

# Personal Data Retention and Disposal Policy



**Version 2.0**  
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## INTRODUCTION

**TANZILLI SOCIEDADE DE ADVOGADOS** and **TANZILLI BRUNSCHWIG SOCIEDADE DE ADVOGADOS** (“**GTLawyers**”) aim, through this Personal Data Retention and Disposal Policy (“**Policy**”), to regulate the legitimate storage and disposal of personal data in the course of their activities, in strict compliance with legal and contractual requirements as well as their Privacy and Data Protection Policy available on their website: <https://www.gtlawyers.com.br/compliance>.

This Policy applies to all personal data processing operations carried out by GTLawyers through its employees, suppliers, partners, associates, and any individuals who have access to personal data processed by GTLawyers (“**Employees**”).

Through this Policy, GTLawyers reinforces its strong commitment to complying with the Brazilian General Data Protection Law (Law No. 13.709/2018 – “**LGPD**”) and complements its collection of policies and instruments that are part of its Privacy and Personal Data Protection Program.

## RETENTION RULES

Personal data must not be retained indefinitely. Each employee responsible for data processing must comply with the principle of data minimization and limited retention, ensuring that personal data is either deleted or, where applicable, anonymized, depending on the context.

As a general rule, GTLawyers will retain personal data in its records only for as long as is necessary to fulfill the purpose for which the data was collected, in accordance with Articles 15 and 16 of the LGPD.

In some cases, the retention period is determined by laws or regulations; however, for many other processing operations, it is up to the companies to determine the retention periods according to their processing purposes. Below, we will provide information on legal deadlines and establish conventional timeframes for retaining personal data.

## DATA RETENTION PERIODS

In the following tables, we provide the maximum retention period for Personal Data by GTLawyers.

For information regarding the personal data processed by GTLawyers and their purposes, please refer to the Privacy and Data Protection Policy, available at: <https://www.gtlawyers.com.br/tipo/etica-e-lgpd/>.

### A. RETENTION PERIODS DEFINED BY LAW OR REGULATION

These are cases in which GTLawyers is required to keep documents, data, and personal information in order to comply with legal or regulatory obligations.

Accordingly, the deadlines applicable to each of the processes mapped during the Diagnostic phase of the LGPD compliance project are listed below. It should be noted that, when there is more than one recommended retention period related to the same personal data or documents, it is advisable to analyze and consider on a case-by-case basis which period should prevail. If the longer period prevails, it is ideal to

retain the data using anonymization tools or, at a minimum, restrict access to such documents exclusively to partners who act as focal points with the respective client.

Category	Type of Data or Documents Retained	Applicable Laws	Legal Retention Period
Employees Personal Data	<b>General Rule:</b>		
	1. Documents containing employees' personal data;	Art. 7, XXIX of the Federal Constitution and Art. 11 of the CLT (Brazilian Labor Code), due to the labor statute of limitations and current legislation.	5 years
	2. Payroll records and electronic records of labor and social security data;	Art. 225, §§ 5 and 22 of Decree No. 10.410/20 in conjunction with Arts. 348 and 349 of Decree No. 3.048/1999.	5 years
	3. Payment Guide for the Guarantee Fund for Length of Service (FGTS) and Social Security Information (GFIP) + Termination Payment Guide for the FGTS (GRRF) + Proof of deposits and related documents dated after November 2014.	Art. 23-A, §3 of Law 8.036/90	5 years
	<b>Exceptions:</b>		
	4. Occupational health and safety documents, such as: <ul style="list-style-type: none"> <li>Occupational Health Medical Control Program (PCMSO)</li> <li>Environmental Risk Prevention Program (PPRA)</li> <li>Social Security Professional Profile (PPP).</li> </ul>	NR-7 (Occupational Health Medical Control Program – PCMSO), NR-01 (Risk Management Program – PGR), NR-09 (evaluation and control of exposure to physical, chemical, and biological agents), and INSS Normative Instruction PRES/INSS No. 128/2022.	20 years
	5. FGTS and Social Security Payment Form (GFIP) + FGTS Termination Payment Form (GRRF) + Deposit receipts and related documents issued prior to November 2014.	Art. 23, §5 and 23-A, §3 of Law 8.036/90 in conjunction with Art. 55 of Decree No. 99.684/90 (cf. TST Precedent 362 and STF-ARE-709212/DF).	30 years
Personal Data of Former Employees, for Compliance with Social Security Obligations	1. Social security contribution guide (GPS);	Articles 173 and 174 of Law 5.172/66 – CTN (National Tax Code)	5 years
	2. Union Payment Form (GRCSU);		
	3. General Register of Employed and Unemployed Persons (CAGED);		
	4. Annual Social Information Report (RAIS).		

