

PRIVACY IN COMPLIANCE WITH THE GENERAL DATA PROTECTION SYSTEM

This Privacy Statement describes how Triple A - Capital & Finance. Lda., Collects, maintains and treats information about individuals and legal persons who visit our website or use our services (hereinafter Users or Customers). The website to which this privacy policy applies is the following www.tripleacapitalfinance.com.

BY USING OUR WEBSITE AND BY GIVING YOUR EXPRESS CONSENT, YOU AGREE TO THE COLLECTION AND USE OF DATA AS SET FORTH IN THIS PRIVACY POLICY. YOU ALSO ACKNOWLEDGE THAT TRIPLE A - CAPITAL & FINANCE MAY PERIODICALLY CHANGE, MODIFY, ADD OR REMOVE OR, OTHERWISE, UPDATE THIS PRIVACY POLICY TO YOUR CRITERION, WITHOUT PRIOR NOTIFICATION.

However, we will always treat your Personal and Collective Information in accordance with the Privacy Policy that was in effect at the time of collection. It is our intention to publish changes to the privacy policy on this page so that you are fully informed about the types of information we collect, how we use it and under what circumstances it may be disclosed. The Privacy Policy is available on our homepage and also on any page where Personal Data is requested. At these data collection points, an additional explanation, where appropriate, may be given as to the purposes for which the data will be used.

Our website does not require any type of registration, allowing you to visit it without informing us of your identity. However, in case you want to contact us via the form, you may need to provide us with personal or collective data.

1. PRIVACY STATEMENT



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The term "personal data" as used in this Privacy Policy refers to information relating to identified or identifiable natural persons (data subject), such as your name, date of birth, email address, correspondence or phone number that can be used to identify you. It also refers to data of identified or identifiable legal persons (managers or employees), such as name, company name, address, date of start of activity, data on operations to be carried out, email address, address for correspondence or telephone number that can be used to identify the company. We treat your personal information as described in this Privacy Policy.

The following sections explain how and when we collect your personal data.

2. RESPONSIBLE FOR THE PROCESSING

Triple A - Capital & Finance, Lda., Headquartered at Avenida Montevideu, nº282, 4150-516, Porto, registered with the Commercial Registry Office of Porto, with corporate number 510543391 (hereinafter referred to as "AAA CF") is responsible for the processing of the personal data of its candidates and is committed to protecting the personal information of its candidates.

3. LEGITIMACY FOR THE PROCESSING

AAA CF collects and may have to collect personal and collective information about Users in order to be able to provide them services, within the scope of a contractual relationship, because such data are necessary for the performance of the contract or necessary to fulfill legal obligation. In these situations, if you do not provide your personal data, AAA CF will be prevented from providing the services requested.

AAA CF may treat your data for purposes that are not required to perform the contract or comply with legal obligation, in which case you will obtain the express consent of the



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User. In these cases, the decision of the Users to provide their personal data is voluntary and may be revoked at any time by the candidates.

4. PERSONAL DATA WE COLLECT AND USE

We may collect the following personal and collective information when using the website;

- Contact information such as name, email address, mailing address, telephone contacts, geographic location, or phone number;
- Data and documents about the projects or operations, which may contain personal data. Estes dados pessoais e documentos são fornecidos diretamente pelo Cliente no nosso website ou, no caso dos documentos sobre operações ou sociedades, recolhidos em bases de dados públicas.

5. PURPOSES OF PROCESSING

We treat personal data on Users, in the context of a contractual relationship with our Customers, we may provide you with services, to collect our services you request, to market services that we believe to be of your interest, namely:

- Provide you with the requested services;
- When requested, assess the needs of your business or project to determine or suggest appropriate services;
- Send you requested information about services;
- Respond to customer requests;
- Bill the services provided;

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- Send you promotional and marketing communications about our services and events, if you have previously consented to receive such communications;
- Answering your questions and doubts;
- Facilitate your transactions with other users when using our services;
- Compliance with legal obligations when applicable, such as compliance with orders from judicial / administrative entities, defense of judicial rights;

We may post the testimonials / comments / references of the clients on our site, which may contain personal information, if you have consented to their publication.

6. COMMUNICATION OF PERSONAL DATA

Your Personal Data may be disclosed to third parties acting on our behalf for processing in accordance with the purpose (s) for which the data was originally collected. These third parties provide services to AAA CF and, for this purpose, need to process personal data. These entities treat personal data on behalf of AAA CF for the purposes described in this Privacy Policy, not selling personal information to third parties or disclosing it to third parties, unless required by law.

The personal data collected may also be disclosed to third parties if the business or project or part thereof is sold, purchased, assigned, transferred or submitted, in which case we will require the other party to process the personal data in accordance with this Privacy Policy.

