



PERSONAL DATA PROTECTION AND PRIVACY POLICY

CELULOSE NIPO-BRASILEIRA S.A. - CENIBRA

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1. INTRODUCTION

Celulose Nipo-Brasileira S.A – CENIBRA, its subsidiaries and other Group entities respect your privacy and are committed to protecting your Personal Data in accordance with Act No. 13.709 / 2018 “General Personal Data Protection Act” (GDPA), as well as applicable Regulations and Statutes.

This Personal Data Protection and Privacy Policy provides definitions, practices, and information related to the processing of Personal Data that you provide us directly through physical or electronic means, such as websites, applications, and social networks, and addresses your privacy rights and legal protections.

This Policy should be read by everyone from time to time and may be supplemented by Policies, Rules, Procedures, or other documents required by CENIBRA.

You should read this Personal Data Protection and Privacy Policy and other information or documents adopted by CENIBRA in connection with this matter, especially when we are collecting or processing your Personal Data, so that you are fully aware of how and why we are using such Data.

2. PURPOSE

2.1 This Personal Data Protection and Privacy Policy deals with the way CENIBRA, its subsidiaries, and other Group entities collect, treat, and process your Personal Information in view of an employment relationship or the use of any website owned by the company, its subsidiaries, and other Group entities with the objective of developing products and/or services, either through participation in research, sweepstakes, competitions, tenders, contracts, and other activities and to meet the company needs.

3. APPLICATION

3.1 This Policy applies to all persons whose Personal Data are collected, treated, used, and processed by CENIBRA, its subsidiaries and other Group entities, including Personal Information of employees, customers, suppliers, service providers, business partners, and other stakeholders.

4. DEFINITIONS

4.1 For the purposes of this Personal Data Protection and Privacy Policy Data the terms below shall have the following meaning:

- a) **Personal data:** any information related to an identified or identifiable individual;
- b) **Anonymized data:** data whose Data Subject cannot be identified through reasonable techniques available to CENIBRA’s operation or treatment.
- c) **Data Subject:** natural person to whom the Personal Data under processing are related;
- d) **Controller or company:** Celulose Nipo-Brasileira S.A. - CENIBRA, with headquarters at Rodovia BR-381, Km 172, District of Perpétuo Socorro, Municipality of Belo Oriente, State of Minas Gerais, ZIP code 35196-000, registered with the Finance Ministry’s Corporate Taxpayers’



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Registry under No. CNPJ/MF 42.278.796/0001-99. It also includes the subsidiary CENIBRA Logística Ltda., CNPJ/MF No. 04.940.191/0001-22, and the entity Instituto CENIBRA, CNPJ/MF No. 05.522.474/0001-17, both of which are located at the same address as CENIBRA;

- e) **Data Protection Officer (DPO):** person formally appointed by the Controller as a communication channel between the Controller, Data Subject, and the National Data Protection Authority (NDPA), who is also responsible for exercising other duties as provided for by the GDPR;
- f) **Processing:** any operation performed on Personal Data in connection with collection, production, reception, classification, use, reproduction, transmission, distribution, access, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination, or extraction of Data;
- g) **Stakeholder:** individual directly or indirectly involved in the Company's business and who performs his or her duties inside or outside the company. In addition to direct employees, it also includes executives, consultants, contractors' personnel, and temporary workers in any capacity;
- h) **Brazil's National Data Protection Authority (NDPA):** A public agency responsible for enforcing, implementing and checking compliance with the GDPR nationwide;
- i) **Cookies:** small data files sent by our websites and stored on the user's electronic devices. They store information on the user's preferences with an aim to customize browsing in line with each user's profile.

5. IMPORTANT INFORMATION

5.1 Controller and Person Responsible for Personal Data Protection

When used in this Personal Data Protection and Privacy Policy, the terms "CENIBRA", "Subsidiaries", "Entities", "Company", "us", or "our" mean the Controller of your Personal Data under the applicable legislation in force, being responsible for processing and ensuring suitable protection of your Data.

