

PRIVACY AND COOKIES POLICY

Last updated: February 9, 2026

This Privacy and Cookies Policy aims to provide transparency regarding the processing of personal data carried out by the Instituto Atlântico , in accordance with Law No. 13.709/2018 (General Data Protection Law – LGPD), **as well as with the resolutions, guidelines and orientations issued by the National Data Protection Authority (ANPD).**

The **Atlantic Institute** adopts technical, organizational, and governance measures aimed at protecting personal data, **observing the principles of purpose, adequacy, necessity, transparency, security, prevention, non-discrimination, and accountability.**

This Policy applies to all personal data processed by Instituto Atlântico through its website, applications, social media, educational platforms, selection processes, institutional programs, APIs, and other digital or physical channels.

GOVERNANCE IN PRIVACY AND DATA PROTECTION

The Atlantic Institute maintains a **Privacy and Data Protection Governance Program** , structured based on the principles of **Privacy by Design and Privacy by Default** , aiming to ensure that the protection of personal data is integrated into institutional processes, projects, products, and services from their conception.

Whenever applicable, the Instituto Atlântico conducts **risk assessments for the protection of personal data** , including Data Protection Impact Assessments (DPIAs), especially in operations involving sensitive personal data, data of children and adolescents, the use of emerging technologies, or high-risk processing.

The Atlantic Institute promotes ongoing actions for awareness, internal training, risk management, monitoring, and continuous improvement, in accordance with the best practices recommended by the National Data Protection Authority (ANPD).

Why does the ATLANTIC INSTITUTE collect personal data?

What personal data is collected by the ATLANTIC INSTITUTE?

What is the purpose of the data processing carried out by the ATLANTIC INSTITUTE?

What is the legal basis and purpose for the data processing carried out by the ATLANTIC INSTITUTE?

For how long does INSTITUTO ATLÂNTICO store personal data?

With whom does the ATLANTIC INSTITUTE share personal data?

Where does the ATLANTIC INSTITUTE transfer the data to?

What are the rights of a data subject in relation to the ATLANTIC INSTITUTE?

COOKIES

What are they used for?

What information is collected?

What type of cookies do we use?

How do I reject cookies?

Why does the Atlantic Institute collect personal data?

We collect personal data to enable our business activity and to provide our customers with the best possible experience on our platforms. We are committed to using the collected data only in accordance with this Privacy Policy and for the purposes previously stated.

What is the purpose of the data processing carried out by the Institute?

What data does the Atlantic Institute process?

Registration details:

When the holder registers on the website, or through other access and communication channels of the **Instituto Atlântico** , we request and collect the following information: name, telephone , Email and job title .

Registration details for the newsletter on the official website:

When the recipient subscribes to a mailing list, we collect their email address.

Social media data:

When the data subject contacts the company through their social media, we may collect previously publicly available information from their social profile, in accordance with the policies. and existing consents on the respective platform, such as: username, contact information, profile picture, access email, location, physical location and characteristics of the user's access devices, sex or gender, among others that the user provided to the social network platform and consented to its publication or sharing.

Navigation data :

When the user browses our partner website, we collect data that identifies them: IP address, date and time, geolocation, characteristics of the access device, browser and version, login and account information (username, password, marketing preferences and cookies), pages accessed, pages searched, time spent on pages, payment information and customer information through partners or affiliates.

Other: collected with express consent or notice.

What is the legal basis and purpose for the data processing carried out by the Instituto Atlântico?

The legal bases for processing user data are: legitimate interest, contractual performance, and consent, fulfillment of contract, among others provided for in art. 7, I, V and IX of the LGPD (Law 13.709/18), in accordance with the initiatives of the areas.

What data is processed?	What can we use them for?	What legal basis is used to process this data?
Data for Data Driven Diagnosis: Name, Email, Company	Identifying the respondent's company's data maturity level, along with providing feedback and suggestions based on the responses given.	Consent (art. 7, I of Law 13.709/2018).
Registration data of potential partners Name, phone number and email;	In the stages of the selection process	Consent (art. 7, I of Law 13.709/2018).

