

PRIVACY POLICY – WHISTLEBLOWING PORTAL

Contato Seguro Prevenção de Riscos Empresariais LTDA

The Privacy Policy of the **Whistleblowing Portal of Contato Seguro Prevenção de Riscos Empresariais LTDA (CNPJ: 10.916.727/0001-77)** was created to demonstrate the interest and commitment of the digital platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA** to the privacy and security of the data and information collected from its users, as well as to ensure transparency regarding the collection and use of such data in the performance of its activities.

This document aims to clarify the general conditions for processing (collection, use, storage, etc.) and protecting personal data voluntarily provided by **Users** (Data Subjects) during their registration on the digital platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA**. The processing of such data is fully compliant with current Brazilian legislation regarding personal data protection, including, without limitation, **Law No. 12,965** of April 23, 2014, and **Decree No. 8,771** of May 11, 2016 (“Brazilian Civil Rights Framework for the Internet”), and Law No. 13,709 of August 14, 2018 (“General Data Protection Law” or “LGPD”).

Questions specifically related to personal data protection should be addressed to lgpd@contatoseguro.com.br, to the attention of Tomás Petter, DPO (Data Protection Officer).

It is essential that the **User** carefully reads this document. By using the platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA**, the User **freely, informedly, unequivocally, expressly, and fully** agrees to this Policy.

1. SCOPE:

The Privacy Policy of the platforms of **Contato Seguro Prevenção de Riscos Empresariais LTDA** applies, without restriction, to all **Users**. Data will be collected at the time of registering interest in using the platforms or upon final registration for use.

Both the collection and maintenance of data are essential for using the platforms, as they unequivocally establish the account holder’s identity, level of access and hierarchy, and powers of representation of the Organization they declare to legally represent.

2. INFORMATION THAT MAY BE COLLECTED:

It is important to note that providing data is done **voluntarily** by the Data Subject, who demonstrates interest in using the digital platforms of Contato Seguro Prevenção de Riscos Empresariais LTDA through registration. In other words, the interest in using the platforms motivates the Data Subject to voluntarily provide the necessary personal information and data for the provision of services.

The WEBSITES of Contato Seguro Prevenção de Riscos Empresariais LTDA may collect information actively entered by the Data Subject at the time of contact or registration, as well as information automatically collected when using the services and network, such as browser used, IP with date and time of connection, among others.

Thus, two types of personal data are processed: (a) data provided by the Data Subject; and (b) data collected automatically.

(a) Personal data provided by the User: The WEBSITES of **Contato Seguro Prevenção de Riscos Empresariais LTDA** may collect all personal data actively entered or submitted by the User when making contact, such as full name, email, CPF (Brazilian Individual Taxpayer Registry), date of birth, phone number, and data required for the execution of specific programs, when filling out forms.

(b) Automatically collected data: The WEBSITES of **Contato Seguro Prevenção de Riscos Empresariais LTDA** also automatically collect a series of information, such as: device characteristics, browser type, IP (with date and time), IP source, clickstream data, accessed pages, search terms entered on our portals, among others. These are used to improve the Data Subject's browsing experience, according to their habits and preferences.

The following personal data may be requested from the **User**: full name, email, date of birth, CPF, and phone number.

We do not intentionally collect, store, or otherwise process excessive or unnecessary personal data for the purpose for which it was collected, nor sensitive data (related to racial or ethnic origin, religious beliefs, political opinions, trade union membership, health, sexual orientation, or genetic data), nor data from children or adolescents. Therefore, we ask you to carefully assess the real necessity of providing certain personal data. If we deem the provided data unnecessary for the intended actions, we may delete it, subject to the Controller's authorization.

3. WHO CONTROLS YOUR DATA?

If you provide your data through the hotsite prepared by us for our clients, **Contato Seguro Prevenção de Riscos Empresariais LTDA** will act solely as the **PROCESSOR** of the personal data, processing the data according to the purposes and legal bases determined by the Controller, which is the company to which you are reporting and to which your data will be forwarded for review and compliance with applicable legal measures.

Therefore, it is important to note that it is the **DATA CONTROLLER's** responsibility, and not Contato Seguro's, to address requests from Data Subjects regarding their rights under the General Data Protection Law. **Contato Seguro Prevenção de Riscos Empresariais LTDA**, as the **PROCESSOR**, will always be responsible for forwarding notifications received to the **CONTROLLER**, which is the party authorized to take appropriate action.

You must be aware of this information to understand who is responsible for receiving your inquiries and requests. If you direct them to **Contato Seguro Prevenção de Riscos Empresariais LTDA**, we will be responsible for forwarding them to the Controller.

