


Number: PL.00.31	MANAGEMENT SYSTEM POLICY	
Review: 02	Internal Privacy Policy	
Data: 15/08/2023		

1. OBJECTIVE

The purpose of this policy is to define the internal privacy policy of green4T's affiliated and controlled companies.

As a modern and forward-looking company, green4T recognizes the need to ensure that its business operates smoothly and without interruption, for the benefit of its customers and other stakeholders.

To this end, all of the company's internal processes are properly mapped with good privacy and data protection practices, and are presented to each sector, with due analysis of the risks involved.

green4T works with essential factors that guide us, namely:

Partnership: We believe that better results come from relationships based on trust, collaboration and respect with our clients and team.

Protection and Prudence: We adhere to the highest levels of security, ensuring protection and continuity of operations.

Assertiveness: Agility combined with assertiveness guides our actions.

Integrity: We are transparent and committed, following ethical standards.

This policy applies to all operations, people and processes that make up the systems that - directly or indirectly - process personal data within or outside the organization, including board members, directors, employees, suppliers and other third parties who have access to green4T's systems.

2. SCOPE

This policy covers all persons of interest - whether individuals or legal entities - who process personal data or which belong to these from green4T's affiliated and controlled companies. This scope was mapped and delimited during the process of adapting the General Data Protection Law, Federal Law No. 27,701.

Holders who wish to exercise their right to self-determination can do so by email at dpo@green4t.com or at www.gree4t.com/canal-do-titular/_____

Doubts regarding the scope of information or suggestions, our communication channel can be done through the e-mail dpo@green4t.com_____

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All contacts will be analyzed and promptly answered after requests.

3. TERMS

In order to level the terms used and make this policy accessible to all, below is a list of terms that we think it is pertinent to conceptualize and that will be encountered while reading this document.

- a) **Assertiveness:** having the ability to expose and defend a position in a clear, calm, objective way and without generating conflicts; b) **LGPD:** General Data Protection Law, federal law No. 13,709/2018, which aims to protect and privacy data of natural persons; c) **ANPD:** National Data Protection Authority, body linked to the presidency of the republic that aims to regulate and manage companies and rules on the protection and privacy of personal data;
- d) **Personal data:** information related to an identified natural person or identifiable;
- e) **Sensitive personal data:** personal data about racial or ethnic origin, religious conviction, political opinion, union affiliation or organization of a religious, philosophical or political nature, data referring to health or sexual life, genetic or biometric data, when linked to a natural person;
- f) **Person in charge (DPO):** person appointed by the company to act as a communication channel between the company, the data subjects (internal and external) and the National Data Protection Authority (ANPD); g) **Data Processing (processed data):** all operations carried out with personal data, such as those related to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or information control, modification, communication, transfer, dissemination or extraction; h) **Holder:** natural person to whom the personal data that are subject to processing refer.

4. RESPONSIBILITIES

4.1. INFORMATION TECHNOLOGY MANAGER

- a) Review and adapt these technology tools according to the new realities;
- b) Make the technological resources available in order to comply with this policy;
- c) Grant access to users, based on due requests from the responsible managers; d) Ensure that external threats cannot affect the privacy of the Company's information; e) Control the records of the technological park (hardware and software) of the green4T companies;

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- f) Check and Safeguard all equipment returned by user or acquired;
- g) Process user access updates to personal data and sensitive personal data in accordance with the request of the responsible managers;
- h) Establish which information, stored on servers, must be preserved through backup; i) Implement improvements in internal controls to comply with Law 13,709/18 (General Data Protection Law-LGPD) and NBR/IEC 27,701.

4.2. PEOPLE AREA a)

- Deliver the company's PL.00.22 - INFORMATION TECHNOLOGY POLICY, to all employees or service providers upon admission; b) Define with the IT manager, with the DPO and the manager in charge, the information resources necessary to carry out the activities for which the employee or provider was hired (hardware, software, control of information on physical media);
- c) Request the blocking of access to the company's information systems in case of dismissal and change of area.

