



1. Scope

This policy, aligned with the General Data Protection Law (GDPL), was established by the company's top management and provides guiding principles for members of the company's data privacy governance structure, involving those responsible for organizational control, directors, managers, employees, etc., regarding best practices for the acceptable use and treatment of personal data within the context of the company's business processes and in compliance with the protection of fundamental rights to freedom, privacy, and the free development of an individual's personality. The protection of personal data is grounded in the following principles:

- I.** Respect for privacy;
- II.** Informational self-determination;
- III.** Freedom of expression, information, communication, and opinion;
- IV.** Inviolability of intimacy, honor, and image;
- V.** Economic and technological development and innovation;
- VI.** Free initiative, free competition, and consumer protection; and
- VII.** Human rights, the free development of personality, dignity, and the exercise of citizenship by natural persons.

This policy applies to the processing of personal data collected by the company, directly or indirectly, from all individuals, including but not limited to current, future, or potential job applicants, employees, clients, suppliers, contractors/subcontractors, business partners, shareholders, or any third parties, with "Personal Data" defined as any data related to an identified or identifiable individual or a person who can be identified by reasonably probable means.

All data processing operations of the company are aligned with the hypotheses provided in the GDPL, the so-called legal bases for the processing of personal data. These hypotheses are:

- I.** By obtaining consent from the data subject;
- II.** For compliance with a legal or regulatory obligation by the company;
- III.** When necessary for the execution of a contract or preliminary procedures related to a contract of which the data subject is a party, at the request of the data subject;
- IV.** For the regular exercise of rights in a judicial, administrative, or arbitration process, the latter in accordance with Law No. 9307 of September 23, 1996 (Arbitration Law);
- V.** For the protection of the life or physical integrity of the data subject or a third party;
- VI.** When necessary to meet the legitimate interests of the company or a third party, except when the fundamental rights and freedoms of the data subject that require the protection of personal data prevail;
- VII.** For credit protection, including as provided in relevant legislation.

2. Processing of Personal Data

The processing of personal data by this company will consider the processing scenarios described above and will also observe good faith and other principles established in the legal system:

- a)** Purpose: carrying out the processing for legitimate, specific, explicit, and informed purposes to the data subject, with no possibility of subsequent processing that is incompatible with these purposes. The subsequent processing will only be possible if it is compatible with these purposes and objectives. In the case of the organization, the purpose is related to the execution of its daily activities linked to its core business, duly established by law, and compliance with legal or regulatory obligations.
- b)** Adequacy: Compatibility of the processing with the purposes informed to the data subject, according to the context of the treatment.
- c)** Necessity: Limitation of the processing to the minimum necessary for the achievement of its purposes, with the inclusion of relevant, proportionate, and non-excessive data in relation to the purposes of data processing.
- d)** Free Access: Guarantee to data subjects of facilitated and free consultation about the form and duration of processing, as well as the entirety of their personal data.
- e)** Data Quality: Guarantee to data subjects of accuracy, clarity, relevance, and updating of data, as needed and for the fulfillment of the purpose of its processing.
- f)** Transparency: Guarantee to data subjects of clear, accurate, and easily accessible information about the processing and the respective data processing agents, while respecting commercial and industrial secrets.
- g)** Security: Use of technical and administrative measures capable of protecting personal data from unauthorized access and from accidental or unlawful situations of destruction, loss, alteration, communication, or dissemination;
- h)** Prevention: Adoption of measures to prevent damage resulting from the processing of personal data;
- i)** Non-discrimination: Impossibility of processing for unlawful or abusive discriminatory purposes;
- j)** Accountability and transparency: Demonstration by the agent of the adoption of effective measures capable of proving compliance with and adherence to personal data protection standards, including the effectiveness of these measures.

3. Collection

Collection is one of the possible processing operations that can be carried out with the personal data of the data subjects. Considering that data processing can be represented by a life cycle, this operation represents the initial stage responsible for obtaining the personal data of the individual (data subject).

Considering that collection is the initial operation in the processing of personal data, the institution should only perform this operation if it complies with the processing scenarios, security measures, principles, rights of the data subject, and other rules stipulated by the GDPL.

4. Data Subject Rights

The company will address requests from data subjects, who may obtain, through a request:

- I.** Confirmation of the existence of personal data processing by the company;
- II.** Access to the personal data of the data subject;
- III.** Correction of incomplete, inaccurate, or outdated data;
- IV.** Anonymization, blocking, or elimination of unnecessary, excessive, or data processed in violation of applicable law;
- V.** Portability of data to another service or product provider, upon express request, in accordance with current legislation, while respecting commercial and industrial secrets. This portability does not cover data that has already been anonymized.
- VI.** The elimination of personal data processed with the consent of the data subject, except when such data is necessary for compliance with a legal/regulatory obligation of the company;
- VII.** Information about public and private entities with which the company has shared data;
- VIII.** Information about the possibility of not providing consent and the consequences of refusal;
- IX.** Revocation of consent, with treatments carried out under the previously given consent remaining valid;
- X.** Review of decisions made solely based on automated processing of personal data that consequently affect the interests of data subjects, including decisions related to the definition of their professional profile, consumption, credit, or aspects of their personality;
- XI.** Opposition to processing based on one of the exemptions from consent.



5. Policy Update

The company may update this policy as our business changes or legal requirements evolve. Significant changes to this policy will be published on the company's website when they come into effect.

6. Cookies

Like many companies, some of our websites may use "cookies." Cookies are pieces of text that are placed on the computer's hard drive during visits to certain websites. The company may use cookies to inform us, for example, if you, the user, have visited our site before. Cookies can enhance the online user experience by saving preferences while visiting the website.

The company will disclose the types of cookies used and how to disable them. When required by law, you can visit the website and refuse the use of cookies at any time on your computer.

7. Information Security

The company adopts appropriate technical and organizational measures to protect the personal data of data subjects against accidental or unlawful alteration, loss, or unauthorized use, disclosure, or access. The company is committed to meeting applicable data safeguard requirements based on privacy by design and privacy by default principles.

The company conducts a privacy impact assessment to adopt suitable safeguards to ensure the protection of personal data. In this regard, it develops a Privacy Data Protection Impact Report (PDPIR), a fundamental document demonstrating the personal data collected, processed, used, shared, and the measures taken to mitigate risks that may affect the civil liberties and fundamental rights of data subjects.

8. Exercise of Data Subject Rights

Any questions regarding any personal data processing operation carried out by the company, as well as any complaints, communications, and requests for clarification, can be directed to: **dpo@band-deicmar.com.br**