

PRIVACY AND PERSONAL DATA POLICY

1. INTRODUCTION

This Policy aims to demonstrate the commitment of the Carmelo Fior Companies, referred to simply as “We,” to the privacy and protection of Personal Data. It also seeks to establish the rules governing the processing of personal data within the scope of the services and functionalities of the corporate website, available at www.carmelofior.com.br, in compliance with applicable legislation, and with transparency and clarity towards You and the market in general.

By providing your data on our website, You declare that you have carefully read this Policy, are fully aware of its contents, and give your free and express consent to the terms set forth herein, including the collection and use of personal data for the purposes specified in this document.

If You do not agree with the provisions of this Policy, you must communicate your request for the deletion of your data through our website, via the Ombudsman channel.

MINORS UNDER 16 YEARS OF AGE – Please do not provide your personal data on our website if you are under 16 years of age.

LEGAL REPRESENTATIVES – Although we prohibit the submission of personal data from children and adolescents, parents and legal guardians must supervise the online activities of minors under their care.

2. DATA COLLECTED

- **How Data is Collected:** Personal data may be collected when You voluntarily submit it or interact with our channels, such as mailing lists and services.
- **Data Accuracy and Updates:** You are solely responsible for the accuracy and truthfulness of the data provided, as well as for keeping it up to date. It is your responsibility to ensure that the information is correct and current.
- **Restrictions on Processing:** We will not be obliged to process or handle your personal data if there are indications that such processing may violate applicable law or be used for illegal, unlawful, or immoral purposes, or for purposes contrary to good customs.

- **Database:** The database formed through the collection of personal data is our property and responsibility. Its use, access, and sharing will be carried out strictly within the limits and for the purposes described in this Policy.
- **Technologies Used:** We use the following technologies: Google Adwords, Google Analytics, social media platforms (LinkedIn, Facebook, Instagram, and YouTube), WhatsApp, Zoom, and Teams.
 - We use cookies. You may configure your browser to block them, understanding that certain website functionalities may be limited as a result.
 - All technologies employed comply with applicable legislation and the terms of this Policy.
 - We do not use automated decision-making processes that produce significant effects on You.

3. DATA SHARING

The data collected and recorded activities may be shared:

- With competent judicial, administrative, or governmental authorities, whenever there is a legal obligation, request, or court order;
- Automatically, in the event of corporate transactions such as mergers, acquisitions, or incorporations;
- With companies engaged to provide recruitment and selection services, subject to compliance with the security and data protection guidelines set forth in Section 4 of this Policy.

4. DATA PROTECTION AND RESPONSIBILITIES

- **Precautions You Should Take:** It is essential that You protect your data. We will never send messages requesting data confirmation or containing executable attachments (.exe, .com, etc.) or links for downloads. Exercise caution at all times.
- **Access to Personal Data:** Personal data is accessed internally only by authorized professionals, in accordance with the principles of necessity, proportionality, and relevance to the company's objectives, and subject to a confidentiality commitment to safeguard your privacy under the terms of this Policy. Any misuse is subject to internal penalties and applicable legal measures.
- **External Links:** When accessing our website or mailing content, You may be redirected to third-party websites with their own privacy policies. It is your responsibility to read, accept, or reject such policies. We are not responsible for the content or privacy practices of these external environments.

- **Outsourced Processing:** Third-party companies that process data on our behalf must comply with the terms of this Policy and with applicable information security standards.
- **Email Communication:** To optimize and improve our communications, when we send emails, we may receive open notifications, where technically available. It is important that You remain alert, as our emails are sent exclusively from the @carmelofior.com.br domain.

