



## PRIVACY AND PERSONAL DATA PROTECTION POLICY OF IPANEMA COFFEES

### INTRODUCTION AND SCOPE

**IPANEMA AGRÍCOLA S.A.**, a stock corporation headquartered in the City of Alfenas, State of Minas Gerais, at BR 369, w/o-no, km 175, Fazenda Conquista, Cep (zip) 37130-000, registered with the CNPJ/ME under no. 42.135.913/0001-65, and **IPANEMA COMERCIAL EXPORTADORA S.A.**, a stock corporation headquartered in the City of Alfenas, State of Minas Gerais, at BR 369, km 175 - administrative headquarters, rural area of Alfenas, Cep 37138-899, registered with the CNPJ/ME under No. 01.983.074/0001-58 ("Ipanema Coffees" or "Us") are committed to protecting the personal information (personal data) of the users (data subjects) to which we have access in the course of our business.

We are located in the State of Minas Gerais, Brazil, and are engaged in, respectively, the cultivation, commercialization and exportation of agricultural produces; particularly, raw and/or roasted and ground coffee, both in Brazil and abroad, forming the Ipanema Coffees Group.

Any *processing of personal data* in our activities is done based on the relevant data protection legislation; particularly, the Brazilian General Data Protection Law (Law No. 13.709/2018 - "LGPD")

In this Privacy and Personal Data Protection Policy ("Policy"), words and expressions in *italic* have the meaning assigned to them by the LGPD. A brief explanation and examples of these words and expressions can be found in the table at the end of this document.

This Policy clarifies how we handle *personal data* in our business activities. Our employees are advised and trained about the need to protect the *personal data* they handle in their day-to-day assignments and tasks.

*Personal data* is the information/data that identifies or can identify the individuals we deal with in our business activities. These individuals (sometimes referred to in this Policy as "you") are the *data subjects*.

*Data subjects* may be our employees, customers, suppliers, service providers (even if on a temporary basis), managers, partners and/or legal representatives of our customers. They are also referred to as "Policy



Beneficiaries”.

References in this Policy to *personal data* include references to *sensitive personal data* (such as those relating to gender, ethnicity, health and others) that we may *process* (that is, process, use, access, as explained in the table at the end of this Policy).

This Policy shall be complied with by our employees, suppliers, service providers, subcontractors, business partners, officers, shareholders, legal representatives and/or agents ("Policy Recipients").

We will be a *personal data controller* whenever we decide how we handle, maintain, process, use - in short, *process* - *personal data* in our business activities. If applicable, we may be an *operator* when the decision on how to *process* *personal data* in our business activities is made by and informed to Us by third parties such as, for example, our customers and suppliers.

In case we process your *personal data* as a data *operators*, at the request of a third party, *controllers*, the purpose and appropriate legal basis for the *processing of personal data* as well as any and all instructions regarding the *processing* is ensured and granted by such third party. This may occur when, for example, a customer sends us personal data to draw up a contract, or a supplier sends us personal data to make a purchase. In such a case, we will forward all requests we receive from *data subjects* to the appropriate *controller*.

This Policy may be updated and modified from time to time and will be revised whenever necessary to reflect the technological breakthroughs, changes in legislation and market reality. The latest version of this Policy will always be made available on our website. This Policy does not override the provisions contained in contracts, but Ipanema Coffees will seek to implement it in all of their contracts.

Whether you are a Beneficiary or a Recipient of this Policy, we advise you to contact us at the email address below, if you have any doubt, questions or believe there may have been a breach of this Policy; and/or, you suspect any compromise of *personal data processed* by Ipanema Coffees.

Email for contact: [dpo@ipanemacoffees.com.br](mailto:dpo@ipanemacoffees.com.br) (André Luiz Martins Miranda).

