

CORPORATE PRIVACY AND DATA PROTECTION POLICY

**PRIVACY GOVERNANCE PROGRAM
AND PROTECTION OF PERSONAL DATA**

**CJ SELECTA S.A.
SEPTEMBER/2022**

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1. INTRODUCTION

The **Corporate Privacy and Data Protection Policy** ("Policy") is the document that establishes the minimum guidelines to be observed by **CJ SELECTA S.A.** ("CJ SELECTA" or "Organization") for its compliance with Federal Law No. 13,709/2018 ("General Personal Data Protection Law" or "LGPD"). In addition, this document also sets out the foundations of CJ SELECTA's Privacy and Data Protection Governance Program ("Privacy Program").

Processing Personal Data in an ethical, legitimate manner and in accordance with the General Law on Personal Data Protection is essential for the success of CJ SELECTA's economic activities, as well as for safeguarding the Organization's image and credibility before employees, business partners, shareholders, suppliers, the National Data Protection Authority ("ANPD"), among others.

The provisions of this Policy seek to: i) cherish and safeguard the interests of all data subjects with whom CJ SELECTA has a relationship; ii) establishing, in a comprehensive manner, standards and good practices for the protection of Personal Data; iii) form a corporate culture and awareness about privacy and data protection; and iv) mitigate the risks of a security incident involving Personal Data.

2. GOAL

The purpose of this Policy is to communicate to CJ SELECTA's employees the guidelines and criteria to be followed in all activities involving Personal Data, in compliance with CJ SELECTA's Privacy and Data Protection Governance Program.

3. APPLICATION

This Policy must be followed by all employees who process Personal Data in their day-to-day activities, as well as third parties contractually bound to comply with CJ SELECTA's internal regulations.

4. DEFINITIONS

In order to provide greater clarity to this Policy, the following words and expressions, in the singular or plural, shall have the following meanings:

1. **National Data Protection Authority** ("ANPD"): is the public body responsible for regulating, supervising and applying administrative penalties related to the protection of Personal Data.
2. **Personal Data**: any information that identifies or may identify a natural person. For example, name, date of birth, marital status, CPF/MF registration number, e-mail, cell phone, home address, bank account and branch, physical, economic, cultural or social characteristics, among others.
1. **Sensitive Personal Data**: any personal data that indicates or is used to infer racial or ethnic origin, religious belief, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, health or sex life, genetic or biometric data.
2. **Person in Charge of the Processing of Personal Data** ("Person in Charge"): person appointed to act as a communication channel between CJ SELECTA, the data subjects and the National Data Protection Authority.
1. **Data Subject**: Natural person to whom the Personal Data refers.
2. **Processing**: Any operation with Personal Data, including collection, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, updating, communication, transfer, sharing and extraction of Personal Data.

5. GUIDING PRINCIPLES OF DATA PROTECTION

CJ SELECTA will ensure that all your Personal Data processing activities comply with the principles of the LGPD, listed below:

Principles	Directions
Good Faith	The processing of Personal Data must always be based on good intentions , as well as ethics and respect for the data subjects.
Purpose and Suitability	The processing of Personal Data shall be limited to legitimate , specific, explicit and informed purposes , and shall only occur in ways that are compatible with these purposes.

Need	The collection and use of Personal Data shall be limited to the minimum necessary for the fulfillment of the defined purposes. Also, such information should be stored for the shortest possible/necessary time.
Free Access and Quality	Data subjects shall be guaranteed a facilitated and free consultation regarding the form and duration of the processing, and the completeness of their Personal Data, ensuring their accuracy, clarity, relevance and up-to-dateness.
Safety and Prevention	The security and confidentiality of Personal Data must be ensured through technical and organizational measures in order to prevent the occurrence of security incidents involving Personal Data.
Transparency	Data subjects must be provided with clear, accurate and easily accessible information about the processing of their data and the respective agents involved therein, in compliance with CJ SELECTA's commercial and industrial secrets.
Non-Discrimination	The processing of Personal Data will never be carried out for discriminatory, unlawful or abusive purposes.
Accountability	Records of all Personal Data processing activities and the respective measures taken to adapt such activities to the rules relating to privacy and protection of Personal Data must be stored, including proving the effectiveness and efficiency of these measures.

