




External Privacy Policy 2023

Caramuru Alimentos S.A.





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1. OBJECTIVES

We at CARAMURU ALIMENTOS S.A. ("Caramuru") appreciate your trust in sharing your Personal Data with us.

We have been working for almost 60 years to provide quality products, always valuing the security of Personal Data Holders. One of the pillars that underpins our philosophy is the simplicity of management and relationship. We also emphasize that among our values are transparency in the relationship, trust, mutual respect, ethics and integrity.

We process a variety of information that may contain Personal Data. However, all treatment is carried out responsibly and in good faith, with the care that the Holders deserve. All our activities are based on the principles of purpose, necessity, transparency, security, prevention, non-discrimination, adequacy, free access, accountability and data quality, that is, in accordance with the General Personal Data Protection Law (LGPD) – Law No. 13.709/2018.

Thus, to demonstrate our commitment to privacy and data protection and in aiming to provide transparency about our Personal Data Processing operations, we provide this Privacy Policy so that you are aware of how we collect and use your personal information, as well as inform you how you can exercise your rights with respect to your personal data.

It is important that a careful reading of this Policy is made, any doubts or concerns may be directed to the email: privacidade@caramuru.com.

2. GUIDELINES

2.1 How Caramuru Processes Your Personal Data

In order for Caramuru to provide its services and perform its activities in an adequate and effective manner, it is necessary to carry out the Processing of Personal Data, and in order to give transparency to the Holders, Caramuru provides below information related to how we treat your Personal Data.

2.2 How Caramuru Collects Personal Data

Caramuru may collect your Personal Data:

- through Caramuru's professionals who work in the lines of business;
- in person;
- via phone or email;
- via the web and/or through the virtual service channels available on the website;
- when you browse our digital platforms, through the use of specific technologies such as cookies.

2.3 What Personal Data is Collected and Processed by Caramuru

For Caramuru to carry out its activities, it may use the following Personal Data, for example:

- **Registration information**, such as full name, physical or digital signature, contact information, home address, personal cell phone number, personal email, age, nationality, place of birth, marital status, photographs, affiliation, identification generated by official bodies (CPF, RG, CNH, CTPS, Passport);
- **Education and professional information**, such as curriculum, education, academic record, licenses, occupation/position, business address, business phone, business fax, business cell phone;
- **Financial information**, such as bank agency and account number, and credit card number;
- **Preference information**, such as, purchase preference;
- **Browsing information**: cookies, IP address, date and time of access to C&A digital platforms, browsing history on websites.

Caramuru acknowledges that the processing of **Sensitive Personal Data** poses a high risk to the Personal Data Holder and, for this reason, its use is restricted to the situations provided for in the legislation, or by obtaining prior, specific and highlighted consent, for the specific purpose proposed, from the holder or its legal guardian, as applicable, except in specific cases where the processing is indispensable even without providing the consent of the holder.

With regard to **Personal Data of Minors**, Caramuru processes such data only when there is the specific purpose of benefiting them, even indirectly, and only with the prior and specific consent of a legal guardian, in accordance with the LGPD.

2.4. For What Purposes Caramuru Processes Personal Data

Below are some examples of purposes for which Caramuru processes your Personal Data:

- Attending to requests and questions from Holders through Caramuru's communication channels;
- Contact by phone, email or other means of communication;
- Promotional marketing actions with customers and consumers to offer products, and the process of donating Caramuru products.
- Activities related to research and product development;
- Recruitment and selection activities and internal reporting for purposes of internal controls, audits and other administrative purposes;
- Activities related to the proper delivery and return of raw materials and products;
- Activities related to the manufacture of Caramuru's products, including interactions related to the logistics chain and claims reporting;
- Registration and financial activities, such as tax obligations, collection, reimbursement of amounts, fraud prevention and credit protection;
- Pre-contractual, contractual evaluations, compliance with legal and regulatory obligations, and exercise of rights in the judicial, administrative and/or arbitral scope, including storage of relevant documentation;
- Activities related to ensuring the physical security of people who access Caramuru's premises.