4.3. EMPLOYEES AND THIRD PARTY PROVIDERS

- a) Ensure the use of personal data to which you will have access for execution the work for which you were hired;
- b) Ensure the use of informational resources exclusively for professional purposes, any use for personal purposes being forbidden; c) The obligation, in the event of an information security incident, to report it mediately in the appropriate tool;
- d) Do not leave the equipment unattended in the car or in busy places; e) Do not use a personal computer to access the corporate network, unless the computer is approved by the IT Team; f) IMMEDIATELY inform the IT Team, in case of loss or theft of the notebook/cell phone, via e-mail ti@green4t.com or servicedesk.green4t.com for proper measures to block access to information; _____
- g) Preserve the integrity and keep confidential the information they make use;
- h) Not to share, in any form, confidential information with others who do not have expressly authorized access; i) All paper to be discarded, which contains any type of information that is not public, must be shredded before being eliminated;
- j) Talking about confidential information should be avoided in public environments such as airports, elevators, restaurants, etc.; k) Not to place confidential files or files that are not in the public domain in any folders with public access permission;

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l) Ensure that corporate information remains only in the company's environment, not being shared on personal computers, personal virtual drivers, personal e-mail, etc., without prior authorization; m) Comply with this security policy, under penalty of incurring the appropriate disciplinary and legal sanctions.

4.4. AREA MANAGER

- a) Inform the People area of the necessary information resources based on the activity to be carried out by the employee or provider; b) Validate and request access for employees under their responsibility in the information systems made available by the company;**
- c) Request the blocking of access to the company's information systems in case of dismissal and change of area; d) Receive, check and send to IT the equipment of employees or providers in case of disconnection;**
- e) Be co-responsible for ensuring the use of equipment and information provided to carry out the work for which the employee or contractor was hired.**

4.5. PERSON IN CHARGE

- (DPO) a) Ensure the due reviews of this policy;**
- b) Guide all company employees in the suitability and use of technology tools in order to comply with law 13.709/18 (General Data Protection Law - LGPD) and NBR ISO/IEC 27.701;**
- c) Respond to the service demands of holders (internal and external), if any;**
- d) Meet the demands of customers, suppliers and the ANPD, when there is.**

4.6. COMPLIANCE MANAGER

- a) Carry out monitoring tests on adherence to the rules established in this policy; b) Adapt green4T companies to Law 13,709/18 (General Data Protection Law - LGPD), defining the improvements in internal controls to be implemented by the information technology area and other requirements described in the law.**

5. GUIDELINES OF THIS POLICY

5.1. CONTINUOUS IMPROVEMENT OF DATA PROTECTION AND PRIVACY Green4T's Privacy policy regarding continuous improvement is:

- Continuously improve the effectiveness of data protection and privacy controls, as well as transparency regarding their uses;
- Improve current processes to bring them into line with good practices, as defined;

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- Increase the level of proactivity (and stakeholders' perception of proactivity) with regard to data protection and privacy;
- Make data protection and privacy processes and controls more measurable to provide a solid basis for decisions;
- Review relevant metrics annually to assess whether it is appropriate to change them, based on historical data collected and, if applicable, promptly notify data subjects of new forms of treatment;
- Obtain ideas for improvement through regular meetings and other forms of communication with stakeholders;
- Review ideas for improvement at regular management meetings, in order to prioritize and assess timeframes and benefits on the organization's business aspect and with special attention to the rights of data subjects.

Ideas for improvements can be obtained from any source, including employees, customers, suppliers, IT staff, risk assessments and service reports. Once identified, they will be recorded and evaluated in administrative reviews.

5.2 DATA PROTECTION AND PRIVACY PROGRAM

The Data Protection and Privacy Program aims to reinforce the culture of care in relation to the personal data of customers, partners, employees and other people of interest and that the company adopts all measures, following the specifications of the LGPD, together with the organization's internal regulations and other regulations.

As a form of immersion and fixation on the program, the campaign is publicized in various green4T communication media, such as: e-mails, posters spread throughout the organization, on the website and on our social media. In each poster and pamphlet, there will be a link or QR Code to access information booklets on the importance of data protection and privacy, proper care and use of computer equipment, security tips, changing and complex passwords, updates on types of most common attacks, such as: social engineering, WhatsApp hijacking, malware and other relevant matters.

5.3 PURPOSE OF PROCESSED DATA

At green4T, the purposes for processing data are defined by the business rules so that, in a transparent and unequivocal way, they can be delimited and respected. The following items will present the group of personal data with their respective purposes and legal bases that support their treatment.