6. PRIVACY PROGRAM

6.1 Normative Framework

The normative structure of CJ SELECTA's Privacy Program is composed of a series of documents with 03 (three) distinct levels of hierarchy, listed below:

6.1.1 Corporate Privacy Policy: formalized in this document, it establishes the principles and fundamentals that should guide the other instruments that make up CJ SELECTA's Privacy and Data Protection Governance Program. This Policy may only be amended by the Privacy Committee, upon approval by CJ SELECTA's Board of Directors/CEO.

6.1.2 Data protection policies: establish the specific rules to be observed in the processing of Personal Data and must comply with the principles defined in this document; and

6.1.3 Data protection procedures: operationalize the rules set forth in the data protection policies, allowing their direct and practical application in CJ SELECTA's daily activities.

6.2 Management and Governance

The management and governance of CJ SELECTA's Privacy Program shall be conducted by the officers below.

6.2.1 Privacy Committee

The Privacy Committee ("Committee") is the deliberative and independent body belonging to CJ SELECTA's governance structure.

The Committee shall meet at least one (1) quarter to present and monitor CJ SELECTA's privacy program, and shall be composed of members of key areas of the Company, capable of deliberating and deciding on matters related to privacy and data protection. In addition, representatives of specific areas involved in Personal Data processing activities may be called upon for deliberation on specific matters.

The objectives of the Committee are, primarily, to ensure communication and compliance with the Privacy Program and to discuss and make decisions on new processing activities.

The Committee shall always be involved in decision-making regarding treatment activities that involve risks assessed as **high and critical**, reporting directly to the CEO of CJ SELECTA whenever appropriate.

The detailed competencies of the Privacy Committee can be found in the CJ SELECTA Privacy Committee Bylaws.

6.2.2 Person in Charge of Processing Personal Data

The *Data Protection Officer* or DPO must have legal and technical knowledge related to the protection of Personal Data and experience in the field. He must have a reasonable degree of independence from

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the rest of the management and his duties must not include activities that may conflict with the Company's responsibility to the holders of Personal Data.

The performance of the Data Protection Officer must ensure CJ SELECTA's compliance with applicable privacy and data protection laws and other regulations. Its main responsibilities include:

1. Administer the Privacy Program;
2. Develop, maintain and propose the revision of CJ SELECTA's privacy policies and policies.
3. Act as CJ SELECTA's point of contact with the National Data Protection Authority and with data subjects;
4. Receive and manage requests from Personal Data subjects; and
5. Review Data Protection Impact Reports, as described in the Handling Policy, with investigation and review of the risks of the activities.

It is up to the Data Protection Officer to decide, in cases of **low to medium** risk, on the Personal Data processing activities conducted by CJ SELECTA.

Finally, the Data Protection Officer must assist in clarifying doubts and guide other members of CJ SELECTA during the execution of their activities, when they involve Personal Data processing operations.

The detailed competencies of the Data Protection Officer can be found in the Statute of the Privacy Committee of CJ SELECTA.

1. *Champions* or Privacy Ambassadors

The *Champions* or Privacy Ambassadors are focal points allocated in areas of CJ SELECTA, who act as a direct contact of the Person in Charge and have the functions of facilitating communications, training and gathering information related to their area.

