



**IRANI PAPEL E EMBALAGEM S.A.**

**CNPJ No. 92.791.243/0001 - 03 NIRE No. 43300002799**

**PUBLIC COMPANY**

## **DATA PRIVACY POLICY**

### **1. OBJECTIVE**

The General Data Protection Law (Law 13.709/2018) was designed to set clear rules on the Handling of Personal Data and to protect the public's right to privacy around such data, based on transparent and secure procedures.

In view of the above, the aim of this policy is to explain how the Company handles Personal Data.

### **2. SCOPE**

This policy applies to Irani Papel e Embalagem S.A. And its subsidiaries, except Irani Soluções para e-Commerce Ltda., which has its own policy.

### **3. TERMS AND DEFINITIONS**

**Anonymization:** Using available reasonable technical means when handling the data, so that it may not be associated, directly or indirectly, to an individual.

**National Data Protection Authority (ANPD):** This Federal Government organization reports to the office of the President of the Republic. It is responsible, under Law No. 13709/2018, for among other things, ensuring that Personal Data is protected, providing guidance for a National Policy for the Protection of Personal Data and Privacy and inspecting and penalizing those responsible for handling data in breach of the legislation to ensure that data is handled appropriately, with a right to a defense and the right to appeal. It is also

responsible for informing the public of the standards and policy for the protection of Personal Data and the measures to keep it safe.

**Company:** Irani Papel e Embalagem S.A. and its subsidiaries.

**Controller:** the individual or legal entity, under public or private law, who is responsible for decisions regarding the handling of personal data;

**Anonymized data:** Data about an individual, who cannot be identified, based on the use of available reasonable technical means at the time of processing;

**Data Protection Officer:** the person appointed by the Controller to act as a communication channel between the Controller, individuals and the National Data Protection Authority (ANPD);

**Data Subject:** This is the individual to whom the Personal Data that is processed refers to;

**Processing:** This is any activity where Personal Data is handled, such as collecting, generating, receiving, classifying, using, accessing, copying, sending, sharing, processing, archiving, storing, deleting, evaluating or managing information, such as modifying, communicating, transferring, disseminating and extracting;

**Transfer of Data Abroad:** When personal data is sent to a foreign country or an international organization that the country is a member of;

**Shared Use of Data:** Where Personal Data is communicated, disseminated, transferred abroad, and linked together by Public Authorities in accordance with their legal responsibilities or between Public Authorities and private entities, reciprocally, under specific authorization, relating to a process for which the authorities or private entities are entitled to handle the data.

#### **4. DATA COLLECTED AND ITS PURPOSES**

The company collects personal data in accordance with the legal principles. Personal Data may be collected on a regular basis or for a particular occasion. It is used in the following situations, but there may be others:

**To provide access to areas of the Company:** Name, Surname, CPF, ID, Driver's License, Phone Number, Health details, etc.

**Registering Shareholders:** Name, Surname, Date of Birth, Parents, CPF, Bank Details, Address, Email, Phone Number, etc.

**Registering Customers and Suppliers:** Name, Surname, Date of Birth, CPF, Address, Email, Phone Number, etc.

**Credit Applications by Customers:** Name, Surname, Date of Birth, CPF, Credit Rating, Income Tax Return, etc.

**Transactions for Buying or Selling Products and Services:** Name, Surname, CPF, Address, Email, Phone Number, etc.

**After Sales Services:** Name, Surname, Occupation, Address, Email, Phone Number, etc.

**Marketing Mailing List and Satisfaction Survey:** Name, Surname, Email, Phone Number, etc.

**Drafting Contracts:** Name, Surname, Date of Birth, CPF, Occupation, Marital Status, Nationality, etc.

**Selection and Recruitment:** Name, Surname, Date of Birth, Nationality, Parents, CPF, Academic and Employment History, Address, Email, Phone Number, etc.

**Sustainability Activities:** Name, Surname, Email, Phone Number, etc.

The Company will handle data relating to minors, if necessary. This will only be done for legally permitted purposes or taken with the consent of their legal guardian, in accordance with art. 14, paragraph 1 of the LGPD, where necessary. In these circumstances, only the name, birth certificate, CPF, sex, address, health details and level of education of the minor will be processed.

