

	Privacy Policy		
	Prepared by: Machado Nunes Advogados (DPO)	Approver: Ricardo Auriemo	
Version 4.0	Date Prepared June 10, 2025	Last Revision October 12, 2026	Pages 1 / 12

Welcome to the Touch Health Privacy Policy (“Touch” or “We”).

We specialize in the development and provision of solutions for healthcare sector players. We have extensive experience in application development, integration of systems and equipment, implementation, support and management of infrastructure in mission-critical environments (the “Services”).

Our Services provide the following capabilities: intelligent scheduling; laboratory management; imaging services management; *business intelligence*; a portal for reports and images; diagnostic imaging; logistics and inventory; and process management.

This Privacy Policy (the “Policy”) addresses how we use personal data and sensitive personal data (mainly health data) in the course of providing these Services, as well as in the management of our websites.

If You are a Healthcare Professional, Employee or Patient associated with any of our clients (“Clients” or “Healthcare Institutions”), and you have any request, you should direct your questions to the specific Client that is responsible for your personal data.

In any event, if you still have any questions or wish to speak with us about any matter relating to the processing of personal data, or in cases where Touch is a data Controller under the Brazilian General Data Protection Law (LGPD – Law No. 13,709/2018), please feel free to contact our team through the following dedicated personal data protection channel: privacidade@touchhealth.com.br.

1. DEFINITIONS

Before reading this Policy, we recommend that you review the definitions of the terms we will use, as defined in the LGPD:

- **Personal Data**: any information relating to an identified or identifiable natural person, such as, for example, your name, CPF (Brazilian individual taxpayer number), email address and telephone number, among others.
- **Sensitive Personal Data**: personal data that deserve greater care due to their nature. In providing our Services, we will mainly process sensitive personal data concerning health, sex life and genetic data. This category also includes data relating to racial or ethnic origin, religious belief, political opinion, membership of a trade union or of a religious, philosophical or political organization, and biometric data.
- **Processing of Personal Data**: any operation carried out with personal data, such as, for example, collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction.
- **Controller**: the natural or legal person, whether public or private, who is responsible for making decisions regarding the processing of personal data. The Controller determines the purposes and means of processing such information.

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- **Processor:** the natural or legal person, whether public or private, who carries out the processing of personal data on behalf of the Controller, following the Controller's instructions.
- **Data Subject:** the natural person to whom the personal data that are the object of processing refer.
- **Data Protection Officer (DPO) (Encarregado):** the person appointed by the Controller and the Processor to act as a communication channel between the Controller, Data Subjects and the Brazilian National Data Protection Authority (ANPD).

2. FOR WHAT REASONS DO WE USE PERSONAL DATA?

To provide our Services, we process personal data, including sensitive data. The Client that has engaged our Services is primarily responsible for the data of Patients and Employees in our systems. Accordingly, the processing of such information takes place exclusively to fulfill the contractual obligations undertaken with Clients, in accordance with the instructions provided by them in their capacity as Controllers.

Below, we highlight the main contexts in which we process personal data to meet these contractual responsibilities. In these contexts, Touch acts as Processor, and the legal bases indicated reflect the framework adopted jointly with Clients, who, as Controllers, are responsible for their final determination (Articles 7 and 11 of the LGPD):

Context	Purposes	Personal Data	Legal Basis
Support	Analysis of and action on issues relating to: data integration in processes; patient registrations; medical prescriptions; inventory control; purchasing and inventory; operations audits.	Name, date of birth, email, telephone number, CPF (individual taxpayer number), RG (national ID number), CRM (medical council registration number), health insurance plan data, address, test results, medical images.	Regular Exercise of Rights
User registration: Healthcare Professionals	Registration of the physician user in the system.	Name, date of birth, email, CRM, telephone number	Performance of a Contract
User registration: Client Employees	Registration of the Client's Information Technology team users in the System.	Name, email and CPF	Performance of a Contract
Development of integrations	Development of integrations and testing of system processes	Physicians: Name, date of birth, email, CRM, telephone number; Patients: Name, date of birth, email, telephone number; test results, medical images, medical record	Regular Exercise of Rights

