

GALAXIES PORTAL PRIVACY POLICY

1. INTRODUCTION

1.1. Galaxies Ltda., a limited liability company registered under CNPJ No. 49.459.097/0001-94, either directly or through its potential controlling companies, under common control, subsidiaries or affiliates, or any other companies within the same economic group ("Galaxies"), respects the privacy of Users of its products, solutions and technological functionalities offered through the Galaxies Portal ("Solutions"), in accordance with the Brazilian General Data Protection Law No. 13.709/2018 ("LGPD").

1.2. In this regard, this Galaxies Portal Privacy Policy ("Privacy Policy") aims to establish the rules regarding the collection, processing, storage, use and sharing of personal data of Users who access the Galaxies Portal, respond to surveys hosted on the Galaxies Portal, or use any of the Solutions.

1.3. Galaxies recommends that Users carefully read this Privacy Policy carefully before creating their account on the Galaxies Portal, responding to surveys hosted on the Galaxies Portal, or using any of the Solutions. If you do not agree with any of the provisions set forth herein, you should not register an account on the Galaxies Portal, respond to surveys hosted on the Galaxies Portal, or use any of the Solutions. By registering an account on the Galaxies Portal or performing any such activities on the Galaxies Portal, the User will have declared and guaranteed that they have read, understood, agree with, and will observe the provisions of this Privacy Policy.

1.4. This Privacy Policy may be updated by Galaxies at any time through simple availability of a new applicable version on the Galaxies Portal. Any changes will be communicated in advance to Users through notice on the Galaxies Portal or by sending notifications through the application or email registered by Users, always indicating the date of the last modification.

1.5. If the User does not agree with any changes made, we recommend deleting their access account to the Galaxies Portal, not responding to additional surveys hosted on the Galaxies Portal, ceasing to use any of the Solutions, and waiting for the end of the data retention period provided for in this Privacy Policy.

1.6. After the modification, if the User continues to use their account on the Galaxies Portal, responding to surveys hosted on the Galaxies Portal, or using any of the Solutions, the User will be deemed to have agreed to the new Privacy Policy, which will apply to the User immediately and automatically.

1.7. This Privacy Policy should be interpreted in conjunction with other terms and conditions that govern the use of the Galaxies Portal and Solutions.

2. DEFINITIONS

2.1. For the purposes of this Privacy Policy, terms and expressions beginning with capital letters will have the meanings attributed to them as follows:

- **"B2B Client"** means legal entities that contract, license and use the Solutions in the context of their commercial, institutional or professional activities, through direct contractual relationship with Galaxies (including through access to Nexus), and may create users and subaccounts, send content (links, videos, images), with the objective of integrating or applying such functionalities in their own processes, products, services or operations.
- **"Personal Data"** means any information that, alone or in combination with other information, identifies or can identify a specific User or that can be associated with a User indirectly.
- **"Anonymized Data"** means Personal Data anonymized in such a way that does not allow identification of the respective data subjects, considering the use of reasonable technical means available at the time of their processing, processed by Galaxies in aggregate form or not.
- **"Galaxies Portal"** means the digital ecosystem developed, managed and made available by Galaxies, composed of all its technological platforms, including, but not limited to, websites accessible from the domains <https://app.galaxies.gg/> and <https://galaxies.nexus>, their respective subdomains, as well as any other domains, mobile applications or digital solutions administered by Galaxies, regardless of the access model through which Users can access the Galaxies Portal or use the Solutions.
- **"Synthetic Personas"** refers to profiles generated by machine learning and artificial intelligence that reproduce response patterns and behaviors of real consumers in various scenarios, based on data originating from responses collected on the Galaxies Portal (and eventually from other sources).
- **"Nexus"** means Galaxies' platform intended for B2B Clients for access and use of Solutions aimed at legal entities (including the creation and management of Synthetic Personas), accessible through the website <https://galaxies.nexus>.
- **"User"** means all people who access the Galaxies Portal or use the Solutions, including, but not limited to: (i) individuals who participate in surveys, respond to questionnaires or interact with Galaxies content on their own behalf ("B2C User"); and (ii) legal entities that contract the use of Solutions (B2B Clients).

2.2. Other terms beginning with capital letters and not defined in this Privacy Policy will have the meanings attributed to them in other terms and conditions that govern the use of the Galaxies Portal.