Caramuru provides a detailed report to let you know what Personal Data of yours we have in our systems, as well as an indication of the purposes for which this data is collected, and with whom it is shared. This report can be requested through the Caramuru portal <https://www.caramuru.com> or directly with our Data Processing Responsible Party by email privacidade@caramuru.com.

2.5 Why Caramuru Processes Your Personal Data

Caramuru only carries out the Processing of Personal Data provided that it is legally authorized or upon the free, express, informed and unequivocal consent of the Data Holder or duly constituted legal representative.

The activities described above are carried out in accordance with the hypotheses provided for in the General Personal Data Protection Law, indicated below:

- **upon your consent:** we use this hypothesis for cases in which the Data Holder authorizes the processing of their personal data, through terms of consent, or similar documents, such as for the authorization of use and image in Institutional Communications;
- **to comply with a legal or regulatory obligation:** we use this hypothesis to comply with legal determinations, such as issuing bills of sale, receiving indemnities in claim processes and participating in the Social Seal program;
- **for execution of contracts:** we use this legal basis for the processes related to the activities necessary to execute the signed contracts, such as for the offer and sale of our products, customer registration, logistical processes, collection, services in general and other activities related to contracts signed with customers;
- **for the regular exercise of rights:** we use this legal basis to exercise our representation in judicial, administrative and eventually arbitral discussions;
- **for credit protection:** we use this legal basis for assessing the granting of credit limits; and
- **for legitimate interests:** we use this legal basis when necessary to meet legitimate interests related to our activity, such as access to systems for maintenance, preparation of contact lists for promotional events, among other activities that Caramuru, in good faith, has a legitimate interest in and needs to process personal data.

When the processing of personal data is based on Legitimate Interest, Caramuru carries out an evaluation regarding the lawful purpose of the processing, as well as verifies if said data are really necessary for the purpose in question, always observing the fundamental rights and guarantees of the Data Holders, in accordance with the LGPD.

2.6 Storage of Personal Data by Caramuru

Caramuru may store your Personal Data for the period necessary to fulfill the purposes for which they were collected, as well as for the purposes of complying with any legal, regulatory, contractual, accountability obligations or requests from competent authorities.

The Personal Data collected is stored on our servers located in Brazil, as well as in an environment of use of resources or servers in the cloud, which may require a transfer and/or processing of this Personal Data outside the country.

2.7 Sharing of Personal Data with Third Parties by Caramuru

Caramuru may share your Personal Data to comply with the purposes stated above, as described below.

2.8 Sharing Personal Data with Partners and Suppliers

Caramuru uses third parties who assist in the operation and support of its activities.

In some cases, the sharing of personal data with these companies is necessary, for example, for the management of the logistics process, for carrying out audits and certifications, in the case of the use of carriers, for customer satisfaction surveys carried out by outsourced companies, for sales brokers, marketing agencies, for consultancies and law firms that assist us in judicial or administrative proceedings involving the Holder, among other activities.

2.9 Sharing of Personal Data with Public Bodies

Caramuru also shares Personal Data with some government agencies and bodies, such as the State Secretariat of Industry, SIC, SEFAZ (Treasury Office), the Federal Revenue Service, municipal governments, the State and Federal Public Prosecutors' Offices and Safety Secretariats. This data sharing is conducted to comply with legal or regulatory obligations to which Caramuru is subject due to the activities it carries out.

2.10 International Transfers

In some situations, it may be necessary for Caramuru to transfer your Personal Data internationally. Caramuru is responsible for ensuring compliance with the requirements of applicable personal data protection legislation when sharing.

Caramuru has means of guaranteeing that the third party that receives your Personal Data is legally committed, through the application of contractual clauses, to comply, at least, with the obligations present in the LGPD, in addition to other applicable rules, as the case may be.

Caramuru encourages the Third Parties with whom your Personal Data is shared to adopt measures and rules of privacy and protection of personal data consistent with the best market practices, monitoring them properly and constantly, to ensure compliance with current legislation and our internal policies.

