



TECHNICAL INSTRUCTION

SQ-00-PPD-01

PRIVACY POLICY

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DISCIPLINE:	PRIVACY AND DATA PROTECTION	DATE:	Jan. 29, 2025

1. OBJECTIVE

Estaleiros do Brasil Ltda. (EBR) understands that Personal Data Protection is essential to guarantee the right to privacy.

The purpose of this Technical Instruction is to establish the rules for Handling Personal Data collected in interactions with **EBR**.

EBR treats personal data always safely and transparently. To demonstrate the commitment and respect to privacy, **EBR** has established this **Privacy Policy**, which applies to all data holders.

2. SCOPE

This Policy applies to all those who have personal data processed by **EBR**, by physical or digital means. This Policy applies to administrators, professionals and third parties, establishing the ways of Processing the Personal Data made available and shared, with which **EBR** interacts in the development of its business activities.

3. TERMS AND DEFINITIONS

ANPD

It is the National Data Protection Authority responsible for overseeing compliance with the General Data Protection Law in Brazil.

Anonymization

Use of reasonable technical means available at the time of processing, through which data loses the possibility of direct or indirect association with an individual.

Consent

It is the free, informed and unequivocal manifestation by which the Holder agrees with the Processing of his Personal Data.

Controller

It is the individual or legal person, public or private, who is responsible for decisions regarding the processing of Personal Data.

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Anonymized Data

Data relating to the Holder who cannot be identified, considering the use of reasonable technical means available at the time of processing.

Personal Data

This is all information that allows identification, such as name, taxpayer identification number ("CPF"), e-mail, address, among others.

Sensitive Personal Data

Identifiable personal data relating to racial or ethnic origin, religious conviction, political opinion, union membership or organization of a religious, philosophical or political nature, data referring to health or sexual life, genetic or biometric data and when linked to a individual person.

Data Officer

It is the person responsible for taking care of data privacy and for acting as a communication channel between **EBR**, the holders and the National Data Protection Authority ("ANPD").

General Personal Data Protection Law ("LGPD") No. 13.709/2018

It provides about individuals' personal data processing, regardless of media, by individuals or public or private legal entities, aiming at protecting the freedom and privacy fundamental rights and the free development of individuals' personalities.

Operator

It is the individual or legal person, public or private, that processes personal data on behalf of the controller. The Operator, therefore, only processes the data in accordance with the Controller's guidelines.

Data Holder

It is the individual person to whom the Personal Data refer, which are the object of Treatment. Examples: customers, non-customers, former customers, professionals, former professionals, dependents, third parties, etc.

International Data Transfer

Personal Data Transfer for a foreign country or international organization of which the country is a member.

Processing of Personal Data

Means any operation, such as collection, use, access, reproduction, sharing, storage, deletion, carried out with Personal Data.



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4. PROCESSING OF PERSONAL DATA**4.1 Talent Acquisition**

EBR, in addition to advertising its vacancies on specialized websites, also receives résumés from its professionals, in addition to résumés eventually left in person at its headquarters, sent through the “Trabalhe Conosco” (Work With Us) channel or by “QR Code” available in its construction. In these situations, **EBR** will process such personal data to proceed with the selection process, verify skills, curriculum information and whether or not the candidate meets the specific requirements of the desired position.

For these activities, the personal data that will be processed can be: full name, RG, CPF, CNH, nationality, address, e-mail, telephones, education, school/academic history, qualifications and certifications, marital status, date of birth, age, position, list of first degree relatives and photo.

4.2 Data necessary for the business relationship - Customers

EBR treats the Personal Data of customers so that it is possible to make the business relationship originated by the signed contract viable.

The following data may be processed:

- Registration data: full name, CPF, RG, marital status, address, personal email and personal telephone number;
- Professional data: title/function in the company you work for, occupation, corporate email, corporate phone, competency, skill and experience data; and
- Financial data: bank, agency and account number.