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Context	Purposes	Personal Data	Legal Basis
		Client employees: Name and email.	
Reports	Sending reports to the Client or enabling their extraction	Patient name, exam, admission date, exam identifier, requesting physician, physician responsible for the report (performing physician), reviewing physician, technician (image/report), health insurance plan, exam modality, room, gender, procedure report status, type of care, age group, age	Regular Exercise of Rights
Scenario simulation	To carry out updates or scenario testing.	Patient name, physician name, date of birth, patient email, physician email, telephone number, CPF, RG, CRM, health insurance plan data, address, test results, medical images, patient medical record	Regular Exercise of Rights

2.1. Other contexts:

In the contexts below, Touch will generally be a Controller of personal data under the LGPD:

- **Touch Website:** aimed at the general public (<https://touchhealth.com.br>), including the business pages we maintain on social networks such as LinkedIn.
- **Email, text messages and other electronic messages:** Interactions such as electronic communications sent by email, for example.
- **Offline registration forms:** Printed or digital forms, and similar means, through which we request your Personal Data, such as, for example, demonstrations at trade fairs and events.
- **Interactions with our advertisements:** (for example, if You interact with one or more of our advertisements on a third-party website, We may receive information about that interaction).
- **Contact Portal:** We use your Personal Data to provide responses to inquiries, complaints and requests. This normally requires the use of your contact and registration Personal Data, in addition to information about the product acquired and the reason for your inquiry (for example, questions about products, technical problems, product issues or complaints, etc.).
- **Legal reasons or merger/acquisition:** If Touch or its assets are acquired by, or merged with, another company, including by reason of bankruptcy, we will share your Personal Data with our legal successors.

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If you have any questions or would like to receive more information about which data we use, or in which processes your data are involved, please feel free to contact us at the following email address: privacidade@touchhealth.com.br.

3. WHICH COOKIES DO WE USE AND FOR WHAT PURPOSES

Cookies are small text files stored in your browser or device. Cookies allow us to recognize your preferences in order, for example, to adapt the Website and your browsing experience to your specific needs.

Accordingly, some of your information is saved in this text file and, when You visit the Website again later, the Website recognizes your browser. Touch may collect cookies, mainly, through its website <https://touchhealth.com.br>.

Strictly necessary cookies are used on the basis of Touch's legitimate interest, as they are indispensable to the operation of the Website. Analytics and marketing cookies are used only with your consent, which can be managed or withdrawn at any time in your browser's cookie settings.

There, we collect the following cookies:

3.1. Strictly necessary cookies

These cookies are essential to the operation of the Website and to record your cookie consent preference, and cannot be disabled in our systems.

Cookie Name	Domain	Cookie Type	Expiration	Description
PHPSESSID	touchhealth.com.br	First-party	Session	Cookie generated by applications based on the PHP language. This is a general-purpose identifier used to maintain user session variables. It is normally a randomly generated number; how it is used may be specific to the site, but a good example is maintaining a login status for a user between pages.

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Cookie Name	Domain	Cookie Type	Expiration	Description
cookie_notice_accepted	.touchhealth.com.br	First-party	30 days	Records that You have already viewed and accepted the cookie notice displayed on the Website, so that it is not displayed again on each visit during this period.
VISITOR_PRIVACY_METADATA	.youtube.com	Third-party	6 months	This cookie is used to store the user's consent and privacy choices for their interaction with the site. It records data about the visitor's consent in relation to various privacy policies and settings, ensuring that their preferences are honored in future sessions.

3.2. Analytics and marketing cookies

These cookies help us understand how visitors interact with the Website (most visited pages, browsing time and traffic source) and identify the origin of visits and the behavior of visitors and leads over time, so that we can improve the Website, our marketing campaigns and our commercial relationships.

