

 <b>Code</b> <b>P-LGPD-001</b>	<b>LGPD PRIVACY POLICY</b>	<b>Issued</b> <b>08/10/2024</b>	<b>Classification</b> <b>Use</b>
		<b>Version</b> <b>5.0</b>	<b>Approved by:</b> <b>José Antonio R.S</b>

## LGPD PRIVACY POLICY

When you are hired by BBC, contract a product/ service, or receive a service from us, you provide us with some personal data (data of natural persons) in order to make your operation viable. BBC values the security of your data, respecting your privacy and transparency with you, and therefore, we dedicate this document to explain how your personal data will be treated by BBC and what measures we apply to keep it safe.

We are BBC INDUSTRIA E COMERCIO LTDA, registered with CNPJ under nº 53.350.047/0001-41, located at Estrada Municipal Bento Pereira de Toledo, 2001 – Itupeva – São Paulo, and according to definition provided by General Law for Protection of Data (“LGPD”) (Federal Law nº 13.709/2018), most of the time we will be the controller of your information, being therefore responsible for defining what happens to your personal data and for protecting them.

To facilitate the understanding of this policy, whenever you find terms “BBC”, “we”, “our”, we are referring to the Administrator of your personal data, and whenever you read “user”, “you”, “your”, we refer to you, our employees, suppliers, or customers (natural person) user of our platforms.

**Administrator** BBC INDUSTRIA E COMERCIO LTDA, represented by Mr. **José Antônio Ramos da Silva**, Superintendent Director, who, considering the sanction of LGPD (Federal Law nº 13.709/2018), as well as need of safeguards, appoints the person in charge for Processing of Personal Data, hereinafter “**Responsible**” Ms. Renata Oliveira Brostel, under the terms of article 23, item I of LGPD, whose activities are described in article 41, §2º of LGPD (*I – accept complaints and communications from holders, provide clarifications and adopt measures; II- receive communications from the national authority and adopt measures; III- guide the entity’s employees and contractors regarding the practices to be taken in relation to the protection of personal data; IV- perform other duties determined by the controller or established in supplementary rules*).

To support the **Responsible**, **Privacy Committee** was created, a technical support group composed of the following members: Renata Oliveira Brostel, Claudineia Marroffino de Souza, Pamela Carvalho, Gabriel Barros dos Santos, Gisele Lopes, Leonardo Guilherme Adão e Rafael Green, whose attributions are:

- I- Offer opinions on privacy and protection of personal data in cases where it is consulted by the Responsible.
- II- Decide, as a group and vote, on the resolution of incidents, and proposals to change the Privacy Policy.
- III- Periodically hold meetings for continuous monitoring of the culture of privacy, always recording the discussions and deliberations, in formal Meeting Report.

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The **responsible** person and the members of the **Privacy Committee** must be respected, capable people, familiar with the legal validity and full effectiveness of the LGPD (the entirety of its provisions), which from August 2021 includes both the proper structuring of the regulatory ANPD and the authority and the possibility of effective application of administrative penalties.

**Operators** are all internal and external contributors who are in some way involved in the processing of personal data on behalf of the “BBC”.

The **administrator** and **responsible** party are responsible for regulating how internal and external contributors must collect, use, store, disclose and destroy personal information.

This regulation is carried out through orders and registration of personal data processing operations in the company, that is, mapping of the life cycle of personal data according to the order contained in Article 37 of the LGPD (**Mapping**), still in accordance with the corporate governance and undertaking of risks.

The **responsible** person and the **Privacy Committee** must carry out the procedure for checking the legal framework of the processing of personal data every 4 (four) months, or earlier, when necessary, by readjusting the mapping.

When **mapping**, when the legal basis attributed to the processing of personal data is the legitimate interest, an assessment of this treatment in kind must be carried out (weighing test or LIA - legitimate interest assessment). Also, if a certain operation has a high risk of misuse or leakage, for example, dealing with a large volume of sensitive personal data or personal data critical to the holders (cases of high risk to the guarantee of civil liberties and fundamental rights of the holders), or even on demand from the ANPD or Judicial, an assessment of the risk in kind (RIPD - Data Protection Impact Report) must be carried out.

