

DATA PRIVACY POLICY

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Revision: N. 02

Date: june/2022

DATA PRIVACY POLICY

Performed by: Luís André Vilela**Approved by:** Marcelo Farnezi Velloso

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REVISION HISTORY

Date	Version	Revision	Description	Performed by:	Approved by:
01/15/2019	1.0	01	Creation of Data Privacy in the Administrative Manual.	Luís André Vilela	Marcelo F. Velloso
06/03/2022	2.0	02	Revision of the Data Privacy Policy and removal of the Administrative Manual	Luís André Vilela	Marcelo F. Velloso

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1. INTRODUCTION

This Privacy Policy was performed in compliance with the Federal Law n. 12,965 of April 23, 2014 (Internet Civil Mark) and with the Federal Law n. 13,709, of August 14, 2018 (Law of Personal Data Protection - LPDP). This Privacy Policy can be updated because of eventual normative update, reason why the user is invited to consult this section periodically.

The Privacy of Personal Data is a set of procedures adopted by companies of various segments and sizes, which with precepts in the protection of the holders' data, seeks compliance with: (i) the Brazilian laws, (ii) standards, internal and external controls, and (iii) all policies and guidelines established for the development of data processing activities. Therefore, Data Privacy aims to avoid any and all improper disclosure and/or use of Personal Data.

Minasligas' data controller, pursuant to Article 41, caput and § 1 of the General Law of Data Protection – (LGDP), has obligations set forth in the legislation, to be exercised with independence, being granted broad access to information and documents related to the Company's data processing activities, so that he/she may verify compliance with the legislation and the rules established internally.

This Data Privacy Policy applies in full to all Data Holders and must be observed by all employees, clients, suppliers and others who have a relationship with the Company and, as such, have access to the personal data it processes.

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2. OBJECTIVES

The purpose of the Privacy Policy of Personal Data is to present the management performed on the personal data provided by individuals ("Holders") with whom Minasligas maintains a relationship, internally or externally.

Minasligas, in the scope of the provision of its services, needs to collect some personal data from the Holders so that contractual and commercial interactions can be established and even so that legal obligations imposed by the Brazilian legislation can be met.

In this sense, this Policy aims to clarify to the Holders, the data that is processed, the ways in which they may be used, to whom this data may be made available and how this data will be protected.

The systems used by Minasligas during the performance of its activities, the filling out of any forms requested by Minasligas and the provision of data directly or indirectly imply the knowledge and acceptance of the conditions of this Policy and of any other terms related to the protection and privacy of the Data.

By providing his/her personal data, the Holder authorizes Minasligas to collect, treat, use and disclose his/her data in accordance with the rules set forth in this Policy.

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3. CONCEPTS

For better understanding of this Policy, we clarify the following concepts:

- ✓ Treatment agents: the controller and the operator.
- ✓ Anonymization: The use of reasonable and technically available means, at the time of processing, by which a data loses the possibility of association, directly or indirectly, with an individual.
- ✓ National Authority: A public administration body responsible for overseeing, implementing, and supervising compliance with this Law throughout the country: the National Data Protection Authority – NDPA (ANPD).
- ✓ Database: Structured set of personal data, established in one or multiple locations, in electronic or physical media.
- ✓ Consent: Free, informed, and unequivocal manifestation by which the data holder agrees to the processing of its personal data for a specific purpose.
- ✓ Controller: A natural or legal person, governed by public or private law, who is responsible for decisions concerning the processing of personal data.
- ✓ Anonymized data: Data relating to the data holder that cannot be identified, considering the use of reasonable and available technical means at the time of its processing.
- ✓ Personal data: Information related to an identified or identifiable natural person.
- ✓ Sensitive personal data: Personal data concerning racial or ethnic origin, religious conviction, political opinion, membership of a trade union or of a religious, philosophical or political organization, data concerning health or sex life, genetic or biometric data when linked to a natural person.

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- ✓ Controller: Person appointed by the controller and operator to act as a communication channel between the controller, the data holders, and the National Data Protection Authority (ANPD).
- ✓ Operator: A natural or legal person under public or private law who processes personal data on behalf of the controller.
- ✓ Holder: Natural person to whom the personal data that are the object of processing refer to.
- ✓ International data transfer: Transfer of personal data to a foreign country or international body of which the country is a member.
- ✓ Processing: Any operation performed with personal data, such as those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of the information, modification, communication, transfer, diffusion or extraction.
- ✓ Shared use of data: Communication, dissemination, international transfer, interconnection of personal data or shared processing of personal databases by public bodies and entities in the performance of their legal powers, or between these and private entities, reciprocally, with specific authorization, for one or more processing modalities permissible by these public entities, or among private entities.
- ✓ General Data Protection Law - GDPL: General Federal Law n. 13,709, of August 14, 2018, which provides for the treatment of personal data, including in digital media, by natural person or legal entity of public or private law, in order to protect the fundamental rights of freedom and privacy and the free development of the personality of the natural person.
- ✓ Personal data breach: A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data transmitted, stored or otherwise processed.

