

## GENERAL DATA PROTECTION POLICY

### 1. INTRODUCTION

1.1. FUNDIBRONZE is committed to maintaining safe and transparent relationships with all people with whom it interacts ( "People" or "Owners" ). Part of this commitment is represented by our efforts to maintain compliance with Law No. 13,709/2018 or General Data Protection Law – LGPD.

1.2. To this end, FUNDIBRONZE presents its General Data Protection Policy ( "PGPD" ) as an integral part of its Data Protection Governance Program, with the aim of establishing guidelines for the processing of Personal Data.

### 2. REACH

2.1. This Policy applies to all FUNDIBRONZE business units, as well as to all people involved in business processes.

### 3. RESPONSIBLE

3.1. The Privacy Committee will review and update the Policy every two years or whenever necessary.

### 4. ACCESS TO THE DOCUMENT

4.1. This Policy and other documents associated with it will be available in digital format accessed through the following link: <Z:\FUNDIBRONZE\LGPD>

### 5. TERMS AND DEFINITIONS

5.1. This Policy will employ terms and definitions described in the LGPD. In any case, it is considered:

a) Personal Data: any information related to a natural person, which can identify them, such as full name, CPF, address, telephone number, email, etc.;



- b) Sensitive Personal Data: are Personal Data regarding racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sexual orientation, genetic or biometric data, when linked to a natural person. E.g.: medical examinations, clinical reports, biometric data;
- c) Person in charge of Personal Data Processing: responsible for FUNDIBRONZE's Personal Data Protection actions, as well as responsible for communicating with Data Subjects and the National Data Protection Authority, regarding information on Data and Information protection;
- d) Holder: natural person to whom the Personal Data that is subject to processing refers;
- e) Processing: any and all processes carried out with these personal data, from simple consultation, through manipulation, storage, sharing, analysis, deletion, etc.;
- f) User: internal people authorized to process Personal Data under the responsibility of FUNDIBRONZE, which may be employees, directors, interns, apprentices;
- g) Third parties: all individuals or legal entities that provide services, products or maintain any type of partnership or commercial representation.

## 6. PRINCIPLES OF PERSONAL DATA PROTECTION

6.1. The LGPD establishes principles that must be followed in all cases of processing of Personal Data. Are they:



- i) Principle of purpose: it is only possible to process Personal Data if there are legitimate, specific and informed purposes to the Holder. Personal Data should not be collected without the purposes of processing being very well defined.
- ii) Principle of adequacy: Personal Data must be used in accordance with the purpose informed to the Holder. The processing cannot distort the purpose originally defined and informed.
- iii) Principle of necessity: Personal Data must be collected to the extent necessary to achieve the proposed purpose. Therefore, avoid collecting, requesting or storing unnecessary data or data without a specific purpose.
- iv) Principle of free access and transparency: Holders must be guaranteed transparency regarding the processing of their Personal Data, as well as adequate means for exercising their rights.
- v) Principle of security and prevention: technical and administrative measures must be adopted to protect and prevent risks and incidents involving Personal Data. Safety and prevention must be reflected in process routines, in the technology used by FUNDIBRONZE and in people's actions.
- vi) Principle of non-discrimination: Personal Data must not be processed for discriminatory purposes, especially data that reveals people's most intimate issues, as is the case with Sensitive Personal Data.
- vii) Principle of responsibility and accountability: It is necessary to adopt measures that are effective and sufficient for the organization's operations to comply with the LGPD.



## 7. GOVERNANCE STRUCTURE

7.1. For the proper organization of our Privacy and Data Protection Governance Program, the conditions that authorize and guide the processing of personal data at FUNDIBRONZE will be contained in: i) Policies: which establish general guidelines for the implementation of the Protection Governance Program of Data and for directing specific standards and routines.

## 8. GENERAL GUIDELINES

8.1. FUNDIBRONZE will employ necessary measures so that the Privacy Governance Program is continuously applied and monitored, in order to comply with the LGPD and the best privacy governance practices. To this end, we will adopt the following guidelines that must be followed by everyone:

(i) Our privacy strategy:

- a) Establish procedures, standards and routines aimed at respecting the principles of the LGPD and the appropriate processing of personal data;
- b) Designate internal or external people to monitor the standards and procedures aimed at the appropriate processing of personal data;
- c) Allocate adequate technical and financial resources to develop the necessary actions;
- d) Monitor and follow ANPD guidelines and good practices;
- e) Maintain and apply policies and standards aimed at information security;
- f) Maintain and update procedures aimed at managing risks involving privacy and protection of Personal Data;



g) Promote audits aimed at measuring the security levels of personal data and compliance with the LGPD;

h) Ensure that aspects of privacy and information security are considered throughout the cycle of FUNDIBRONZE's work processes, products and services, from conception to effective execution;

i) Guarantee contractual conditions for data protection and information security, observing the criticality of each operation and necessary measures to ensure the adequate and secure processing of personal data.

(ii) Our relationship with Data Subjects:

a) Adopt clear and accessible language for all Holders, especially those with special needs;

b) Guarantee means for Holders to exercise their rights and evaluate requests with equality, impartiality and transparency;

c) Promote adequate guidance to Data Operators regarding necessary changes to the processing of Personal Data;

d) Update holders about changes in the processing of their Personal Data;

e) Keep the mapping of activities carried out with the processing of personal data updated, ensuring the recording of the minimum information indicated in good practices or by the ANPD.



(iii) Our way of raising awareness:

- a) Promote periodic educational and internal awareness campaigns about our Privacy Governance Program and good practices for protecting Personal Data;
- b) Apply knowledge tests related to training to Employees and directors.

(iv) Our incident management:

- a) Adopt procedures for identifying, communicating and treating incidents and mitigating risks involving Personal Data;
- b) Immediately communicate to the National Data Protection Authority and the Holder about the occurrence of security incidents that may result in relevant risks or damages to the Holders;
- c) Immediately communicate to the Holders about the occurrence of security incidents that may cause relevant risks or damages to the Holders;
- d) Adopt internal educational actions to raise awareness and provide guidance on the causes of the main risks or incidents that occur and how to avoid them.

**Carlos Vogelsanger**  
Director