<b>Personal data included in tax documents</b>	Income Tax Declarations and Assessments, including: Bank statements, Assets and property information, Salary, Marital status, Address, Identity documents (ID, name, parentage, photo, date of birth), Sensitive personal data, such as: Receipts from doctors, hospitals, and health insurance, Union membership, Political affiliation, Gender and race information.	Articles 173 and 174 of Law 5.172/66 – CTN (National Tax Code) and Normative Instructions from the Brazilian Federal Revenue Service.	<b>5 years</b>
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## B. CONVENTIONAL RETENTION PERIODS

When there is no legal provision establishing a specific period for retaining certain personal data, GTLawyers, in accordance with the guidelines and principles of the LGPD, as well as applicable foreign legislation and best industry practices, will define periods that are proportional and appropriate to fulfill the purpose for which the data was collected. Once these periods have expired — as indicated in the “Retention Period” column in the table below — the personal data will be deleted, anonymized, or transferred to an inactive database, where they will remain with restricted access and be kept exclusively for potential litigation (dispute resolution) or to comply with legal and regulatory obligations (such as audits), and will not be used in daily operations.

In cases where personal data is eliminated (i.e., when there is neither anonymization nor transfer to the inactive database), deletion will take place as follows: if the data is stored (i) in emails or desktop folders, deletion will be followed by emptying the recycle bin; (ii) in Dropbox, deletion will be performed through the platform itself; and (iii) in the electronic document management system (EDMS), deletion will be carried out within the tool.

GTLawyers is committed to conducting regular reviews of the retention periods defined below to ensure compliance with the LGPD and best practices in data protection.

Category	Process	Data Used	Applicable Legislation	Retention Period
<b>Activities performed by GTLawyers in the provision of legal services</b>	Drafting of Fee Proposals for clients	Name, e-mail, job title and phone number	Art. 22 of Law No. 8.906/1994 (Brazilian Bar Association Statute) in conjunction with Art. 206, §3 of the Civil Code	5 years from the end of the commercial relationship
	Drafting / Reviewing Contracts	Name, marital status, nationality, profession, CPF, RG or RNE or passport, address, photo, and email of legal representatives	Art. 206, §3 of the Civil Code	5 years from the end of the commercial relationship
	Background Check/ Due Diligence	Name, CPF, RG, address, parentage, date of birth, photo	Art. 206, §3 of the Civil Code	3 years from the end of the commercial relationship