## **PRINCIPLES**

When *processing personal data* Ipanema Coffees is guided by the following principles:



- Purpose and Legitimacy: we will *process personal data* in compliance with the legal bases set out in the LGPD, appropriate for each *processing* and purpose. The legal bases we may use are: consent of the *data subject*; compliance with a legal or regulatory obligation by the *controller*; *processing* and shared use of data by the Public Administration, necessary for the execution of public policies provided for in laws and regulations or supported by contracts, agreements or similar instruments; performance of studies by research body, ensuring, whenever possible, the anonymization of personal data; when necessary for the execution of a contract or preliminary procedures related to a contract to which the *data subject* is a party, at the request of the *data subject*; for the regular exercise of rights in legal, administrative or arbitral proceedings; for protection of the life or physical safety of the *data subject* or of third parties; for the protection of health, exclusively in procedures carried out by health professionals, health services or health authorities; to meet the legitimate interests of the *controller* or of third parties, except in the case where fundamental rights and freedoms of the *data subject* prevail, which require protection of the *personal data*; or for credit protection, including insofar as provided for by applicable law.
- Adequacy, necessity and non-discrimination: we will collect only the *personal data* necessary to perform our activities and process them in keeping with the legitimate and specific purposes they are intended for, without using them for discriminatory, illegal or abusive purposes.
- Free Access, Data Quality and Transparency: we will meet the requests from *data subjects* regarding their *personal data* according to the terms of the LGPD and in compliance with contracts with our customers and suppliers, where applicable.
- Security and Integrity of Personal Data: we will *process personal data* by means of technical and organizational measures appropriate for their protection and conservation.
- Prevention and Responsibility: Ipanema Coffees will promote appropriate technical and organizational measures for the protection and conservation of *personal data* and compliance with the applicable regulations.

## **INFORMATION ABOUT PROCESSING OF PERSONAL DATA**

***What types of personal data does Ipanema Coffees process, for what purpose, on what legal basis and how does Ipanema Coffees collect and process personal data?***

The *personal data* collected and processed are those necessary to perform the core activities of Ipanema Coffees,



namely the cultivation, trading and export of agricultural products; particularly, raw and/or roasted and ground coffee, whether in Brazil or abroad.

As a *personal data controller*, we collect and *process personal data* in our relations with our employees, prospective employees, business partners in general (service providers, even if temporary), suppliers, subcontractors, officers, shareholders, auditors and third parties indicated in the corporate and contractual documents we deal with our activities, and customers.

As a *personal data operator*, we collect and *process personal data* of the legal representatives and employees of the companies that hire us for providing services in the area of intermediation, assembly and administration of agribusiness.

The *processing of personal data* is based primarily on the compliance with the legal and regulatory requirements as well as on request of the *data subject* (or the company/cooperative/ association/legal entity to which it relates) for the entering into and execution of contracts and performance of our business activities and legitimate interests.

The *collection* and *sharing* of personal data may be done through interactions in the most diverse forms, guided by information security, as follows: through the reception of personal data by email, by telephone messaging applications, by means of proper forms; the insertion, by Ipanema Coffees' employees, of information in cloud environments; for performance of contractual activities and customer service.

Important note: if you disclose/provide/share other people's *personal data* to/with Us (for example, you as a supplier's employee disclose *personal data* of other people in your organization), you represent that you have the appropriate legal basis to disclose the *personal data* of such other people to Us for the purpose of informing us.

Based on the nature and purpose of the business activity to be entered into with the business partner, the *personal data* collected may be used to provide you (and the business partner you relate to) with information about our developments, events and services.

#### ***With whom does Ipanema Coffees share personal data?***

Ipanema Coffees will share personal data with their staff (employees, officers and shareholders) and third parties (service providers, subcontractors and their employees), who shall have access to and handle *personal data* for



the performance of their duties and activities with Ipanema Coffees, all of whom are Beneficiaries and/or Recipients of the Policy.

Some of Ipanema Coffees' technology infrastructure partners/providers may provide us with services from other countries. Whenever we store your *personal data* with such partners, characterizing the international transfer of personal data, the respective transfer will be carried out according to the LGPD and other applicable legislations.

In addition, Ipanema Coffees may share *personal data* as follows:

- In response to a request for information by a relevant authority or third party, if we believe that the disclosure is in compliance with any applicable law, regulation or legal process.
- With law enforcement agencies, government authorities or third parties. as long as imperative for complying with the legal process, according to the applicable legislation.
- On an aggregated and/or anonymized way, so that it cannot be used to identify the *data subject*.
- If the *data subject* is notified and authorizes Ipanema Coffees to share their personal data.