In this regard, all individuals will be able to ask for information on the way their data is being treated and for how long, free of charge. They may also ask what data the Company possesses. They may exercise their rights by contacting the company through <https://irani.com.br/ideias-em-acao/contato/> or by email at [encarregadodedadosirani@irani.com.br](mailto:encarregadodedadosirani@irani.com.br).

Remember that, although Data Subjects have the right to have their data corrected and updated, the Company is not responsible for ensuring that the information provided is accurate, up-to-date, true and complete. It is the Data Subject's responsibility to provide accurate, up-to-date information.

Finally, we confirm that the technology that the Company uses complies with current legislation and it individually, clearly, specifically and legitimately asks for the Subject Owner's consent, when applicable.

## **5. SHARING PERSONAL DATA**

The Company states that it will share the Personal Data of Data Subjects, both internally and externally, for the handling purposes outlined above. All sharing will be in accordance with the law or in response to court orders or contractual requirements.

## **6. THE PERSONAL DATA RETENTION PERIOD**

The Company wishes to inform Data Subjects that their Personal Data will be retained for as long as it is necessary to achieve the relevant purposes, in accordance with the Data Retention Schedule. Once this time has elapsed and the data has served its purpose, it will be deleted or anonymized securely.

In some cases, data collected by the Company may need to be retained for longer: for legal reasons, due to a court order, due to fraud prevention measures (art. 11, item II, item "a", of Law No. 13709/2018), due to credit protection measures (article 7, item X, of the LGPD) and other legitimate interests, as provided for by article 10, of the LGPD. Once the retention period is over and the reason for retention has expired, the data will be deleted securely.

## **7. THE DATA SUBJECT'S RIGHTS IN RELATION TO PERSONAL DATA**

The Data Subject has various rights in relation to their Personal Data, including:

- a) Confirmation that their data is being handled;
- b) Access to their data;
- c) The right to correct incomplete, inaccurate or out-of-date information.
- d) The right to have unnecessary or excessive data anonymized, blocked or deleted, as well as any data that is not being handled for its stated purpose;
- e) The right to have their data ported to another service or product provider, by making an express request;
- f) Information about sharing their data;
- g) Information about not providing or revoking their consent, including the eventual consequences of doing so; and
- h) Deleting Personal Data.

## **8. STORING AND SECURITY**

The Company confirms that Personal Data is stored securely and confidentially, based on security and prevention principles. This includes measures to prevent unauthorized access or damage to the data.

When there is no legally stipulated length of time, Personal Data will be retained for as long as it is required for the purpose for which it was collected. Anonymized data, that cannot be associated to any individual, will be kept indefinitely.

The data may be stored on a server in this country or one overseas. Storage will comply with security principles and we guarantee that all security, technical and administrative measures will be used to protect Personal Data from accidental or illegal incidents.

Finally, the Company, as a Controller of Personal Data, will notify the ANPD and the Data Subject if any security incident occurs that may cause a significant risk or significant harm to the Data Subjects.

## **9. DATA PROTECTION OFFICER**

The person responsible for data protection, the Data Protection Officer for the Company, is Cassandra Driessen Pavelski, who can be contacted by email at [oficialdedadosirani@irani.com.br](mailto:oficialdedadosirani@irani.com.br).

## **10. COMMUNICATION CHANNELS**

If you have any questions, comments or suggestions, please contact us by sending an email to [encarregadodedadosirani@irani.com.br](mailto:encarregadodedadosirani@irani.com.br). If you wish to make any request related to the exercise of your rights, access the Request Form on the Company's website, through the address <https://irani.com.br/ideias-em-acao/contato/>.

## **11. APPROVAL**

This policy was approved by the Data Privacy Committee, in accordance with the internal regulations, at a Meeting of the Committee held on Jan 27, 2022 (Minutes No. 01/2022).

## **12. AMENDMENTS**

The Company may amend this Privacy Policy at any time. Any amendments will be published on our website and will apply from the date they are published, so that they reflect exactly how we are processing Personal Data.

This Privacy Policy came into effect on Jan 27, 2022.