

Privacy Policy Hapvida Notredame - English version

1. INTRODUCTION

The Brazilian General Data Protection Law (Law No. 13,709/2018 – “LGPD”) was enacted in August 2018 and entered into force in September 2020.

The LGPD establishes rules governing any activity that may be performed with personal data, including collection, storage, sharing, disposal, among other activities collectively referred to as “processing,” with the purpose of safeguarding the privacy rights of individuals (data subjects).

Hapvida NotreDame provides services to its beneficiaries and patients based on the principles of confidentiality, security, and privacy of the personal data it processes. We are committed to protecting and securing personal data.

This Privacy Notice applies to all personal data processing activities carried out by the companies comprising Hapvida NotreDame, whether as data controllers, subsidiaries, affiliates, or associated companies.

2. IMPORTANT DEFINITIONS

Hapvida NotreDame adopts the following definitions based on the LGPD:

PERSONAL DATA: Any information relating to an identified or identifiable individual. In practice, the term encompasses anything that allows an individual to be identified (e.g., name, Brazilian Individual Taxpayer Registration Number – CPF, among others). Personal data may be confidential and non-sensitive.

SENSITIVE PERSONAL DATA: Personal data concerning racial or ethnic origin, religious beliefs, political opinions, membership in a trade union or religious, philosophical, or political organization, data concerning health or sex life, genetic or biometric data, when linked to an individual.

ANONYMIZED DATA: Data that originally related to an individual but has undergone processes that ensure that it can no longer be linked to such individual.

COOKIES: Information files stored on your computer or mobile devices through your internet browser. These files allow a website to “remember” your actions and preferences recorded during browsing (e.g., language, font, display settings, etc.).

PSEUDONYMIZATION: Processing whereby data loses the possibility of being directly or indirectly associated with an individual, except through the use of additional information maintained separately by the controller in a controlled and secure environment.

DATA SUBJECT: An individual who interacts with Hapvida NotreDame in situations where they may provide their personal data and have such data processed in accordance with a matter specifically governed by the LGPD. Examples include individuals who browse its websites, portals, and social media, patients, beneficiaries of health and/or dental plans, among others.

DATA PROCESSING: Any operation performed with personal data, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, assessment or control of information, alteration, communication, transfer, dissemination, or removal.

OWN NETWORK: Healthcare facilities owned and managed by Hapvida NotreDame (hospitals, clinical centers, laboratories, Preventive Medicine units, Physiotherapy Centers, Ophthalmology Centers, Oncology Centers, Notrelife 50+ facilities, among others).

ACCREDITED NETWORK: Partner healthcare facilities that provide services to Hapvida NotreDame (hospitals, clinical centers, laboratories, Preventive Medicine units, Physiotherapy Centers, Ophthalmology Centers, Oncology Centers, Notrelife 50+ facilities, among others).

BRAZILIAN GENERAL DATA PROTECTION LAW (Law No. 13,709/2018 – LGPD): The law entered into force in September 2020 and establishes rules governing any activity that may be performed with personal data, including collection, storage, sharing, and disposal, among other processing activities, safeguarding the privacy rights of individuals (data subjects).

3. PRINCIPLES

The processing activities involving personal data (sensitive or otherwise) carried out by Hapvida NotreDame follow the principles established by the LGPD, pursuant to Article 6 of Law No. 13,709/2018, namely:

PURPOSE: The processing of data must have legitimate, specific, explicit purposes that are communicated to data subjects;

ADEQUACY: The processing of data must be compatible with the purpose(s) communicated to the data subject, in accordance with the context of the processing;

NECESSITY: The processing of data must always be limited to the minimum necessary, covering only data that is relevant, proportionate, and not excessive in relation to the purpose(s) of the processing;

FREE ACCESS: Guarantee to the data subject of facilitated and free access to information regarding the manner and duration of data processing, as well as to all of their data;

DATA QUALITY: Guarantee to the data subject of the accuracy, clarity, relevance, and updating of data, as necessary and for the fulfillment of the processing purpose;

TRANSPARENCY: Guarantee to the data subject of clear, accurate, and easily accessible information regarding processing activities and the respective data processing agents;

SECURITY: Use of technical and administrative measures capable of protecting personal data against unauthorized access and accidental or unlawful situations involving destruction, loss, alteration, communication, or dissemination;

PREVENTION: Adoption of measures to prevent the occurrence of harm resulting from personal data processing activities;

NON-DISCRIMINATION: Processing must not be carried out for unlawful or abusive discriminatory purposes;

ACCOUNTABILITY: Adoption of effective measures capable of demonstrating compliance with and adherence to data protection rules, as well as the effectiveness of the measures adopted.