This data is used for the following purposes:

- Facilitate the business relationship for the development of the entire contractual process of solutions and services, for which we carry out since the registration of the company that the data holder represents or of which he is a partner in our systems, until the elaboration of the contracts;
- Create a register in his systems with his information, facilitating and streamlining the relationship;
- Keep the registration data of the data holders duly up-to-date in their systems;
- Maintain contact with data holders;
- Collect any open (overdue) and unpaid amounts;
- Check for any irregularities to proceed with the contracting of the desired services;
- Authorize entry to construction sites.



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4.3 Business Relationships - Suppliers, Service Providers and Partners (Third Parties)

EBR processes the Personal Data of suppliers, service providers and partners so that it is possible to make the business relationship originated by the signed contract viable. The following data may be processed:

- Registration Data: signature, full name, RG, CPF, address, e-mail, telephones, date of birth, age, profession, professional identification, professional contacts;
- Financial Data: Banking Data, such as bank, branch and account number.

This data is used for the following purposes:

- Conduct a thorough assessment of suppliers, service providers and partners;
- Sign contracts and execute them in their entirety, as well as other contractual amendments;
- Register partners in their management systems and their main points of contact;
- Creation of users in management systems;
- Make payment for services taken and products purchased;
- Carry out a follow-up of the contracted service;
- Maintain an active contact channel with suppliers, service providers and partners;
- Authorize entry to construction sites.

4.4 Legal or Regulatory Obligations

In some situations, **EBR** is obliged to process some personal data to ensure compliance with legislation, such as, for example, sending invoices/electronic invoices and documents to agencies, regulatory bodies and public administration. In these cases, it will be necessary: full name, CPF, address and telephone number.

4.5 Contacts on the Site

EBR website has contact channels and forms that can be used for various purposes, such as job search, complaints, commercial questions, etc. The data entered there, when applicable, will be saved by **EBR**. In this context, the data received will not be transmitted to third parties. In these cases, the following data may be processed: name and e-mail.

4.6 Internal Procedures

In order for **EBR** to carry out its regular activities, such as financial and accounting activities, marketing, sales prospecting and the like, the following data may be processed:

- Registration data: full name, CPF, RG, marital status, address, personal email and personal telephone number;



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- Professional data: title/function in the company you work for, occupation, corporate email, corporate phone, competency, skill and experience data; and
- Financial data: bank, agency and account number.

This data is used to:

- Maintain records of business transactions and payments;
- Produce internal reports and analysis, as required;
- Ensure the security of operations and systems;
- Answer questions and queries from the Board of Management;
- Generate *leads* and prospecting opportunities;
- Send *mailings* with information about our products, events and actions, as well as sending a *newsletter* ;
- Judge or receive, register and manage legal proceedings.

5. PERSONAL DATA COLLECTION

5.1 Data Collection Channels

EBR may collect data, directly or indirectly, through the following channels:

- Direct collection: in person, by phone, by mail, by email and WhatsApp.
- Indirect collection: through partners or group companies and official entities.

When dealing with your data, **EBR** follows all the principles defined in article 6 of the “LGPD”, especially the principle of necessity, which determines that processing must be restricted to the minimum necessary to achieve its objectives, adequately and without excesses.

Register

Personal data may be collected through **EBR** forms and systems.

Site

Personal data can be collected when registering in one of the sessions available on the **EBR** website, such as (i) Contact Us or (ii) Ethics Channel (when there is identification).

Cookies

It is also possible to collect data through cookies, which consist of small text files sent by the website to the user's computer, and which remain stored there. In this way, it is possible to store information about the device used by the user, as well as the time and place of access to the website.



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6. SHARING OF PERSONAL DATA

If necessary, **EBR** may share the holders' personal data with companies from the same economic group, advertising and marketing consultancies, public bodies, such as the Federal Revenue Service, business partners and service providers.

To safeguard the privacy of holders, **EBR** uses contractual instruments and audits to ensure that third parties who receive this personal data on its behalf, grant them the same protection provided thereby.

