



PRIVACY POLICY

Hello, welcome!

HEDRO SISTEMAS INTELIGENTES LTDA, a private legal entity duly incorporated under CNPJ No. 26.199.823/0001-81, with registered office at Rua Hélio Ribeiro, No. 212, Centro, Entre Rios de Minas/MG, ZIP Code 35490-000 (hereinafter referred to as “HEDRO”), **recognizes** that your privacy is of utmost importance and, accordingly, takes all possible measures to protect it, assuming the responsibility of processing your personal data with integrity and in strict confidence.

This Privacy Policy (the “Policy”) aims to establish and share with you, in a transparent manner, how information and your data are collected, used, stored, processed, and protected in the context of your use of our Hedro Callisto Application.

In order to achieve this objective and in compliance with applicable legislation, particularly the **Brazilian General Data Protection Law (Lei Geral de Proteção de Dados Pessoais-LGPD)**, we have developed this Privacy Policy with a mission: to process your personal data in a manner that prevents any loss, alteration, theft, or any other form of use not in accordance with this Privacy Policy.

In this way, by providing transparency regarding our processing of collected personal data, we make this policy public.

Please note that if you have any questions, you may always contact us at the following email address: suporte@hedro.com.br

1. What are the rights of personal data subjects?

With respect to your personal data, you hold the following rights:

- Right to restrict or limit the processing of your personal data, which may be exercised when you contest the accuracy of the data, when the processing is unlawful, when the data is no longer required for the proposed purposes, when you object to the processing of your data, or in cases of unnecessary data processing;
- Right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you, including the right to object to the use of your personal data for profiling, including for marketing purposes;
- Right to withdraw consent, subject to the provisions of applicable law;
- Right of the data subject to obtain confirmation as to whether or not personal data concerning them is being processed and, where applicable, the right to access such personal data;
- The data subject is granted the right to obtain rectification of any inaccurate personal data concerning them;



- The right of the data subject to have their personal data erased, subject to the exceptions provided by law.

We further guarantee that the processing of your personal data shall comply with the following principles:

- **Data minimization:** the data subject's personal data shall be collected in an adequate, relevant, and limited manner, restricted to what is necessary for the purposes for which it is processed;
- **Purpose limitation:** the data subject's personal data shall be collected only for specified, explicit, and legitimate purposes and may not be further processed in a manner incompatible with those purposes;
- **Integrity, confidentiality and transparency:** personal data shall be processed in a secure manner, protected against unauthorized or unlawful processing and against accidental loss, destruction, or damage, through the adoption of appropriate technical and organizational measures;
- **Lawfulness, fairness, and transparency:** the data subject's personal data shall be processed lawfully, fairly, and transparently.
- **Accuracy:** the data subject's personal data shall be accurate and kept up to date where necessary, ensuring that inaccurate data is erased or rectified without delay;
- **Storage limitation:** the data subject's personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed;

You may exercise the rights described herein by submitting a written request to the following email address: suporte@hedro.com.br

2. What data and information do we collect and for what purpose?

All data collected and/or provided by you shall be in compliance with applicable data protection legislation and this Privacy Policy, and shall be treated as confidential, used solely for the purposes set forth herein and/or authorized by you.

Data is collected when you enter or voluntarily submit it upon accessing and interacting with the features made available, which includes:



Data Collected	Purpose	What is the legal basis for the processing of your personal data?
Personal Data for Registration [Full name, email, phone number, job title]	Such data is used to enable your registration in our application and, additionally, to allow you to contact our customer service center.	Compliance with a legal obligation and legitimate interest in providing personalized services.
Usage Personal Data [IP address, records of interactions with the Application, mobile device model, and operating system version (Android or iOS)]	These are the personal data collected about you when you access our application, gathering information about the device used and behavior within the application, for the purpose of improving our content and services.	Consent, where third-party and/or non-essential tracking technologies or software development kits (SDKs) are involved; legitimate interest where strictly necessary technologies are used for the operation of the Application.
Device Telemetry [Data acquired by hardware (sensors, metrics)]	Data visualization and report generation.	Necessity for operation of the application.

We may occasionally use your data for purposes not provided for in this Policy, provided that such use falls within your legitimate expectations. Any use of your data for purposes that do not meet this standard shall require your prior authorization.

During your use of the Application, automated technologies may be employed to collect technical information, including but not limited to access logs, device identifiers, operating system information, application version, IP address, performance data, and interaction records with application features.

Such information is collected for the purpose of enabling the proper functioning of the Application, enhancing the User's experience, ensuring security, conducting technical analyses, and identifying any operational failures or inconsistencies.



Certain information may be stored locally on the User's device or on infrastructure servers maintained by **HEDRO**, subject to the provisions of this Policy and applicable legislation. The restriction or deactivation of certain permissions or technical mechanisms may partially impact the functioning of some Application features.

It is also important to note that we do not share such data with third parties except where necessary for the operation of the collection mechanisms or for the provision of contracted services, as described in this Policy.

Within the Application, we use device identifiers and similar technologies to enable navigation and a personalized experience. Data safety declarations may be consulted directly in the application stores (Google Play Store and Apple App Store) through the Data Safety and Privacy Label forms.

3. Amendments to this Policy

We reserve the right to amend this Privacy Policy at any time and as many times as necessary, in order to comply with any legislative changes, with the aim of providing you with ever-increasing security and convenience. To this end, we recommend that you review it as frequently as possible.

For ease of reference, we will always indicate at the end of this document the date of its most recent update, and if material changes are made, you will be notified before such changes take effect.

You are therefore encouraged to carefully read any notice of this nature.

By continuing to access or use our services after such revisions have entered into force, you agree to be bound by the revised terms.

4. Sharing or Disclosure of Personal Data

The information collected is for our exclusive use for the purposes referred to herein and shall under no circumstances be sold to third parties.

However, we may disclose your personal data in the good-faith belief that such action is necessary for:

Legal compliance. Including (i) legal processes and requests; (ii) the establishment or exercise of our legal rights or defense in legal proceedings; or (iii) as required by law; and

Third-Party Service Provision. We may also work in conjunction with other companies in various activities to facilitate our services. Such third parties receive your data only to the extent necessary for the provision of the contracted services. We emphasize that our contracts are governed by Brazilian data protection law, prohibiting such third parties from disclosing or using the data for any other purpose.

5. Data Controller



The controller responsible for processing the collected personal data is **HEDRO SISTEMAS INTELIGENTES LTDA**, a private legal entity registered under CNPJ No. 26.199.823/0001-81, with registered office at Rua Hélio Ribeiro, No. 212, Centro, Entre Rios de Minas/MG, ZIP Code 35490-000.

6. Security in the Processing of Your Personal Data

HEDRO is committed to protecting your privacy by implementing appropriate technical and organizational measures to safeguard your personal data against unauthorized access and against situations of destruction, loss, alteration, communication, or dissemination of such data.

To ensure security, solutions shall be adopted that take into account: appropriate techniques; implementation costs; the nature, scope, context, and purposes of the processing; and the risks to the rights and freedoms of the data subject.

7. International Transfer of Personal Data

HEDRO is headquartered in Brazil and the data we collect is governed by Brazilian law. However, the data we collect is stored on AWS servers in the United States, pursuant to Article 33 of the Brazilian General Data Protection Law (LGPD). **HEDRO**, in this context, adopts all security measures necessary to protect your personal data.

8. Thank you for reading our Privacy Policy!

We are always available to assist you. Should you have any remaining questions or wish to obtain further information regarding this Policy, please contact us at the following email address: suporte@hedro.com.br

Last updated: April 12, 2026.