#### ***Where are personal data stored?***

Personal data is stored in the company's Data Center, bound to preserve the security and protection of *personal data*, and in physical files.

Ipanema Coffees will keep the *personal data* for the period allowed by the applicable legislation, considering the need to comply with legal or regulatory obligations, or order of a competent authority.

As a computer use guideline, the access to *personal data processed* by Ipanema Coffees is restricted only to those persons authorized to access such data as necessary for the performance of the activities.

Furthermore, Ipanema Coffees uses the antivirus system (Symantec End Point Protection) to protect the files that flow through its network environments.



### ***How does Ipanema Coffees protect personal data?***

We keep a record of the *processing of personal data* carried out, in compliance with the LGPD. We also keep *personal data* safe and protected against unauthorized or unlawful *processing* and their loss, destruction or damage.

Ipanema Coffees is committed to responding to information security incidents in order to mitigate, remediate and/or report any incidents, as determined by the applicable standards, as well as to prepare a personal data protection impact report in instances where the *processing of personal data* may cause risks to civil liberties and fundamental rights.

In case of any security incident involving personal data, Ipanema Coffees will notify the subject, the ANPD and other related personal data processing agents in no longer than two (2) business days.

### ***What are the rights of the personal data subject?***

Ipanema Coffees will respond to requests from *data subjects* regarding inaccurate or outdated information on request of the data subject via the email address indicated at the beginning of this Policy.

In certain situations, Ipanema Coffees shall respond immediately to requests from *data subjects* to exercise their rights under the LGPD. In case Ipanema Coffees is unable to comply with them immediately, the *data subject* will be notified within fifteen (15) days, or another time indicated by the National Data Protection Authority (ANPD).

If it is not possible to respond immediately to the request, Ipanema Coffees will promptly send a reply to the *data subject*, reporting, where appropriate, that Ipanema Coffees is not a *data processing agent (controller or operator)* and indicating, where possible, the responsible agent; or indicating the reasons that prevent the sending of an immediate reply that fully meets the demand of the *data subjects*.

In connection with the rights to confirm the existence of or access to *personal data*, Ipanema Coffees will answer immediately (on a simplified way) or within fifteen (15) days (by means of a clear and complete statement indicating the data origin, the lack of register, the criteria used and the purpose of the *processing*, observing the commercial and industrial secrets of Ipanema Coffees).



In order for Ipanema Coffees to be sure that the person making the request is the *data subject*, we may ask that the request be accompanied by a proof of identity and we may also establish other confirmation actions. This is a security measure to ensure that *personal data* are not inadvertently disclosed. Ipanema Coffees may also contact the *data subject* to obtain further information about the request.

If the request is particularly complex, Ipanema Coffees will notify the *data subject* that more time is needed and will set a new deadline for a response and keep the *data subject* updated on the request progress.

The data subject's rights are:

- (i) Confirmation of existing *processing*: if the *data subject* has doubts about whether Ipanema Coffees *processes* his/her personal data, such subject may request confirmation of this fact.
- (ii) Access to data: the *data subject* may request Ipanema Coffees to access their *personal data*. A list of the categories of *personal data* being *processed* will be displayed. If the *processing* has taken place on the basis of his/her consent or under contract, the *data subject* may also request a complete copy of all his/her *personal data* held by Ipanema Coffees, subject to Ipanema Coffees' right to keep his trade and industry secrets and contractual obligations.
- (iii) Correction of incomplete, inaccurate or outdated *personal data*: the *data subject* may request the rectification of his/her personal data in Ipanema Coffees' records.
- (iv) *Anonymization*, blocking or deletion: if the *data subject* considers that some of his/her *personal data* are unnecessary, excessive or *processed* in violation of the law, the *data subject* may exercise this right. Applicable laws may allow *processing* to continue even in case of a request for *anonymization*, blocking or elimination.
- (v) Portability: in some cases, the *data subject* may request the transfer of his/her *personal data* to another responsible for the *processing*. Ipanema Coffees reserves the right not to transfer *personal data* concerning his commercial or industrial secrets and to preserve them in keeping with the appropriate legal bases.
- (vi) Deletion of *personal data* processed with the consent of the *data subject*, except for the following cases: compliance with a legal or regulatory obligation by the controller, study by a research entity, ensuring, whenever possible, the *anonymization* of the personal data; transfer to third parties, provided that the requirements for the *processing of personal data* set out in the applicable legislation are met; or the exclusive use of the



*controller*, being forbidden his access by third parties and provided that the data are *anonymized*.

