

Privacy Policy

Version 1.0 · Brazil, Colombia and the United Arab Emirates

01 Who we are and who this Policy applies to

Peregrini Global Mobility ("Peregrini", "we" or "us") is the controller of the personal data processed through the website peregrinimobility.com (the "Website").

This Policy explains what data we collect, why we collect it and how you can exercise your rights. It applies to anyone who visits the Website or contacts us through the form.

We serve individuals and companies with projects in Brazil, Colombia and the United Arab Emirates. For this reason, we comply, as applicable to each data subject, with:

- in Brazil, the General Personal Data Protection Law (Law No. 13,709/2018, "LGPD");
- in Colombia, Statutory Law No. 1581 of 2012 and its regulations, compiled in Decree No. 1074 of 2015;
- in the United Arab Emirates, Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data.

Privacy contact

Any question or request about your data can be sent to contato@peregrinimobility.com. This is the channel for communication with data subjects and for handling enquiries and complaints under the applicable legislation.

02 What data we collect and why

We collect only the data you provide in the contact form, plus minimal technical data generated by browsing.

DATA	WHAT WE USE IT FOR
Full name	To identify you and personalise our service
Email	To reply to your message and send a commercial proposal, if you ask for one
Phone	To contact you by call or messaging app, when you prefer that channel
Date of birth	To confirm that the contact is made by an adult and to guide the initial stage, since document requirements in mobility projects often vary with age
Technical data	IP address, browser type, date and time of access: to keep the Website secure and working, and to prevent fraud and automated attacks

Please do not include in the form identity document numbers, copies of documents or sensitive data, such as health information, racial origin or religious beliefs. If any such data is needed for a contracted service, it will be requested later, through a secure channel and with the required authorisations.

We do not use your data for: sending advertising without your specific authorisation, selling or transferring it to third parties, or decisions made solely by automated means.

Legal bases

- **Brazil (LGPD):** replying to your message and preparing a proposal are preliminary steps to a contract taken at your request (art. 7, V). Website security relies on our legitimate interest (art. 7, IX). Any retention required by law relies on compliance with a legal obligation (art. 7, II).
- **Colombia (Law 1581 of 2012):** we process your data based on your prior, express and informed authorisation, given by ticking the consent box in the form.

- **United Arab Emirates (Federal Decree-Law No. 45 of 2021):** we process your data based on your consent and, where applicable, the other grounds in art. 4, such as taking pre-contractual steps at your request.

03 Who we share data with

Your data is accessed only by the Peregrini team and by the technology providers that make our service possible. These providers act as processors ("encargados" under Colombian terminology) and process the data only on our instructions.

PROVIDER	ROLE · PROCESSING LOCATION
Cloudflare, Inc.	Website hosting and security · United States and global server network
Cloudflare, Inc.	Receipt and storage of form messages · United States and global server network
Resend, Inc.	Sending notifications of new messages to Peregrini's mailbox · Brazil (São Paulo) and United States
Universo Online S.A. (UOL)	Business email mailbox · Brazil

We may also share data when required by law, a court order or a competent authority. If, in the future, a contracted service requires support from partners in the destination countries, this will be disclosed and authorised in the relevant contract.

04 International transfers

Because some providers process data outside your country, your data may be transferred internationally. In these cases, we use the mechanisms provided for in each law:

- **Brazil:** standard contractual clauses approved by the ANPD (CD/ANPD Resolution No. 19/2024) or another mechanism under art. 33 of the LGPD. You can request the full text of the clauses used through the privacy contact.

- **Colombia:** a data transmission agreement with the provider or another mechanism permitted by Law 1581 of 2012 and Decree No. 1074 of 2015.
- **United Arab Emirates:** the safeguards provided for in arts. 22 and 23 of Federal Decree-Law No. 45 of 2021.

05 How long we keep data

If the contact does not lead to an engagement, we keep your data for up to 12 months after the last interaction and then delete it. If there is an engagement, the data follows the periods set out in the contract and in the applicable legislation. Technical browsing data is kept by the hosting provider for the period needed to keep the Website secure.

06 How we protect your data

We adopt technical and administrative measures proportionate to the size of our operation, including:

- encrypted connection (HTTPS) across the entire Website;
- access restricted to the people who need the data to serve you;
- two-factor authentication on email and Website management accounts;
- choice of providers with recognised security standards.

If a security incident occurs that may cause significant risk or harm, we will notify the affected data subjects and the competent authorities, as required by the applicable legislation.

07 Cookies

The Website does not use advertising or tracking cookies. The hosting provider may use strictly necessary cookies for the security and operation of the Website, which do not require consent. If we start using analytics or marketing tools, this Policy will be updated before they are implemented.

08 Your rights

You may, at any time and free of charge, exercise the rights provided for in the legislation of your country.

JURISDICTION	DATA SUBJECT RIGHTS
Brazil LGPD, art. 18	Confirm the existence of processing; access your data; correct incomplete or outdated data; request anonymisation, blocking or deletion of unnecessary or excessive data; request portability; know who we share your data with; withdraw consent, where it is the basis for processing; object to irregular processing; and petition the ANPD.
Colombia Law 1581 of 2012, art. 8	Know, update and rectify your data; request proof of the authorisation granted; be informed of how your data has been used; revoke the authorisation or request deletion of the data; and file complaints with the Superintendence of Industry and Commerce (SIC), after completing the procedure with us.
United Arab Emirates Federal Decree-Law No. 45 of 2021, arts. 13 to 18	Access your data and receive it in a structured format; correct or erase data; restrict or stop processing; object to processing; and lodge a complaint with the competent data protection authority.

How to exercise your rights

Send your request to contato@peregrinimobility.com with the subject "Privacy", stating your name and the right you wish to exercise. We may ask for additional information only to confirm your identity.

We respond within the time limits of the applicable legislation. For data subjects in Colombia, enquiries are answered within 10 business days and complaints within 15 business days, extendable under arts. 14 and 15 of Law 1581 of 2012.

09 Children and adolescents

The Website and the contact form are intended for people aged 18 or over. Data of children and adolescents, as in family projects, will only be processed after an engagement, with the specific

consent of at least one parent or legal guardian, and always in the best interests of the child or adolescent.

10 Changes and effective date

This Policy may be updated to reflect changes in our services or in the law. Material changes, especially regarding the purposes of processing, will be communicated before they take effect. The current version will always be available on the Website.

Version 1.0 — effective from 26 October 2026.