Decision DIR-157/20 "Employee Appointment / DPO – General Personal Data Protection Act" appointed a Data Protection Officer (DPO) who, according to Act No. 13.709/2018, is responsible for:

- a) accepting grievances and communications from Data Subject, providing clarifications, and taking applicable measures;
- b) providing Stakeholders with guidance on Personal Data Protection practices; and
- c) performing other duties as stipulated by the company and applicable legislation.

5.2 Communication channels

Should you have any question or comment about this Policy with respect to CENIBRA, its



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subsidiaries, and Group entities or about your legal rights under Item 6.8 hereof, please get in contact with the Data Protection Officer (DPO) as follows:

- Celulose Nipo-Brasileira S.A. - CENIBRA, Rodovia BR-381, km 172, Belo Oriente - Minas Gerais - CEP 35196-000, care of Flávio Silveira Furtado – Data Protection Officer;
- e-mail: encarregado.dpo@cenibra.com.br - Flávio Silveira Furtado.

Moreover, you may file a complaint with the NDPA at any time, although we would like to be given the opportunity to previously address your concerns, grievances, and considerations. In this sense, please get in touch with us if you have any question, complaint, or other requirement with respect to your Personal Data.

5.2.1 Deadline for response

We endeavor to respond to all reasonable requests received in line with Item 5.2 hereof within 15 (fifteen) days. Occasionally, the response may take longer in case of particularly complex requests or if you have filed multiple requests.

5.3 Duty to Inform about Changes in Personal Data

Personal Data provided to the company should be accurate, true, and up to date. Please report to us any changes in your Personal Data during your relationship with us.

5.4 Transmission of Personal Data to Third Parties

Your Personal Data will not be transmitted to any other party outside our group companies, unless we are obliged to do so in accordance with the GDPR provisions, particularly to fulfill obligations we have assumed in the relationship with you or by statutory, legal, and/or contractual obligation, and also if you have given your consent to do so, as applicable.

Notwithstanding the circumstances listed in the previous Item, our websites may include links to third-party websites, plug-ins, and applications. By accessing such links or activating such connections you can allow third parties to collect or share your Data. As we do not control these third-party sites and are not responsible for their privacy rules, you are recommended to read the respective Privacy Policy of every website you visit.

5.5 Corporate E-mail

CENIBRA provides corporate e-mail to its own employees and authorized third parties for the purpose of professional use and, although it may occasionally be deemed personal data in specific circumstances, the entire contents of such corporate e-mails are always deemed professional, rather than personal. Therefore, CENIBRA can access them at any time to ensure proper performance and continuity of its activities.

6. BASIC PRINCIPLES

6.1 Personal Data we may collect



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Identifiable Personal Data means any information about an individual that identifies him/her or allows him/her to be identified, not including Data from which the Data Subject's identity has been removed or that does not allow identification (Anonymized Data).

We may collect, use, store, process, and transfer different types of your Personal Data obtained during the course of any relationship between us. Said Data may include the following kind information:

- a. **Identity Data:** Documents and/or personal information about the Data Subject and/or his/her children and spouse, including: name, surname, gender, nationality, date of birth, marital status, username, registration, or other similar identifier, personal documents (ID, taxpayer's federal registration, voter registration);
- b. **Employment Data:** employment card number, social security number, degree of disability (if any), salary and other remuneration, job description, working hours, absence history (particularly sick leave, special leave, maternity leave, parental leave) and, where applicable, paid leave, as well as any other Data required to manage the working relationship;
- c. **Contact Data:** address, delivery address, e-mail address, and landline or cell phone numbers;
- d. **Financial Data:** Bank branch and account number, debit and credit card, credit history;
- e. **Transaction Data:** details about payments "from" and "to" you, products and services provided and/or purchased;
- f. **Control Data:** access control through badge, monitoring systems, and electronic security CCTV – Closed Circuit Television (video recordings, information on access and collection time);
- g. **Technical Data:** IP address, login, browser type and version, time zone configuration and location, browser plug-in types and versions, operating system and platform, among other built-in technologies on devices you use to access any of our application and social networking sites;
- h. **Profile Data:** Data: your username and password, comments, and responses to Surveys;
- i. **Usage Data:** the way you use our websites;
- j. **Marketing and Communication Data:** your preferences in receiving marketing and communication material, including internal communication and material from business partners, as well as your communication preferences;
- k. **Aggregate Data:** statistical or demographic data that can be derived from your Personal Data, but are not considered Personal Data by law as they do not directly or indirectly reveal your identity.