- (vii) Information on entities and countries with which Ipanema Coffees shares their *personal data*: the *data subject* may request such information.
- (viii) Information on the possibility of non-consent and on the consequences of denial: where consent is necessary for *processing*, Ipanema Coffees will always inform the *data subject* of the possibility to not consent and the consequences of not consenting.
- (ix) Withdrawal of consent: where *processing* is based on consent, the *data subject* may withdraw that consent at any time, so that Ipanema Coffees will no longer be able to *process* the *data subject's* personal data from that moment on, except for *personal data* that have already been *processed* or the existence of another legal basis for Ipanema Coffees to *process it*.

### *Responsibilities*

The responsibilities of Ipanema Coffees for the *processing of personal data* described in this Policy are limited to efforts to adopt good practices pursuant to Article 32 of the LGPD.

### *Privacy by design*

Ipanema Coffees has adopted the principle of *privacy by design*, which means that privacy will be taken into account from the beginning of a project's development, and will contemplate, in the definition and planning of all new or significantly altered systems that collect or *process personal data*, privacy issues, including the completion of one or more data protection impact assessments.

### *Cookies*

We use cookies on our website to collect personal or navigational information in order to improve your experience on each website visit.

Cookies are small text files stored on your device (computer, tablet or cell phone), which allow us to recognize your navigation preferences as an Internet user and, thereby, improve your experience.





### *Personal Data Protection Impact Assessment*

The data protection impact assessment will include:

- Consideration of how *personal data* will be *processed* and for what purposes;
- Verification that the proposed *processing* of *personal data* is necessary and proportionate to the purpose(s);
- Assessment of the risk to individuals in the *processing of personal data*;
- What controls are necessary to address the risks identified and to demonstrate compliance with the legislation;

The use of techniques such as data minimization and pseudonymization will be considered where applicable and appropriate.

Definition according to LGPD		Explanation / examples
Processing agents	The controller and the operator.	Refer to controller and operator.
Anonymization	<i>Use of reasonable and available technical means at the time of processing, whereby the data lose the possibility of association, directly or indirectly, with an individual.</i>	<p>These are technical methods to dissociate personal data from the data subject, without having – by means existing reasonable techniques – a way to rebuild the "path" to link the personal data to the data subject again.</p> <p>Examples: data randomization, where the link between the data and the data subject is removed by applying some data exchange; and generalization, where data are correlated to a broader set of identifying data; for example: instead of stating that the employees of Company XYZ are mostly of a certain race or gender, it is stated that in the industry segment of a certain geographical region of the country, the</p>



		<p>majority of employees are of a certain race and gender.</p> <p>Note that pseudonymization is different from anonymization. Pseudonymization uses techniques such as encryption with a secret key (by applying the key, the personal data will be associated again with the data subject, so they will not be anonymized); tokenization (by applying the token, it is known that the user was a certain individual / person / data subject).</p>
National Data Protection Authority (ANPD)	<i>Public administration body responsible for supervising, implementing, and enforcing compliance with the General Law on Personal Data Protection throughout the country.</i>	The ANPD is the body that enforces the LGPD: it regulates, inspects, imposes penalties, issues rules explaining legal issues, and draw up guidelines.
Database	<i>A structured set of personal data, established at one or several locations, in electronic or physical support.</i>	It is any system, computerized or not, for data archiving and maintenance. A repository or container for a collection of data files.
Blocking	<i>Temporary suspension of any processing operation, by means of personal data or database maintenance.</i>	If the ANPD or any legal authority determines the blocking of the data, the processing agents will be temporarily suspended from using them, for any purpose or specific purpose. However, the suspension of data processing does not exempt the processing agents from keeping the data protected according to the LGPD.
Consent	<i>Free, informed, and unambiguous expression by which the data subject agrees with the processing of his/her personal data for a specific purpose.</i>	It is the statement in which the data subject allows certain personal data to be processed. The request should be made by the operator or controller on a clear and transparent way, and should mention the specific and limited and appropriate use for the intended use purpose.