3. OBJECTIVE AND COMMITMENT

3.1. Respecting User privacy is a fundamental part of Galaxies' mission. The purpose of this Privacy Policy is to ensure transparency regarding Personal Data processing processes carried out by Galaxies for the purposes of making the Galaxies Portal available, developing Galaxies' business activities, or any of the Solutions, throughout the entire lifecycle of Personal Data collected.

3.2. Galaxies values the privacy of its Users and treats all Personal Data collected through commercially reasonable information security and privacy practices to ensure the integrity of Personal Data processed.

3.3. Galaxies collects the Personal Data necessary to provide the Solutions and to carry out its business activities. Thus, information that allows Galaxies to create User accounts, provide Solutions adequately, develop Galaxies' business activities, fulfill commitments made to Users, and satisfy applicable legal requirements are collected and processed.

3.4. Galaxies undertakes not to use any Personal Data for purposes other than those described in this Privacy Policy, or in disagreement with consent given by the User, or in a manner that contravenes applicable data protection legislation. Galaxies also undertakes not to use any Personal Data for discriminatory purposes or in a way that harms any rights or individual freedoms of the respective data subjects.

3.5. The User acknowledges and agrees that Galaxies is a business corporation whose corporate purpose is the development and provision of technological solutions in data intelligence (including for B2B Clients), within or outside the Galaxies Portal, for consideration, and for this reason the collection, processing, and use (including for Galaxies' commercial purposes) of Users' Personal Data is an essential part of its business activities. The User expressly consents to the use of their Personal Data in connection with Galaxies' business activities and for commercial purposes, provided that such use observes the terms and conditions of this Privacy Policy.

4. PERSONAL DATA COLLECTED

4.1. Galaxies may collect Personal Data from various sources, for various reasons and in various situations, acting in some as controller and in others as processor, under applicable legislation, but always based on appropriate legal bases and observing the purposes described in this Privacy Policy.

4.2. To access the Galaxies Portal, B2C Users must create an access account and may participate in surveys to collect responses about products, services, trends, behaviors and personal preferences. For this purpose, they may provide Galaxies with:

- Full name;
- Email;
- Position/function;
- Username;
- Date of birth;
- Phone number;
- Corporate phone (when applicable);
- Access credentials (user and password, corresponding hashes);
- Access logs (IP, login date and time, device);
- Country, State and City of residence; and
- Survey responses regarding products, services, knowledge, interests, preferences, feedback, trends and behaviors, concerning different business sectors.

4.3. Galaxies may collect some information from B2B Clients, including, but not limited to, the following information:

- Corporate name;

- CNPJ;
- Name and CPF of legal representative;
- Position/function of authorized users;
- Complete address;
- Contact email and phone;
- Billing and collection data (e.g., tax invoices).

4.4. Users may provide Galaxies with various information (some of which may be or contain Personal Data), including, but not limited to, the following information:

- Files (images, videos, audio, documents);
- URLs or links provided;
- Free text submitted by User;
- Associated metadata (filename, upload date, size, file type).

4.5. When accessing the Galaxies Portal or using any of the Solutions, Galaxies may automatically collect User information, either directly or through the use of analytics services or similar tools, which may include:

- IP address of the device used to access the Galaxies Portal or use any of the Solutions;
- Specific actions performed during use of the Galaxies Portal, including pages visited, content accessed, or interactions with other Users or Galaxies Portal functionalities;
- Terms searched in the Galaxies Portal search field;
- Time, frequency and duration of Galaxies Portal use;
- Information about emails sent by Galaxies to Users or received from them;
- Platform event logs (errors, failures, usage metrics);
- Cookies and session tracking in the environment (for security, fraud detection and improvements);
- Specific Analytics tools for the corporate environment (e.g., user activity monitoring).

4.6. Also, whenever the User visits the Galaxies Portal or receives and interacts with marketing communications or advertisements on the Galaxies Portal or in any of the Solutions, Galaxies may automatically record User activity, as well as collect information about emails or advertisements with which the User interacted through cookies, web beacons, tracking pixels, browser plug-ins and embedded scripts.

4.7. The Galaxies Portal uses its own cookies and third-party tools. These cookies are essential for proper system functioning, especially in B2B contexts, and include functionalities such as session authentication, interface personalization and performance monitoring.

4.8. In addition to necessary cookies, Nexus may use analytics tools to collect information about Portal usage by Users, with the objectives of continuously improving the platform, identifying operational failures, offering a more efficient experience and building statistical data for product and service offerings to third parties. Information collected through these cookies may include IP address, clicked events, pages visited, response time and other interaction data, always processed with reasonable security standards.

