



PORTO CENTRAL

PRIVACY POLICY FOR PORTO CENTRAL MEMBERS

1. PURPOSE.

This INTERNAL PRIVACY POLICY [“POLICY”] aims to demonstrate the commitment of Porto Central Complexo Industrial Portuário S.A. [“PORTO CENTRAL”] to the privacy and protection of the PORTO CENTRAL MEMBER’s personal data, covering the data collection, use, sharing, storage, reuse and elimination of their data [“Data Processing”], whether physical or digital, in order to bring transparency about how and the purposes your data is processed, in accordance with Law No. 13,709/18 [“LGPD”].

2. WHAT DO WE USE YOUR DATA FOR?

PORTO CENTRAL will use its MEMBERS’ personal data to meet specific purposes, as follows:

2.1. Allow full execution of the employment contract. PORTO CENTRAL will process its MEMBERS’ personal data, such as banking and/or financial data as register information, bank, agency and bank account to make the payment of the respective remuneration, to enable the execution of the contract work.

2.2. Allow the execution of ancillary contracts of the employment contract. PORTO CENTRAL will process its MEMBERS’ personal data, including register information, data and information on family members and dependents, among others, to allow them to enjoy benefits such as health plans, possibly offered while the employment contract is in force.

2.3. Take care of its health. PORTO CENTRAL may process its MEMBERS’ personal data, including sensitive data related to health, such as history and medical records, aiming to protect the personal health of its MEMBERS, including, through health services together with medical-hospital plans, campaigns vaccination and incentives to preserve health, medical care in case of accident or occupational illness and any other procedure linked to health and quality of life.

2.4. Ensure safety and physical safety. PORTO CENTRAL will process its MEMBERS’ personal data, register details and vehicles, to ensure the safety of its MEMBERS and third parties, for accessing its headquarters, units and common areas.

2.5. Comply with legal and regulatory obligations. PORTO CENTRAL will process its MEMBERS’ personal data, including data considered sensitive, such as complete qualifications, union affiliation, personal documents, data related to racial or ethnic origin, banking and social security data, admission and dismissal exams, to comply with

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obligations set out in the law, by regulations of government bodies, by tax authorities, by the Judiciary and/or any other competent authority.

2.6. Exercise of rights. PORTO CENTRAL will process its MEMBERS' personal data, before, during and after the end of the contractual relationship to exercise its rights guaranteed by law, including, but not limited to, for use as evidence in administrative and judicial proceedings.

2.7. Purposes necessary for the operation of PORTO CENTRAL. PORTO CENTRAL may process and share its MEMBERS' personal data for legitimate purposes involving the continuity of its activities, such as compliance with regulatory obligations, compliance with current legislation, analysis and conduct of internal reports, collection and analysis of statistics, internal processes and procedures organization, as well as in negotiations and corporate operations. Processing may only occur if strictly necessary to achieve these purposes.

2.8. Exceptionality for other purposes with consent. PORTO CENTRAL may process its MEMBERS' personal data, as long as they understand and expressly consent that this processing is necessary, appropriate and meets a specific purpose.

3. HOW LONG WILL YOUR DATA BE KEPT?

As a rule, PORTO CENTRAL will no longer retain its MEMBERS' personal data and/or FORMER MEMBERS (except in cases of legal or regulatory obligation) until the employment contract or any instrument of a different nature that gave rise to the contractual relationship ends, observing the legal deadlines for storing this information. PORTO CENTRAL may also retain MEMBERS' data using technical means to remove the possibility of direct or indirect association with them.

4. IN WHICH SITUATIONS CAN YOUR PERSONAL DATA BE SHARED?

In some cases, it will be possible for MEMBERS' data to be shared with controlled companies, subsidiaries, auditing companies, potential customers and investors (if applicable) or other companies providing products or services, directly related to their activities.

By way of example, MEMBERS' personal data may be shared with health plan administrators, financial institutions, companies that are part of the parent company of PORTO CENTRAL, as well as other partner companies of PORTO CENTRAL during the execution of their social activities.

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PORTO CENTRAL will only share what is strictly necessary to achieve the specific purpose. PORTO CENTRAL will use contractual instruments and technical procedures in order to ensure that these Third Parties, recipients of MEMBERS' Personal Data, are in full compliance with applicable legislation, in particular with the provisions of the LGPD.

It is possible that some of these Third Parties are located outside Brazilian territory. In this case, PORTO CENTRAL will make sure that this data transfer is carried out, as a rule, to countries that offer an adequate degree of protection, as determined by the LGPD, or under the basis of some hypothesis contemplated by said standard.

5. HOW TO MAKE A REQUEST INVOLVING YOUR DATA?

It is important for the MEMBERS to know that their personal data is protected by law and that they can:

- (i) access and/or obtain a copy of its personal data processed by PORTO CENTRAL;
- (ii) correct, update and/or complement its personal data processed by PORTO CENTRAL;
- (iii) exercise any other right granted by law.

To access, obtain a copy, correct, update and/or complete your personal data, you can make your request and send it through the channel privacidade@portocentral.com.br.

In specific cases authorized by law, it is possible that your request may not be met. In these cases, PORTO CENTRAL will inform and explain the reasons justifying non-compliance, always based on applicable law. Access requests involving personal data and/or third-party documents will not be honored.

6. HOW DO WE GUARANTEE THAT YOUR PERSONAL DATA IS SECURE?

PORTO CENTRAL adopts the appropriate Information Security Policy to keep MEMBERS' personal data safe and protected from unauthorized access and accidental or illicit situations of destruction, loss, alteration, communication or any form of inappropriate treatment, including, but not limiting yourself:

- (i) the establishment of strict control over the processing of personal data;
- (ii) the provision of access authentication mechanisms, using, for example, strong passwords for possible access, in order to ensure the individualization of the person responsible for processing the records;
- (iii) creating a detailed inventory of record accesses;

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- (iv) The use of records management solutions is currently being implemented using techniques that guarantee the inviolability of data, such as encryption or equivalent protection measures, without prejudice to the adoption of other technical standards stipulated by the competent authorities.

7. WHAT TO DO IF YOU HAVE A QUESTION, SUGGESTION OR REQUEST?

If MEMBERS have any questions, suggestions and/or requests involving this POLICY, they should contact their leader or by email privacidade@portocentral.com.br

8. QUESTIONS ABOUT THE DEFINITIONS OF THIS PRIVACY POLICY?

Consult the glossary below:

- (v) **Personal Data.** Any information related to a natural person, directly or indirectly, identified or identifiable, whether in physical or digital media.
- (vi) **Sensitive Personal Data.** Special category of personal data relating to racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, relating to health or sexual life, genetic or biometric data relating to the natural person.
- (vii) **Data Holder.** Natural persons to whom the personal data refers, such as former, present or potential customers, MEMBERS, contractors, business partners and third parties.
- (viii) **Treatment.** Any operation carried out with personal data, such as: the collection, production, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer or extraction.
- (ix) **Anonymization.** The process through which data loses the possibility of association, directly or indirectly, with an individual, considering the reasonable technical means available at the time of processing.

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