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5.3.1 Customer Data

The data is collected for administrative matters and business opportunities both for the client and for green4T, within the rules established in our policies, as well as all the rights of the data subject, respecting the protection and privacy of data, in accordance with what is established in the LGPD. The retention period varies according to each activity of the organization, therefore, for each area, sector or activity, there is a different retention period. guide in the "customer" references of the processed data.

The following data is collected:

- Name, RG, CPF, address, marital status, telephone, e-mail, position, department, nationality, date of birth.

Legal basis for treatment: Article 7 of LGPD items II and V.

5.3.2 Employee Data

Data is collected for administrative purposes, within the rules established in our policies, as well as all the rights of the data subject, respecting data protection and privacy, in accordance with what is established in the LGPD. The retention period varies according to each activity of the organization, therefore, for each area, sector or activity, there is a different retention period. guide in the references "collaborators" or "employees" of the processed data.

The following data is collected:

- First name, last name, full address, telephone, e-mail, place of birth, dependents, marital status, education, salary, working hours, health certificate, RG, CPF, license plate, title, ethnicity, father, mother, PIS, bank details, proof of expenses, place of birth, blood type, ASO, photo, registration form, life insurance, CTPS, training diploma, negative certificate of labor debts (CNDT), INSS regularity certificate (CRF), recorded images of Closed Circuit TV (CCTV), area of operation, location, Driver's License, income report, CREA, curriculum vitae, courses, department, headquarters and city, login, password, enrollment, date of admission, date of dismissal, reason for dismissal, pathology, school history, vesting period for vacation, type of access, bank statement, gender, chronic illness, nationality, shareholding, usage profile, voter registration, NIT, gender, test results, payroll point.

Legal basis for treatment: Article 7 of LGPD items II, V and DECREE-LAW No. 5.452/43 (CLT)

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5.3.3 Outsourced Data

The data is collected for administrative matters and business opportunities both for third parties and for green4T, within the rules established in our policies, as well as all the rights of the data subject, respecting the protection and privacy of data, in accordance with what is established in the LGPD. The retention period varies according to each activity of the organization, therefore, for each area, sector or activity, there is a different retention period. provide guidance on "outsourced" references to processed data.

The following data is collected:

- Name, e-mail, corporate telephone, RG, CPF, voter registration, nationality, marital status, date of birth, address, CREA, father's name, mother's name.

Legal basis for treatment: Article 7 of LGPD items II and V.

5.3.4 Third Party Data

Data is collected for administrative purposes, within the rules established in our policies, as well as all the rights of the data subject, respecting data protection and privacy, in accordance with what is established in the LGPD. The retention period varies according to each activity of the organization, therefore, for each area, sector or activity, there is a different retention period. guide in references that are not cited in the other items of section 6 of the treated data.

The following data is collected:

- Name, RG, CPF, date of birth, address, telephone, e-mail, father's name, mother's name, position, CRC.

Legal basis for treatment: Article 7 of LGPD items II and V.

5.3.5 Supplier Data

Data is collected for administrative matters and business opportunities for both suppliers and green4T, within the rules established in our policies, as well as all data subject rights, respecting data protection and privacy, in accordance with what is established in the LGPD. The retention period varies according to each activity of the organization, therefore, for each area, sector or activity, there is a different retention period. guide in references "suppliers" of processed data.

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The following data is collected: •

Name, RG, CPF, bank account, e-mail, telephone.

Legal basis for treatment: Article 7 of LGPD items II and V.

5.3.6 Data from Attorneys Data

is collected for administrative purposes, within the rules established in our policies, as well as all data holder rights, respecting data protection and privacy, in accordance with what is established in the LGPD. The retention period varies according to each activity of the organization, therefore, for each area, sector or activity, there is a different retention period. guide in references of "attorneys" of the processed data.

The following data is collected: •

Name, address, RG, CPF, marital status.

Legal basis for treatment: Article 7 of LGPD items II and V.

5.3.7 Visitor Data

The data is collected for administrative, security and business opportunities issues both for visitors and for green4T, within the rules established in our policies, as well as all the rights of the data subject, respecting the protection and privacy of data, of in accordance with what is established in the LGPD. The retention period varies according to each activity of the organization, therefore, for each area, sector or activity, there is a different retention period, therefore, we request you to read below the data treatments for each activity.

