https://destaque.com.br/

1. Introduction

Destaque Gestão Documental reaffirms its commitment to privacy, the protection of personal data, and the security of information processed in the context of its activities.

This **Privacy Policy** aims to inform users, in a clear, accessible, and transparent manner, how the processing of personal data of clients, partners, suppliers, job applicants, website visitors, social media users, and other data subjects who interact with Destaque takes place.

DESTAQUE EMPREENDIMENTOS EM INFORMÁTICA LTDA – EPP, trade name **Destaque Gestão Documenta**l, is a private legal entity, registered under CNPJ No. **02.548.026/0001-02**, founded in 1998, with headquarters at **Av. Dom Hélder Câmara, No. 2606, Maria da Graça, Rio de Janeiro/RJ, ZIP Code 21050-455**, with branches at **Av. Dom Hélder Câmara, No. 2654, Maria da Graça, Rio de Janeiro/RJ, ZIP Code 21050-455**, and **Av. Nova York, No. 299, Bonsucesso, Rio de Janeiro/RJ, ZIP Code 21041-040**, operating in the provision of physical and digital document management solutions, specialized services, and technological platforms aimed at the organization, security, and governance of information.

The processing of personal data carried out by Destaque fully observes all principles of the laws and regulations applicable to privacy and personal data protection, especially the **Brazilian General Data Protection Law – LGPD** (Law No. 13,709/2018) and the principles of good faith, purpose, adequacy, necessity, security, and transparency.

By accessing and interacting with our channels, services, or content, the user declares awareness of, and agreement with all rules of use, protection, and security of information as described in this Privacy Policy.

We ask that you read this policy carefully and, if you have any questions or wish to communicate with us regarding the information mentioned in this Policy or to exercise rights related to your personal data, you may contact our Data Protection Officer at: privacidade@destaque.com.

DESTAQUE GESTÃO DOCUMENTAL values the privacy of its users and has created this Privacy Policy to demonstrate its commitment to protecting your privacy and personal data, under the terms of the General Data Protection Law and other applicable laws, as well as to describe how your privacy is protected by DESTAQUE when collecting, processing, and storing your personal information.

By using the services offered by DESTAQUE GESTÃO DOCUMENTAL, you consent to the use of information as described in this Privacy Policy.

2. Definitions and Basic Concepts

In order to better understand the Privacy Policy of DESTAQUE GESTÃO DOCUMENTAL, the definitions of some of the terms used in this document are provided below:

- **User / Data Subject**: natural person to whom the processed personal data refers.
- **Controller**: natural or legal person who makes decisions regarding the processing of personal data.
- **Processor**: natural or legal person who processes personal data on behalf of the controller.
- **Personal Data**: any data that can identify a person, such as name, civil identification document number and Brazilian Individual Taxpayer Registry (CPF), date of birth, address, e-mail, telephone number, debit/credit card number, IP address, geolocation data.
- **Consent**: free, informed, and unequivocal manifestation by which the data subject agrees to the processing of their data for a specific purpose.
- **Legal Bases**: legal grounds that authorize the processing of personal data.
- **Data Protection Officer (DPO)**: communication channel between Destaque, data subjects, and the Brazilian National Data Protection Authority (ANPD).
- **Cookies**: small text files stored on the computer, smartphone, or other internet-enabled device when the user visits a website, used to ensure proper page functionality, improve browsing experience, and collect usage information.
- **Processing**: any operation performed with personal data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.

3. Destaque's role in Data Processing

Destaque operates in the processing of personal data in the context of its physical and digital document management activities and may perform different roles depending on the nature of the service provided and the relationship established with the data subject or its clients.

3.1. Acting as a Data Controller

Destaque acts as a controller of personal data when it defines the purposes and means of processing, especially in relation to data processed for:

- institutional marketing and its own commercial communications.
- relationships with clients, partners, and suppliers.
- recruitment, selection, and human resources management processes, including data of candidates, employees, and individual service providers.

- navigation and interaction on its institutional website, digital channels, and social media.

In these situations, Destaque is responsible for decisions related to the processing of personal data, under applicable legislation.

3.2. Acting as a Data Processor

Destaque acts as a processor of personal data when it processes data on behalf of its clients, in accordance with their instructions, within the context of providing physical and digital document management services, including, where applicable:

- storage, organization, and digitization of physical documents.
- implementation, support, and operation of technological document management solutions.
- assisted migration, organization, classification, and indexing of documentary collections.
- operational support related to the use of the McFile platform.

In these cases, the processing of personal data occurs in a manner limited to the contracted purposes and in compliance with the controller's instructions.

3.3. Content of Client Documents

This Privacy Policy does not specifically describe the content of physical or digital documents processed, stored, digitized, or organized by Destaque on behalf of its clients within the scope of document management services.

Any personal data eventually contained in these documents is exclusively defined by the clients and may vary according to the nature of the collection, the activity performed, and the contracted purposes.