4.9. Below, we detail the main types of cookies and tools used, their purposes and guidance on consent and management:

Item	Description
Use of Corporate Cookies	Galaxies may use essential cookies to ensure functionalities such as authentication sessions, login maintenance, dashboard personalization and User preferences. These cookies are fundamental for platform functioning.
Analytics Tools Used	Integration of tools such as Google Analytics, Firebase, Mixpanel and Amplitude, for the purpose of collecting navigation and interaction data.
Data Collected	Analytics tools may collect: IP address, usage behavior, clicked events, pages visited, permanence time, device and operating system used
Purposes of Data Collection	Information collected is used to: improve User experience, correct system errors, monitor platform performance and stability, analyze usage patterns to improve functionalities, map User behavior and interest patterns on our sites and partner channels, offer products, content and advertising campaigns, create Synthetic Personas and aggregated consumer profiles based on data to guide strategic and marketing decisions, conduct market research and usability tests based on real user segmentations, generate statistical data, information and insights about platform usage, partner sites/channels and User preferences
Cookie Consent	Consent for cookie use may be presumed with contractual acceptance. Still, Users may manage cookies via browser or settings panel, being informed that their deactivation may harm the completeness of their experience with the Galaxies Portal (generating impacts such as automatic logout, loss of preferences or panel use instability).
Data Retention and Sharing	Data collected via cookies may be: stored for the period necessary for the specific purpose (e.g., active session, error analysis), shared with contracted third parties, such as Content Delivery Network (CDN) providers, security providers or analytics platforms, always based on contractual clauses of security and legal compliance.

4.10. Synthetic Personas made available by Galaxies are generated based on statistical data and irreversibly anonymized information, under the terms of article 12 of the LGPD. There is no possibility, from any technical or operational perspective, of reidentification or reversal of the anonymization process that would allow obtaining, directly or indirectly, personal data from real individuals. The processing of such Anonymized Data, therefore, is not subject to LGPD application, as provided in its article 12. Still, Galaxies maintains security and ethical responsibility in the use and generation of such Synthetic Personas.

4.10.1. If the User enters third-party data (such as images, names or emails), the respective data subject maintains their legal rights, but the responsibility for attending to them belongs to the B2B Client, as Controller. Galaxies will act as Processor, providing support when formally requested.

4.10.2. Any request may be made via Galaxies' DPO channel. In the case of data submitted by B2B Clients, it is recommended that the data subject initially contact the B2B Client themselves, who will forward the request to Galaxies if necessary.

5. PURPOSES OF PERSONAL DATA PROCESSING

5.1. The purposes of Personal Data collection and processing described in this Privacy Policy determine and limit which Personal Data is collected by Galaxies and how it will be used, how long Galaxies will store it, as well as which rights and other control mechanisms will be available to the User.

5.1.1. In this sense, to ensure transparency regarding the use of Personal Data by Galaxies, all Personal Data processing purposes collected are listed below.

5.2. Hypotheses of Personal Data processing in which Galaxies acts as Controller

5.3. Galaxies collects and processes certain Personal Data according to the cases and respective purposes described in the table below:

Processing Purpose	Data Processing Operation	Legal Basis for Data Processing
User Account Creation and Administration	For this data processing, Personal Data interpreted as useful for registration is used.	The legal basis for this processing is Contract Execution (LGPD, art. 7, V).
Payment processing, cancellations, and refunds	For this processing, data about your payment methods are collected and processed, enabling the complete Galaxies Portal experience.	The corresponding legal basis is Contract Execution (LGPD, art. 7, V).
Data Sharing with Third Parties	Personal Data may be shared with commercial partners, clients, technology providers, media platforms, consultancies and research companies, with the objective of creating content, products, services and offers; preparing and distributing market studies, user profiles or statistical insights; generating aggregated profiles or Synthetic Personas; conducting and distributing behavior, market and consumption preference analyses; measuring campaign effectiveness and improving third-party products, services and commercial strategies. Sharing occurs in a controlled manner and adopting	The corresponding legal basis is Consent (LGPD, art. 7, I).