Data concerning your health can be collected and processed to comply with legal and regulatory obligations, in particular labor, social security, or social welfare laws, as well as for preventive and occupational medicine applications, assessment of employee suitability to the work, and management of health plans and insurance plans.

Also, biometric data necessary for your safety and access and worktime control in line with other



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corporate internal controls can be collected and treated for such specific purposes.

Except to fulfill applicable legal and regulatory requirements and/or comply with specific labor or contractual obligations, we do not collect Sensitive Personal Data such as racial or ethnic origin, religious belief, political opinion, membership in unions or organizations of a religious, philosophical or political nature, sexual life and health data, and genetic or biometric data.

6.1.1 No Provision of Personal Data

If we need to collect, treat, and process Personal Data for the fulfillment of a legal or regulatory obligation, execution of contract, performance of preliminary procedures in connection with a relationship to which you are a party, to serve our or third parties' legitimate interests, and/or for purposes of credit protection and you fail to provide or request the deletion of such Data, we may not be able to perform the Contract or fulfill the corresponding contractual obligation or comply with legal or regulatory obligations.

In that case, we may have to cancel access to a product, service, or benefit that you wish to obtain and also terminate the Contract or any kind of relationship we may have with you.

6.2 How we collect your Personal Data

We will only collect, treat, and process your Personal Data upon your consent, as applicable, or as provided for by law.

Your Data may be collected directly from you or indirectly from third parties within the Company, whether contractors or not (for example, between organizational units and systems), or, in specific cases, from third parties outside CENIBRA (such as: security systems, government agencies, recruitment services, etc.).

We use different methods and ways to collect your Personal Data, including, but not limited to:

a. **Direct Interactions:** when you provide your Personal Data by filling out forms and questionnaires, sending e-mails, visiting websites, talking on the telephone and delivering personal documents. Such interactions may occur when you:

- intend to or actually have a work/employment relationship with us;
- intend to or actually provide products and/or services;
- electronically sign documents with CENIBRA and its subsidiaries and group entities;
- order our products or services;
- create an account or access our websites;
- request marketing or communication materials to be sent to you;
- enter a Competition, Draw, Promotion, Tender, Research; or
- send any written feedback with respect to suggestions, complaints, whistleblowing, or any other form of communication with the company.

b. **Interactions through Technologies or Automated Interactions:** when you use any of our websites and applications and interact with them, your technical data can be automatically collected, such as: equipment, actions, and navigation patterns through cookies and other similar technologies.



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- c. **Interactions with Third Parties or Publicly Available Sources:** We may obtain Personal Data from publicly available sources, such as: open government databases or other public domain Data.

6.3 How We Use Your Personal Data

We will use, treat, and process your Personal Data as provided for by law, in good faith, for legitimate and specific purposes, for the purposes for which we have collected them, to comply with the law and regulations, by order of competent authority, in a way that is compatible and adequate for such purposes, always with transparency, and under safe and non-discrimination conditions.

Personal information will be normally used, treated, and processed under the following circumstances:

- a) When you have authorized us to use your Personal Data for a specific purpose;
- b) To comply with legal or regulatory obligations;
- c) To perform a contract or preliminary procedures involving a business relationship or any other relationship to which you are a party;
- d) When necessary to meet our or third party's legitimate interests;
- e) To protect your credit, taking into consideration applicable legal provisions.

Examples of uses of collected personal data:

- Management of salaries, allowances, bonuses and other benefits, social security contributions (pensions, other indemnities), and taxes;
- Management of absences and leaves such as or related to annual vacation, maternity or paternity, illness, death, marriage, birth of a child, blood donation, voter registration, compliance with military service requirements, and appearance in court;
- Confidential management of personnel records and working time;
- Benefit management (health, dental, life insurance, and others) and employee training;
- Management of annual employee evaluation and other result evaluations;
- Management of the proper functioning of corporate communication, whether by e-mail, company social networking, or computer tools;
- Management of access to facilities (badge control, biometrics), CCTV, and access to information systems;
- Submission of information in certain internal cases, preferably anonymously, before judicial and administrative authorities or in the context of an arbitration or mediation.