Note: A visitor can be any type of element mentioned in section 6, therefore, depending on the type of visitor, the corresponding section must be observed.


The following data is collected through the visit to the company:

• Name, RG

Legal basis for treatment: Article 7 of the LGPD, item II, Article 11 of the LGPD, item II, item g and clause 7.2 of ISO/ABNT 27.002

5.4 DATA LIFE CYCLE

The data goes through a flow that goes from its collection, storage, security to its elimination. To understand how data can "be born", be stored for a certain period, until they are inactivated or canceled, within green4T, figure 1 shows the data life cycle:

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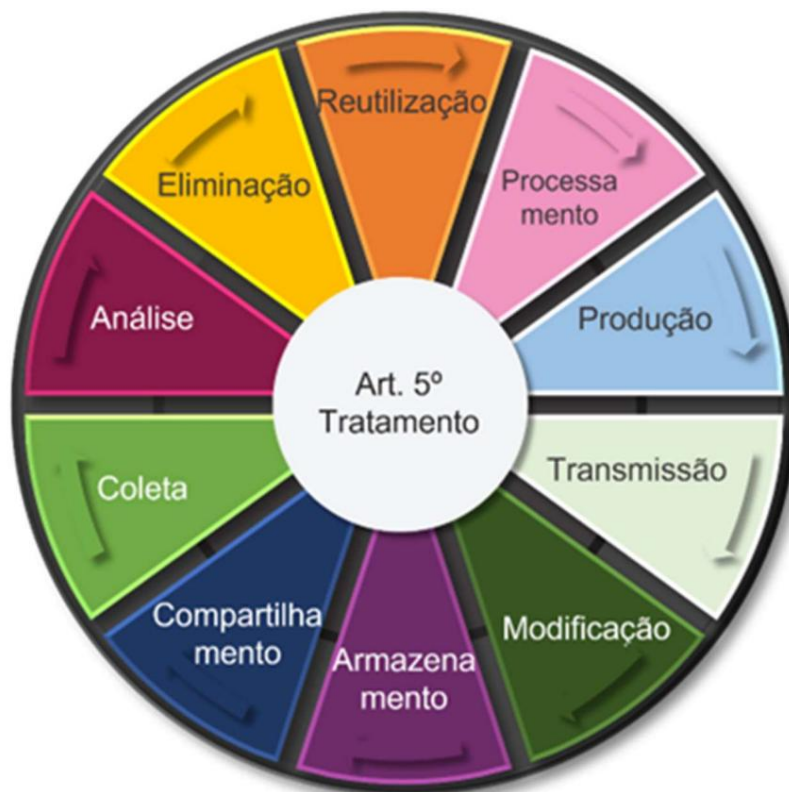


Figure 1- Data Lifecycle

Understanding the life cycle of information (personal data) is extremely important as it makes it clear to those responsible for information security the purpose of using data for the company's business, who are the people who access them, how they use the data, where they store it, how they share access to it and how it is deleted. This entire study is carried out in the RIDP carried out in all sectors of the company.

5.5. IN CASE OF VIOLATION

green4T has an incident response team duly oriented to act in cases of data breach. For this reason, we have established a process in accordance with the guidelines of information security standards, Figure 1 shows the data cycle that is based on the General Data Protection Law. Figure 2 shows the flowchart of actions in an incident event involving personal data. This process is described in P.00.01 - Information Security Incidents.


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Figure 2 - Incident Response Flowchart

6 REFERENCE DOCUMENTS


PL.00.22 - Information Technology Policy_green4T
 PL.00.34 – Information Security Policy_green4T PL.00.32
 – External Privacy Policy_green4T P.00.01 –
 Information Security Incidents_green4T

7 CONTROL OF RECORDS

NA.

8 REVISION HISTORY

Revision	Data	Description of change	Approved by the Manager	Approved by Certifications
00	30/05/2022	Issuance	Edward Marines	Adriana Moyses
01	13/07/2022	Inclusion of green4T affiliated and controlled companies	Edward Marines	Adriana Moyses

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02	15/08/2023	Changed item 3.5.7 with withdrawal of visitor data via website. Changed item 5.3 and included legal basis for treatment in items 5.3.1 to 5.3.7	LGPD Committee: Eduardo Rasi, Alan Baldo, Claudio Pessoa (DPO) and Thais Almeida
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