7. INTERNATIONAL TRANSFER OF PERSONAL DATA

It is possible that there is a transfer of personal data outside Brazil. In these cases, **EBR** will certify that this transfer occurs to partners that have a degree of data protection similar to that provided for by Brazilian legislation, or, when the National Authority for the Protection of Personal Data so authorizes.

8. COOKIES

EBR may use *cookies* for different purposes, such as generating access statistics, enabling hassle-free and quick navigation on its website, and remembering your language preferences.

The cookie is a small file added to your device or computer to provide a personalized access experience, which makes it possible to analyze internet traffic and know which websites have been visited. A cookie does not give access to the computer or reveal information other than what the user chooses to share.

Categories of cookies and their respective purposes:

Types of Cookies	What do they do?
Performance	These are <i>cookies</i> that help to understand how users interact with the <i>website</i> , providing information about the areas visited, the time of visit to the website and any problems that may be encountered.
Functional	These are <i>cookies</i> that allow the <i>website</i> to remember previous user choices, such as navigation language. They are responsible for providing a personalized experience.
Marketing	These are <i>cookies</i> used to provide more relevant and specific content for the user's interest. They can also be used to show advertising with greater targeting or to limit the number of ads that are shown. Also, they allow measuring the effectiveness of a launched campaign.
Necessary	They are essential <i>cookies</i> to enable the proper functioning of the <i>website</i> , as well as to allow the user to make use of all available functionalities.



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In general, the *cookies* used collect the following information: which browser the user uses, information about their IP address, together with the date, time and duration of their visit, the pages viewed and the *links* that were clicked.

It is possible to disable *cookies* in the browser settings, but some cookies are essential for the normal operation of **EBR** website, so that opposing the use of necessary *cookies* *will limit the functionality of the website*.

9. PERSONAL DATA HOLDER'S RIGHTS

The holder of personal data has the following rights regarding his personal information:

1. Find out if **EBR** processes his personal data and which ones are processed;
2. Correct or request correction of incomplete, inaccurate or outdated data;
3. Request the anonymization, blocking or deletion of unnecessary, excessive data;
4. Request data portability from another provider of similar products or services;
5. Request the deletion of data collected and used based on his consent;
6. Obtain complete information about the public or private entities with which his data is shared;
7. When the processing activity requires consent, the data subject can refuse to consent. In this case, you will be informed of the consequences of not carrying out such activity;
8. When the processing activity requires consent, at any time, the holder may revoke it.

In order to exercise these rights, the holder must contact **EBR 's Data Officer** at the email address: lgpd@ebrbrasil.com.

10. TIME OF RETENTION OF PERSONAL DATA

EBR will retain personal data for as long as necessary to fulfill the purpose for which it was collected, unless a longer retention period is necessary to comply with legal and contractual obligations, investigations, litigation, judicial / extrajudicial settlements, and commercial and financial registrations.

11. PROTECTION OF PERSONAL DATA

EBR has strict policies and procedures that determine how personal data should be handled. Such rules are intended to ensure the proper and lawful processing of personal data.

Technical measures are also adopted to keep personal data safe and protected from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or any other form of inappropriate or unlawful treatment, always in light of the rules applicable for data protection and information security.



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These security measures are continuously monitored and revised according to the latest technological advances and organizational resources.

12. SAFETY MEASURES

EBR is committed to ensuring the security of personal data collected. To this end, technical and organizational measures are adopted to protect personal data against dissemination, loss, misuse, alteration, treatment, or unauthorized access, as well as against any other form of illicit treatment.

13. INFORMATION ABOUT THE DATA OFFICER

Data Protection Officer - DPO (*Data Officer*): Marina Ludovico Bruno

Contact email: lgpd@ebrbrasil.com.

**14. QUESTIONS**

If you have any questions, please contact our Data Officer at lgpd@ebrbrasil.com.

15. UPDATE

The information made available here may be updated or changed to reflect the reality of our operations. Therefore, please consult this Privacy Policy periodically.

16. APPLICABLE STANDARDS

None.