6.4 Treatment and Sharing of Your Personal Data

CENIBRA, its subsidiaries, and Group entities will only process, use, or treat your Personal as provided for in legislation. Such treatment, use or processing will occur, for example, with the



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objective of:

- allowing us to carry out and manage our operating and administrative activities in an effective, efficient way;
- ensuring a consistent approach to employee management;
- complying with laws, regulations, and internal policies, rules, and procedures; or
- getting in contact with you or your family in an emergency.

The company may also process, use and treat your Data based on your express consent, if applicable. Should the processing of Data be based on consent, you may withdraw your consent at any time. However, such consent withdrawal shall not affect the legality of any processing previously carried out by the Company.

Data will be destined to those who need to access and/or process them, which includes the following main areas: Human Resources, Corporate and Institutional Communication, Control and Finance, Legal, Procurement, and Forestation Incentive Program. In some specific cases, your Data may be shared with other areas within the company, depending on the purpose.

We may need to share your Personal Data with certain third parties in order to meet the purpose for which your data was collected, comply with contractual, legal, or regulatory requirements, meet our or third party's legitimate interests, whether a contractor or not, and/or for credit protection. Usually, data will be provided anonymously, although occasionally they may have to be shared on an individual basis, which is more frequently the case of the following recipients:

- a) Service providers acting as Data processors that provide core elements of the activity with which both you and ourselves are related, including IT and systems administration services through websites;
- b) Suppliers of materials and equipment, such as: part and uniforms stores, among others inside CENIBRA premises;
- c) Professional consultants and advisors, including lawyers, financial institutions, auditors, and insurance companies;
- d) Public authorities, regulatory bodies, and unions under certain circumstances as provided for by law or collective bargaining agreement. All third parties are required to respect the security of your Personal Data and treat them in accordance with the law.

We do not allow our suppliers and service providers to use your Personal Data for purposes other than those specifically set out and in line with our written instructions. When sharing Personal Data with third parties, the corresponding contract shall stipulate such third party's obligation to comply with the General Data Protection Law and applicable penalties for the data recipient in case of non-compliance with its duties and obligations under the GDPR. Moreover, the following contractual criteria shall be taken into consideration:

- Obligation of confidentiality in relation to Personal Data.
- Assurance of strict compliance with the GDPR rules and CENIBRA's, its subsidiaries' and Group entities' regulations, policies, and procedures.



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- Application of standards and procedures relative to information technology security.
- Return or disposal of Personal Data at the end of the contract or if there is no longer any purpose or need for such data processing.

6.5 International Data Transfers

We do not usually transfer your Personal Data out of the country. However, in specific cases in which such transfer may be necessary to fulfill the purpose for which your Personal Data were collected, comply with contractual, legal, or regulatory requirements, meet our or third party's legitimate interests, and/or for credit protection, your Personal Data may be transferred abroad subject to applicable legislation and regulations.

Some examples in which Personal Data transfer may occur, as provided for by applicable legislation, include: use of technology systems that host data outside the country and the need for information by controllers to comply with their own standards and regulations and/or corporate legislation and regulations applicable to Group companies incorporated abroad.

6.6 Personal Data Security

We have established appropriate security measures to prevent your Personal Data from being accidentally or unlawfully lost, altered, used, accessed, or disclosed in an unauthorized manner. We have worked out supplementary operating rules and procedures to deal with any suspicion or occurrence of Personal Data breach and, should such a breach occur, we shall adopt all measures in line with both internal and legal requirements.

In the event of occurrence or signs of incidents involving potential or actual undue access or leakage of Personal Data, the employee responsible for managing such specific information or any other employee who identifies such potential risk shall take appropriate actions and immediately give written notice to the DPO aiming at the adoption of mitigation measures as instructed by the DPO.

