

PRIVACY POLICY

Last alteration: November 16, 2021

Welcome to Casa Triângulo gallery!

1. INTRODUCTION

1.1 We appreciate your visit and your interest in our gallery. The gallery is committed to the safety of your data, transparency in our data processing activities and your autonomy in the managing of your data. We are an art gallery that represents artists, promotes expositions and commercialises artworks for our clients (“services” or “Our services”).

1.2 In order to establish a trusting and transparent relationship with you, we provided this document, which reflects our Privacy Policy and it applies to you: our data subjects (“you”). The policy includes the following categories of people:

- a) **Clients:** individuals or companies who buy or request the loan of artworks from the gallery, collectors, or any other individual who benefits or is interested in the services provided by the gallery;
- b) **Artists:** individuals who create the artworks featured in the gallery and who are represented by Us, or who participate in other projects developed;
- c) **Service providers:** individuals or companies who render services to our Clients, through the gallery, or directly to Us, as well as its representatives.

1.3 Here you will find information on which data is collected, what We do with it, the purpose of its collection, how we protect your data, and what are your rights in relation to it, observing the applicable law, in particular Law no. 13.709/2018 (General Data Protection Law - LGPD).

1. COLLECTION AND USE OF DATA

2.1. To adequately provide our services, it is necessary that you provide some data directly to the gallery, which will be stored in our system. We may also obtain data through third-parties, through public sources or through your release (data made manifestly public by you). Next, we develop this topic:

Types of Processed Data	Reason for Processing
Registration data from clients and artists	The gallery collects information such as name, phone number, e-mail, home and professional addresses, ID and Social Security Numbers from clients and artists. This data is collected to enable the artists' registration in fairs and expositions; to send presentations to the public; to create files for the artworks; to promote artists in communication vehicles and to send the gallery's press release; to issue artwork certificates; to send newsletters to clients; to send VIP invitations; to send physical materials and technical visits; to survey new clients and artists; and to issue bills of sale.
Artists' banking data	We process the artists' banking data to make the payment owed for their artworks. When necessary, the gallery shall request their Social Security Number and their banking agency, in which the amount will be deposited.
your browsing activity while you visit Our website	We may also utilise tools, ours or from third-parties, to monitor your activities while you browse our website, such as cookies, and analytics and performance tools. We will also process this data to develop new functionalities and enhance the functioning of our website and our services; undertake statistical analysis - generic or anonymised, if possible, of the use of the website; as

	well as recommend artists We believe will interest you. More information on the use of cookies and similar technologies utilised in the website are in Topic 7 of this Policy.
Artists' biographical data	We process biographical data and professional backgrounds of artists. It is possible that the biography contains pictures, sexual orientation, ethnic or racial origins, political and philosophical opinions, religious conviction, as well as the year and location of the artist's birth. We process this data to promote them in our communication channels, register them in fairs, and divulge their work to our clients.
Service providers' data	The gallery collects the name, e-mail, phone number, Social Security Number, address and banking data from the outsourced service providers (e.g. photographers, assemblers, artwork carriers, journalists, etc.). This data is collected to reach the data subject in order to hire their services and supply of materials, as well as make the payment and forward the contact information to clients interested in hiring the offered service.
Data made manifestly public by clients, artists and service providers	The gallery processes data such as name, user ID, and pictures of clients, artists and service providers made manifestly public in social media. This data is collected to present the gallery's services to potential clients, besides surveying new artists and service providers for the gallery. In this context, the gallery does not process data from private accounts in social media and those which do not express specific interest in arts or the gallery itself.
Data collected and stored to the compliance of legal and regulatory obligations	We also collect data in compliance with specific legal and regulatory obligations, due to services provided by the gallery, like sales which involve politically exposed people.

regarding the gallery's relationship with the public administration's	
Data processed for the regular exercise of rights in judicial, administrative or arbitration procedures	We may process personal data so that We may analyse and prove facts in a judicial, administrative, or arbitration procedure in which the gallery may feature as party or a third-party; as well as when necessary to answer, in good faith, court orders or other supinoes forwarded by competent organs.
Data resulted from the legal obligation as set forth in the Brazilian Civil Rights Framework for the Internet (Law no. 12.965/2014) and its regulatory decree Decree no. 8.771/2016)	For the adequate management of our website and compliance with the storage legal duty, we may collect records of access data, that is, the information referring to the day and time of usage of Our website from a specific IP.
Client's name and email	The client must inform their name and email in order to access the gallery's viewing room.