4. DATA COLLECTED AND PROCESSED

Hapvida NotreDame processes personal data of: (i) beneficiaries of its health plans through its own and/or accredited network, depending on the contracted service; (ii) patients treated through its own or accredited network; (iii) employees and former employees; and (iv) service providers.

The following data may be collected:

(i) Data provided by the data subject (or their representative) and/or obtained as a result of the agreement entered into with Hapvida NotreDame, such as name, identity document number, CPF number, address, email address, mother's name, telephone number, bank details (branch and account number), sensitive personal data (e.g., health data, data concerning sex life, genetic and biometric data), among others.

(ii) Data collected automatically as a result of browsing Hapvida NotreDame websites and applications (e.g., IP address or MobileID – the identification associated with each mobile device).

(iii) Data concerning children and adolescents. In such cases, whenever applicable, we seek authorization from their legal representatives, pursuant to applicable laws.

(iv) Data collected from third parties representing the beneficiary (e.g., brokers).

5. PURPOSE OF PERSONAL DATA PROCESSING

The information collected by Hapvida NotreDame varies according to the service provided.

To make this information more accessible, we list below the manner and purposes for which we collect your personal data:

(i) Conducting preliminary steps prior to entering into the Healthcare and/or Dental Services Agreement necessary for the preparation of a commercial proposal.

(ii) Performing the Healthcare and/or Dental Services Agreement through our own and/or accredited network, depending on the contracted product.

(iii) Providing medical services through Hapvida NotreDame's own network.

(iv) Providing medical care services through Telemedicine.

(v) Complying with legal or regulatory obligations established by regulatory authorities overseeing Hapvida NotreDame's activities, such as the Brazilian National Supplementary Health Agency (ANS), Brazilian Securities and Exchange Commission (CVM), Brazilian Health Regulatory Agency (ANVISA), among others.

(vi) Exercising the right of defense in administrative, judicial, or arbitration proceedings, including responding to complaints submitted to the Ombudsman, Compliance, Hapvida NotreDame's customer service center, consumer protection bodies such as Procons, IDEC, Senacon, the Public Prosecutor's Office, and other supervisory authorities.

(vii) Confirming the identification of beneficiaries and/or patients, investigating and preventing potential violations, irregularities, or fraud, and conducting audits.

(viii) Developing and improving the resources and functionalities of Hapvida NotreDame's websites, applications, products, and services in order to provide you with a better experience.

- (ix) Processing reimbursement requests.
- (x) Actuarial analysis and statistical and financial studies.
- (xi) Offering new products and services.
- (xii) Participation in benefits programs to provide discounts to our beneficiaries and employees on products and services offered by our business partners, including pharmacies.
- (xiii) Responding to questions and requests and providing support.
- (xiv) Performing examinations, procedures, and hospital services.
- (xv) Special preventive care programs.
- (xvi) Access to Wi-Fi at our facilities.
- (xvii) Satisfaction and patient experience surveys.
- (xviii) Assessment and selection of candidates for employment opportunities.

6. RETENTION OF PERSONAL INFORMATION AFTER TERMINATION OF THE AGREEMENT

Personal data will be retained after termination of the contractual relationship for the period necessary to comply with a legal or regulatory obligation, exercise the right of defense in judicial, administrative, or arbitration proceedings, or, in certain situations, based on Hapvida NotreDame's legitimate interest in preventing fraud and other violations of applicable legislation.

7. SHARING OF PERSONAL DATA

Hapvida NotreDame may operate jointly with other companies in order to provide its services. Whenever sharing of your personal data is necessary, we adopt, whenever possible, mechanisms for anonymization or pseudonymization of such data.

We include personal data protection clauses in our agreements with third parties in order to preserve your privacy, information security, and data confidentiality to the greatest extent possible.

We may share your personal data in the following situations:

(i) Suppliers and service providers: We have certain categories of suppliers that we need to engage in order to provide our services, and some of them may process personal data received by us on our behalf.

(ii) Hospitals, Clinics, and Laboratories: When the data subject is a beneficiary of our Health and Dental Plans, in order to properly provide our services, it is necessary to share certain data with the hospitals, clinics, and laboratories of their choice regarding their procedures so that we can authorize such procedures through their Health or Dental Plan.

(iii) Company where the beneficiary works: If the company where the data subject works has contracted our Health and Dental Plan services, certain information may be shared with such company so that the data subject may exercise their rights related to our agreement.

(iv) Safeguarding and protection of rights: Hapvida NotreDame reserves the right to access, retain, and provide any data and information concerning the data subject when necessary to comply with a legal obligation or court order; enforce or apply our agreements; or protect the rights, property, or security of Hapvida NotreDame, as well as our employees and/or other users. For example, we may share certain information with the Public Prosecutor's Office and/or the police when requested by such authorities, solely to the extent legally authorized.

