsing data and cookies: up to 13 (thirteen) months from collection, as detailed in Section 10 of this Policy;
- Data subject to a legal obligation: for the period set out in the corresponding legislation (e.g. 5 years for tax purposes, as applicable).

7.3. Once the retention periods have elapsed, the data will be deleted or anonymized, except in the retention cases provided for in art. 16 of the LGPD.

8. Rights of the Data Subject

8.1. Under art. 18 of the LGPD, the Data Subject may exercise the following rights before RWS at any time:

- confirmation of the existence of processing;
- access to the personal data;

- correction of incomplete, inaccurate or outdated data;
- anonymization, blocking or deletion of unnecessary or excessive data or of data processed in breach of the LGPD;
- portability of the data to another service or product provider, subject to trade and industrial secrets;
- deletion of personal data processed on the basis of consent, except in the retention cases provided for by law;
- information about the public and private entities with which RWS has shared data;
- information about the possibility of not giving consent and the consequences of refusal;
- withdrawal of consent, under art. 8, paragraph 5, of the LGPD; and
- objection to processing carried out on a legal basis that does not require consent, in case of non-compliance with the LGPD.

8.2. Requests may be sent to the Data Protection Officer at dpo@rwsintegration.com. RWS will respond within a reasonable time, subject to legal limits and deadlines.

8.3. To verify the identity of the requester, RWS may require additional information strictly necessary to confirm that the request comes from the Data Subject.

9. Information security

9.1. RWS adopts reasonable technical and administrative measures to protect personal data against unauthorized access, loss, destruction, alteration or inadequate or unlawful processing, observing market standards and the principle of accountability.

9.2. The technical and administrative measures adopted by RWS are described in the Security Policy, published at rwsintegration.com/pt-br/legal/security, which is the single source of that information and applies in its then-current version.

9.3. Despite the efforts adopted, no information system is entirely immune to failures. In the event of a security incident that may create relevant risk or damage to Data Subjects, RWS will take the communication measures provided for in art. 48 of the LGPD.

10. Cookies and similar technologies

10.1. The Site uses cookies and similar technologies to keep the page working, remember user preferences and understand how the Site is used.

10.2. The cookies used fall into the following categories:

- Essential cookies: necessary for the operation of the Site and for browsing security. They do not require consent and cannot be disabled.
- Analytics and preference cookies: used to understand how the Site is browsed and to remember user choices. They are activated only after acceptance in the consent banner shown on first access.

10.3. On first access to the Site, the user may accept or reject non-essential cookies through the consent banner. The choice is recorded in a dedicated cookie and is valid for up to 12 (twelve) months, and may be revisited at any time by clearing the browser cookies.

10.4. The user may also block or delete cookies at any time through the browser settings. Disabling essential cookies may impair the operation of parts of the Site.

11. Children and adolescents

11.1. The Site is not directed at children or adolescents. RWS does not knowingly collect personal data of persons under 18 years of age. If it identifies such inadvertent collection, RWS will take the appropriate steps to delete the data.

12. Changes to this Policy

12.1. This Policy may be updated at any time to reflect changes in our processing practices, in applicable legislation or in ANPD guidance.

12.2. The current version will always be available on the Site, with an indication of the date of the last update. Material changes will be communicated by reasonable means. Previous versions remain available for consultation at rwsintegration.com/pt-br/legal/privacy.

13. Data Protection Officer (DPO) and Contact

13.1. RWS has appointed a Data Protection Officer (DPO), responsible for receiving communications from Data Subjects and from the ANPD, pursuant to art. 41 of the LGPD.

13.2. Contact of the Data Protection Officer: Email: dpo@rwsintegration.com

13.3. The Data Subject may also file a complaint with the Brazilian National Data Protection Authority (ANPD) through the website www.gov.br/anpd.

14. Governing Law and Jurisdiction

14.1. This Policy is governed by the laws of the Federative Republic of Brazil.

14.2. The courts of the Judicial District of São Paulo/SP are elected as competent to settle disputes arising from this Policy, without prejudice to the right of the consumer Data Subject to opt for the courts of their domicile under the Applicable Laws.

Version history

Version	Date	Change
2.0 (current)	June 2026	References to the published legal pages; international transfer detailed (Section 6)
1.0	November 2025	Original version

Legal documents

Terms of use
Privacy policy
Data Processing Addendum (DPA)
Security Policy
Sub-processors

Last updated: June 2026

This English version is provided for convenience only. The Portuguese version at rwsintegration.com/pt-br/legal/privacy is the official version and prevails in case of any divergence.