<p>Visitor newsletter subscription:</p> <p>Email, Name</p>	<p>Email for sending free materials and marketing materials that help boost the business;</p>	<p>Consent (Art. 7, I)</p>
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<p>Online browsing data of website users</p> <p>IP address, date and time, geolocation, access device characteristics, browser and version, login and account information (username, password, marketing preferences and cookies), pages accessed, pages searched, time spent on pages .</p>	<p>Customizing navigation according to user preferences;</p>	<p>Consent (art. 7, I of Law 13.709/2018).</p> <p>Legitimate Interest (support and promotion of the controller's activities, art. 10, I of Law 13.709/2018).</p>
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<p>Legal name, social name, date of birth, email, phone number, country, state, postal code, city, level of education, type of institution, field of work, age, gender, disabilities, neural condition (Autism Spectrum Disorder (ASD), Attention Deficit Hyperactivity Disorder (ADHD), Tourette Syndrome, Generalized Anxiety Disorder (GAD), Depression, Dyslexia, Schizophrenia), accessibility.</p>	<p>Apply for jobs. Personal data will be processed through the Gupy platform, therefore we recommend that you carefully read Gupy's Privacy Notice (https://www.gupy.io/Site-de-privacite) to understand the procedures.</p>	<p>Consent (Art. 7, I)</p>
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<p>Adult (for adults): CPF (Brazilian tax ID), Phone Number, Email, Date of Birth Date of birth, Education</p> <p>Minor (when applicable): Inclusion of CPF (Brazilian Individual Taxpayer Registry) number and name of the legal guardian.</p>	<p>I - Access to the educational program;</p> <p>II - Participation in the selection and monitoring process;</p> <p>III - Storing the data in the educational program's database;</p> <p>IV - Issuance of certificates for the program and its partners;</p> <p>V - Sharing data with partners, mentors, and teachers of the educational program;</p> <p>VI - Making the full name available for public consultation (List of Approved Candidates);</p> <p>VII - Class records, including capturing images of students, mentors, and teachers captured via meet during classes taught via Google Meet and Shared via YouTube (private link) for a limited time;</p> <p>VIII - Making data available to partners during the student's immersion period;</p> <p>IX - Publication on social media of a testimonial containing a photo and name.</p> <p>X - To offer and promote courses related to the topic of interest, which may include education and training in specific areas;</p> <p>XI - Send detailed information about the courses, such as course content, dates, times, participation options (in-person, online), and prices (when applicable) applied);</p> <p>XII - Inform the holders about new opportunities, special offers, discounts and Course launches, so they can benefit from promotions and new features;</p> <p>XIII - Send newsletters with informative content, course updates, articles, tips, and other relevant communications to keep the holder updated on the</p>	<p>Consent (Art. 7, I)</p> <p>Fulfillment of legal obligation (Art. 7, II)</p> <p>Contract Execution (Art. 7, V)</p>
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	Atlantic activities.	
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<p>Full name, Email, CPF (Brazilian tax identification number), Address (including postal code, street, house number, additional information, neighborhood, city and state), Telephone number, Date of birth, Date of birth, Education, Academic background (name of course and educational institution), Occupation, Years of experience in the field, How you found out about the Bootcamp, Name preferred course, proof of affiliation with the higher education institution, and ID card. Sensitive data: race, ethnicity, health, gender, household income, and neurodiversity.</p>	<p>I - To offer and promote courses related to the topic of interest, which may include education and training in specific areas; II - Send detailed information about the courses, such as program content, dates, times, Participation options (in-person, online), and fees (when applicable); III - Inform policyholders about new opportunities, special offers, discounts, and product launches. courses, so that they can benefit from promotions and new offers; IV - Send newsletters with informative content, course updates, articles, tips, and other relevant communications to keep the holder updated on Atlântico's activities; V - Disclosing the full name and CPF numbers partially obscured (e.g., 123.xxx.xxx - xx) of the candidates classified and eligible to be classified in courses promoted for recognition purposes on the official page. VI - Analyze academic, professional, and socioeconomic information to establish criteria. fair and objective selection of candidates, considering their education, schooling, income, employability and age; VII - To promote affirmative action for socially vulnerable groups, based on criteria. duly justified and explained in the call for tenders; VIII - Implement inclusion and diversity policies to broaden access for groups underrepresented groups, such as Black, Indigenous, LGBTQIA+, disabled, and neuroatypical people, observing applicable laws and</p>	<p>Consent (Art. 7, I) Fulfillment of legal obligation (Art. 7, II)</p>
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	<p>ethical principles;</p> <p>IX - Facilitate communication with candidates before, during, and after the selection process, ensuring Sending relevant information, guidance, and updates;</p> <p>X - Manage the logistics of classes, schedules, and other operational aspects related to lessons and course activities;</p> <p>XI - To monitor the participation and performance of selected students during the course, aiming to Identify support needs and ensure the effectiveness of capacity-building actions;</p> <p>XII - Share strictly necessary data with educational partners and platforms. exclusively for the execution and support of the course's classes and activities, ensuring safety. and compliance with the LGPD;</p> <p>XIII - To carry out statistical analyses and prepare internal reports to measure the social impact of program and guide future improvements, using anonymized data whenever possible;</p> <p>XIV - Ensure compliance with the General Data Protection Law (LGPD), maintaining the collection, the storage and use of information in strict compliance with the principles of purpose, necessity, suitability, transparency and safety.</p>	
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FOR HOW LONG Does the Atlantic Institute store this data?