(v) Companies belonging to Hapvida NotreDame: We may transfer data among companies belonging to Hapvida NotreDame in order to provide our services. All of our companies are subject to contractual obligations under which they undertake to process personal data with the same level of security and in accordance with applicable laws.

(vi) Business partners: In the development and provision of services made available to you, in compliance with the principles established by the LGPD and other specific legislation on the subject.

To supplement this information, Hapvida NotreDame provides a Privacy and Personal Data Protection Guide for Suppliers, Service Providers, and Business Partners, which contains essential information regarding the LGPD and Privacy and Data Protection measures. The guide is available through the link provided in the original document for consultation and is intended to support the understanding of the Privacy and Data Protection practices adopted by Hapvida NotreDame.

8. INTERNATIONAL DATA TRANSFER

Hapvida NotreDame is committed to protecting the privacy and personal data of its data subjects. Our headquarters are located in Brazil; however, in certain situations, it may

be necessary to share personal data with partner companies, suppliers, or technology service providers located outside Brazil.

Such international data transfers may occur, for example, for the purpose of hosting data on servers located abroad or for other purposes necessary to provide our services.

We ensure that all international transfers of data will be carried out exclusively on the basis of one of the mechanisms provided for under the Brazilian General Data Protection Law (LGPD) and in accordance with the guidelines issued by the Brazilian Data Protection Authority (ANPD).

Data subjects may exercise their rights under applicable legislation, such as access, correction, deletion, and information regarding transfers carried out, through the form made available as described in Section 10 of this document.

For further information, you may contact the Data Protection Officer (DPO) through the channel indicated in Section 14.

9. SECURITY AND INTEGRITY OF PERSONAL DATA

Hapvida NotreDame maintains security measures to safeguard personal information against unauthorized access and accidental or unlawful situations involving destruction, loss, alteration, communication, or dissemination.

The mechanisms adopted by Hapvida NotreDame include firewalls (to protect against malicious access), Data Loss Prevention or “DLP” tools (for data loss prevention), encryption solutions (using algorithms to prevent personal data from being read), access controls through credentials, management of access profiles by levels, with periodic review of criticality, established vulnerability management processes, vulnerability scans, and periodic penetration testing.

Although, within our capabilities, we employ the necessary security measures to prevent incidents from occurring, security cannot be absolutely guaranteed against all existing threats, given the circumstances inherent to the architecture of the Internet.

In addition, we are committed to training our employees on the importance of data protection in order to keep them up to date with market best practices.

10. RIGHTS OF DATA SUBJECTS

In compliance with Brazilian data protection legislation, Hapvida NotreDame makes every effort to safeguard and guarantee the rights of data subjects. The LGPD grants data subjects the following rights:

(i) Confirmation of the existence of processing: allows the data subject to know whether their personal data is processed by the Company.

(ii) Access to processed data: allows the data subject to obtain information about how their data is used, with whom it is shared, and to request a copy thereof, subject to any applicable intellectual property rights.

(iii) Correction of incomplete, inaccurate, or outdated data: allows the data subject, at any time, to request the correction and/or rectification of their personal data.

(iv) Anonymization, blocking, or deletion of unnecessary or excessive data or data processed in violation of the LGPD: allows the data subject to request anonymization, blocking, or deletion of their personal data, unless there is another reason for its retention, such as a legal obligation to retain the data or the need to preserve it for the safeguarding of rights.

(v) Data portability to another service provider upon express request: allows the data subject's data to be transferred, in a structured format, to another organization, subject to further regulation by the ANPD.

(vi) Deletion of personal data processed based on consent: allows the deletion of personal data provided based on consent, unless there is another reason for its retention, such as a legal obligation to retain the data or the need to preserve it for the safeguarding of rights.

(vii) Information regarding the public and private entities with which the data has been shared: allows the data subject to know with whom their personal data has been shared.

(viii) Information regarding the possibility of not providing consent and the consequences of refusal: allows the data subject to understand the consequences of not providing consent in certain situations.

(ix) Withdrawal of consent, pursuant to Article 8, §5 of the LGPD (Law No. 13,709/2018): allows the withdrawal of previously provided consent.

Requests to exercise these rights are subject to an analysis of applicable legislation by Hapvida NotreDame and, when a request cannot be fulfilled, the response will include the reasons for such impossibility.

Hapvida NotreDame respects the rights of data subjects and therefore always acts to ensure that they have knowledge and transparency regarding their data and how it is processed. Accordingly, requests concerning personal data may be submitted through our customer service channels.