Category	Process	Data Used	Applicable Legislation	Retention Period
	Drafting Power of Attorney	Name, CPF, RG, address, parentage, date of birth, photo (of company legal representatives)	Arts. 206, 653, 656, 657, and 692 of Law No. 10.406/02 (Civil Code) in conjunction with Art. 1, III of the Public Records Law (Law 6.015/73) + IN RFB No. 1863-2018	10 years from the end of the commercial relationship
	Request for Registration of Foreign Documents at the Registry of Deeds and Documents – RTD	Name, nationality, marital status, profession, CPF, RG or RNE, passport copy, address, job title (if administrator), photo	Arts. 206, 653, 656, 657, and 692 of Law No. 10.406/02 (Civil Code) in conjunction with Arts. 1º, III, 6º, 129, and 148 of the Public Records Law (Law 6.015/73)	10 years from the end of the commercial relationship
	Judicial or Administrative Process (receiving new processes, obtaining copies of processes/procedures, etc.)	Name, nationality, profession, marital status, CPF, RG, address, parentage, date of birth, photo, email, telephone recordings. Potentially, data of children and sensitive data (depending on the nature of the case).	Civil Procedure Code in conjunction with Art. 11 of CLT (Labor Code) in conjunction with Art. 7º, XXIX, of the Federal Constitution; Arts. 173 and 174 of Law 5.172/66 - CTN (National Tax Code)	10 years from the end of the commercial relationship
	Registration of Acts at the Commercial Registry	Name, nationality, marital status, profession, CPF, RG or RNE, address, job title (if administrator), photo.	Art. 206, §3 in conjunction with Art. 697 of Law No. 10.406/02 (Civil Code) and Art. 2º of Law No. 8.934/1994 (S/A Law) + Regulations of the competent Commercial Registry / DREI	10 years from the end of the commercial relationship
	Registration of Acts at the Real Estate Registry (RGI)	Name, nationality, marital status, profession, CPF, RG or RNE, full address, photo	Civil Code in conjunction with Art. 1º, III of the Public Records Law (Law 6.015/73), RGI Regulations	5 years from the end of the commercial relationship
	Registration of Operations at the Central Bank	Name, CPF, address, email, and photo	Arts. 1º and 4º of BACEN Resolution No. 4.571/2017 in conjunction with IN RFB No. 1863/2018	5 years from the end of the commercial relationship
	Final Beneficiary Declaration for the Federal Revenue Service	Name, nationality, marital status, profession, CPF, RG or RNE or passport, address, photo	RFB Normative Instructions + Arts. 173 and 174 of Law 5.172/66 - CTN (National Tax Code)	5 years from the end of the commercial relationship

Category	Process	Data Used	Applicable Legislation	Retention Period
	Receiving requests for legal opinions or consultations	Name, marital status, profession, address, email, RG, CPF, phone number, job title/function. May include sensitive data such as health information.	Art. 206, §3 of the Civil Code; Art. 11 of CLT in conjunction with Art. 7, XXIX of the Federal Constitution	5 years from the end of the commercial relationship
	Judicial cost guides / payment orders	CPF, RG, photo, address, and possibly banking information.	Art. 206, §3 of the Civil Code	3 years from the end of the commercial relationship
	Document Storage on the Network	Name, nationality, profession, marital status, CPF, RG, address, parentage, date of birth, photo, email, telephone recordings. May include children's data and sensitive personal data depending on the case.	Art. 206, §3 of the Civil Code; Art. 11 of CLT in conjunction with Art. 7, XXIX of the Federal Constitution	5 years from the end of the commercial relationship
	Tax Planning	Personal data from income tax returns, financial transactions, contracts, payment amounts, including name, address, ID, date of birth, parentage, and photo. May include children's and sensitive data.	Articles 173 and 174 of Law No. 5.172/66 – National Tax Code (CTN)	5 years from the end of the commercial relationship
	Regular Contact with Client Representatives / Focal Points for Service Execution	Name, phone number, professional data (position and role), email.	Art. 206, §3 of the Civil Code	3 years from the end of the commercial relationship
	Analysis of Data Subject Requests	Name and email (this data may vary depending on the case).	Art. 18 of the LGPD in conjunction with Art. 205 of the Civil Code; CNIL Resolution No. 2016-264 of July 21, 2016 (NS-048)	5 years from the end of all contractual obligations; identification data will be kept for 3 years from the moment the right is exercised
	Drafting / Analysis of Appointment Minutes (DPO, Committees, and CCO)	Name, marital status, nationality, profession, CPF, RG, address.	Art. 206, §3 of the Civil Code	3 years from the end of all contractual obligations