Instituto **Atlântico** stores its clients' data for as long as the data subject maintains a commercial relationship with the company, or for the time reasonably necessary to fulfill the purpose for which it was collected and informed in this policy (including for evidentiary purposes relevant to legal relationships occurring in the context of the website and its services).

If the data subject requests the deletion of their data, the **Instituto Atlântico** may refuse exclusion if

necessary to comply with legal obligations and defend its interests in court.

Database Data	5 years
Purchase data	10 years.
Marketing	Until consent is revoked or after 6 years.
Financial management	10 years
Registration data	6 years
Navigation	At least 6 months.
Tax management	10 years.
Employment data	20 years or permanently.
Contractual data	10 years

With whom does the Atlantic Institute share personal data?

THE **Instituto Atlântico** does not share its clients' personal data with third parties, except in cases where it is **necessary** for the provision of offered services or contractual and legal obligations to which it is subject. When for economic purposes other than those initially informed in this policy, the company will only share data with express, clear, and specific consent.

To provide the Services to you, we may need to use certain service providers. These companies process your data to the extent necessary to provide the services. To ensure a high level of protection of personal data, the **Instituto Atlântico** conducts data policy analysis and implements the necessary security measures to ensure adequate data protection.

We will implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, for example, by ensuring that all employees authorized to process personal data have committed to the confidentiality of their data.

To achieve the business objectives of the company, the **Instituto Atlântico** may share the personal data of its users with partner companies, service providers, marketing companies, financial institutions, fraud detection entities, credit protection companies, the courts by court order, technology service providers, advertising partners, cloud computing companies, logistics, delivery and transport partners , among others.

INFORMATION SECURITY MEASURES

The **Atlantic Institute** adopts appropriate technical and organizational measures to protect personal data against unauthorized access, accidental or unlawful destruction, loss, alteration, communication or dissemination, considering the nature of the data processed, the context, the purposes and the risks involved.

Among the measures adopted are, where applicable: access control, profile and privilege management, encryption, environment monitoring, event logging, internal information security policies, third-party management, and periodic employee training.

Access to personal data is restricted to duly authorized professionals bound by confidentiality obligations.