In such cases, Destaque acts as a processor of personal data, carrying out processing in accordance with the client's instructions, who acts as the data controller, observing applicable legislation, adopted security measures, and current contractual provisions.

4. Personal Data Collected

Destaque collects and processes personal data in a proportional, appropriate, and non-excessive manner, limited to the minimum data necessary for the execution of its activities, service provision, compliance with legal and regulatory obligations, and relationship with data subjects. Depending on the case and the nature of interaction with the company, the following personal data may be processed, among others:

Registration and contact data, such as name, e-mail, telephone number, position, company, professional address, and other information voluntarily provided by the data subject in forms, registrations, commercial proposals, or contact channels.

Access records and operational logs, including technical information related to system use, such as date and time of access, IP address, device identifiers, browser type, authentication records, and security events.

Communications and interactions, including content exchanged through service channels, technical support, commercial relationships, e-mail, telephone, chats, or other forms of contact.

Statistical and browsing data on the institutional website and digital channels, such as pages accessed, duration of navigation, access origin, interactions with content, and campaign information, processed for institutional marketing strategies, lead generation, and continuous improvement of digital channels.

Information provided in recruitment and selection processes, including identification data, professional and academic information, experience history, résumés, professional profiles, and other data voluntarily submitted by candidates within selection processes.

Information about your interactions with AI features, including the questions you submit and your usage preferences.

4.1. Data Collection Methods

Personal data processed by Destaque may be collected through different means, including:

Directly from the data subject, when voluntarily provided through forms, contracts, registrations, commercial proposals, selection processes, communications, or interactions with the company.

Automatically, through the use of systems, applications, cookies, logs, monitoring tools, and similar technologies during website navigation, platform use, or service utilization.

5. Cookies

Destaque's website uses cookies to enable essential functionalities, improve browsing experience, analyze the use of digital channels, and support institutional and marketing actions. Cookies are small text files stored on the user's device when accessing a website, allowing, for example, browser recognition, preference retention, and navigation information collection.

The use of cookies occurs with the user's consent, which may be managed at any time through preference options available on the website itself or in browser settings.

6. Use of Personal Data

The user's personal data will be used to improve DESTAQUE's processes and services, as well as to offer its solutions and products, especially to:

- evaluate the candidate's profile for a job vacancy.
- provide our services.
- send marketing communications.
- verify how our services are being used.
- improve service, resolve issues, answer questions, and address nonconformities.
- improve security management.
- prevent, investigate, and respond to fraud or unauthorized use of services, actions that violate terms, notices, and policies, or other unlawful actions.
- act in compliance with legal and regulatory obligations.

Your e-mail address will be used solely to contact you with news and updates about DESTAQUE, to send notices related to system operations, and to conduct satisfaction surveys regarding our services.

7. Legal Basis for Data Processing

The processing of personal data carried out by Destaque is based on the legal grounds provided by the LGPD, as applicable, including:

- data subject consent.
- performance of a contract or preliminary procedures.
- compliance with legal or regulatory obligations.
- regular exercise of rights.
- legitimate interest, subject to the appropriate balancing test.

All data processing activities carried out by Destaque and its employees observe good faith, processing purpose, as well as adequacy and necessity.

8. Digital Data Processing

Destaque processes personal data by digital means within the context of service provision, system use, and operation of technological document management solutions.

8.1. Use of Cloud Infrastructure

For operational activities such as assisted migration, mass document import/extraction, and technical support, Destaque may use cloud computing services provided by Amazon Web Services (AWS).

In such cases, storage occurs in a controlled manner and only for the time strictly necessary to perform contracted activities, with the adoption of appropriate technical and administrative measures to protect information.

8.2. Storage Location

Personal data processed in connection with the services provided by Destaque is stored on servers located in Brazil, except for the features described in the following paragraph.

Certain optional features, such as optical character recognition (OCR), artificial intelligence and semantic information processing, may involve the processing of data on servers located in the European Union, which is recognized as an international organization providing a level of data protection that is adequate and compatible with the LGPD, pursuant to ANPD Board of Directors Resolution No. 32 (Resolução CD/ANPD nº 32), published on January 26, 2026. In such cases, the following may be processed, limited to what is strictly necessary: (i) the content of the document or excerpts submitted to the feature, (ii) associated metadata, and/or (iii) technical operation records (logs) essential to the performance and security of the service. Processing is carried out solely for the purpose of performing the feature contracted or enabled by the client and maintaining the security and stability of the services. Primary data storage remains in Brazil, and any transfers are carried out with appropriate contractual, technical and organizational measures, commensurate with the nature and risk of the processing, in accordance with applicable law.

8.3. Use of the McFile Platform

Destaque acts as McFile's representative in Brazil, responsible for implementation, support, and customer relationships.