Controller	<i>A natural person or legal entity under public or private law who is responsible for decisions relating to the processing of personal data.</i>	The controller is responsible for decisions relating to the processing of personal data. Among other things, the controller decides which data will be processed, how and for what purpose. For example: a company controls the personal data of the company's employees.
Anonymous data	<i>Data relating to a data subject who cannot be identified, considering the use of reasonable technical means available at the time of their processing.</i>	These are personal data that, having gone through some process of anonymity, cannot be linked / bound to their subject. For example, this happens when a confidential data set (such as an employee's self-declaration of ethnicity) is transformed into statistical data (the percentage of employees identifying each ethnicity, etc.).
Personal data	<i>Information related to the identified or identifiable natural person.</i>	Any information that can lead to personal identification (full name, CPF, address, affiliation, biometrics, etc.).
Sensitive personal data	<i>Personal data concerning racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data concerning health or sex life, genetic or biometric data, when linked to a natural person.</i>	These are a kind of personal data (sensitive data), so one considers there is a real possibility of misuse for discriminatory and harmful purposes to individuals, such as race/ethnicity, religion, political opinions, sexual life, and genetic or biometric data (such as facial biometrics or DNA).
Elimination	<i>Deletion of data or set of data stored in a database, regardless of the procedure used.</i>	Deletion of personal data. It is different from blocking as the processing agent – to whom the National Data Protection Authority (ANPD) or a legal authority determines the deletion of personal data – will no longer be able to use them.
Operator	<i>A natural person or legal entity, under public or private law, who processes personal data on behalf of the responsible for the processing.</i>	It is the one who processes personal data on behalf of another entity, that is, on behalf of the controller. For example: processing of the payroll



		for employees of a certain company will be under the operator of the employees' personal data. Must follow the instructions of the data controller, but cannot commit irregularities / violations of LGPD under the guise of following the controller's instructions.
Research Entity	<i>Direct or indirect public administration body or non-profit legal entity under private law, legally set up according to the Brazilian legislation, with head offices and jurisdiction in the country, that includes basic or statutory research in its institutional mission or social or statutory purpose, applied, of a historical, scientific, technological, or statistical nature.</i>	These are entities that use personal data for specific purposes that can benefit the community and, therefore, are subject to different data processing rules and to requests for consent from data subjects.
Data subject	<i>Natural person to whom the personal data under processing refer.</i>	Individual to whom the personal data refer. The person who has the final say in any matter relating to the processing of his/her personal data. It is the person who, in cases where a consent is required for certain processing of personal data, must give unambiguous, informed consent.
International transfer	<i>Transfer of personal data to a foreign country or international organization of which the country is a member.</i>	This occurs when personal data are transferred outside Brazil. The transferor shall ensure that, in the country receiving them, the level of data protection is at least equal to that provided by the LGPD.
Data processing	<i>Any operation performed with personal data, such as those related to collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, assessment or information control,</i>	These are all actions performed with the data subject's personal data. Note that among the words used to describe the activities that characterize the processing is the word <i>access</i> . In order to take almost all the other actions indicated in the law definition, it is first necessary



	<i>modification, communication, transfer, dissemination or extraction.</i>	to access the personal data; then, if there is access, there is processing.
Shared use of data	<i>Communication, disclosure, international transfer, interconnection of personal data or shared processing of personal database by public bodies and entities in the fulfillment of their legal powers, or between these and private entities, mutually, with a specific authorization, for one or more processing types allowed by these public entities, or between private entities.</i>	There will be data sharing, under the LGPD, when certain personal data processing activities are performed by one or more public entities for legal purposes, or between public and private entities against an authorization.

In preparing this table, a variety of materials were consulted, with an emphasis on the following sources:

- [www.iapd.org.br](http://www.iapd.org.br)
- [www.dataprivacy.com.br/iapp](http://www.dataprivacy.com.br/iapp)
- [www.fiemg.com.br](http://www.fiemg.com.br)
- [www.guialgpd.com.br/lgpd-commented/](http://www.guialgpd.com.br/lgpd-commented/)