2.11 What your rights are and how to exercise them

As of the entry into force of the LGPD, you, as a Personal Data Holder, may exercise your rights in relation to the Personal Data Controllers. Thus, Caramuru provides below the detailed mechanisms so that you understand in a clear and transparent way what they are and how to request them:

- **Confirmation of the existence of processing:** You can request Caramuru to confirm if it carries out the Processing of your Personal Data.
- **Data access:** You may request that Caramuru informs and provides a copy of the Personal Data that is processed.
- **Correction of incomplete, inaccurate or outdated data:** If you identify that your data is incomplete, inaccurate or outdated, you can request that Caramuru carry out the correction of the Data, for this you must present documentation that proves the correct and current form of the personal data.
- **Anonymization, blocking or deletion:** If Personal Data is treated unnecessarily, in excess or in non-compliance with the LGPD, you can request that Caramuru anonymize, block or delete this data, provided that the excess, lack of need or non-compliance with the law is effectively verified.
- **Data portability:** you may request Caramuru to transfer your personal data to another service provider and we will generate a copy in a standard information exchange format for subsequent use by other service or product providers.
- **Deletion of personal data processed with consent:** If you have given consent to the processing of your personal data for specific purposes, you may request the deletion of this personal data.

- **Information from public or private entities with which Caramuru shared data use:** You may request that Caramuru provide a list of the processing agents with whom it shares your Personal Data, whether public or private entities.
- **Information on the possibility of not providing consent and on the consequences of refusal:** If your consent is required to access or use a particular product or service, you can request Caramuru to clarify whether it is possible to provide that product or service without your consent for the processing of your personal data, or what are the consequences of not providing consent in this case.
- **Revocation of consent:** If you have given your consent for Caramuru to process your Personal Data, you can request the revocation of this authorization. The revocation of consent may result in the impossibility of providing services or even in the termination of the services provided, but does not prevent the use of (i) anonymized data; and (ii) data whose processing is based on another legal hypothesis provided for in the LGPD.
- **Automated Decision Review:** You may request the review of decisions made solely on the basis of automated processing of personal data that affect your interests and the indication of the criteria used for these decisions.

It is important to clarify that there may be exceptions to the requests mentioned above. For example, when you ask us to delete Personal Data, eventually we may be prevented from fulfilling that request, due to a legal or contractual requirement. If this happens, you will be informed of the situation.

If you wish to exercise any of these rights, you can do so through the Caramuru portal <https://www.caramuru.com> or directly with our Data Processing Responsible Party at privacidade@caramuru.com. In order to enforce your rights, we may request proof of your identity as a security and fraud prevention measure. The data provided for this verification will be used exclusively for this purpose.

2.12 Data Collection through Cookies

Specifically with regard to the collection of Cookies, it should be clarified that Cookies are small text files that applications, websites and ads store on the hard drive of your computer or device when accessing a page of the website.

The purpose of the Cookie is to identify you the next time you access the website and thus provide a personalized service according to your preferences or browsing history, and therefore provide greater practicality and functionality in your navigation.

Cookies can be of the following categories:

- **Strictly necessary cookies:** Strictly necessary Cookies are essential for the website to function properly and cannot be disabled on our systems, as without them the services you have requested cannot be provided.
- **Performance cookies:** Performance Cookies collect information from the pages accessed to understand how long you stayed on it or if it presented any type of error or unavailability.
- **Functionality cookies:** Functional cookies remember information regarding the pages of the website you have visited for the purpose of providing enhanced functionality and customizations so that you do not have to configure the website with each visit.
- **Advertising cookies:** Advertising Cookies are intended to target advertisements and advertising messages based on your interests and preferences.
- **Third Party Cookies:** Third-party Cookies are set by websites other than the website being visited.
- **Session cookies:** They refer to Cookies that are stored in the memory and not recorded on the hard drive, that is, they disappear when the browser is closed.
- **Persistent cookies:** Refers to Cookies that are stored on your computer's hard drive until they are expired or deleted by you.

Our websites may use Cookies, in these cases a statement is sent to your browser, explaining the use of Cookies and giving you the option not to accept Cookies that are not mandatory. For further definition and guidelines, the Cookies Policy will be defined.