Category	Process	Data Used	Applicable Legislation	Retention Period
<b>Information Technology Services</b>	Management of network users	Name and email. Data of children/adolescents may be processed in the case of minor apprentices.	Naming policy and external permissions followed by GTLawyers (ITIL); Art. 15, caput, Law No. 12.965/2014 (Internet Civil Framework) in conjunction with Art. 206, §5º, I, Civil Code	5 years from the end of the commercial relationship.
	Management of Legal Manager users	Name and email. Data of children/adolescents may be processed in the case of minor apprentices.	Naming policy and external permissions followed by GTLawyers (ITIL); Art. 15, caput, Law No. 12.965/2014 (Internet Civil Framework) in conjunction with Art. 206, §5º, I, Civil Code	5 years from the end of the commercial relationship.
	Management of users in GED system	Name and email. Data of children/adolescents may be processed in the case of minor apprentices.	Art. 15, caput, Law No. 12.965/2014 (Internet Civil Framework) in conjunction with Art. 206, §5º, I, Civil Code	5 years from the end of the commercial relationship.
	Email account administration	Name and email. Data of children/adolescents may be processed in the case of minor apprentices.	Art. 7, XXIX, Federal Constitution; Art. 11 of CLT + Art. 206, §5º, I and II of Civil Code	5 years from the end of the commercial relationship.
	Opening of support tickets by users	Name, email, phone number, and access data. Data of children/adolescents may be processed in the case of minor apprentices.	Art. 7, XXIX, Federal Constitution; Art. 11 of CLT + Art. 206, §5º, I and II of Civil Code	5 years from the end of the commercial relationship.
<b>Administrative and Financial</b>	Purchasing	Name and email	Art. 206, §3 of the Civil Code	3 years from the end of the commercial relationship.
	Client Registration in Legal Manager	Name and email (client registration documents – individual or legal representative)	Art. 206, § 3 of the Civil Code	5 years from the end of the commercial relationship.
	Billing (NH - fee invoice)	Name, CPF, email, and address	Art. 206, §5º, II of the Civil Code + arts. 173 e 174 of CTN	
	Billing (NDD - Expense Invoice)	Name, CPF, email, and banking details (bank branch, account, and bank)	Art. 206, §5º, II, Civil Code in conjunction with Arts. 173 and	



Category	Process	Data Used	Applicable Legislation	Retention Period
			174 of the CTN (National Tax Code)	
	Monthly Bank Reconciliation	Name, CPF, identity, and address of employees	Art. 206, §5º, I and II, Civil Code in conjunction with Arts. 173 and 174 of the CTN	
	Itaú Bank (Payments to employees, service providers, and miscellaneous purchases)	Name and CPF (of employees or service providers)	Art. 206, §3º, V, Civil Code in conjunction with Arts. 173 and 174 of the CTN	
	INTL FCStone Bank (Receipt of fees and advance expenses)	Name of the representative, CPF, identity, address, and email of employees	Art. 206, §3º, V, Civil Code in conjunction with Arts. 173 and 174 of the CTN	
<b>Marketing</b>	Event Organization	Name and email	CNIL Resolution No. 2016-264 of July 21, 2016 (NS-048); CNIL Decision No. SAN-2020-008 of November 18, 2020	3 years from the end of the commercial relationship or until the opt-out request is made by the data subject.
	Publication of Articles	Name and email	CNIL Resolution No. 2016-264 of July 21, 2016 (NS-048); CNIL Decision No. SAN-2020-008 of November 18, 2020	3 years from the end of the commercial relationship or until the opt-out request is made by the data subject.
	Other Prospecting Emails	Name and email	CNIL Resolution No. 2016-264 of July 21, 2016 (NS-048); CNIL Decision No. SAN-2020-008 of November 18, 2020	3 years from the end of the commercial relationship or until the opt-out request is made by the data subject.
	Inclusion of Professionals on the GT Lawyers Website	Name, email, photo, qualifications, and professional history. Data of adolescents may be processed when there are minor apprentices in the GTLawyers team	N/A	5 years from the end of the commercial relationship.
	Directories (partners' own system)	Name, email, photo, professional history. Personal data of adolescents may be processed when there are minor apprentices	N/A	5 years from the end of the commercial relationship.

