

# PRIVACY AND PERSONAL DATA PROTECTION POLICY

#### INTRODUCTION

Becomex prioritizes the correct and secure handling of data in its business model, and this is no different for your personal data.

Therefore, in order to make transparent the way we collect, process, and discard your data, we have prepared this Privacy and Personal Data Protection Policy so that you can browse our website safely and comfortably.

We recommend that you read this Privacy and Personal Data Protection Policy and, if you have any questions, suggestions, or requests, please contact us at privacidade@becomex.com.br.

# PRIVACY AND PERSONAL DATA PROTECTION POLICY SUMMARY

This Privacy and Personal Data Protection Policy aims to clearly demonstrate how we receive, use, share, and process the personal data and information that we collect through the forms on our website. In this document, you will also find the channels that we make available for you to contact us to verify what data we store that belongs to you and to exercise any of your legally provided rights.

#### Please see below the sections of this policy:

- · What information we collect about you;
- How we collect your personal data;
  - Cookies:
  - How to manage Cookies;
- How we use your information;
- Data sharing;
- Becomex's responsibility and how we protect your personal data;
- How long we will keep your information with us;
- Guarantee of Your Rights;
- Data Protection Officer;
- Changes to this Privacy and Personal Data Protection Policy;
- Contact us.

# WHAT INFORMATION WE COLLECT ABOUT YOU

Ensuring information security and the privacy of your data is in Becomex's DNA. We are committed to protecting all information and data that comes to us, by any means, and we take the task of keeping all information secure seriously and transparently.

Our website's architecture is designed not to collect any sensitive data about you, so any information or data of this nature should not be included in any document submitted through online forms.

To provide you with an excellent experience when browsing our website, we need to collect some information that belongs to you, in order to improve your interaction with us.

### Some of the information we may collect while you browse our website is:

- How you use or how often you visit our website.
- How you use our services and products and interact with us.
- Corporate contact information (email, telephone), company, position, and other information provided by you.
- Personal information such as name, phone, personal email, and information available in your resume when you apply for a vacancy through our website.
- Cookie and tracking information such as location data, IP address, browser type, device identifier, etc.
- Information you provide on our online forms.

We may also receive information from external sources, such as partners or customers. In this case, we guarantee that once we have the data in our database, we will subject it to the same protection rules as if it had been collected by us.

#### **HOW WE COLLECT YOUR PERSONAL DATA**

We can collect your data and information in basically two ways:

Through your interaction with our website (cookies) and the information you fill in web forms:

Browsing cookies.

#### **BROWSING COOKIES**

We would like to clarify that allowing browsing Cookies on your device does not give us access to the device or any of your data and information stored on your machine.

The use of browsing Cookies serves only to improve our relationship through our portals, so that you receive content that is relevant to you and that, by doing so, we can deliver greater value to you and make our website and our content more efficient.

#### **HOW TO MANAGE COOKIES**

By using this website, you agree to our Privacy and Personal Data Protection Policy. This also clearly indicates your consent to our placing browsing Cookies on your device to improve the efficiency and reach of our website's content.

However, you are allowed to manage and control the Cookies on your device in all the ways that are currently available for this purpose, such as controlling them through your browser, using private browsing, blocking location tracking, etc. However, please remember that removing or blocking cookies may have an impact on your user experience and parts of this website may not be fully accessible once Cookies are blocked.

#### **HOW WE USE YOUR INFORMATION**

Becomex uses the data and information collected about you, always in compliance with applicable legal requirements and respecting the balance of legitimate interests of all parties involved.

# By browsing our website, you agree to our Privacy and Personal Data Protection Policy and authorize the use of the collected data for the following purposes:

- Monitoring access to adapt content of greater relevance related to our products and services;
- Improving and personalizing our products and services;
- Managing and responding to contacts made through the website;
- Managing and improving our website;
- Including your data in our talent pool.

#### The collected data may be used to improve the relationship between Becomex and its customers or potential customers. Therefore, the use of data and information may involve:

- Sending marketing content related to our products or services that we understand may be of interest to you based on your browsing behavior on our website. We emphasize that you can unsubscribe from receiving this content by selecting the "unsubscribe" option;
- Contacting you to receive feedback on our products, services, and system features;
- Contacting you for market research purposes;
- Strengthening business ties;
- Protecting our rights and those of our customers.

#### **DATA SHARING**

The data and information collected from your access to our website may be shared with other companies in our group or with our business partners, referred to as operators, in compliance with agreements and commitments that guarantee the security and privacy of your information, as well as applicable laws.

Becomex may share data and information with its suppliers, such as data centers and cloud services, specifically for the storage of such information. It is important to note that some of these recipients may be located outside of Brazilian jurisdiction, where laws may be less stringent regarding the protection of personal data or information security in general. In such cases, Becomex ensures that it will take all necessary measures to protect the information in accordance with its legal and contractual obligations.

Finally, in addition to the situations indicated above, Becomex may share your data when ordered to do so by a government or legal authority, in accordance with the jurisdictions to which it is subject.