INFORMATION SECURITY INCIDENTS

The **Atlantic Institute** maintains internal procedures for **the prevention, detection, response, and mitigation of information security incidents** that may pose a significant risk or harm to the holders of personal data.

In the event of a security incident involving personal data, the **Instituto Atlântico** will conduct a risk assessment, adopt appropriate corrective measures and, where applicable, **notify the National Data Protection Authority (ANPD) and the affected data subjects**, in accordance with Article 48 of the LGPD and the ANPD's guidelines.

INTERNATIONAL TRANSFER

To enable the company to provide its services, it may be necessary to transfer data to companies in other countries that have the same level of protection as that provided by Brazilian regulations. To ensure an adequate level of protection, the **Instituto Atlântico** conducts risk mapping for international data transfers and shares data with countries that have minimum legal guarantees of protection and a low risk of data breaches. Therefore, the transfer is conditional upon verification of the foreign legal basis, the existence of seals, certifications, standard contractual clauses, and the security standards stated in the privacy policies and contractual terms.

Notwithstanding the company's commitment to transmitting data only within the limits and for the purposes permitted by Brazilian law, as already mentioned in this policy.

What are the rights of the data subject in relation to the Atlantic Institute?

In accordance with applicable regulations, the **Instituto Atlântico** respects the rights of personal data subjects, as provided for in Article 18 of the LGPD (Brazilian General Data Protection Law), and informs that, at any time, the data subject may request, observing the channels and means made available by the **Instituto Atlântico** :

Information on data processing and access

The data subject may request confirmation of the processing of their data by... **Instituto Atlântico** , as well as requesting access to them.

Full or simplified copy of the data

The data subject may request a printed or digital copy of their data, and the costs of providing the copies are covered by [the provider/service]. **Instituto Atlântico** , respecting the limits of feasibility and reasonableness.

Data correction

Considering that the user is responsible for the accuracy of the information registered, the holder must request the correction of any incorrect, incomplete, inaccurate, or outdated data. False registration information is the responsibility of the holder and may affect and even interrupt the provision of services to the holder. **Instituto Atlântico** undertakes to correct inaccurate data in accordance with the holder's request. holder.

Anonymization of unnecessary, excessive, or unlawfully processed data.

The data subject may request that demonstrably **unnecessary and excessive data** be anonymized, that is, that, using reasonable technical means, the controller makes it impossible to associate the data, directly or indirectly, with the data subject.

Elimination and blocking of unnecessary or excessive data or data processed in violation of the Law.

The data subject may request the deletion of data that is demonstrably **unnecessary or excessive**. stored in the data operator's database following the controller 's rules .

Data portability

The data subject may request the transmission of data to other service and product providers, provided that trade and industrial secrets are observed, and that the technical standards adopted by the **Instituto Atlântico are followed** , respecting the limits of feasibility and reasonableness.

Review of automated decisions

Whenever decisions are made solely on the basis of automated processing of personal data that **affect** the interests of the data subject, there will be a right to request a review through the available channels.

Possibility of not offering or revoking consent.

The data subject may revoke consent or request the destruction of data that is unnecessary or excessive for the fulfillment of the contract or the stated purpose, without prejudice to the legal grounds for legitimate refusal by the **Instituto Atlântico** .

Therefore, in the absence of any other legitimate basis, the **Atlantic Institute** may delete the information from its database at the request of the data subject. Consequently, some of the services for which the data **would be relevant may be limited or terminated.**

The Atlantic Institute may object to the elimination when:

- a) The processing of data is necessary for compliance with obligations to which the company is subject;
- b) The data is necessary for the exercise or defense of a right in legal action in which INSTITUTO ATLÂNTICO may be sued;
- c) If there is a rule that mandates its maintenance for a minimum period of time;
- d) The data has been anonymized;
- e) The purpose on which the treatment was based remained unchanged;
- f) There must be a legitimate interest on the part of the company;
- g) The data were collected if they were necessary and appropriate for the treatment;
- h) The treatment is linked to a public interest (health, life, safety);

The **Atlantic Institute** makes every effort to respond to and fulfill requests as quickly as possible, respecting the reasonable time frame stipulated by law.

