

# PRIVACY POLICY

Application: Sempre Alerta - Citizen | Last updated: December 18, 2025

**Data Controller:** Moohtech Desenvolvimento de Softwares Ltda (CNPJ 28.070.032/0001-82) | Avenida Paulista, 854, Bela Vista, São Paulo/SP, ZIP 01310-001, Brazil | Contact: contato@moohtech.com

This Policy describes how Moohtech collects, uses, shares, and protects personal data in connection with the Sempre Alerta - Citizen application, in compliance with Brazil's General Data Protection Law (LGPD - Law 13.709/2018) and other applicable regulations.

## 1. Collected data

To enable the service, we may collect the following categories of data:

- **User-provided data:** full name, phone number (for authentication), email, address, and profile details.
- **Geolocation data:** precise latitude/longitude collected with your permission in the operating system. This data is used to validate service coverage and, when you open an incident, to attach your location to the request. Depending on partner/service configuration, background location may be used for geofence coverage and location-based alerts.
- **Incident data:** incident description, photos, videos, audio files, and timestamps.
- **Technical and device data:** IP address, device identifiers, device model/manufacturer, operating system version, battery level, and crash/diagnostic logs.

## 2. Purposes and legal bases

We process personal data for the purposes below, based on legal bases provided under LGPD (Art. 7) and other applicable laws:

- **Service provision:** authentication, coverage validation, incident submission, and communication with the Operational Center/partner (Contract performance / Art. 7(V)).
- **Safety operations (partner response):** forwarding incident information to the authorized partner responsible for handling the request (Protection of life and physical safety / Art. 7(VII), when applicable; and/or Contract performance).
- **App improvement and security:** diagnostics, performance analysis, fraud/abuse prevention, and reliability (Legitimate interest / Art. 7(IX)).
- **Audit and legal:** compliance with legal/regulatory obligations, court orders, and defense of rights (Legal obligation / Art. 7(II)).

## 3. No tracking for advertising

Moohtech does **not** sell personal data and does **not** perform tracking for behavioral advertising as defined by Apple policies (no data broker sharing and no cross-app advertising linkage).

## 4. Data sharing

Sharing occurs strictly as needed to provide the service and comply with legal obligations:

- **Authorized partners responsible for the covered area:** Operational Centers and response teams of government entities and/or authorized private partners (e.g., condominiums, stadiums/arenas, transportation operators, event organizers, licensed security companies) so they can handle the user's request.
- **Infrastructure providers:** cloud hosting and operational providers (e.g., Azure), map services, and SMS/OTP providers, acting as Operators/Processors under security guidelines.

- **Judicial or supervisory authorities:** when required by law, court order, or for defense of rights in legal proceedings.

## 5. Data retention and deletion

We retain personal data only for as long as necessary for the purposes described, including legal and audit requirements:

- **Access logs:** may be retained for at least 6 months as required by Brazil's Marco Civil da Internet (Law 12.965/2014).
- **Incident data:** may be retained for longer periods (generally 5 years or more) for audit, compliance, operational and safety statistics (anonymized), and partner administrative requirements.
- **Deletion request:** users may request account deletion. Data required to meet legal obligations may be retained even after deletion requests.

## 6. International transfers

Data may be processed on servers located outside Brazil (e.g., cloud infrastructure in the USA). When applicable, transfers are performed with appropriate safeguards and contractual measures.

## 7. Information security

We adopt security measures including encryption in transit (HTTPS/TLS), access controls, and monitoring. No system is completely invulnerable; users should also protect their devices and credentials.

## 8. Your rights

Under LGPD (Art. 18), you may request confirmation, access, correction, anonymization, deletion (where applicable), portability, and information about data sharing. To exercise your rights, contact: contato@moohtech.com.

## 9. Governing law and forum

This document is governed by the laws of the Federative Republic of Brazil. The forum of São Paulo/SP is elected to resolve disputes, except where consumer protection rules provide otherwise.