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4. THE PRINCIPLES

Minasligas is committed to accomplish the laws provided in the General Law of Data Protection – GLDP (LGPD), and to respect the principles provides in the Article 6th, as follows:

- a) Purpose: processing for purposes that are legitimate, specific, explicit, and informed to the data holder.
- b) Adequacy: compatibility of the processing with the purposes informed to the data holder, according to the context of the processing.
- c) Necessity: limitation of the treatment to the minimum necessary for the accomplishment of its purposes, with coverage of the relevant, proportional, and not excessive data in relation to the purposes of the data processing.
- d) Free access: guarantee to the data holders of easy consultation, free of charge, on the form and duration of the processing, as well as on the completeness of their personal data.
- e) Data quality: guarantee, to the owners, of the accuracy, clarity, relevance and updating of the data, in accordance with the need and for the fulfillment of the purpose of its processing.
- f) Transparency: guarantee, to the data holders, of clear, precise, and easily accessible information on the performance of the processing and the respective processing agents, with due observance of commercial and industrial secrets.
- g) Security: the use of technical and administrative measures to protect personal data from unauthorized access and accidental or unlawful destruction, loss, alteration, communication or disclosure.

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- h) Prevention: adoption of measures to prevent damages from occurring as a result of personal data processing.
- i) Non-discrimination: no processing for unlawful or abusive discriminatory purposes.
- j) Accountability: demonstration, by the agent, of the adoption of effective measures capable of proving the observance of and compliance with the personal data protection rules, including the effectiveness of such measures.

5. THE USE OF DATA BY MINASLIGAS

The Data handled by Minasligas shall only be used provided it is in compliance with the rules set forth in this Personal Data Privacy Policy, as well as with the Brazilian legislation.

In processing the Data, Minasligas endeavors to comply with the best practices in matters of data security and protection, promoting actions and improving systems so as to ensure the protection of the data provided by the Data Holders.

All Data are processed by Minasligas in strict compliance with the applicable legislation and are processed in specific databases created for each purpose.

Minasligas collects and processes the necessary Data for the manufacture and sale of its products in the market, as well as for employee-related activities, as described in the following items.

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In addition to this Policy, Minasligas has an internal document that details the personal data requested/needed in each activity, as per data mapping carried out by the company with the support of specialized consultants, keeping them available to the public who may request them for consultation.

5.1. THE EXTERNAL PUBLIC PERSONAL DATA

Relating to the external public that keeps relation with the Minasligas, there is data processing in the following cases, if you, data Holder, is:

A. A CANDIDATE FOR A JOB VACANCY

For applicants to any job vacancy at Minasligas, it will be necessary to share the data below, according to the need and purposes described, framed by the LGPD in the terms and legal basis indicated.

- ✓ It is worth saying that the company has an internal document that indicates, in detail, the data handled, as mapped by the company, by a specialized consulting firm, in accordance with the LGPD.
- ✓ DATA: data required for the recruitment and selection process of new employees, including those necessary for registering in the company's management systems, especially full name, CPF, E-mail, and others described in the internal document, for participation in the selection process.
- ✓ COLLECTION CHANNEL: the candidate himself reports his data.
- ✓ PURPOSES: recruitment and selection of new employees.
- ✓ LEGAL BASIS: art. 7th, V, of the LGPD and art. 11, II 'd', Art. 7th, IX of the LGPD, art. 14 §1º (if minor).
- ✓ SHARING: there may be sharing with third-party companies that perform candidate selection, in some of the available positions.

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B. VISITORS

- ✓ If you visit any of Minasligas' facilities, the data below will be required:
- ✓ DATA: date, Event, Registration, Username, Company, Badge, images of internal camera.
- ✓ COLLECT CHANNEL: of the visitor himself / herself.
- ✓ PURPOSES: control of entrance in the facilities of Minasligas, as well as monitoring and security of the environment.
- ✓ LEGAL BASE: art. 7th, item VII of the LGPD.
- ✓ SHARING: There is not.