4. LEGAL BASIS AND PURPOSE FOR PERSONAL DATA PROCESSING

As a Processor, **Contato Seguro Prevenção de Riscos Empresariais LTDA** will process personal data in accordance with the legal bases determined by the Controller, and the Data Subject has the right to request more information about the legal bases authorizing the processing of the provided data.

Nevertheless, in the interest of ensuring transparency in our activities, we inform you that the main legal bases used will include:

- a. Data Subject's consent;
- b. Necessity for contract execution and service provision;
- c. Compliance with legal or regulatory obligations; and
- d. Collection and processing of data to safeguard and preserve the legitimate interests of Contato Seguro Prevenção de Riscos Empresariais LTDA, as well as the interests of third parties for which it is responsible in some way.

The collected data will be processed for specific purposes, such as:

- a. allowing the Reporter/User to register a report and/or complaint on the platform;
- b. confirming their identity; and
- c. ensuring communication between the User and the reported companies, as well as enabling commercial and/or support contact with Contato Seguro Prevenção de Riscos Empresariais LTDA.

5. DATA SUBJECT RIGHTS

As Data Processors, we act in cooperation with the Data Controller to ensure the exercise of your rights as provided under applicable law. Thus, as a *User*, you may request from Contato Seguro:

- a. confirmation of whether your personal data is being processed;
- b. access to your data;
- c. correction of incomplete, inaccurate, or outdated data;
- d. anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- e. portability of your data to another service or product provider, subject to trade and industrial secrets;
- f. deletion of your personal data, except in cases provided for under applicable law, to exercise the rights of **Contato Seguro Prevenção de Riscos Empresariais LTDA** and to comply with legal requirements;
- g. information about the public and private entities with which **Contato Seguro Prevenção de Riscos Empresariais LTDA** has shared your data;
- h. information about the possibility of not providing consent and the consequences of refusal;
- i. revocation of your consent, when provided, subject to public interest or other legal bases justifying continued processing; and
- j. objection to any processing of personal data based on exceptions to consent, in cases of non-compliance with applicable law, subject to public interest that may justify continued processing.

Requests for deletion may be submitted in two ways:

- a. Through the report protocol: **Users** should access the protocol consultation area, using their report protocol, and follow the “personal data removal” instructions. Access is via the website <https://www.contatoseguro.com.br>;
- b. Through direct contact with Contato Seguro: Users should send an email to lgpd@contatoseguro.com.br requesting deletion of their personal data related to a specific report. To validate authenticity, the **User** must provide an identity document (passport, RG, CNH, or CPF), the reported company’s name, and the report creation date. Contato Seguro specialists will validate the request.

Regardless of the requested action, **Contato Seguro Prevenção de Riscos Empresariais LTDA** will forward the request for review by the Controller. Failure to do so may risk violating rights guaranteed to the Controller under Law 13.709/2018.

6. STORAGE AND PROCESSING OF PERSONAL DATA

Contato Seguro Prevenção de Riscos Empresariais LTDA adopts technical and administrative security measures to keep all stored data secure, using internal guidelines, confidentiality clauses, and strict access controls.

Data access is only granted according to real need, with access levels strictly controlled within **Contato Seguro Prevenção de Riscos Empresariais LTDA**. Specifically regarding data collected through our digital platform, it is stored, processed, and protected using best practices in hosting and data processing.

Despite all efforts and procedures used by **Contato Seguro Prevenção de Riscos Empresariais LTDA**, the Data Subject must be aware that no Internet security system is completely inviolable against unwanted intrusions. Our commitment is limited to adopting protective measures recommended by the current state of the art.

It is important to note that **Contato Seguro Prevenção de Riscos Empresariais LTDA** has an environment certified by **ISO/IEC 27001:2022**, ensuring greater security for collected and stored information.

7. INTERNATIONAL TRANSFER OF PERSONAL DATA

The platforms of the **Whistleblowing Portal** of **Contato Seguro Prevenção de Riscos Empresariais LTDA** do not transfer the information included in reports, including personal data, to other countries or international organizations. All storage and processing are carried out on servers located in Brazil.

However, **Contato Seguro Prevenção de Riscos Empresariais LTDA.** uses Google's environment (<https://policies.google.com/privacy>) for storing administrative documents, including Google Drive, whose hosting is not located in Brazil. Only administrative documents and notifications from data subjects are stored in this environment, for historical purposes and to preserve the legitimate interests of **Contato Seguro**, its **clients**, and the **data subjects** themselves.

Additionally, **Contato Seguro Prevenção de Riscos Empresariais LTDA** may offer optional tools assisted by artificial intelligence resources, the use of which is decided by the Data Controller. Considering that the main market providers of **Large Language Models (LLMs)** do not host or store data in Brazil, specific applications may involve international data transfer. Examples include Google Gemini, OpenAI's ChatGPT, and Anthropic's Claude.

