

Privacy Notice

Published on 8 September 2025

The purpose of this Privacy Notice is to clarify and inform the personal data subjects who access the www.clydeco.com website how their personal data is processed, especially with regards to collection, use, storage and sharing operations.

1. About this Privacy Notice

1.1 The purpose of this website Privacy Notice is to inform you, the data subject, objectively and transparently about how Clyde & Co.¹ processes your personal data.

2. What types of personal data do we use?

2.1 In order to carry out our activities, we may process the following categories of personal data:

- Registration and identification data, such as name, civil qualification, date and place of birth, nationality, telephone number, and identifying information before public enrolments
- Credit information, such as credit history, credit agency score, institutional information for credit decisions and business support
- Personal data related to electronic communications, such as e-mail, IP address and information on pages accessed
- Sensitive personal data of clients, service providers, employees, and candidates, such as criminal records, declarations of political, religious or gender orientation, affiliation, health status, among other data.

3. Why and how do we process your personal data?

3.1. Clyde & Co may process your personal data in order to carry out its business activities. The following table shows the main personal data processing activities according to the main purposes, data subjects affected, legal hypotheses and categories of personal data processed:

Goal	Case	Type of data
• Services to clients	Legal duty and regular exercise of its rights	All listed above
• fulfil legal, regulatory, and compliance duties of Clyde & Co.	Legal duty and regular exercise of its rights	All listed above
• as part of hiring activities	Legal duty and regular exercise of its rights	Registration and identification data; data related to electronic communications; and sensitive

¹ Clyde & Co. Sociedade de Consultores em Direito Estrangeiro/Direito Inglês and Clyde & Co. Consultores Ltda.

		personal data of employees and candidates
• management of seminars, events, and legal updates	Legal duty and regular exercise of its rights	Registration and identification data; data related to electronic communications; and sensitive personal data of clients and candidates
• alumni of the firm	Legal duty and regular exercise of its rights	Registration and identification data; data related to electronic communications; and sensitive personal data of employees and candidates
• individuals who attend our seminars or events or receive our legal updates or visit our offices or websites	Legal duty and regular exercise of its rights	Registration and identification data; data related to electronic communications; and sensitive personal data of employees, clients, and candidates
• services to Clyde & Co (suppliers)	Legal duty and regular exercise of its rights	All listed above

3.2 The processing of personal data for Clyde & Co.'s business activities is covered by the legal hypotheses mentioned in the table above.

3.3 In addition, we may process your personal data to fulfil other legal obligations, such as complying with court orders or meeting the requirements of other public authorities, as provided by law.

3.4 Finally, another purpose is the management of our website, which involves the use of cookies.

4. Why and how do we treat cookies on our institutional website?

4.1 To help us promote our services, improve your experience on the Clyde & Co. website, as well as to provide personalised services, Clyde & Co. uses the cookies set out in the [Cookie Notice](#).

4.2. We use strictly necessary or 'essential' cookies, based on the legal hypothesis of legitimate interest, which cannot be deactivated in our systems. These cookies enable essential functionalities for the provision of the website like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

4.3 We also use preference, statistics and marketing cookies, which are optional and disabled by default. Optional cookies depend on the consent of the user - the data subject - for their use. Preference cookies remember (for example) your preferred language or the region you are in. Statistics cookies aim to improve the website by collecting anonymised data on browsing and the use of the resources provided. Marketing cookies track visitors across websites in order to display relevant ads.

4.4 Settings can be set in the cookie banner or modified at any time in the advanced cookie settings icon at the bottom right of the website.

5. How do we obtain your personal data?

5.1. We obtain your personal data through our website or other forms of contact and interaction with the user. Your data may be obtained when you provide it to us yourself, for example by sending correspondence and documents containing personal information for the provision of services or participation in events.

5.2 We may also obtain your personal data by indirect means, in which our customers refer to you in order to have one of our services provided.

6. How do we store your personal data?

6.1 We store your personal data securely, in a technological infrastructure that meets the security standards required by the regulations, in a way that favours the exercise of the data subject's rights.

7. With whom can we share your personal data with?

7.1 We may share your personal data with offices and companies associated with the Clyde & Co. international group, for administrative purposes, the purposes of workflow management and the provision of legal services, respecting the provisions of the Brazilian Law No. 13.709/18, for the Protection of Personal Data ("LGPD"), in particular the principle of necessity and always in a manner compatible with the purpose(s) for which they were collected, as indicated in Item 3.

7.2 The main group legal entities with which we may share your personal data are listed below:

Entity	Country
Clyde & Co LLP	UK
Clyde & Co US LLP	USA
Clyde & Co Australia	Australia

7.3 Whenever we share your personal data with data operators, we will require that your data is handled in accordance with ANPD resolutions, especially CD/ANPD Resolution no. 19/2024, which includes secure storage, retaining it only for the period instructed and not subsequently sharing it with other organisations without our prior express authorisation.

8. How is your personal data deleted?

8.1 Your personal data will be deleted when it has fulfilled the purpose(s) for which it was collected, in compliance with the applicable time lapse and the laws for the end of processing, deletion and data retention hypotheses, under the terms of articles 15 and 16 of the LGPD.

9. How do we protect your personal data?

9.1 Your personal data processed by Clyde & Co. will be protected in accordance with the information security standards and guidelines issued by the competent bodies and in accordance with the provisions of the LGPD.

10. Your rights as a data subject.

10.1 Your main rights as a data subject are:

- Confirmation of the existence of processing
- Access to data
- Correction of incomplete, inaccurate or outdated data
- Anonymisation, blocking or deletion of data that is unnecessary, excessive or processed in breach of the LGPD
- Request portability of your data to other service provider
- Deletion of data processed with consent, except for the retention cases provided in the LGPD
- Obtaining information on public or private organisations with which the Clyde & Co has shared your data for the fulfilment of legal duties
- Possibility of not providing consent, as well as being informed of the consequences, in the event of refusal, when the data processing operation is based on consent
- Revocation of consent, when applicable
- Request a review of decisions taken solely on the basis of automated processing of personal data and obtain information on the criteria and procedures used, where applicable, in a clear and appropriate manner, in accordance with the LGPD

11. Requests from data subjects may be directed to the following contact, by e-mail or letter:

CLYDE & CO. CONSULTORES LTDA

E-mail: dataprotectionofficer@clydeco.com

Rua Padre Joao Manuel, 199, Conj. 23 e 24, Cerqueira Cesar, São Paulo/SP

Data Protection Officer (Brazil):

Mr. Daniel Macaluso

11.1 The data subject or their representative shall provide details, including their full name and e-mail address and relationship to Clyde & Co. and any other relevant information so that we can identify them, confirm their capacity and identity.

12.2 The identity and contact details of the data controller are available on our website.

13. UPDATES TO PRIVACY NOTICE

Clyde & Co. is constantly updating its processes, so this Notice may be updated whenever necessary to reflect changes in the way Clyde & Co. handles personal data.

We recommend that you check the latest version of this Notice regularly.

This Privacy Notice was last updated in September 2025.

This English version of the Privacy Notice is a translation of the Portuguese version and shall be used for reference only. In case of conflict, the Portuguese version shall prevail.