Cookie Name	Domain	Cookie Type	Expiration	Description
__trf.src	.touchhealth.com.br	First-party	1 year	RD Station cookie (marketing automation platform). Used to track the origin of a visit to the Website (for example, which campaign or channel brought the visitor).
_ga	.touchhealth.com.br	First-party	~13 months	Cookie set by Google Analytics (GA4). Used to

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Cookie Name	Domain	Cookie Type	Expiration	Description
				distinguish unique visitors to the Website and to calculate usage statistics.
_ga_XXXXXXXXXX (the identifier varies depending on the Google Analytics property)	.touchhealth.com.br	First-party	~13 months	Cookie set by Google Analytics (GA4). Used to maintain the visitor's session state and measure the Website's performance.
__utmc	.touchhealth.com.br	First-party	Session	This is one of the four main cookies set by the Google Analytics service, which allows website owners to track visitor behavior and measure site performance. It is not used on most sites, but is set to allow interoperability with the older version of the Google Analytics code, known as Urchin. In those older versions, it was used in combination with the __utmb cookie to identify new sessions/visits for returning visitors. When used by Google Analytics, this is always a session cookie that is destroyed when the user closes the browser. Where it is seen as a persistent cookie, it is likely that a different technology is setting the cookie.
__utmt	.touchhealth.com.br	First-party	10 minutes	This cookie is set by Google Analytics. According to its documentation, it is used to throttle the request rate of the service, limiting data collection on high-traffic sites. It expires after 10 minutes.
__utmb	.touchhealth.com.br	First-party	30 minutes	This is one of the four main cookies set by the Google Analytics service, which allows website owners to track visitor behavior and measure site performance. This cookie determines new

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Cookie Name	Domain	Cookie Type	Expiration	Description
				sessions and visits and expires after 30 minutes. The cookie is updated whenever data is sent to Google Analytics. Any activity by a user within the 30-minute lifetime will count as a single visit, even if the user leaves and returns to the site. A return after 30 minutes will count as a new visit, but as a returning visitor.
rdtrk	.touchhealth.com.br	First-party	1 year	RD Station cookie. Used to identify and track visitor/lead behavior across visits, for marketing and commercial qualification purposes.

3.3. Other third-party services embedded in the Website

In addition to the cookies above, the Website loads third-party resources that may process your IP address, even without setting their own cookies on Touch's domain: Google Fonts, which delivers typefaces directly from Google's servers, and Google Maps, a map embedded in the Contact page showing the location of our offices.

Cookie Name	Domain	Cookie Type	Expiration	Description
YSC	.youtube.com	Third-party	Session	This cookie is set by YouTube to track views of embedded videos.
VISITOR_INFO1_LIVE	.youtube.com	Third-party	6 months	This cookie is set by YouTube to track user preferences for YouTube videos embedded in websites; it can also determine whether the site visitor is using the new or the old version of the YouTube interface.

3.4. How can I remove or block cookies?

If You would like to know which cookies are installed on your device, or if you wish to delete or restrict them, use your browser settings. You will find further explanations on how to proceed by clicking the links below. To find information relating to other browsers, visit the browser developer's website.

- [Google Chrome](#)

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- [Internet Explorer](#)
- [Safari](#)
- [Firefox](#)
- [Opera](#)

Please note: the use of cookies allows us to offer you a better experience on our websites. Strictly necessary cookies cannot be blocked, as they are indispensable to the operation of the Website. Blocking analytics and marketing cookies may impair the proper functioning of some pages.

4. IS TOUCH A CONTROLLER OR A PROCESSOR OF PERSONAL DATA UNDER THE LGPD?

With respect to the processing of data of Healthcare Professionals, Client Employees and Patients that may be processed in the course of providing the Services, Touch will act in the role of Processor of Personal Data, as defined by the LGPD, acting exclusively in accordance with the instructions and determinations given by the Healthcare Institutions (Controllers).

Clients, as Controllers, are responsible, without prejudice to the obligations assigned to Touch as Processor by the LGPD, for:

- Determining and applying the appropriate legal bases under the LGPD (Article 7 or 11) to legitimize the processing carried out with the personal data of Patients and their Staff, with Touch being required to follow the instructions received.
- Recording and retaining the documents and evidence necessary to verify that the Patient's valid consent was obtained, where applicable, or that another legal basis for processing was properly applied, with Touch being required to follow the instructions received.