## BECOMEX'S RESPONSIBILITY AND HOW WE PROTECT YOUR PERSONAL DATA

As the controller of your data under the law, Becomex is responsible for the processing as well as the processing guidelines for your data when shared with suppliers and partners, as described in the section above.

We adopt a series of measures to protect the personal data and information made available to us, including physical, electronic, and managerial security measures focused on preventing misuse, interference, or loss, as well as unauthorized access to information, modification, and improper disclosure. Our security measures include:

- It is part of our culture to process all data and information we receive with responsibility, transparency, and ethics. Therefore, our entire internal team is properly trained and qualified to follow our Information Security policies. In this way, we guarantee that we take the necessary care in all relevant areas to keep your data safe;
- We have clear and objective Information Security policies that are followed by all of our internal employees and suppliers. This gives us the administrative and technical control to restrict access to personal data, subject to the need to know.
- We are ISO27001:2013 certified and invest in our technology area to ensure that we have effective programs in place, such as firewalls, encryption, antivirus software, etc.
- We also take care of the physical security of our office, through registration of entry and exit of external personnel, security cameras, biometric access, and access control for third parties to the building.
- We guarantee the destruction or anonymization of personal information, when required by law.
- We require our business partners to have proper technical and organizational security measures in place to protect your personal information.
- We maintain an Information Security Incident Management program that provides for communication, within a reasonable time frame, to the National Data Protection Authority and the data subject in the event of any incident that may entail relevant risks or damage.
- We will comply with the guidelines, standards, and regulations issued by the

National Data Protection Authority (ANPD) for the proper and faithful processing of personal data.

Becomex is committed to strictly following the terms of the law, especially in the event of any information incident, minimizing and notifying the National Data Protection Authority (ANPD) and the data subject of any potential significant harm to their data.

## HOW LONG WILL WE KEEP YOUR INFORMATION WITH US?

Your personal data will be kept in our systems for the longest of the following periods, taking into account, in particular, the legal obligations of Becomex or group companies:

- for the period necessary to fulfill our business relationship;
- we will comply with any and all periods required by law, for example, tax laws, labor laws, and social security laws;
- fend of the limitation or forfeiture period provided for in the Civil Code or any other period that may give rise to disputes or investigations regarding our services;
- for as long as your consent is valid, in applicable cases;
- in accordance with current legislation.

#### **GUARANTEE OF YOUR RIGHTS**

You can contact us at any time to obtain information about what personal data or information we hold about you, as well as to exercise any of your rights, such as:

#### Confirmation and access to data:

The right to obtain confirmation of whether or not personal data concerning you is being processed by Becomex, and if so, the right to access your personal data.

#### Data rectification:

The right to request the correction or updating of inaccurate or outdated personal data concerning you.

#### Data deletion:

The right to have your personal data deleted from the website, subject to Becomex's legal rights and obligations.

#### Data anonymization:

The right to have your data disassociated from any and all forms of identification with its Holder, making it impossible to identify you.

#### Data blocking:

The right to temporarily suspend the processing of your personal data, when it is inaccurate or used in an unlawful manner or without complying with the proposed purposes or for unnecessary purposes.

#### Objection:

The right to object, on grounds relating to your particular situation, to the processing of personal data concerning you, subject to Becomex's legal rights and obligations.

#### Data portability:

The right to request the transfer of your personal data to another website provider of service or product, where applicable.

#### Obtain information about data sharing:

The right to obtain information about the public and private entities with which Becomex has shared your data.

#### **Obtain information about consent:**

The right to obtain information about the possibility of not providing consent and its consequences.

#### Right to obtain review of automated decisions:

The right not to be subject to any decision taken solely on the basis of automated processing (if any).

#### Right to withdraw consent:

The right to request the withdrawal of your consent to the processing of your data by Becomex.

The information above may be requested at any time by the Holder by sending an email to: privacidade@becomex.com.br.

Please note that your request will always be answered within a reasonable timeframe, as required by law. However, there are situations in which your data may not be deleted or destroyed, such as:

- Conflict with any other law or regulation in force that requires Becomex to retain the data.
- The existence of a contractual relationship established between the Holder and Becomex, where only the termination of the contract would allow the deletion of the data, subject to legal and regulatory obligations.
- The existence of judicial, administrative or arbitration proceedings, where the data may be mandatory for the progress of the proceeding.

#### **DATA PROTECTION OFFICER**

All information related to the processing of Personal Data, as well as the guarantee of the rights of the Holder indicated in this policy, will be handled by the Data Protection Officer appointed by Becomex, in this case represented by:

Data Protection Officer: ALBES Brasil LTDA

**E-mail:** privacidade@becomex.com.br

# CHANGES TO THIS PRIVACY AND PERSONAL DATA PROTECTION POLICY

We may amend this Privacy and Personal Data Protection Policy in accordance with our internal needs or in accordance with legislative changes that lead us to update this policy.

The version of the policy can always be confirmed at the end of the pages by reviewing the document with the date of the last change.

Therefore, we recommend that you return to this policy periodically to ensure that its terms are still current.



#### **CONTACT US**

If you have any questions, concerns, or complaints regarding data privacy, please contact us at privacidade privacidade@becomex.com.br.