

Last Update: June 01, 2022

Welcome! Thanks for using utrail!

When you use utrail, you entrust us with your data and information. We are committed to maintaining that trust.

In this regard, this Privacy Policy explains in a clear and accessible manner how your information and data will be collected, used, shared and stored through our systems.

Acceptance of our Policy will be made when you access or use the utrail website, application or services. This will indicate that you are aware and

in full agreement with how we will use your information and data.

This Policy is divided as follows to facilitate your understanding:

1. What information does utrail collect
2. How utrail uses the information collected
3. How, when and with whom utrail shares your information
4. What rights do you have over the information we collect?
5. How Utrail protects your information
6. Updates to this privacy policy
7. Applicable law

This document should be read in conjunction with our Terms of Use, which contains an overview of our platform. In case you have doubts or need to deal with any matter related to this Policy, please contact us via email at contato@utrail.app.

1. INFORMATION WE COLLECT

We collect the following types of information:

1.1. Information you provide to us.

That includes:

Registration data. When you sign up for utrail, you provide us with information such as login, password, name, profile picture, email address, phone number, CPF, date of birth, age, gender, credit card if making payments, profile description.

Sensitive data. During your use of utrail, you may provide us with data such as information relevant to social and ethnic origin, health, genetic information, sexual orientation and political beliefs, religious and philosophical, which are traditionally considered sensitive.

Your sensitive data will be used to: settings, understand the user behaviors and interests. Through this Policy, you expressly consents to the collection, use and sharing of these data, in the terms established herein.

Connection via third-party services. When you connect or log in to utrail with third party services (e.g. Google and Facebook), we may collect the data you provide to us through these services, such as name, email address, profile description, contact list, photo profile, likes, groups. In this case, we respect your settings privacy policy and we will ask for permission to collect such data.

Authentication information. To provide you with a safe environment, we may ask you to provide us with identifying information (for (e.g. photo of identity document and proof of residence) or other authentication information (eg via SMS or email).

Address book information. Utrail may, through its authorization, gain access to your address book contacts equipment, or you can enter them manually in order to use certain utrail features, such as inviting them to use utrail.

1.2. Information generated when you use our services.

We collect the following generated information:

Access logs. Utrail automatically collects access logs to application, which include the IP address, with date and time, used to access utrail. These data are required to be collected, in accordance with the Law 12.965/2014, but will only be provided to third parties with your express authorization or by means of a legal demand.

Usage data. We collect information about your interactions on utrail, such as your navigation, the pages or other content you access or creates, your searches, participation in surveys or forums, and other actions.

Connected device location data. We collect data from location, which are collected through your equipment or device connected, if you authorize. Your authorization to share your location may be revoked at any time. However, that may disable some of the features of the platform.

Background location data. Utrail app may collect background location data of the equipment or device used to access it, even if the application is closed. trail may collect this location data for browsing purposes. Your authorization to share your location may be revoked at anytime. However, this may inactivate some of the platform features.

Payment data. When you make payments on utrail, you may supply us with payment data, such as date and time, amount and other details of the transaction, which may also be used to fraud prevention purposes. In this way, we can provide you with a safe and suitable environment for you to carry out your transactions.



Equipment characteristics. Like most apps, utrail automatically collects data about the characteristics of your device, including its operating system, its version, hardware information, language, internet signal and battery.

Communications with utrail. When you communicate with utrail, we collect information about your communication, including metadata such as date, IP and time of communications and all their content, as well as any information you choose to provide.

Communications with other users. When you communicate with others utrail users, we collect information about your communication, including metadata such as date, IP and time of communications and all your content, as well as any information you choose to provide.

Cookies and similar technologies. We use cookies, which are text files generated and stored on your browser or device through websites, applications and online advertisements. Cookies may be used for the following purposes: authenticating users, remembering preferences, and user settings, understand user behaviors and interests user.

1.3. Information from other sources.

This may include:

Information from other users. Other utrail users may produce information about you, such as referrals, reviews, or comments.