Regarding the party responsible for processing collected data and the privacy policy:

The controller responsible for data processing is the **Instituto Atlântico** . Any requests, questions or complaints regarding personal data may be sent to the Data Protection Officer (DPO), Josué Fama, via email at privacidade@atlantico.com.br. Address: Av. Washington Soares, 909 - Loja 42 43 44 45 - Edson Queiroz, Fortaleza - CE, 60811-341.

The **Atlantic Institute** reserves the right to change this Privacy Policy at any time, due to changes in legislation or services, or at its sole discretion, which is why we recommend checking the date of the last revision in the header of this Privacy Policy.

COOKIE MANAGEMENT AND SIMILAR TECHNOLOGIES

The **Atlantic Institute** uses cookies and similar technologies to ensure the proper functioning of the website, improve the browsing experience, analyze performance and, when authorized, offer personalized content and communications.

Essential cookies are used based on the legitimate interest of the **Atlantic Institute** , as they are indispensable to the functioning of the website.

Analytical, advanced functionality and advertising cookies are used with the prior, free, informed and unequivocal consent of the user , and can be accepted, refused or managed in a granular way through the banner or cookie management tool available on the website.

The user can, at any time, **review or revoke their consent** , as well as delete cookies through browser settings or the cookie management tool.

The use of third-party cookies adheres to security, privacy, and compliance criteria with applicable legislation.

Requests related to data subject rights will be analyzed and answered **within a reasonable timeframe, observing legal deadlines and ANPD guidelines** , through the official channel indicated in this Policy.

For security and fraud prevention purposes, the Atlantic Institute may request additional information to confirm the applicant's identity.

What are they for?

The purpose of using **cookies** is to personalize the user's browsing experience according to personal preferences and by analyzing the user's habits on the platform.

They determine the preferences, interests, usefulness, and number of uses of websites, allowing for faster and more efficient navigation for the user.

What information is collected?

The information collected (device used, location, time) is generic and, as a rule, cannot identify the user. Information that could potentially identify the user, such as when the user is already registered, is subject to the same provisions as this [regulation/policy]. **Privacy Policy** .

WHAT TYPE OF COOKIES DO WE USE?

Essential Cookies

These are the elements without which the user cannot benefit from essential site features. **Atlantic Institute** .

Analytical cookies

These cookies are used to analyze how users interact with the website, allowing for the identification of potential improvements in navigation and user experience, for example. These cookies do not identify users, but collect anonymized information that is used solely for statistical analysis.

Functionality cookies

These are the devices used to record user preferences and some decisions they have already made on the site, preventing the user from having to repeat the same actions on each new visit.

Third-party cookies

These are the tools used to cross-reference browsing information and user actions with third-party tools on the website . **Instituto Atlântico** . In general, they are tools for performance analysis, marketing, and advertising.

Advertising cookies

These are the metrics used to target advertising according to the user's interests and to measure the effectiveness of that advertising.

Session cookies

These are used only temporarily to identify problems and improve the browsing experience during that session.

Persistent cookies

They are stored on the user's device or computer to identify new visits and allow browsing according to the user's interests.

How to reject cookies?

Users can reject cookies at any time using their browser settings (incognito window), but refusal may impair the browsing experience. In addition to rejecting cookies beforehand, users can also revoke consent for cookies already installed. Revocation deletes cookies previously stored in the browser , offering greater control over what information is stored. It's important to remember that revoking cookies may affect website functionality and require some preferences to be reset on each visit.

This Privacy Policy may be updated at any time due to legislative, regulatory, operational, or institutional changes. **We recommend that you periodically review this document** , the current version of which will always be available on our website, clearly indicating the date of the last update.