	security measures compatible with the sensitivity of shared information.	
Access to User location for commercial opportunity mapping	Collection of User location data, when authorized, is used to identify geographical usage patterns, regional preferences and local needs, allowing opportunity mapping and more effective offering of Galaxies or third-party products and services. This data helps direct action strategies, optimize resources and improve delivery of Galaxies or third-party products and services in a way more adherent to User context. Processing may involve the use of precise or approximate geolocation, as configured by the User themselves.	The corresponding legal basis is Consent (LGPD, art. 7, I).
Develop new functionalities and promote improvements	With the objective of promoting corrections and improvements, as well as enabling correct implementation of new functionalities, Galaxies may use or share with third parties the Personal Data collected, in an anonymized manner.	The corresponding legal basis is Controller's Legitimate Interest (LGPD, art. 10).
Provide additional communications related to marketing, including new products, opportunities and subscriptions to the User	Through this data processing, Galaxies seeks to expand and improve experience quality; it may also use data to offer new Solutions or announce products and services offered by third parties.	The corresponding legal basis is Consent (LGPD, art. 7, I).
Fraud prevention on the Galaxies Portal	Data processing intended to protect the technological environment of the Galaxies Portal, aiming at User and Galaxies security.	The corresponding legal basis is Fraud Prevention Guarantee (LGPD, art. 7, IX).
Rights Defense and Protection of Galaxies' Material and Immaterial Property	Galaxies, in conducting its activities, may encounter hypotheses of irregular use by any User, being reserved the right to use data and information useful for promoting defense of its rights and properties.	The corresponding legal basis is Controller's Legitimate Interest (LGPD, art. 10).

Corporate Account Creation and Administration (B2B Client)	B2B Client data collection for registration and validation.	Contract Execution (LGPD, art. 7, V).
B2B Client data provisioning	Management of B2B Client employee profiles and credentials.	Contract Execution (LGPD, art. 7, V) and, when applicable, legal obligation compliance (e.g., audit, traceability).
Payment and Billing Processing (B2B Client)	Tax invoice issuance, billing control, cancellations, refunds.	Contract Execution (LGPD, art. 7, V).
Availability, Training and Improvement of Synthetic Personas (among other AI Solutions)	Galaxies may use Personal Data to provide, train, improve and maintain its Solutions (including Synthetic Personas); to develop new Solutions or functionalities; to improve or train models or algorithms.	The corresponding legal basis is Legitimate Interest (LGPD, art. 7, IX) and, when applicable, Consent (LGPD, art. 7, I).
Interaction Logs, Monitoring and Security	Security checkpoints, failure logs, fraud prevention, misuse detection.	Legitimate Interest (LGPD, art. 7, IX) and, if there is legal audit obligation, legal obligation compliance (LGPD, art. 7, VI).
Commercial Communications and Product Expansion	Sending newsletters, webinar invitations, new product or module offers, whether from Galaxies or offered by third parties.	The corresponding legal basis is Consent (LGPD, art. 7, I).

5.4. Galaxies may also access, read, preserve and disclose any Personal Data when necessary to comply with a legal obligation or court order, enforce this Privacy Policy and other agreements, or protect the rights, property or security of Galaxies, its employees, contractors or others.

5.5. As applicable, due to the nature of Solutions made available through the Galaxies Portal, the viability of certain Solutions and the development of Galaxies' business activities will depend on sharing Personal Data with clients, partner companies or service providers, both in Brazil and abroad. In such cases, Galaxies undertakes to require such third parties to process Personal Data in accordance with the LGPD.

5.5.1. Galaxies may share Users' Personal Data with: (i) subprocessors (for example, infrastructure providers, analysis tools, backup services, monitoring); (ii) research partners who assist in AI engine improvement; and (iii) competent authorities, when there is legal request. In all cases, sharing will occur only to the extent necessary for providing contracted services or complying with legal obligation, and through signing an instrument that guarantees equivalent protection obligations to those set forth in this Privacy Policy.

6. PROCESSING OF CHILDREN AND ADOLESCENTS' PERSONAL DATA

6.1. We do not intentionally collect Personal Data from children without requesting consent from parents or legal guardians. When we identify from information provided to us that a User is under 12 years old, we request consent from parents or legal guardians.

6.2. The processing of Personal Data of adolescents will be carried out in the best interest of the data subject in accordance with applicable legislation.

6.3. The specific purposes of processing data relating to Users who are children and adolescents include participation in opinion polls surveys, usability tests and studies on digital habits.