## WHAT PERSONAL DATA MAY BE COLLECTED BY THE BBC

During your purchase or negotiation experience, we may collect various types of personal data necessary for performance, automatically or not, for the purposes of verification, monitoring and control, or provided directly by you, such as to implement registration. See below which personal data we can collect and treat:

<b>1. Name</b>
<b>2. Gender</b>
<b>3. Citizenship</b>
<b>4. Birth date</b>
<b>5. Marital status</b>
<b>6. Wedding certificate</b>

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<b>7. Birth certificate</b>
<b>8. ID</b>
<b>9. CPF (Taxpayer Identification number)</b>
<b>10. CNH (Driver's License)</b>
<b>11. PIS (Social Integration Program)</b>
<b>12. ID (professional registry)</b>
<b>13. Parents' names</b>
<b>14. Email</b>
<b>15. Landline</b>
<b>16. Cellphone</b>
<b>17. Address</b>
<b>18. Bank Data</b>
<b>19. Job Title / Function</b>
<b>20. Current Compensation</b>
<b>21. Signature</b>
<b>22. Photo</b>
<b>23. Health data, including dental</b>
<b>24. Proof of Residence</b>
<b>25. CTPS (employment booklet)</b>
<b>26. Voter Registration (card)</b>
<b>27. CV / certificate of enrollment</b>
<b>28. Footage</b>
<b>29. GPS location</b>
<b>30. Biometry</b>
<b>31. IP Address (Internet Protocol)</b>
<b>32. Cookies - connection logs</b>
<b>33. SUS (Single Health System) card</b>
<b>34. Proof of service taken from partner/covenants</b>
<b>35. Course enrolment / benefit</b>
<b>36. Military service status certificate</b>
<b>37. Serasa (databank for credit protection) Score</b>
<b>38. Pefin/Refin</b>

In specific cases involving prior consent, if you give us permission to process your personal data, you can withdraw that permission at any time by using our direct channel with the BBC's Privacy Officer by emailing **dpo@bbcind.com.br**

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## HOW THE BBC MAY USE YOUR PERSONAL DATA

We use your personal data to perform a contract and/or to provide a quality service. Listed below are the purposes for which we may use your personal data.

### Registration information:

- To enable the execution of your employment contract and ancillary obligations.
- To enable the provision of different services or supply of products, such as contracts for industrialization, among others.
- To develop new features and improvements, improving your experience with our services and products.
- To carry out investigations and measures to prevent and combat means of payment fraud.
- To secure compliance with a legal or regulatory obligation or to ensure the regular exercise of the BBC's rights. In these cases, we can even use and present the information in judicial and administrative proceedings, if necessary.
- To collaborate with the fulfillment of a court order, from a competent authority or from an inspection agency.

### Geolocation:

- For locating company assets, in case of loss or theft.

### Navigation Data:

- To assist in diagnosing and solving technical problems.
- To develop new features and improvements, improving your experience with our services and products.

## WITH WHOM BBC MAY SHARE PERSONAL DATA

In order to carry out the activities listed above, where necessary, we may share your personal data with other service providers, partner companies or regulatory authorities. We will never use your personal data for commercial purposes. A summary of these options is presented below.

In order to be able to perform an employment contract or to provide our products and services qualitatively, we rely on the cooperation of various service providers who process the personal data collected on our behalf and in accordance with the rules of the General Data Protection Act "LGPD" (Federal Law No. 13 709/2018). These service providers act principally for the operation of the company in respect of the administrator's compliance with legal or regulatory obligations and the performance of contracts or preliminary procedures relating to contracts.

Other shares that may arise are with judicial, police or government authorities, in accordance with a legal order, cases where we need to provide the personal data in our

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databases, i.e., to comply with requests from administrative authorities, regulators, and to act in cooperation with government authorities.

## PERSONAL DATA STORAGE AND SECURITY

We store your data securely in data centers located in Brazil, adopting all applicable legal measures to ensure the protection and confidentiality of your personal data.

It is important that the data holder feels secure because we will adopt the best techniques to protect the personal data collected from unauthorized access, such as destruction, loss, alteration, communication or any form of inappropriate or unlawful treatment. However, we emphasize that any information security activity is not completely secure. If you have any concerns or suspects that your data is at risk, please contact us through our channel with the **Responsible**, [dpo@bbcind.com.br](mailto:dpo@bbcind.com.br). Our role is to help you with protective measures.

Your personal data will be stored for as long as you are a participant or user of BBC experiences. After this time, we may retain your personal data for a further period for contractual, legal or audit purposes, and to enable compliance with regulatory obligations. We will store your personal data in accordance with the rules, respecting the terms established in the applicable legislation.