2. SHARING OF DATA WITH THIRD-PARTIES

3.1. The gallery may share your personal data with third-parties, within the limits of the applicable legislation or pending your consent, when applicable. The sharing will fulfill the following purposes:

a) Sharing with Art Fairs: the gallery may share clients' and artists' personal data with national and international Art Fairs so that invitation of VIP lists can be sent and to register the artists' artworks in the fair;

b) Sharing with accountability and logistics companies: the gallery may share data from clients artists, and service providers (item 2.1., lines 1 and 5), as well as banking data from artists and service providers (item 2.1., lines 2 and 5) with accounting companies in order to provide payment, write bills of sale, and financial and accounting control of the gallery. The gallery may also share registration data from clients and artists (item 2.1., line 1) with logistic companies, such as shipping companies and customs clearance companies, for the shipping and removal of artworks;

c) Sharing with clients, and journalists: the gallery may share artists' registration data (item 2.1., line 1) with clients, and journalists to identify the artwork after the sale or to promote expositions and artists represented by the gallery;

d) Sharing with database, financial and administrative management softwares: the gallery may share your personal data with companies that provide data storing services, payment processing and financial management, to guarantee an efficient management and optimise the gallery's services;

e) Sharing with financial institutions or other data receptors: the gallery may share your registration data and banking information (item 2.1., lines 2 and 5) with financial institutions to provide payments to artists and service providers;

f) Sharing to assist the services in information security issues, as well as analyse technical and operational problems: the gallery may share data in Our system with Partners, in order to allow for the solution of technical issues, fraud combating, and to guarantee the safety of our services;

g) Sharing with instant message platforms and social media: the gallery may share personal data with instant messaging apps and social media platforms when communicating with you or other gallery collaborators. The personal data is shared with these third-parties through chats and private messages, never in a public setting, and is aimed to guarantee your registration in the gallery's database or to share information between the gallery's collaborators;

h) Sharing to fulfill legal or regulatory obligations and court orders: besides the sharing mentioned above, the gallery may share your data to fulfill, as strictly necessary, the requests from judicial, administrative, or arbitral authorities.

3.2. You may register your opposition to certain sharing through a specific opt-out request. We will keep this record updated in our system and return to you with information relating to your request. It is possible that by opposing the data sharing with some of our Partners our services may be compromised. In such cases, we will inform you of the consequences of the opting-out.

3. HOW IS YOUR PERSONAL DATA STORED BY THE GALLERY?

a. Method and care of storage

4.1. All data processed by the gallery is stored in servers hired by Us, according to the current legislation, and based on the implementation and constant

reevaluation of the best practices in terms of privacy and security, guaranteeing the integrity and protection of your personal data.

b. For how long do We retain your data?

4.2. Your personal data will be retained for as long as it is necessary for the purposed it was collected. More specifically, we will store your data for at least the time period while Our commercial, contractual or legal relationship lasts.

4.3. In any case, you understand that your personal data shall be stored for the necessary time frame for the fulfilling of legal or regulatory obligations the gallery is subjected to (e.g. regulation of politically exposed people as established in COAF's Resolution no. 29, of 7 December 2017 and the storage period determined in art. 15 of Law no. 12.965/2014, Brazilian Civil Rights Framework for the Internet). In this case, the data shall be stored for the sole purpose of fulfilling a potential court order and will be deleted as soon as the storage obligation is fulfilled.

4.4. Your data can also be stored when and if it is deemed necessary to the gallery's involvement in judicial, administrative or arbitral proceedings, always upholding the limitation period for data storage.

4.5. Similarly, your data can be excluded by the gallery when determined by a competent authority, such as a request from the National Authority on Data Protection (ANPD), in observance with coercitive measures or other requests, when applicable.

4.6. The gallery stresses that you may request the exclusion of your data when it is being unnecessarily or excessively processed or processed in a way that is not compatible with the LGPD, as provided in Topic 6 of this Policy. In such cases, we will file your request and update you with regards to our internal process. If We find there is any irregularity with the data processing, the gallery commits to excluding the questioned data. If no irregularity is found, the gallery will inform you and will seek to clarify any

doubts relating to our processing activities, observing our commercial and industrial secrets.

4. INTERNATIONAL DATA TRANSFERS

5.1. The gallery may transfer some or all your data internationally, so long as it's needed to fulfill our services to you or to execute any of the gallery's necessary or legitimate functions.

5.1.1. When offering our services, we seek to foster partnerships guaranteeing a high security level in the data storage, looking for concluding contracts that uphold this Privacy Policy and the applicable data protection legislation. Our goal is to keep partnerships able to ensure the same levels of protection as in here.

5.1.2. Your data may also be stored in servers located outside the national territory, including, but not limited to, cloud storage servers that follow international data processing and security standards.

5.2. As a rule, the purpose of such transfers is tied to the performance of our services contracted by our clients. In other cases, and when necessary, we will ask for your specific consent to enable any international transfers not included in the scope of our services.