Data collected from other platforms. Utrail will be able to interact with other platforms and other services, such as social networks and payment. Some of these services may provide us with information about you, which we will collect to provide you with a better experience and increasingly improve our services and offer you new features as well as settings, understand the behaviors and user interests.

2. HOW WE USE YOUR INFORMATION

It doesn't hurt to remember, we value your privacy very much. Therefore, all data and information about you are treated as confidential, and only those we will use for the purposes described herein and authorized by you, primarily for that you can fully use utrail, always aiming to improve your



user experience.

2.1. authorized uses

In this way, we may use your data to:

Allow you to access and use all utrail features;

Send you messages about support or service, such as alerts, notifications and updates;

Communicate with you about products, services, promotions, news, updates, events and other matters that you may be interested in;

Analyze user traffic in our applications;

Carry out targeted advertising according to your tastes, interests and other information collected;

Customize the service to adapt it more and more to your tastes and interests;

Create services, products and features;

Detection and prevention of fraud, spam and security incidents;

Verify or authenticate information provided by you, including comparing to data collected from other sources;

Better understand user behavior and build profiles behavioral;

For any purpose you authorize at the time of data collection;

Comply with legal obligations.

Eventually, we may use data for purposes not provided for in this privacy policy, but these will be within your legitimate expectations.

The possible use of your data for purposes that do not comply with this prerogative will be done with your prior authorization.

2.2. Deletion of data

All data collected will be deleted from our servers when you so request, by free and facilitated procedure, or when they do not are most necessary or relevant for us to offer you our services, unless there is any other reason for its maintenance, such as eventual legal obligation to retain data or need to preserve data for utrail rights protection.

In cases where you request the deletion of your data, we will keep your data for 12 (twelve) months from your deletion request

2.3. Monitoring

utrail reserves the right to monitor the entire platform, especially to ensure that the rules described in our Terms of Use are being observed, or that there is no violation or abuse of applicable laws.

2.4. User deletion

utrail reserves the right to exclude a specific user, regardless of the



of any kind, if this Policy or the Terms of Use are not respected. As we cherish the good relationship with users, we recognize that have the right to seek to understand the reasons and even contest them, which can be done by the following email: contato@ustrail.app.

3. SHARING OF INFORMATION

Utrail may share the information it collects, including your personal data, with business partners, advertisers, sponsors and providers services, located both in Brazil and in the following countries: United States of America and other countries in America. The sharing of information will occur anonymously, whenever possible, with a view to preserve your privacy. By means of this document, you authorize expressly such shares.

ustrail allows other companies and ad networks to advertise on our platform through different technologies. So you can eventually receive ads, content and links directly into your app displayed in a personalized way, according to your interests and behaviors on our platform or other services with which you interact. To this end, data can be shared between utrail and these other companies, mainly unique identifiers, IP addresses, cookies and java scripts, which can be used to measure advertising efficiency online. You hereby expressly authorize such shares. However, utrail is not responsible for the acts, advertisements and content generated by our business partners and ad networks, and this Policy does not apply to them as utrail does not control them. We suggest having access and read the privacy policies of the companies with which you eventually interact. All data, information and content about you can be considered assets in the case of trades in which utrail is a part. Therefore, we We reserve the right, for example, to include your data among the assets of the company if it is sold, acquired or merged with another. Per through this Policy you agree and are aware of this possibility. utrail reserves the right to provide its data and information about you, including your interactions, if legally required to do so, act necessary for the company to comply with national laws, or if you expressly authorize it.

4. RIGHTS OF OWNERS

You can always choose not to disclose your data to us, but keep in mind that mind that some of this data may be necessary to use the features of our applications. Regardless, you will always have rights relating to privacy and the protection of your personal data. Therefore, below we summarize all the rights you have under the laws



Brazilian industry related to data protection and the General Data Protection Law

Data (“LGPD”), which are:

4.1. Right of access. This right allows you to request and receive a copy of the personal data we hold about you.

4.2. Right of rectification. This right allows you, at any time, to moment, you can request the correction and/or rectification of your data personal information if you identify that some of them are incorrect. However, To make this correction effective, we will have to check the validity of the data you provide to us. You can directly rectify some of the your personal data via email contato@ustrail.app.

