Suave Waitlist Privacy Notice

Last updated: September 2025

Your privacy matters to us. This Privacy Notice explains how Suave LLC ("Suave", "we", "our") handles your personal data when you join our waitlist for the upcoming launch in Brazil.

1. Who we are

Suave LLC, based at 50 Victoria Ave 203 177, Millbrae, CA 94030, USA, is the controller of your personal data for purposes of this Notice.

We are creating a waitlist for people interested in Suave's upcoming launch in Brazil.

You can reach us at: info@suave.cx

2. Key Definitions

- Personal Data: Any information that identifies you or could reasonably identify you.
- **Sensitive Personal Data**: Information such as health, ethnicity, religious beliefs, political opinions, biometric or financial details. *Suave does not collect this information for the waitlist.*
- **Controller**: The entity responsible for deciding how and why personal data is processed (Suave).
- **Processor**: A trusted service provider that processes data only on our instructions.
- **Consent**: Your clear agreement for us to process your personal data for specific purposes.

3. What data we collect

Information you provide directly:

- Name
- Email address
- Phone number

When: signing up for the waitlist, filling out forms, contacting us, or responding to surveys.

Information collected automatically:

- IP address
- Browser type and device details
- Operating system and unique device IDs
- General location (from IP address)

Website interaction data (pages visited, links clicked, errors)

Information from third parties:

At this stage, Suave does **not** obtain data from third parties (such as credit agencies or social networks). If this changes, we will update this Notice before doing so.

4. Why we use your data

We process your data for:

Primary purposes

- Managing the waitlist and contacting you when Suave is available.
- Responding to your inquiries.
- Meeting legal or regulatory obligations.

Secondary purposes

- Improving our website and services.
- Sending you information about Suave's launch, offers, or updates (always with your option to unsubscribe).

We do not use your data for profiling, automated decision-making, or credit scoring.

5. Legal basis for processing

- Consent: For sending launch updates and marketing communications.
- Legitimate interest: To improve the website and respond to inquiries.
- Legal obligation: To comply with laws and regulatory requirements.

You may withdraw your consent at any time by contacting <u>info@suave.cx</u>. If you withdraw consent, you may no longer be part of the waitlist.

6. Sharing your data

We do not sell or rent your personal data.

We may share your information with:

- Service providers (hosting, analytics, email platforms) under strict confidentiality.
- Legal or regulatory authorities, if required.

If Suave works with group companies or partners in the future, we will inform you and update this Notice.

7. International transfers

Your data may be stored in the United States or other countries with different data protection laws.

To safeguard your data, we rely on:

- Standard Contractual Clauses (SCCs) approved by regulators.
- Encryption and pseudonymization.
- Working only with providers who meet strict security standards.

8. How we protect your data

We use technical and organizational measures including:

- Encrypted connections (HTTPS, TLS)
- Firewalls and access controls
- Security reviews and staff training

No system is 100% secure. Please be careful with your account details and personal information online.

9. Your rights under Lei Geral de Proteção de Dados Pessoais (LGPD)

You may:

- Access: request a copy of your personal data.
- Correct: fix incomplete or inaccurate data.
- **Delete**: ask us to erase your data where legally allowed.
- Object: to processing based on our legitimate interests.
- Restrict: limit how we use your data in some cases.
- **Portability**: request your data in a structured format.
- Withdraw consent: at any time.

You may also file a complaint with Brazil's National Data Protection Authority (ANPD).

10. Exercising your rights

Email us at info@suave.cx.

We may need to verify your identity before processing requests. If you act through a representative, we will ask for proof of authorization.

We aim to respond within **15 days**. Normally, there is no fee unless your request is excessive or unfounded.

11. How long we keep your data

- While you remain on the waitlist.
- Up to six months after launch in Brazil, if you do not become a customer.
- If you become a customer, your data will then be subject to the Suave Customer Privacy Policy.

We may retain data longer if required by law or for resolving disputes.

12. Cookies and tracking

We use cookies and similar tools to:

- Improve your browsing experience.
- Understand how visitors use our website.

We do not use email tracking pixels for the waitlist, but may introduce them later with notice. For more details, see our **Cookies Policy**.

13. Updates to this Notice

If we make significant changes, we will:

- Update this Notice on https://www.suave.cx
- Notify you by email (if appropriate)

You may withdraw consent if you do not agree with future updates.