5. SHARING OF YOUR DATA

We may share your personal data in the following circumstances:

- **To safeguard and protect Touch's rights** before competent judicial, administrative or governmental authorities, whenever there is a legal determination, request, requisition or court order;
- **In the event of a change in our corporate structure and with other companies in our economic group**, such as in the case of a merger, acquisition, incorporation or change of control;
- **When required by applicable law**, including sector-specific regulations; and
- **With partner service providers responsible for the administration, custody and security of such data**, such as cloud infrastructure and data center providers and support and monitoring tools integrated into our environments, who are authorized to use the Personal Data only for the specific purposes for which they were engaged.

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To provide the Services and host our systems, we use a multicloud and data center infrastructure made up of the following providers, which act as technology and hosting sub-processors: Amazon Web Services (AWS), Oracle Cloud Infrastructure (OCI) and Open Datacenter. Personal data are stored and processed mainly in Brazil, in data centers located in São Paulo/SP and Goiânia/GO. However, certain global cloud services of these providers, including those used for backup and disaster recovery, may involve the storage or processing of data in the United States (for example, in the AWS N. Virginia region), which constitutes an international transfer of personal data. In such cases, we take care to ensure that your data are secure, through the mechanisms provided for in Article 33 of the LGPD and in ANPD Governing Board Resolution (Res. CD/ANPD) No. 19/2024, such as the standard contractual clauses approved by the ANPD.

6. DATA RETENTION PERIOD

We may keep your data with us in the following circumstances:

- For as long as they are necessary to fulfill the purposes described above;
- For as long as a legal or regulatory obligation requires us to keep the data;
- For the statutory period applicable to the possible filing of claims by or against Touch.

If none of the above circumstances any longer justifies the retention of such data, we will delete them completely or alter them in such a way that it becomes impossible for us and our partners to identify you as the data subject. Backup copies that may contain such data will be deleted in accordance with the regular retention cycles of those systems.

7. SECURITY OF YOUR DATA

At Touch, we protect your data by means of appropriate technical and administrative security measures, pursuant to Article 46 of the LGPD, and we seek the same level of excellence from our partners, but it is important to emphasize that no system is completely secure.

Among the measures adopted, we highlight: (i) segregation of environments, through the use of dedicated resources (exclusive servers and isolated instances) or public cloud services with logical segmentation by client, depending on the contracted resource; and (ii) backup and replication routines at locations separate from the primary one, as well as redundant cloud storage, to ensure continuity of the Services and recovery in the event of incidents (disaster recovery).

It is very important that you know that the security of your data is also your responsibility. Therefore, we recommend that you always take the following precautions:

- Use secure equipment and connections, and up-to-date web browsers, operating systems and antivirus software;
- Do not share data sent to Touch on other websites; we will not request other data from you outside our official contact channels.

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- If you communicate with us by email, pay attention to the web domain used. Touch exclusively uses the contact channels listed on the domain: <http://touchhealth.com.br/>
- Keep your personal information up to date with us; it will be essential for confirming your identity if you request any information or document remotely, or if we need to contact you.

If you identify or become aware of anything that compromises the security of personal data, please contact us at the following email address: privacidade@touchhealth.com.br

8. YOUR RIGHTS

The LGPD guarantees rights relating to the privacy and protection of Personal Data. These rights are intended to protect your Personal Data and safeguard your privacy.

As Touch is generally not the primary party responsible for the processing of personal data of Patients, Client Employees and Healthcare Professionals, in many cases they should contact the Healthcare Institution, which is Touch's client, directly in order to exercise their rights.

In any event, we list below what these rights are and how you can exercise them before Touch, when it is the Controller of Personal Data.

Right	Explanation
Confirmation of the processing of your Personal Data	You may request and receive confirmation of the existence of processing of your Personal Data.
Access to Personal Data	You may request and receive a copy of your Personal Data processed by Us.
Correction of incomplete, inaccurate or outdated Personal Data	You may request the correction of your Personal Data if you identify that it is incorrect.
Anonymization, blocking or deletion of unnecessary, excessive or unlawfully processed Personal Data	You may request the anonymization, blocking or deletion of Personal Data from our database. Your Personal Data may be anonymized, blocked or deleted from the servers when so requested or when they are no longer necessary or relevant for the provision of our products and Services, unless there is any other reason for their retention, such as a possible need to retain the Personal Data for compliance with a legal obligation or for the safeguarding of the rights of Touch and/or third parties.
Portability of Personal Data	You, or third parties appointed by you, may obtain access to the Personal Data processed by Touch in a structured and interoperable format, provided that this does not violate our intellectual property or trade secrets.
Not providing consent or withdrawing it	You have the right not to provide or to withdraw your consent; however, this will not affect the lawfulness of any processing previously carried out.