4.3. Right of exclusion. This right allows you to ask us to delete all the personal data we hold about you. all data collected will be deleted from our servers when you request or when they are no longer necessary or relevant to offer you our services, unless there is any other reason for its maintenance, as a possible legal obligation to retain data or need to preserve them to protect ustrail right. To change your personal information or delete it from our bank data, just send an email to contato@ustrail.app.

4.4. Right to object to processing. You also have the right to dispute where and in what context we are processing your personal data for different purposes. In certain situations, we may demonstrate that we have legitimate reasons to process your data, which override your rights, if, for example, they are essential to the delivery of our applications.

4.5. Right to request anonymization, blocking or deletion. This one right allows you to ask us to suspend processing of your personal data in the following scenarios: (a) if you want us to establish data accuracy; (b) when you need them to be keep the data even if we no longer need it, as necessary, to establish, exercise or defend legal claims; or (c) if you have objected to the use of your data, but in this case we need to verify that we have legitimate reasons to use them.

4.6. Right to portability. We will provide you, or third parties that you choose your personal data in a structured and interoperable format.

4.7. Right to withdraw your consent. You have the right to withdraw the your consent to the terms of this Privacy Policy. However, this will not affect the legality of any processing previously performed. If you withdraw your consent, you may not we may provide certain services.



4.8. Right to review automated decisions. You also have the right to request the review of decisions taken solely on the basis of in automated processing of your personal data that affect your interests, including decisions aimed at defining personal profiles, professional, consumer and credit aspects and/or aspects of their Personality. We may need to request specific information from you to help us confirm your identity and guarantee your right to access your personal data (or to exercise your other rights). This is a security measure for ensure that personal data is not disclosed to anyone other than entitled to receive them. We may also contact you for more information. information in relation to your request in order to expedite our response. We try to respond to all legitimate requests within 5 business days. Occasionally it may take longer than 5 days if your request is particularly complex or if you have made multiple requests. In this case, we will communicate it and keep you updated on the progress of your request. If you have any questions about these issues and how you can exercise these rights, please feel free to contact us at the email contato@ustrail.app.

5. INFORMATION SECURITY

All your data is confidential and only people with the right authorizations will have access to them. Any use of these will be in accordance with the present Policy. utrail will make all reasonable market efforts to ensure the security of our systems and your data. Our servers are located in different locations to ensure stability and security, and can only be accessed through communication channels previously authorized.

All your information, especially sensitive data, will, whenever possible, be encrypted, if they do not make their use by the platform unfeasible. You can request a copy of your data stored on our systems at any time. We will keep data and information only as long as they are necessary or relevant for the purposes described in this Policy, or in the case of periods predetermined by law, or as long as they are necessary for the maintenance of utrail's legitimate interests. utrail considers your privacy extremely important and will do everything within reach to protect it. However, we cannot guarantee that all data and information about you on our platform will be free from unauthorized access, especially if you share the credentials necessary to access our application. Therefore, you are solely responsible for keeping your password in a safe place and sharing it with third parties is prohibited. You undertake to notify utrail immediately, through secure means, of any unauthorized use of your account, as well as unauthorized access by third parties to it.

6. PRIVACY POLICY UPDATES



ustrail reserves the right to change this Policy as often as necessary, in order to provide you with more security, convenience, and improve your experience more and more. That is why it is very important to access our Policy periodically. To make it easier, we indicate at the beginning of the document the date of the last update. If material changes are made that require new authorizations from you, we will publish a new privacy policy, subject again to your consent.

7. APPLICABLE LAW

This document is governed by and shall be interpreted in accordance with the laws of the Federative Republic of Brazil. The Forum of the District of São Paulo as the competent person to settle any questions that may arise of this document, with express waiver of any other, however privileged it may be.