Should any additional international transfer be necessary, particularly for technology improvements or new functionalities chosen by the Controller, **Contato Seguro Prevenção de Riscos Empresariais LTDA** will only carry it out with countries that ensure the same standards of information security and personal data protection, and in accordance with the guidelines of the Brazilian **National Data Protection Authority (ANPD)**.

8. COMPLIANCE WITH INTERNATIONAL LEGISLATION

For Users residing in the **European Union**, personal data will be processed in compliance with the **General Data Protection Regulation (GDPR)**. This means we guarantee transparency in processing, respect for data subject rights, and the adoption of security measures to protect your privacy.

Users may also exercise their **GDPR** rights, including access, rectification, portability, erasure, and objection to processing.

For Users residing in the **United States**, particularly in **California**, our company complies with the **California Consumer Privacy Act (CCPA)**. We ensure Californian consumers the right to know which data is collected, request deletion, refuse data sale, and demand transparency regarding data use. In compliance with the CCPA, we do not discriminate against Users who choose to exercise their privacy rights.

Additionally, other **U.S. states** are enacting their own privacy laws, such as the **CDPA (Virginia)**, **CPA (Colorado)**, **CTDPA (Connecticut)**, and **UCPA (Utah)**. Our company is committed to analyzing and

applying these regulations on a case-by-case basis, when necessary or upon request, ensuring compliance with applicable data protection laws.

9. DATA RETENTION PERIOD

We store and retain your information: (i) for the period required by law; (ii) until the end of personal data processing, as described below; (iii) for as long as necessary to preserve the legitimate interests of **Contato Seguro Prevenção de Riscos Empresariais LTDA**, as applicable; (iv) for as long as necessary to protect the regular exercise of rights of **Contato Seguro Prevenção de Riscos Empresariais LTDA** in judicial, administrative, or arbitral proceedings; and (v) for the period determined by the Data Controller, based on its legal grounds such as legitimate interest, legal defense, or other applicable bases.

The termination of personal data processing will occur in the following cases:

- a. When the purpose for which the personal data was collected has been achieved and/or the data is no longer necessary or relevant;
- b. When the Data Subject withdraws consent or requests termination and deletion, provided no other legal ground justifies retention;
- c. When the contract with the Controller of the Whistleblowing Portal ends; and
- d. When there is a legal determination to do so.

Some data submitted via **Contato Seguro Prevenção de Riscos Empresariais LTDA** websites may be deleted during routine record maintenance. We are not obliged to store personal data indefinitely and disclaim any liability for destruction of such data. On the other hand, we will comply with the Controller's determinations, when applicable.

As previously stated, **Contato Seguro Prevenção de Riscos Empresariais LTDA** acts as a **PROCESSOR** of personal data. Therefore, data will only be removed through: (i) request by the Data Subject and review by the Controller; (ii) direct request by the Controller; and/or (iii) contract termination. In this last case, deletion requires the Controller to receive a backup of the data and sign a receipt, to ensure no loss or unrecoverable deletion occurs, preserving legitimate interests.

10. COMMUNICATION POLICY

We do not have a policy of sending unsolicited emails or emails that are not directly related to the activities we perform.

11. CONNECTIONS TO OTHER SITES

The digital platform may allow connections to third-party websites intended to facilitate User use, even if not directly related to ***Contato Seguro Prevenção de Riscos Empresariais LTDA.***

However, such connections are not made by systems owned by ***Contato Seguro Prevenção de Riscos Empresariais LTDA.*** They are external systems over which ***Contato Seguro Prevenção de Riscos Empresariais LTDA.*** has no control, including in matters of information security.

Since linked sites are not part of ***Contato Seguro Prevenção de Riscos Empresariais LTDA.***, we do not control, recommend, or endorse their content, products, services, policies, or privacy practices. We do not have access to personal data collected and processed by them, nor to their advertising, cookie, or terms of use policies. Therefore, we recommend that Users carefully read those third-party documents.

12. INCIDENT RESPONSE PLAN

Contato Seguro Prevenção de Riscos Empresariais LTDA. has an Incident Response Plan describing how the company should act in the event of situations such as cyberattacks, data leaks, malicious applications (e.g., viruses), or violations of company security policies and standards.

If an incident is detected or suspected, the Incident Response Plan must be initiated and its steps carried out.

13. CONTACT WITH THE DATA PROTECTION OFFICER

Contato Seguro Prevenção de Riscos Empresariais LTDA. has designated a Data Protection Officer to manage the communication channel with Data Subjects. If you have any questions regarding this Privacy Policy or the processing of your personal data, please contact our DPO, **Tomás Petter**, at lgpd@contatoseguro.com.br.