5. YOUR RIGHTS REGARDING THE PROCESSING OF YOUR DATA

6.1. The gallery undertakes to guarantee you, data subject, have the possibility to exercise your data processing rights, in the best possible way, as established by the LGPD. We stress that these rights must be expressly requested by the data subject or by their legal representative, and we will seek to fulfill their request as soon as the titularity is proved. Below, we itemise these rights and how you can exercise them:

Right	What does it mean?
Right to be informed	You have the right to be informed of any sharing of data with public and private entities, as well as the possibility of not consenting and its consequences, when your consent is requested by the gallery.
Right to confirmation and Right of access	You may know whether we process your data as well as request the access to your data. The right of access may be carried out in a simplified manner, when immediately answered, or through a complete declaration, in 15 days counted from your request.
Right to rectification	This right is based on the principle of quality of data, which ensures the processing of exact, clear, and updated data. As such, you may request the correction of any incomplete, unclear, or outdated data.
Right to anonymisation, blocking, and elimination and opposition of data	You may request the anonymisation, blocking, elimination or opposition of your data when it is unnecessary, excessive, or processed in a way that is non-conforming with the LGPD. We recommend that your request states the reasons why you understand that your data is being processed in an unlawful way. We will then return to you with precise information as to the challenged data.
Right to withdrawal of consent	It is possible that you, freely and at any time, revoke your consent to a data processing upon a express, free, and simplified expression of will, any time it is the applicable legal basis. We inform that

	<p>the request of withdrawal of consent does not comprehend the request of the erasure of data processed with your consent, and it also does not affect the legality of the processing made prior to your request. We recommend there is an express request for the elimination of data processed with your consent.</p>
<p>Right to data portability</p>	<p>You shall have the right to ask that your data is transmitted to another controller, if it does not violate the gallery's intellectual property or business secrets. To exercise this right, you must inform Us comprehensively to whom you want the data transferred. We inform that this right is subjected to ANPD's regulation to guide the market's practices as to its application.</p>
<p>Right to have automated decisions revised</p>	<p>In cases where the decision making is based solely on the automated processing of data, you may request the review of the decision, if it affects your interests.</p>
<p>Right to petition</p>	<p>You have the right to file possible complaints regarding your data to the controller (person to whom the decisions regarding the data processing falls) and to ANPD.</p>

6.2. All rights indicated in this Policy may be exercised free of charge, upon request to the gallery, pending confirmation of titularity and provided that all requirements are met. To do so, you must send your detailed request to the e-mail address info@casatriangulo.com, and we shall apply our best efforts to assist you as fast as We can.

6.3. We also inform you that we seek to comply with promptness to all requests sent by data subjects. However, it is possible that in some cases, we have genuine reasons as to why We didn't comply, in respect to third-parties' privacy and data protection that may be involved in the processing, in attention to our commercial and industrial secrets related to your request, or because there is a legal obligation to store data, either to fulfill legal or regulatory obligations, or to enable the gallery's or third-parties' defences in disputes of any kind.

6.4. After the handling of the requests, we will adopt any and all measures to ensure the data correction, blocking, anonymisation and/or exclusion you requested. We shall also endeavour to inform any third-parties with whom We may have shared your data about the data correction, blocking, anonymisation or exclusion so that they may do the same, subjected to the hypothesis specified in law.

6.4.1. By hiring some of our services which demand data sharing, such as the international shipping of artworks, you understand that your data may be processed by the Partner in accordance to their own privacy policies, which may not be aligned with Ours.

6. *COOKIES*

7.1. Our website may utilise cookies and/or similar technologies. It is important that you know the gallery's policy in this regard.

7.2. Cookies are a standard feature of platforms that allow them to store small quantities of the platform's browsing and visiting data in their computer or mobile device. Cookies help the gallery learn, for example, which areas of the website are useful to you and which need improvement.

7.3. You may opt to accept the use of cookies and similar technologies by altering your browser's settings. If you deactivate them, your experience on our website may be reduced and some features may not work as expected.

a. Cookies and similar technologies We may utilise in the website

7.4. Below, We indicate the different kinds of cookies and similar technologies we may use. As the data is collected by cookies, the other Sections of this Policy apply and add to this Topic.

- ❑ **Essential cookies:** these cookies allow you to navigate through the website, as well as enjoy its functionalities. Without them, the website will not have as good a performance as intended, and some of the features may not even be available.
- ❑ **Preference cookies:** these cookies collect information on your choices and preferences, and allow the gallery to remember the language and other local settings, besides personalising the website based on your preferences.
- ❑ **Analytics cookies:** these cookies collect information on your website usage and allow the gallery to improve and correct the platform's functionalities. For example, analytics cookies indicate the most visited pages on the platform, the time spent and hyperlinks clicked in pages, as well as help register any difficulties you may have experienced. This allows the gallery to see the general patterns of usage of the website. This information is used only to analyse the traffic on the platform, and not to identify individual information.

b. Cookies and similar technologies management

7.5. You may accept or refuse the cookies from the platform you're using at any time, by activating your browser's settings. Information on the proceedings to activate or deactivate the cookies may be found on your internet browser's help support on their website, or through the following links: [Chrome](#); [Firefox](#); [Microsoft Edge](#); [Internet Explorer](#). We reiterate, however, that if you deactivate our cookies, it is possible that some features of the platform you're using may not work as intended.

7. CHANGES IN OUR PRIVACY POLICY

8.1. The gallery may alter this Privacy Policy at any time, and the version in force shall always be the most recent.

8. APPLICABLE LAW AND COMPETENT JURISDICTION

9.1 This Privacy Policy is ruled by Brazilian law. Any litigation related to the website, the Privacy Policy or its contents must be subjected to the district court of the capital city of São Paulo, except in the instances when there's a legal provision stating otherwise.