C. CONTRACTORS/SUBCONTRACTORS AND EMPLOYEES OF THIRD PARTIES PROVIDING SERVICES TO MINASLIGAS

Every outsourced company that is hired by Minasligas and has employees that will provide services on the company's facilities must go through the Contractors Management procedure, a procedure from the integrated management system, requiring the data as below:

- ✓ DATA: copy of the Social Contract, of the CNPJ card, and of the Operation Permit, copies of the employee records or of the contract (in case of a non-CLT bond), copy of the employees' CTPS, RG and CPF, and, when applicable, a copy of the registration with the specific class body.
- ✓ COLLECT CHANNEL: delivered by the outsourced company's representatives.
- ✓ PURPOSES: management of contractors and subcontractors and service providers' employee records.
- ✓ LEGAL BASIS: art. 7th, item II and V of the LGPD.
- ✓ SHARING: There is not.

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D. COSTUMERS PHYSICAL/LEGAL PERSON AND FUTURE COSTUMERS

In the relations with costumers and future customers, Minasligas, with commercial purposes, requires the data as below:

- ✓ DATA: name, address, telephone and CPF, and all the others needed for the issuing of fiscal documents pursuant relative legislation, arising from the commercial relation, in addition to the data of the person who is the reference of the client contact.

For credit protection purposes, Minasligas uses the information contained in the restrictive registration agencies, full name and CPF of the clients and future clients with whom it maintains a commercial relationship.

- ✓ COLLECTION CHANNEL: Direct contact with prospects and customers, through hiring, and credit protection service providers.
- ✓ PURPOSES: prospecting new customers and conducting business negotiations, sales order registration, issuing tax documents, checking customers' financial suitability,
- ✓ LEGAL BASES: art. 7th, V, IX and X of the LGPD.
- ✓ SHARING: There is not.

E. MINASLIGAS' EXTERNAL DRIVERS

The following data is required from the drivers that provide services to Minasligas or that need access to the Company to pick up finished products or deliver materials:

- ✓ DATA: name, CPF, CNH and other documents needed for access enrollment.
- ✓ COLLECT CHANNEL: directly obtained with the drivers.
- ✓ PURPOSES: to register the drivers for release goods for delivery and register the exit of finished products from Minasligas.

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- ✓ LEGAL BASIS: art. 7th, item V, VII and Art. 11, II, “e” of the LGPD.
- ✓ SHARING: There is not.

F. MINASLIGAS’ SUPPLIERS

Minasligas suppliers use data information necessary for the execution of the commercial activities existing between the parties.

- ✓ DATA: personal information needed to the effectiveness of the product purchase or service hiring.
- ✓ COLLECT CHANNEL: through the hiring among the parties.
- ✓ PURPOSES: purchases of raw material, supplies and purchases in general for Minasligas.
- ✓ LEGAL BASIS: art. 7th, item VII of the LGPD.
- ✓ SHARING: There is not.

5.3. COOKIES COLLECTED FROM VISITORS TO THE MINASLIGAS WEBSITE

Cookies are collected from visitors to the Minasligas website when they access or browse the portal.

Ao acessar o site você autoriza o uso de cookies de acordo com a presente política.

The cookies collected in Minasligas’ site are:

Cookies needed: they are essential Cookies for the correct functioning of the site and the user can browse the site and use its applications.

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Cookies of performance: they are Cookies installed by outsourcers that are useful to analyze the way the user interacts with the site. Those cookies do not identify the user and are used for analyzes and statistics. For this purpose we use the *Google Analytics*.

Google Analytics does not collect information that identifies a visitor. It is only used to improve the functioning of the website and collects information about how users use the portal, their interactions, location, among others.

- ✓ DATA: information in relation to the user interaction in the portal.
- ✓ COLLECT CHANNEL: through the visitors' access to Minasligas' site.
- ✓ PURPOSES: to improve the performance of the portal, analyses and statistics, aggregating information anonymously.
- ✓ LEGAL BASIS: art. 7th, item I of the LGPD.
- ✓ SHARING: There is not.

6. CONSERVATION OF PERSONAL DATA

The processing of personal data by Minasligas will happen up to:

- i a verification has been carried out that the indicated purposes of processing have been achieved or that the data are no longer necessary/pertinent to the achievement of the intended purpose, or
- ii The end of the treatment period stipulated by labor and social security laws or any other laws applicable to the relationship has occurred.

The personal data shall be eliminated after the end of its treatment, within the scope and technical limits of Minasligas' activities.

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Minasligas may keep the collected personal data, even after the end of the processing, in one of the following situations:

- iii Accomplishment of legal or regulatory duty,
- iv Constitution of proofs in order to guarantee the regular exercise of rights, inclusive in contract and in judicial lawsuit, administrative and arbitral,
- v Minasligas exclusive use, denied its access by third person, and since the data are anonymized,
- vi Transfer to a third person, once respected the requirements of data processing provided in Law.