5. DATA STORAGE AND ACTIVITY LOGGING

- Personal data and activity logs are stored in a secure and controlled environment, in compliance with the following minimum retention periods:
 - Registration data, digital identification, and other information provided by You: Retained for the period necessary to fulfill legal obligations, execute contracts, or comply with judicial or administrative determinations.
- **Extended Retention Periods:** For purposes of auditing, security, fraud prevention, and the preservation of rights, we may retain the history of your Personal Data for a period longer than that specified in this Policy, always in accordance with applicable legal or regulatory requirements.
- **Data Storage:** Your Personal Data will be stored on our servers located in Brazil, as well as in environments utilizing cloud computing resources or servers. This may involve the transfer and/or processing of your Data outside Brazil, in compliance with applicable provisions, while ensuring the protection of your rights at all times.

6. YOUR RIGHTS AND HOW TO EXERCISE THEM

- **Basic Rights:** You have the right to request confirmation of the existence of processing of your Personal Data, as well as to access, rectify, or update your Data through our Service Channel.
- **Limitation, Objection, and Deletion of Data:** Through our Service Channel, you may also request:
 - The limitation of the use of your Personal Data;
 - To express your objection to processing or revoke your consent, where applicable;
 - The permanent deletion of your Personal Data collected by us, which will be carried out within 30 business days, unless there is a legal or regulatory obligation to retain it.

- After the retention period or if there is no legal requirement for storage, your Personal Data will be securely deleted or anonymized for statistical purposes

7. INFORMATION ABOUT THIS POLICY

- **Amendments and Updates:** We reserve the right to amend this Policy at any time, whenever necessary to ensure compliance with legal, regulatory, or business changes. We recommend that you review it periodically when accessing our website.
- If changes require renewed consent, you will be duly informed through our communication channels.
- **Severability:** If any provision of this Policy is deemed invalid or unenforceable by a competent authority or court decision, the remaining provisions shall remain in full force and effect.
- **Electronic Communication:** You acknowledge that all communications sent via email, SMS, instant messaging applications, or any other digital means to the contact details you have provided are valid, effective, and sufficient for disclosing information related to our services, your Personal Data, terms of use, or any other relevant matter, unless otherwise specified in this Policy.
- **Service Channel:** For any questions regarding the provisions of this Privacy and Personal Data Processing Policy, or to exercise your rights under applicable data protection laws, you may contact our Data Protection Officer via email at: lgpd@carmelofior.com.br.
- **Notice to Users Outside Brazil:** If you do not reside in Brazil, by using our website's functionalities you agree that your data will be processed in accordance with the GDPR.

8. GLOSSARY

For the purposes of this Policy, the following definitions and descriptions shall apply for better understanding:

- **Data:** Any information entered, processed, or transmitted through our Database.
- **Personal Data:** Data related to an identified or identifiable natural person.
- **Anonymization:** The use of reasonable and available technical means at the time of Processing, by which data loses the possibility of direct or indirect association with an individual.
- **Sensitive Personal Data:** Personal data concerning racial or ethnic origin, religious belief, political opinion, membership in a trade union or organization of a religious, philosophical, or political nature, data regarding health or sexual life, genetic data, or biometric data when linked to a natural person.
- **Data Protection Officer (DPO):** The designated individual and focal point within the organization responsible for assessing Data Protection rules.
- **Cloud Computing:** A virtualization technology for services built from the interconnection of multiple servers via a common information network (e.g., the Internet), with the objective of reducing costs and increasing the availability of supported services.
- **Access Account:** Credential required to use or access exclusive functionalities of our portal.
- **Cookies or Trackers:** Small files sent by our environments and stored on your devices that retain preferences and other information, with the purpose of customizing your browsing experience according to your profile.
- **IP (Internet Protocol):** A set of alphanumeric characters that identifies users' devices on the Internet.
- **Logs:** Records of activities of any users accessing our portal.
- **Session ID:** Identification of the user's session upon accessing our portal.
- **Solely Automated Decisions:** Decisions that affect a user and are programmed to operate automatically, without human intervention, based on the automated processing of personal data.
- **Processing:** Any operation carried out with Personal Data, including collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation, control, modification, communication, transfer, dissemination, or extraction, in accordance with applicable legal bases and regulations.

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