

	<b>POLICY</b>	<b>PCT 009</b>
	<b>PROTECTION OF PERSONAL DATA</b>	<b>Date: 04/16/2024</b>
		<b>Page 1 of 5</b>

## **1. OBJECTIVE**

Establish guidelines and general guidance on the principles that should guide Tupy S.A. ("Company") in the processing of personal data, ensuring compliance with applicable laws.

## **2. SCOPE**

This Policy applies to the activities of processing personal data carried out by the Company and/or third parties acting on its behalf, in addition to the guidelines contained in the Tupy Code of Ethics and Conduct.

## **3. SETTINGS**

### **3.1 PERSONAL DATA**

Any information related to an identified or identifiable natural person. An identifiable natural person is someone who can be identified, directly or indirectly (e.g.: name, address, email address, ID number, etc.)

### **3.2 PROCESSING OF PERSONAL DATA**

Any activity carried out with personal data from the collection of information to its deletion.

## **4. GUIDELINES**

The Company collects and treats different types of information, such as data provided by the holders, for the purpose of performing specific services or as part of a business relationship. Personal data may include, among others, any identification data, contact data, financial data, browsing data (cookies, location, IP address), and other personal data necessary for the specific purposes for which the data is processed.

Detailed information about the specific processing activities carried out with the personal data are available in the respective privacy notices provided to data subjects in accordance with Article

13 or 14 of Regulation (EU) No. 2016/679 ("GDPR"), Article 9 of the General Data Protection Act ("LGPD") of Brazil, or the corresponding articles of other data protection laws, as applicable.

#### 4.1 PURPOSE OF THE PROCESSING OF PERSONAL DATA

The processing of personal data considers the following activities: collection, production, classification, use, access, reproduction, storage, deletion, evaluation or control of information, modification, and transfer, among others.

The Company may process personal data for various purposes, such as: (i) to manage and administer working relationships with data subjects; (ii) the acquisition/supply of products and services, including financial procedures; (iii) to comply with legal or regulatory obligations; or (iv) to meet the legitimate interests of the Company.

The Company may, in addition, process the personal data provided by data subjects in contracts, forms or correspondence, or visitors to the Company's facilities.

#### 4.2 ESSENTIAL PRINCIPLES

The principles that guide the Company's practices when processing personal data are:

- a. **LAWFULNESS AND TRANSPARENCY:** personal data will be collected and processed in a lawful and transparent manner. The term "lawfulness" means that, under no circumstances will personal data be collected without a lawful reason for doing so, and personal data will not be adopted for abusive or discriminatory purposes. The term "transparency" means that data subjects will receive clear and plain language information regarding the type of personal data processed by the Company, the data itself, and the reasons why the Company collects the data, and how it treats it.
- b. **PURPOSE LIMITATION:** Personal data is only used for specific, explicit and legitimate purposes.
- c. **DATA MINIMIZATION:** Personal data is collected and used in the minimum amount necessary to achieve the purposes for which it is intended.

- d. **STORAGE LIMITATION:** Personal data is kept only for the period necessary to meet the purpose for which personal data is being processed. In certain cases, the legislation itself establishes specific retention periods.
- e. **ACCURACY:** Personal data is accurately maintained and updated, and reasonable steps are taken to review, correct and/or delete potentially inaccurate personal data.
- f. **INTEGRITY AND CONFIDENTIALITY:** Appropriate security measures are adopted to ensure the integrity and confidentiality of personal data.
- g. **FREE ACCESS:** the data holders are granted access as to the way and duration of the processing activity, as well as the integrity of personal data.

#### 4.3 WAYS OF PROCESSING PERSONAL DATA

Personal data can be processed electronically or manually (in printed format). The Company adopts appropriate security measures and tools to reduce the risk of any improper alteration, loss, unauthorized use, disclosure or access to personal data. In addition, it is ensured that personal data is only processed in accordance with the essential principles and only by persons duly authorized and instructed for this activity.

#### 4.4 SHARING AND TRANSFER OF PERSONAL DATA

In the case where the sharing of personal data with other parties is necessary, the Company shall ensure that such access will be limited and that the principles contained in this Policy are respected. Circumstances in which sharing and transferring personal data may be required (non-exhaustive list):

- a. Within the Company, if it is necessary to share the data to comply with legal obligations, to meet the legitimate interests of the Company or third parties;
- b. With third-party service providers to whom the Company entrusts certain services, who will process personal data in accordance with this Policy and for no purpose other than the provision of contracted services;

- c. With public agencies and/or regulatory authorities (such as tax authorities), courts and/or other government authorities, upon request or in any circumstances, to the extent required by applicable laws.
- d. Considering its performance in several jurisdictions, the Company may transfer personal data to other entities of the group (subsidiaries and affiliates) located in other countries. Such transfers will be made in accordance with applicable data protection laws.

#### 4.5 RIGHTS OVER PERSONAL DATA

The Company assures to data subjects the exercise of their rights, in accordance with applicable laws and with each specific situation. Such rights include:

- a. **Right of Access and Information:** Data subjects have the right to request the disclosure or provision of access, in a clear, appropriate, and ostensible manner, with respect to certain information in the way of processing of personal data.
- b. **Right of Portability.** Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format that may be transmitted to another controller.
- c. **Right of Rectification.** Data subjects have the right to correct outdated, incomplete, or inaccurate personal data.
- d. **Right to Data Erasure.** Data subjects have the right to request anonymization, blocking or deletion of unnecessary or excessive data, or data whose processing does not meet the provisions included in the applicable laws.
- e. **Right of Opposition.** Data subjects have the right to oppose the processing of the data, provided that they are informed in advance about the possible consequences arising from the choice to not allow the processing of their personal data.
- f. **Right to review decisions based on automated processing.** Data subjects have the right to access clear and appropriate information about the criteria and procedures used to generate decisions made so only based on the automated processing of their personal data.

**5. CONTACT INFORMATION**

To exercise rights, comment or request any information regarding its rights or this Policy, data subjects may contact the Company by e-mail at: [data.privacy@tupy.com](mailto:data.privacy@tupy.com) or use the contact details included in the corresponding specific privacy notice, as required in accordance with applicable laws.

**6. FINAL PROVISIONS**

The content of this Policy may be changed to meet new regulatory provisions on the matter or upon approval by the Board of Directors.

Validity: Starting December 16, 2020.

1<sup>st</sup> version: 12/16/2024.

2<sup>nd</sup> version: 04/16/2024.

Document managers:

<b>Responsible</b>	<b>Area</b>
<b>Preparation</b>	Compliance
<b>Review</b>	Statutory Board and Committee on Governance and Personnel Management
<b>Approval</b>	Board of Directors