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Right	Explanation
Objecting to certain processing of Personal Data	You have the right to object to certain processing purposes. In some cases, Touch may demonstrate that it has legitimate grounds, its own or those of partners, to process the Personal Data, which would override the objection to processing, such as, for example, where the Personal Data are strictly essential for the provision of the Services.

You also have the right to obtain information about the public and private entities with which we share your Personal Data, to be informed about the possibility of not providing consent and the consequences of refusal, to request review of decisions made solely on the basis of automated processing that affect your interests, and to petition the Brazilian National Data Protection Authority (ANPD).

It is also worth mentioning that there are cases in which some of these rights cannot be exercised, or may be exercised only partially, due to Touch's legal compliance obligations or where Touch has a right to retain such data.

In these cases, we guarantee that access to and use of such data will be restricted exclusively to those purposes.

If you have any questions about your privacy rights, you may contact us at privacidade@touchhealth.com.br, and we will respond as quickly as possible.

9. CHANGES TO THIS POLICY

This policy may be changed, so we recommend that you review this document whenever you access our website. In any event, whenever we change our Policy, we will inform you through the contact channels established with us.

If your consent becomes necessary, we will contact you to obtain it before use. We recommend that you pay attention to the contact channels provided to **Touch**, because in that case we will not be able to use your data for your benefit until your consent has been duly confirmed.

10. GOVERNING LAW AND VENUE

Whenever the law permits, the law applicable to this Privacy Policy shall be the legislation of the Federative Republic of Brazil, and the venue for the discussion of any claims arising from this document shall be the courts of the judicial district of São Paulo/SP, waiving any other, however privileged it may be, except in cases where the applicable legislation grants the Data Subject the right to bring proceedings in the courts of their place of residence.

11. QUESTIONS AND CLARIFICATIONS

If you believe that your Personal Data have been used in a manner different from what this Policy or your preferences indicate, or if you have questions, comments or suggestions about this document, please contact us. We have a Data Protection Officer (DPO) available to help. You can reach the DPO at the following contacts:

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Email: privacidade@touchhealth.com.br

Data Protection Officer (Encarregado): Machado Nunes, Marques e Gutierrez Sociedade de Advogados, registered under CNPJ (Brazilian corporate taxpayer number) No. 27.389.845/0001-77

Responsible person: Lucas Bonafé, registered with the Brazilian Bar Association, São Paulo Section (OAB/SP), under No. 351.394.

Alternate: Daniel Marinho, registered with the Brazilian Bar Association, São Paulo Section (OAB/SP), under No. 523.531.

It is important to know that, when you make a request, we may ask for additional personal information to confirm that You are the data subject. This is necessary to ensure the accuracy and security of the information provided.

12. REVISION CONTROL

Revision No.	Date	Prepared by	Validated by
00	June 14, 2023	Machado Nunes Advogados (DPO)	Ricardo Auriemo
01	August 30, 2024	Machado Nunes Advogados (DPO)	Ricardo Auriemo
02	December 13, 2024	Machado Nunes Advogados (DPO)	Ricardo Auriemo
03	June 12, 2025	Machado Nunes Advogados (DPO)	Ricardo Auriemo

Changes:

Rev. 00 – Original issue on June 14, 2023

Rev. 02 – General updates and adjustments in accordance with Res. CD/ANPD No. 18/2024 (role of the Data Protection Officer in the processing of personal data).

Rev. 03 – Updates following the update of data mappings carried out in 2024.

Rev. 04 – Update regarding the appointment of an Alternate Data Protection Officer in accordance with Res. CD/ANPD No. 18/2024 (role of the Data Protection Officer in the processing of personal data).

Rev. 05 – Updates involving information on the use of Cookies, following the audit carried out on September 10, 2026, on International Transfers of Personal Data, and on technology infrastructure and information security measures.