Category	Process	Data Used	Applicable Legislation	Retention Period
	Internal Communication Email - Integration	Name, email, photo, qualifications, and professional history. Personal data of adolescents may be processed when there are minor apprentices.	N/A	5 years from the end of the commercial relationship.
Human Resources	Recruitment & Selection	Name, date of birth, phone number, email, professional background, photo, professional social media, and address.	N/A	6 months from the end of the recruitment process.
	Hiring of New Employee (including minor apprentices)	Name, date of birth, CPF, RG, driver's license (CNH), phone number, email, parents' names, dependents, voter registration, race, health information, marital status, banking data, photo, professional qualifications, professional social media, and address.	Law No. 11.788/08 (Student Internships); Statute of the Legal Profession and the Brazilian Bar Association (OAB); Art. 7, XXIX of the Federal Constitution; Art. 11 of the CLT in conjunction with Art. 206, §5º, I and II of the Civil Code	5 years from the end of the employment contract
	Payroll Processing	Name, CPF, and banking data (bank name, branch, and account number).	Law No. 11.788/08; Statute of the Legal Profession and the OAB; Art. 7, XXIX of the Federal Constitution; Art. 11 of the CLT in conjunction with Art. 206, §5º, I and II of the Civil Code; Arts. 173 and 174 of the CTN	5 years from the end of the employment contract.
	Termination of Employment Contract (Team Member)	Name, CPF, and address.	Law No. 11.788/08; Statute of the Legal Profession and the OAB; Art. 7, XXIX of the Federal Constitution; Art. 11 of the CLT in conjunction with Art. 206, §5º, I and II of the Civil Code	5 years from the end of the employment contract.

If another processing activity involving personal data is identified for which no retention period has been established in the table above, contractually, or by law, the employee must inform the Data Protection Officer so that the retention period can be evaluated and defined.

## LEGAL BASES FOR PERSONAL DATA RETENTION

The legal bases that will justify the retention/storage of the aforementioned personal data are:

- **Legal or Regulatory Obligation (Article 7, II, LGPD)**, for Personal Data that will remain stored in GTLawyers' database due to legal retention periods;
- **Performance of a contract or pre-contractual procedures with the data subject (Article 7, V, LGPD)**, when necessary for the provision of a service, supply of a product, or functionality requested directly by the Data Subject, even prior to the effective contracting;
- **Regular exercise of rights in judicial, administrative, or arbitral proceedings (Article 7, VI, LGPD)**, for Personal Data that will remain stored in GTLawyers' database during the statute of limitations or expiration periods determined by applicable laws, or throughout the course of investigations or proceedings, to ensure the defense of rights;
- **Legitimate interest (Article 7, IX, LGPD)**, for Personal Data that will remain stored in GTLawyers' database for the support and promotion of GTLawyers' activities.

Finally, it should be noted that in the case of administrative or judicial proceedings, the aforementioned periods may be extended, and therefore, data will continue to be processed and the retention periods indicated above may be prolonged. Except in such cases, if GTLawyers intends to extend the storage period, the Data Subjects must be notified of the new end date of the retention period.

## DATA SECURITY

The protection of Personal Data is one of our top priorities. GTLawyers is committed to adopting technical and administrative security measures suitable for protecting personal data against unauthorized access and accidental or unlawful situations of destruction, loss, alteration, disclosure, or any form of improper or unlawful processing.

## DISPOSAL METHODS

Once the storage period has expired, and provided there is no valid reason for retention, personal data will be securely deleted or anonymized.

The methods for disposing of personal data processed by GTLawyers are listed below.

1. **For personal data in physical documents:** the documents will be shredded and the waste will be disposed of for recycling.
2. **For personal data on removable media (CD, USB drive):** the media will be formatted to delete the data, followed by the physical destruction of the media (or, alternatively, the overwriting of its contents).

3. **For personal data in computer folders:** the file will be deleted from the folder and from the recycle bin. Subsequently, additional solutions will be used to ensure that these files cannot be recovered (e.g., formatting the machine; using DBAN).
4. **For personal data in systems, platforms, or servers licensed by GTLawyers:** the supplier will be requested to delete the data, with a deadline set and a declaration required to attest that the disposal has been completed.

## DATA PROTECTION OFFICER CONTACT

If you have any questions and/or requests regarding Privacy and Data Protection, please contact GTLawyers' Data Protection Officer via email:

- **Name:** Anne-Catherine Brunschwig
- **E-mail:** [compliance@gtlawyers.com.br](mailto:compliance@gtlawyers.com.br)

If any situation is identified that may indicate a violation of this Policy, it must be immediately reported to the Data Protection Officer.

## UPDATES AND EFFECTIVENESS

Updates to this Policy will be published in our physical and/or virtual environments and/or sent by email or message.

This Policy is effective immediately and may be updated without prior notice whenever necessary.

**April 17<sup>th</sup>, 2025.**