In addition, Personal Data may be disclosed to third parties if we are required to do so by applicable law, court order or governmental regulation, or if such disclosure is necessary to support any legal or criminal investigation.

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7. TRANSFER OF PERSONAL DATA

Some of the personal data that we collect and process (name and email) may be communicated to third countries where other partner entities operate for the purpose of developing the operations by such entities if you consent.

8. SECURITY AND CONFIDENTIALITY

AAA CF takes appropriate measures to protect personal data in accordance with data protection and personal data protection laws including, in particular, requiring its service providers to take appropriate measures to protect the confidentiality and security of data personal. To ensure the security and confidentiality of the Personal Data we collect, we use protected data networks. In the course of processing your Personal Data, we take reasonable steps to protect such information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

9. INTEGRITY OF DATA AND CONSERVATION

AAA CF has implemented the procedures necessary to ensure that the personal data processed are appropriate to the intended use and correct and complete in view of their intended purpose. AAA CF reserves the personal data for the period necessary for the purposes described in this privacy policy, unless the superior period of conservation is required by law.

In this case, AAA CF will keep your personal data for the purposes of managing the contractual relationship with you for a period of 10 years after the termination of the contractual relationship, unless necessary to fulfill legal obligation or in the context of legal proceedings.

With respect to direct marketing activities and publication of testimonies, personal data will be kept for a period of 10 years after the last communication of consent by the holder of the personal data.

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10. DATA HOLDER RIGHTS

If the candidates have any questions or concerns regarding the way AAA CF handles their personal data or if they wish to request access, correction, limitation, deletion of personal data, opposition to treatment and portability under the legal terms or request that we stop their under applicable law, they should send an e-mail to the following e-mail address: info@tripleacapitalfinance.com.

However, we caution that some of the requests described above may not be possible or required in respect of certain personal data under the applicable law or that their exercise may only be possible under certain legal circumstances.

AAA CF treats your data in accordance with the legislation in force for the protection of personal data, however, if you consider that your rights are not fulfilled, you have the right, at any time, to file a complaint with the National Protection Commission of Data (CNPD).

11. TALK TO US

If you have any questions or concerns about AAA CF's compliance or our website with this Privacy Policy, or if you would like to make any recommendations or comments to improve our Privacy Policy, please send us an email to info@tripleacapitalfinance.com.

12. GOOGLE ANALYTICS

We use Google Analytics to plan our portfolio of sites (i) optimizing traffic to and between corporate sites and (ii) integrating and optimizing web pages where appropriate. "Google Analytics" is a service offered by Google Inc. "Google" which generates detailed statistics on a website's traffic and traffic sources and measures conversions and sales. GoogleAnalytics uses "cookies" stored on your computer to help analyze how users use our site. Information generated by cookies about the use of our site, including your IP address, will be anonymized by using the appropriate settings)

and transmitted to Google servers in the United States. For more information on how IP anonymization works, see <https://support.google.com/analytics/answer/2763052>.

Google will use the information generated by cookies to evaluate the use of our site by compiling reports on site activity, providing us with such reports for analytical purposes.

Google may transfer this information to third parties in the event of statutory obligation or if a third party processes data on behalf of Google. Under no circumstances will Google combine or associate your IP address with other data stored on Google.

You can prevent or stop the installation and storage of cookies by your browser settings by installing the free browser add-on for opt-out available at <https://tools.google.com/dlpage/gaoptout?hl=pt-BR>. Please be advised that in this case you may not fully utilize all the functions of our site. By using our website, you consent to the processing of any personal data that Google collects for the purpose described above.

14. LINKS TO OTHER WEBSITES

The AAA CF website contains hyperlinks to other third party websites, so it is recommended that you consult the pages within those sites that refer to your privacy policies. AAA CF's Privacy Policy is not applicable to third-party sites, so if you visit another site from there, you should always read the privacy policy of that site and verify that you agree to its terms before submitting your data.

AAA CF is not responsible for the privacy policy or the content made available on third party websites. We may provide links to other sites that we believe are of interest to our visitors. Our goal is to ensure that these sites are of the highest standard. However, due to the nature of the Internet, we can not guarantee the privacy standards of the sites to which we link or assume responsibility for the content of sites other than this site.



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ACCEPTANCE OF PRIVACY POLICY

AAA CF is governed by the legislation in force and is bound to comply with this Privacy Policy.

Without prejudice, AAA CF reserves the right to change without notice its Privacy Policy. Any changes to the Privacy Policy will be posted on the Site and regular consultation of this document is advised. The version published on the Site is the version currently in force.

If you do not agree to this Privacy Policy, please do not provide your personal information. However, we caution that the use of the services provided on the AAA CF Site will be conditioned upon the provision of your Personal Data, without which you will not be able to benefit from the services provided by AAA CF.

Further information on the protection of personal data may be obtained by consulting the applicable legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

Last updated: 05/22/2018.