If a data subject becomes aware that any of their data needs to be updated, they may update it directly through the beneficiary's logged-in area on Hapvida NotreDame's websites, through the form indicated in the original document, or through our customer service channels.

Through the form indicated in the original document, the Data Subject may exercise their rights directly or through a duly appointed legal representative.

For this reason, additional documents may be requested by the Hapvida NotreDame team to verify the identity of the Data Subject. All validation steps will be carried out through their email address. Please monitor your inbox and add the domain "m.onetrust.com" to your email provider's safe senders list.

If we receive a request for deletion of Personal Data, such Data may need to be retained for a period longer than the requested deletion period, pursuant to Article 16 of the Brazilian General Data Protection Law, for: (i) compliance with a legal or regulatory obligation; (ii) research by a research organization; and (iii) transfer to a third party, subject to the data processing requirements established under the same Law. Once the retention period and legal requirement have expired, the Personal Data will be deleted using secure disposal methods or anonymized for statistical purposes, through the adoption of reasonable efforts and available techniques.

11. COOKIES

Cookies are small text files stored in your browser or device. They allow certain information to be collected. For example, through a cookie, we can identify when the same visitor returns to our website.

Cookies generally have an expiration date. Some cookies are automatically deleted when the browser is closed (known as session cookies), while others may remain stored on the device for a longer period until manually deleted (known as persistent cookies).

Hapvida NotreDame uses the following types of cookies on its websites:

Strictly necessary cookies: ensure that our website functions properly. Therefore, these cookies cannot be refused if you wish to visit our website. Functionality cookies: enable the implementation of optimized functionalities on the website (e.g., video viewing). Analytics and tracking cookies: allow the collection of statistical information regarding how our website is used (e.g., how many times a particular page or functionality was accessed), in order to improve our website and understand our users' profiles. Advertising cookies: enable offers of products and services to be made available according to your interests. Social media cookies: enable plugins from certain social media platforms when the user chooses to access our website through such platforms.

Performance cookies: allow us to count visits and traffic sources so that we can measure and improve website performance.

Therefore, if you wish to refuse the installation of these cookies on your device, you may access our Cookie Notice at any time to configure the cookies used.

It is important to clarify that Hapvida NotreDame is not responsible for the use of cookies by third parties. Please be aware that cookies placed by third parties may continue to monitor your online activities even after you have left our website. We therefore recommend regularly clearing your browsing history through your browser settings.

12. OTHER TRACKING TECHNOLOGIES – WEB BEACONS

Hapvida NotreDame uses a software technology known as web beacons (also referred to as web bugs, clear GIFs, or pixels) to help understand which content is effective, for example, by counting the users who have visited certain pages. Web beacons consist of small graphics with a unique identifier, whose function is similar to that of cookies and which are used to determine whether specific content has been viewed. Unlike cookies, which are stored on the user's computer, web beacons are invisibly embedded in web pages. Hapvida NotreDame may therefore correlate the data collected through web beacons with other data already collected.

13. USE OF ARTIFICIAL INTELLIGENCE (AI)

Hapvida uses Artificial Intelligence (AI) resources in some of its processes, always in an ethical and responsible manner and in strict compliance with applicable legislation, particularly the Brazilian General Data Protection Law (LGPD), as well as with the legal and regulatory obligations and commitments undertaken under this Privacy Notice.

The use of AI is intended to improve the quality and efficiency of the healthcare services provided, offer safer and more personalized experiences to beneficiaries, and support professionals in their daily activities. Possible applications include the automation of internal processes, support for clinical analyses, optimization of care workflows, and continuous improvement in the management of healthcare resources.

All AI-based solutions are subject to human oversight, periodic review, and security control mechanisms, ensuring that personal data processing occurs only for legitimate purposes, within the limits of necessity, and in full respect of data subjects' rights.

In addition, Hapvida adopts appropriate technical and organizational measures to protect data processed through AI, such as anonymization whenever applicable, access controls, audits, and continuous monitoring, ensuring transparency, accountability, and trust in the use of this technology.

14. CONTACT INFORMATION FOR PRIVACY AND DATA PROTECTION MATTERS

You may direct your questions and/or requests to Hapvida NotreDame's Data Protection Officer ("DPO") through one of the following contacts:

DPO (Data Protection Officer): Julia Warcman

Alternate DPO (Data Protection Officer): Rafael Avellar Centoducatte

Email: privacidade@hapvida.com.br

15. CHANGES TO THIS NOTICE

Hapvida NotreDame may amend this Privacy Notice at any time. Any changes will be duly made available through the website pages.