Personal data will be held for as long as you are an active employee, supplier or customer of the BBC, subject to the terms of the mapping carried out and approved by the Superintendent Director, representing BBC, and this process must be reconfirmed by the **Responsible** every 4 (four) months or sooner, if necessary. The retention periods (most often 3 years or 5 years) of your personal data are for contractual, legal or audit purposes, as well as to ensure compliance with regulatory obligations. We will store your data in accordance with the rules, respecting the terms established in the applicable legislation.

## COOKIES AND MONITORING TECHNOLOGIES

We may use certain tracking technologies to collect information about activities carried out on our platforms and as a result of your experience with us. Information collected through technologies is used to perform metrics and identify usage problems.

May be present:

- **Cookies:** A cookie is a small file added to a user's device to provide a personalized access experience. Cookies help us analyze internet traffic and allow us to understand when a user has visited a particular website. The cookie does not give access to a computer and does not reveal information beyond the data that the user chooses to share with us.
- **Analytics tools:** These tools may collect information about how users visit company applications.

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## INTERNATIONAL TRANSFER OF PERSONAL DATA

Some of your personal data may be transferred to other countries, for example when we use cloud services for data processing or storage. In cases where the BBC carries out international data transfers, measures will be adopted to ensure that the processing operation is carried out in accordance with the LGPD and the International Data Transfer Regulation, approved by Resolution CD/ANPD No. 19, of August 23, 2024.

## YOUR RIGHTS AS A HOLDER OF PERSONAL DATA - CONSENT

Transparency in the handling of your personal data is a priority for the BBC. In addition to the information provided in this LGPD Privacy Policy, you may also exercise the rights provided for in the General Data Protection Act "LGPD" (Federal Law No. 13.709.2018), including: Confirmation of the existence of personal data processing; Access to personal data; Withdrawal of consent; Correcting incomplete, inaccurate or outdated personal data; Deletion of personal data processed without consent or unnecessarily, excessively or when it is understood that any point of the LGPD has not been complied with; Information about the possibility of not providing consent and the consequences of the refusal, where applicable.

We are responsible. We will ask for your express consent to process or share sensitive personal information, such as minors' personal data, confidential medical data, racial or ethnic origin, religious or philosophical beliefs, political views, trade union membership, genetics, biometrics and health or gender life. Once consent has been given, the holder will always have the option to withdraw it at any time.

All requests will be processed free of charge and will be subject to a preliminary assessment of their identity and the feasibility of the service in order to comply with any obligations that prevent the full fulfillment of rights holders' requests.

## STORAGE AND DELETION OF YOUR PERSONAL DATA

We will treat your personal data with high levels of protection and guarantee your privacy. Where applicable, and even if you choose to delete your personal data from our database, the BBC may retain some or all of your personal data for further periods to comply with legal or regulatory obligations, also for the regular exercise of the BBC's rights, legal cases and audit purposes of a different nature, always for specific periods and based on legal grounds that justify the retention of this data.

The storage period of your personal data for later deletion will most often be 3 or 5 years.

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## CHANGES TO THIS PRIVACY POLICY

We are constantly striving to improve your experience. Thus, our data processing practices may change with the inclusion of new features and even unforeseen circumstances.

We value transparency in the way we handle your personal data. In the event of any change to the relevant privacy term, such changes will be approved by the Privacy Committee and will take effect and be binding once the new version is published on our website.

We will not restrict your rights without your explicit consent to what you have already agreed to. We always indicate the date on which the latest changes were posted and provide access, upon request to the **Responsible**, to archived versions of previous policies. If the changes are material, we will provide more prominent notice, which may include, where appropriate, an email notification of changes to the Privacy Policy.

## TALK TO THE DATA PROTECTION OFFICER

When you have any questions about the Privacy Policy, even after you have read this Policy, or need to interact with us about matters relating to your personal information, you may do so through the appropriate means:

**Responsible Email: [dpo@bbcind.com.br](mailto:dpo@bbcind.com.br)**

Finally, we clarify that the terminology DPO stands for Data Protection Officer, derived from the General Data Protection Regulation (GDPR), the law that gave rise to the topic and was approved in 2016 by the European Parliament.

<b>Elaboration:</b>	<b>Approval:</b>		<b>Date</b>
Renata Brostel	José Antonio Ramos da Silva	Privacy Committee	October 8 <sup>th</sup> 2024
R&D Manager	Director		