7. RIGHTS OF THE DATA HOLDERS

Pursuant to the applicable legislation, in particular as provided in articles 9 and 18 of the LGPD, the Holder may request, at any time, upon petition to Minasligas:

- a) Confirmation of processing existence.
- b) Access to data.
- c) Correction of uncomplete, inaccurate or outdate data.
- d) Anonymization, blocking or elimination of unnecessary data, excessive or handled in disagreement with the provisions of this Law.
- e) Portability of the data to another service or product provider, upon express request, in accordance with the regulations of the national authority, respecting commercial and industrial secrets.
- f) Deletion of personal data processed with the consent of the data holder, except in the cases provided for in art. 16 of the LGPD.
- g) Information of public and private entities with which Minasligas as controller has shared data use.

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- h) Information about the possibility of not providing consent and the consequences of refusal.
- i) Revocation of consent.

The requests described above should be forwarded to one of the channels indicated in item 10 - CONTACT US.

Minasligas will keep personal data for as long as necessary to carry out its activities. However, the Company may retain certain information as required by applicable law.

When there is no basis for further processing of personal data, they will be deleted or anonymized in accordance with applicable laws.

8. SAFETY MEASURES ADOPTED BY THE COMPANY

The Company is committed to ensuring the confidentiality, protection and security of the personal data of its Data Holders by maintaining sufficient security, technical and administrative measures to protect the personal data of employees from unauthorized access and from accidental or unlawful destruction, loss, alteration, communication or any form of inappropriate or unlawful processing, as well as requiring other processing agents to whom their personal data may be shared to adopt the same measures indicated herein.

Minasligas has systems and equipment in place to ensure the security of Data, creating and updating procedures to prevent unauthorized access, accidental loss and/or destruction of personal data, pursuant to Article 46 of the LGPD, and undertakes to comply with the legislation on the protection of the Holders' personal data and to treat such data only for the purposes for which they were collected, as well as to ensure that such data is treated with adequate levels of security and confidentiality.

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In this regard, the Company has appointed a Data Protection Officer to monitor compliance with the applicable policies and standards on personal data protection, being:

- ★ Name: Mr. Luís André Vilela
- ★ Contact email: lgpd@minasligas.com.br
- ★ Position: Data Manager

It is also important to reinforce that the Company maintains, with the third parties with whom it shares data, a contractual relationship with guarantee requirements and privacy standards compatible with those practiced by Minasligas.

The database formed through the collection of Personal Data is under the responsibility of the company, and its use, access and sharing, when necessary, will be done within the limits and business purposes described in this Policy.

Every employee must undertake to oversee its application and observance. Access to the Systems which contain data will be restricted to the employees who depend on them for the performance of their tasks, by means of strict control which identifies the authorized users. Thus, access to the System will be assigned according to the user's profile, and access to certain files may be restricted due to the position held by Employees.

The access to the systems will be controlled by the IT area and will be under the supervision of the Information Technology Manager, who will be in charge of assigning access passwords to the network.

The access to the system will only be allowed through the insertion of the login and password, which are personal and non-transferable.

In the event of a Data breach, as well as improper handling, the employee should contact the Data Controller as indicated in this Policy.

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Minasligas shall notify the National Data Protection Authority (ANPD) and/or the data subject in the event of any security incident that may lead to relevant risk or damage, as per article 48 of Law N. 13,709/2018.

9. DATA PRIVACY RISK MANAGEMENT

The company adopts a contingency plan aimed at guiding the conduct of its employees in case of leakage, inadequate treatment of the Data and invasion of the systems by hackers.

Human failure, although inevitable, is mitigated through the adoption of manuals and internal policies aimed at guiding the conduct of employees in the performance of activities with the Company, in order to prevent them from treating the data inappropriately and/or leaking it. The invasion of systems by hackers is mitigated through the use of firewall and antivirus.

10. CONTACT US

The holder may contact Minasligas for further information regarding the treatment of his/her personal data, as well as any questions related to the exercise of the rights attributed to him/her by the applicable legislation and, in particular, those referred to in this Policy, through the following channels:

E-mail: lgpd@minasligas.com.br

Address: Rua Maria Luiza Santiago, nº.200 – 20º. Andar - Belo Horizonte – MG
– Brasil

Telephone: 55 31-3261-9519

Minasligas' site: www.minasligas.com.br

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11. CHANGES IN THE PERSONAL DATA PROTECTION POLICY

The Company reserves the right to make changes or updates to this Policy at any time.

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