6.4. Galaxies recommends that parents or guardians guide minors regarding protection of their online privacy and avoid sharing personal information without proper supervision.

7. ROLES AND RESPONSIBILITIES

7.1. Galaxies acts as Controller when processing User Personal Data and in developing the anonymized synthetic data base. In the Nexus context, Galaxies acts as Processor when processing potential Personal Data sent by B2B Clients, storing data and generating simulations according to contractual instructions.

7.2. The B2B Client will be considered Controller of Personal Data eventually inserted in Nexus, such as images, audio or files. It is the B2B Client's responsibility to ensure compliance with legal obligations, including obtaining valid legal basis (consent, legitimate interest, legal obligation, etc.), as well as informing data subjects about processing.

7.3. Galaxies may hire subprocessors to enable Nexus functioning, such as cloud providers, messaging services, monitoring and backup. Such subprocessors will be contractually obligated to comply with security and data protection standards compatible with the LGPD.

8. RETENTION PERIOD OF PERSONAL DATA

8.1. Galaxies only stores your information for the period necessary for the purposes presented in this Privacy Policy, observing the data retention period determined, above all, by the LGPD.

8.2. If you request deletion of your account, your personal information provided to Galaxies during your use of our Solutions will be deleted, except for purposes permitted by data protection legislation.

8.3. In some cases, we may retain your information even if you delete your account, such as in cases of mandatory record keeping provided for in applicable laws, if there is an unresolved issue related to your account (such as an unresolved complaint or dispute), as well as for regular exercise of our rights, or if necessary for our legitimate interests, such as fraud prevention, audits and improving security of our users.

8.4. Galaxies may retain Personal Data for a longer period to comply with legal obligations under applicable legislation, and Galaxies is required to retain certain transactional data under tax and civil legislation for a period of up to 10 (ten) years.

8.5. The Data processed within the scope of Nexus may be processed or stored on servers located outside Brazil, in accordance with articles 33 to 36 of the LGPD. In such cases, the international data transfer will occur through specific contractual clauses, commercially reasonable security guarantees and restricted access controls.

9. SECURITY CONTROLS AND RISK MITIGATION ADOPTED BY GALAXIES

9.1. Galaxies makes commercially reasonable efforts to ensure the security of Personal Data processed, and takes procedural, technical and physical precautions to avoid any improper processing of Personal Data.

9.2. Users' Personal Data is stored in a secure environment, in accordance with all applicable legislation and this Privacy Policy.

9.3. Personal Data is transmitted with controls to ensure information processing security. Access to Nexus by corporate users is protected by multifactor authentication (MFA), applying least privilege principles, in which only authorized administrators can manage users, integrations and logs.

9.4. Even with all Galaxies' efforts, given the current technological state, it is impossible to guarantee that any data transmission over the Internet is completely secure. Therefore, if you identify or become aware of anything related to Galaxies that compromises information security, contact us as quickly as possible, so that incident response measures can be taken.

9.5. In the event of a security incident with data impact (such as leak or unauthorized access), Galaxies will notify potentially affected Users within 72 (seventy-two) hours after detecting the event, adopting its internal incident response plan.

9.6. Galaxies conducts regular training with its employees on best practices in information security and privacy,, with a view to mitigating operational risks and reinforcing data protection culture.

10. CUSTOMER SERVICE CHANNEL FOR CLARIFICATIONS AND REQUESTS RELATED TO PERSONAL DATA PROCESSING

10.1. Galaxies considers it fundamental that parties involved in any Personal Data processing hypothesis have full understanding of the issues involved, and always seeks to document its

processes and procedures in the most adequate and transparent way possible, aiming to meet the interests of those involved, applicable legislation and international best practices.

10.2. If you have questions about any matter related to Personal Data processing by Galaxies, this Privacy Policy, or if there are indications that your Personal Data has been used improperly, contact our Personal Data Protection Officer indicated below.

10.3. The channel should also be used in case the User, a data subject shared with Galaxies, wants to exercise the rights provided for in art. 9, 18 and 19 of the LGPD – that is, in case they choose correction, anonymization, blocking, elimination, portability of said data.

10.4. Responses to requests will be provided within the legal deadline of up to 15 (fifteen) days, upon proof of identity or legitimacy, as the case may be.

Data Protection Officer (for the Galaxies Portal): Name: Daniel Victorino Email: danielvictorino@galaxies.gg

Last modification of the Privacy Policy on 07/17/2025.