7. RIGHTS OF DATA SUBJECTS

CJ SELECTA is committed to the effectiveness of the rights of Personal Data holders, which include, but are not limited to,:

Right of the Holder	Description
Right to Confirmation of the Existence of Processing	Data subjects have the right to question whether CJ SELECTA processes their Personal Data.
Right of Access	Guarantee to the data subjects of an easy and free consultation on the form and duration of the processing, as well as on the completeness of their Personal Data.
Right to Data Quality	Guarantee, to the holders, of the accuracy, clarity, relevance and updating of the data, according to the need and for the fulfillment of the purpose of the processing.
Right to Anonymization, Blocking, or Deletion	Data subjects may request anonymization, blocking, or deletion of data that is unnecessary, excessive, or processed in non-compliance with the LGPD.
Right to Portability	Possibility of requesting, by the holder, the portability of their data to another service or product provider, in accordance with ANPD regulations and observing CJ SELECTA's commercial and industrial secrets.
Right to Information on Data Sharing	Direito de informações sobre as entidades públicas e privadas com as quais foi realizada o compartilhamento de seus dados.
Right to Object	Possibility for the data subject to oppose the processing activities of their data based on one of the hypotheses of waiver of consent, in case of non-compliance with the provisions of the LGPD.
Right Not to Consent and to Revoke Consent	Data subjects must be informed about the possibility of not providing their consent and about the consequences of refusal. It also includes the guarantee of revoking consent.
Right to Automated Decision Review	Guarantee of review of decisions made solely on the basis of automated processing of Personal Data that affect the interests of data subjects, including decisions aimed at defining their personal, professional, consumer and credit profile or aspects of their personality.

In order to meet the requests of the holders, CJ SELECTA will take into account the following guidelines:

1. Provide an adequate, prepared and available channel for receiving requests at any time of the day, with confirmation of receipt of the request, which may be automated;
2. Have a response script defined to respond to requests, containing the measures that must be taken to meet each one;
3. Ensure the generation of evidence at all stages of the process, from the receipt of requests to the moment of submission of the response;
4. Whenever possible, allow the data subject to choose the means of sending responses between digital and physical. In the absence of a choice, the same means by which the request was received will be used for response;
1. Observe the response deadline for the request for confirmation and access to data, which must be immediate for responses in simplified format, or in a maximum of 15 (fifteen) days, for complete declaration;
 1. For other requests, observe the deadline of a maximum of 15 (fifteen) days, except for duly justified exceptions to the holder; and
2. Store the data in formats that make it easy to query (e.g., structured database or single file of physical documents separated by the name of the holder).

The fulfillment of the rights described above shall be made free of charge to the holders.

8. TRAININGS

All CJ SELECTA employees who are involved in Personal Data processing activities must receive periodic training, to be decided by the Privacy Committee, specifically on the following topics:

1. General concepts of privacy and data protection, including the presentation of this policy and other CJ SELECTA rules on the subject; and
1. Specific concepts of privacy and data protection applied to the activities of each area.

The training referred to in the first item listed above should be part of the integration procedure for new employees.

9. INFORMATION SECURITY INCIDENTS INVOLVING PERSONAL DATA

CJ SELECTA is committed to adopting technical and administrative measures to protect the Personal Data processed and prevent the occurrence of incidents and damages.

If any employee notices the occurrence or suspicion of an incident with Personal Data, he/she must report it immediately, through the IT Tickets channel. Details of the measures to be taken in such cases are in the Procedure for Responding to Security Incidents involving Personal Data.

10. ASSOCIATED DOCUMENTS

- Personal Data Handling Policy;
- Policy on Sharing Personal Data with Third Parties;
- Consent Use and Management Policy;
- Privacy by Design Assessment Policy; and
- Personal Data Security Incident Response Procedure.

11. FINAL PROVISIONS

If you have any questions related to this Policy, or for situations in which a violation of the practices described above has been identified or suspected, please contact the CJ SELECTA Officer, through the e-mail address juridico_cjs@cj.net or by phone at 34 2512-7043, extension 7043. Reports of violations of this Policy will be anonymous and non-retaliation will be guaranteed.

This Policy has been approved by CJ SELECTA's Privacy Committee and is effective as of the date of publication. Its revision will occur every 01 (one) year from the date of its effective approval or, at the discretion of CJ SELECTA, it may be changed at any time. In any case, CJ SELECTA employees will always be notified and will receive the most up-to-date version.