2.13 Information Security Measures

Caramuru adopts various security, technical and administrative measures based on the best market practices to ensure the integrity and protection of your Personal Data.

Our information security team is dedicated to protecting your information through the continuous improvement of processes, always aiming to: **(i)** protect personal data from external threats; **(ii)** preserve the confidentiality of passwords; **(iii)** avoid emails or websites with suspicious or doubtful content; and **(iv)** prohibit physical or electronic access to personal data by an unauthorized person.

We have a highly qualified team responsible for ensuring that Caramuru adopts the best security practices, including:

- Continuous monitoring of the environment;
- Continuous analyses and testing of information security in systems;
- Periodic audits.

We also recommend that you never share your passwords with anyone, they are personal and non-transferable, and always be careful when posting your personal data on social networks or any other public environment.

3. REFERENCE DOCUMENTS

35027 - Data Retention and Protection Policy.

35028 - Internal Privacy Policy.

4. DEFINITIONS

- **Processing Agents:** Controller and the Operator of Personal Data.
- **Anonymization:** Use of reasonable technical means available at the time of Processing, by means of which data loses the possibility of association, directly or indirectly, with an individual.
- **National Data Protection Authority (ANPD):** Public administration body responsible for ensuring, implementing and supervising compliance with the LGPD throughout the national territory.
- **Controller:** Natural or legal person, under public or private law, responsible for making the main decisions regarding the Processing of Personal Data and for defining the purpose of this processing. These decisions include the instructions provided to contracted operators to carry out a certain processing of personal data.
- **Personal Data:** It is any and all information related to the identified or identifiable natural person.
- **Sensitive Personal Data:** Personal Data on racial, ethnic origin, religious conviction, political opinion, union affiliation, organization of a religious, philosophical or political nature, data regarding health or sexual life, genetic or biometric data. For the purposes of this Policy, when we use the expression "Personal Data", we will be referring to common and sensitive Personal Data, except when there is express mention of the category "Sensitive Personal Data".

- **Data Protection Officer (DPO):** It is the 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).
- **General Personal Data Protection Law (LGPD):** Law No. 13.709/18, which provides for the Processing of Personal Data in Brazilian territory, in physical and digital means, in order to protect the fundamental rights of freedom and privacy and the free development of the personality of the natural person.
- **Personal Data Operator:** Natural or legal person, under public or private law, who carries out the Processing of personal data on behalf of the Personal Data Controller.
- **Third parties:** Refer to Caramuru's suppliers, partners and service providers.
- **Data Holder:** It is the individual or natural person to whom the personal data being processed refers (clients, former clients, representatives of legal entity clients, Members, Third Parties and the general public).
- **Processing of Personal Data:** Any and all operations carried out with personal data (collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction). Thus, whenever we use the term "Processing" we are referring to any of these activities.

5. RESPONSIBILITIES

Caramuru is responsible for the processing of the personal data described in this policy. Our complete information follows: Corporate Name: CARAMURU Alimentos S.A., CNPJ: CNPJ 00.080.671/0001-00, Address: Via Expressa Júlio Borges de Souza, 4240, Setor Nossa Senhora da Saúde, Itumbiara/GO, CEP 75.520-900.

6. FINAL PROVISIONS

6.1 Contact Channels

If you have any questions regarding this Privacy Policy or other related matters, you may contact the **Data Protection Officer** by email: privacidade@caramuru.com.

6.2 National Data Protection Authority

The LGPD establishes the National Data Protection Authority (ANPD), which will also be available to the Holder to receive complaints regarding the processing of personal data. Information on complaints to the ANPD can be found **on the ANPD website**.

6.3 Updates to this Policy

Caramuru may change this Privacy Policy at any time. Whenever any relevant condition of this Privacy Policy is changed, these changes will be valid, effective and binding after the new version is published on our website <https://www.caramuru.com>.

In the event that changes to this Privacy Policy result in changes in personal data processing practices that depend on your consent, we will request your consent to the new terms of the Privacy Policy in relation to the processing of data and indicated purposes.