Relying on the support by CENIBRA's Information Technology and Legal departments, the DPO shall ensure that the risk situation ceases and, at the same time, investigate the facts and corresponding causes, get in contact the parties involved and potentially affected, and propose measures to prevent recurrence, as well as disciplinary measures in line with the Code of Conduct.

CENIBRA's Japan-based shareholder may provide support to Data management and processing as set out in this Policy in order to allow proper use of technology and other Personal Data protection and security mechanisms. In addition, it may issue regulations in supplementation of the rules stipulated in this Policy and other related documents, provided such instruments are subject to the GDPR rules and comply with applicable regulations.

6.7 Retention and Disposal of Personal Data

Your Personal Data, either in physical or electronic format, shall only be retained for as long as is necessary to fulfill the purposes for which they were collected and for the custody periods as established by law to protect rights and obligations.



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In determining the appropriate retention period for your Personal Data, we take into consideration the legal provisions, the amount, nature, and sensitivity of your Personal Data, the potential risk of damage from unauthorized use or disclosure of your Data, the purposes for which we process your Data, and applicable legal requirements.

You may cancel your consent at any time and ask us to delete your Personal Data, in which case we shall do so as soon as possible, except for Data that are necessary to fulfill contractual, legal, and regulatory obligations or meet legitimate interests over the duration of such obligations.

Under certain circumstances, such as for research or statistical purposes, we may anonymize your Personal Data, so that they would no longer be associated with you and, in that case, the information is no longer Personal Data and may be used indefinitely for such specific purposes.

The topics below give a few examples of data and document retention and disposal:

- a) **Human Resources:** Data and documents are stored during the time the employee works at the Company and after the termination of the Employment Contract to comply with the legal retention periods set out by the labor, tax and/or social security legislation;
- b) **Security Records:** Images of camera-monitored environments are stored for a predetermined period of time. Biometric and badge data are stored during the time the Employee works for the company and for the period after termination of the Employment Contract as necessary to comply with legal labor provisions. Visitor data will remain stored for a predetermined standard time.
- c) **Inspection or Administrative and Judicial Proceedings:** Data and documents are filed for a period as necessary to meet specific statute of limitation requirements and statutory limitation periods, which may be extended as a precautionary approach or, in the case of administrative and judicial proceedings, until the final judgment.

Physical documents and data that are no longer needed or whose custody term has already expired are usually destroyed by incineration or any other appropriate, safe means, on a quarterly, semi-annual, or annual basis, by the teams in the management area responsible for this matter or by the Central Archives team, depending on where such documents and data are actually filed.

6.8 Know your Rights

The ownership of your Personal Data and your fundamental rights of freedom, intimacy, and privacy are guaranteed according to the Law. In this respect, you may request:

- a) Access to your Personal Data.
- b) Correction of incomplete, inaccurate, or outdated Personal Data.
- c) Cancellation of consent, if applicable, and elimination of Personal Data, except for those necessary for the fulfillment of contractual, legal, or regulatory obligations, for the duration of said obligation.
- d) Confirmation of the existence of Personal Data treatment or Processing.



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- e) Anonymization, blocking, or deleting of Personal Data that are unnecessary, excessive, or treated in disagreement with the Law.

You can contact the Personal Data Protection Officer (DPO) through the channels indicated in Item 5.2 in order to enforce your rights.

7. BREACH OF THIS POLICY

We have established this Policy and Internal Procedures and Regulations to deal with any suspected or actual breach of Personal Data. When any Employee violates or knows of any violation of this Policy and supplementary instruments, the event must be referred to the Personal Data Protection Officer (DPO) through the channels indicated in Item 5.2, so that CENIBRA can take the necessary actions, including disciplinary measures, in accordance with the legislation, Code of Conduct, and applicable internal regulations.

8. REFERENCES

- Act No. 13.709/2018 “General Personal Data Protection Act – GPDPA”;
- CENIBRA Code of Conduct;
- CENIBRA Logística Code of Conduct;
- Decision DIR-157/20 “Employee Appointment / DPO – General Personal Data Protection Act - GPDPA”.