The McFile platform is a cloud-based document management solution with its own Privacy Policy applicable to data processing within the platform, which can be consulted at: https://mcfile.com/en/privacy-policy/

Data processing carried out directly on the McFile platform follows the guidelines and rules described in the referenced Privacy Policy, including with regard to the cloud infrastructure used by McFile.

9. Physical Data Processing

Destaque also performs activities of storage, organization, transport, digitization, and final disposal of physical documents and may process personal data contained in physical documents. These activities are performed in controlled environments, with restricted access, defined operational procedures, and physical and administrative security measures compatible with the nature of the processed information.

When applicable, transport, external storage, or document destruction services may be performed by specialized third parties, subject to contractual and security controls.

10. Data Sharing

Destaque may share personal data with third parties only when necessary for the execution of its activities, proper service provision, compliance with legal or regulatory obligations, and protection of its legitimate interests, where applicable, always observing the principles of necessity, purpose, and data minimization.

10.1. Main categories of recipients

Data sharing may occur, as applicable, with the following categories of recipients:

Technology service providers and suppliers, including cloud hosting services, IT infrastructure, data storage, backup, monitoring, information security, and technical support.

Commercial relationship, communication, and marketing platforms, such as CRM tools, marketing automation, institutional communications, satisfaction surveys, and campaign analysis, where applicable.

Operational service providers, including logistics, transport, and secure physical document destruction companies.

Professional consultancies, such as legal, accounting, auditing, compliance, information technology, and security services.

Public, administrative, or judicial authorities, pursuant to legal or regulatory obligations, court orders, or valid requests.

10.2. Main Processors used

Currently, Destaque uses, among others, the following processors for personal data processing, all in accordance with their respective purposes and observing the principles of necessity, purpose, and data minimization:

- **Amazon Web Services (AWS)** – infrastructure, storage, authentication, and security, as indicated in items 8.1 and 8.2 above.
- **Amazon Bedrock** – artificial intelligence services (language models and document processing), as set out in item 8.2 above;
- **Google Cloud** – optical character recognition (OCR), as set out in item 8.2 above;
- **McFile** – document management platform, under the terms set forth in item 8.3 above.
- **Stripe** – credit card payment processing.
- **Mailchimp** – communication delivery, e-mail marketing campaigns, and transactional messages.
- **Google** – access analysis, digital marketing, and website usage measurement.
- **Moskit** – customer relationship management (CRM).
- **HelpScout** – service and support.

The above list represents the main processors used and will be periodically updated according to the evolution of company activities. Any additional information about these processors involved in personal data processing may be requested by data subjects via e-mail at privacidade@destaque.com.

10.3. Limitations and Safeguards

Personal data sharing always occurs in a manner limited to the minimum necessary, observing legitimate processing purposes, and is carried out with the adoption of appropriate contractual, technical, and organizational measures designed to ensure confidentiality, integrity, and security of information.

Destaque does not share personal data for third-party marketing purposes nor sell personal data.

When sharing involves third parties acting as data processors, processing will be carried out in accordance with Destaque's or the applicable controller's instructions, as appropriate, and in compliance with applicable legislation.

11. Information Security

Destaque adopts appropriate technical and administrative measures to protect personal data against unauthorized access, loss, alteration, disclosure, or any form of improper processing, observing internal criteria of confidentiality, integrity, and information availability.

Access to personal data is restricted to authorized employees and third parties, according to necessity and processing purposes.

In the event of a security incident resulting in unauthorized access, loss, disclosure, or alteration of personal data, Destaque will adopt appropriate measures to mitigate risks and, where applicable, notify affected data subjects and/or clients within a reasonable timeframe, under applicable legislation.

When required by applicable law, Destaque will also notify the Brazilian National Data Protection Authority (ANPD).

12. Data Retention and Deletion

Personal data is retained only for the time necessary to fulfill processing purposes or to comply with legal, regulatory, or contractual obligations.

After this period, data may be deleted or stored in a restricted manner when necessary for fraud prevention, regular exercise of rights, or compliance with legal obligations.

13. Rights of Data Subjects

Under the Brazilian General Data Protection Law (LGPD), the data subject may, at any time, request:

- confirmation of the existence of processing.
- access to personal data.
- correction of incomplete, inaccurate, or outdated data.
- anonymization, blocking, or deletion of unnecessary or excessive data.
- data portability, where applicable.
- information about data sharing with third parties.
- objection to processing, where applicable.
- revocation of consent, when it is the legal basis.

Requests may be submitted to the Data Protection Officer (DPO) at privacidade@destaque.com and will be analyzed within the timeframes and terms provided by applicable legislation.

When there is a request for access to client personal data by a competent public authority to comply with a legal obligation, Destaque undertakes to notify the client within up to 5 business days, whenever permitted by law.

14. Updates to this Policy

This Privacy Policy may be updated at any time to reflect legal, operational, or best practice changes. Any changes made will be communicated to clients by email, and the current version will always be available on Destaque's official channels.