ERNESTO BORGES
ADVOGADOS

POLICY

Privacy and Personal Data Protection

SGQ-DOC 01

Version: 08 – August/2025

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1. Introduction

Ernesto Borges Advogados Law Firm (hereinafter referred to as "Law Firm") has the mission to provide legal services that excels its clients' expectations about quality and outcome, creating wealth for the company, and valuing its members and partners, grounded on the tenet that the privacy and protection of personal data is a fundamental individual right, and information is an asset of utmost importance for our Law Firm.

As a result, it understands that there is an operation of personal data processing in its internal processes, regardless of the way in which the collection was performed, and that such processing implies vulnerability, owing to both internal and external factors, which may compromise the protection of personal data and impact the privacy of data subjects.

Thus, it establishes this PRIVACY AND PERSONAL DATA PROTECTION POLICY ("Policy" or "PPDPP"), as a core element of its Corporate Governance system. This Policy is in line with the applicable Brazilian laws, as well as with internationally recognized standards and good practices, aiming to ensure appropriate levels of protection for personal data processed by the Law Firm, as well as to establish a relationship of trust with relevant data subjects through a transparent performance.

For the purposes of this Policy, the terms "Personal Data" and "Sensitive Personal Data" will be jointly referred to as Personal Data.

The purposes of this Policy, Personal Data and Sensitive Personal Data will be jointly referred to as Personal Data. The term "Data" covers information in general that is required for the performance of the Law Firm's activities, and may or may not include Personal Data.

2. Definitions

The terms set out in this Policy should be interpreted in keeping with the definitions herein:

1. **Anonymization:** Use of reasonable technical means available at the time of processing, by means of which a data loses the possibility of association, directly or indirectly, with an individual.

2. **Brazilian Authority for Personal Data Protection (ANPD):** Government agency in charge of ensuring, implementing, and overseeing compliance with the General Personal Data Protection Law (Law 13709, of August 14, 2018) throughout the Brazilian domestic territory.

3. **Blocking:** Temporary suspension of any processing operation, upon storage of personal data or database.

4. **Information Security Steering Committee (CGSI):** Permanent cross-disciplinary working group under the management of the Board of Directors of Ernesto Borges Advogados Law Firm.

5. **Consent:** Free, informed, and unequivocal statement by which the relevant data subject agrees to the processing their personal data for a certain purpose.

6. **Data Controller:** Individual or legal entity, governed by public or private law, in charge of decisions regarding the processing of personal data.

7. **Anonymized Data:** Data relating to the relevant data subject that cannot be identified, considering the use of reasonable and available technical means at the time of processing.

8. **Sensitive Personal Data:** Personal data on racial or ethnic origin, religious conviction, political opinion, union membership or organization of a religious, philosophical or political nature, data regarding health or sexual life, genetic or biometric data, when linked to an individual.

9. **Personal Data:** Information relating to an identified or identifiable individual.

10. **Deletion:** Deletion of data or data set stored in a database, regardless of the procedure used.

11. **Data Protection Officer:** Person appointed by the data controller and appointed to act as a communication channel between the data controller, data subjects, and ANPD.

12. **Data Processor:** Individual or legal entity, under public or private law, who processes personal data on behalf of the data controller.

13. **Information Security:** Preservation of the tenets of confidentiality, integrity, and availability of information of Ernesto Borges Advogados Law Firm.

14. **Third Party:** Any and all service providers, suppliers, consultants, clients, business partners, third parties hired or subcontracted, whether they are individuals or legal entities, regardless of formal contract or not.

15. **Data Subject:** Individual to whom the personal data being processed refers.

16. **Processing:** Any operation carried out with personal data, such as those pertaining to the collection, production, reception, sorting, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, assessment or control of information, change, reporting, transfer, dissemination or extraction.

17. **User:** Partners, lawyers, employees subject to the Consolidation of Labor Laws, interns, apprentices from any area of the companies that make up the Ernesto Borges Advogados Law Firm or third parties appointed to the provision of services to the Ernesto Borges Advogados Law Firm, regardless of the legal regime to which they are subject, as well as any other individuals or legal entities duly authorized to use any information asset of the Ernesto Borges Advogados Law Firm to perform their professional activities.

18. **Personal Data Breach:** Situation in which personal data is processed in violation of one or more relevant privacy protection requirements.

3. Purposes

1. The purpose of this Policy is to set out guidelines for Privacy and Protection of Personal Data that allow the Law Firm to process personal data in keeping with Brazilian law.

2. To advise on the adoption of technical and administrative controls to meet the requirements for Protection of Personal Data, in keeping with the applicable laws.

3. To ensure to the data subjects of the personal data processed by the Law Firm the fundamental rights of freedom and privacy, and the free development of an individual's personality.

4. To proactively address potential information security incidents involving personal data.

5. To minimize the risk of financial loss, reduced market share, client trust or any other negative impact that incidents involving personal data may have on the Law Firm.

6. To establish Privacy by Design and Default in its personal data processing activities, striving for the protection of privacy from the design of a product or service, maintaining it throughout the development cycle, and throughout its interactions with processing agents and personal data subjects.

4. Guidelines

1. The purpose of this Policy is to ensure the systematic and effective management of all aspects pertaining to the protection of personal data and the rights of its data subjects, providing support to critical business operations, and mitigating identified risks and possible impacts on the Law Firm.

2. The Advisory Board, Board of Directors, and Information Security Steering Committee are committed to the effective management of

Personal Data Protection in the Law Firm, which is why they take all appropriate measures to ensure that this Policy is properly communicated, understood, and followed at all levels of the Law Firm. To this end, periodic reviews will be carried out to ensure its continued relevance and appropriateness to the needs of the Law Firm.

3. It is the policy of Ernesto Borges Advogados Law Firm:

    1. To ensure the relevant data subject the choice of allowing or not the processing of their personal data, except in cases where the law allows the processing of personal data without the data subject's consent;

    2. To ensure that the processing of personal data complies with applicable laws, and in accordance with a permitted legal basis;

    3. To communicate clearly to the data subject, at the time of collection, the processing to which their data will be submitted, collecting new authorization whenever the data is submitted to processing other than that authorized, except in cases where the law allows the processing of data without the data subject's consent;

    4. Whenever necessary, to provide the relevant data subject with sufficient explanations about the processing of their personal data, as provided for in the applicable laws;

    5. To restrict the collection of personal data strictly to what is allowed pursuant to the applicable laws, and the purposes set forth in the collection of the personal data subject's consent, minimizing, where possible, the collection of said data;

    6. To restrict the use, access, retention, disclosure, and transfer of personal data to what is necessary to fulfill the specific, explicit, and legitimate purposes;

    7. To retain personal data only for as long as necessary to fulfil the stated purposes and subsequently destroy, block or anonymize it securely;

    8. To block access to personal data and not carry out any further processing when the stated purposes expire, although the retention of personal data

is required by the applicable laws;

9. To ensure the appropriateness and quality of personal data, except in cases where there is a legal basis for maintaining outdated data;

10. To provide personal data subjects with clear and easily accessible information about the policies, procedures, and practices with respect to the processing of personal data carried out by the Law Firm, including what data is processed, the purpose of processing, and means of contact to receive further information;

11. To report data subjects when there are significant changes in the processing of their personal data;

12. To ensure that data subjects are able to access and review their data, provided that their identity is authenticated with an appropriate level of assurance, and that there is no legal restriction on such access or review of personal data;

13. To ensure traceability and accountability throughout the processing of personal data, including the possibility of sharing this data with third parties;

14. To fully address data breaches, ensuring that they are properly recorded, sorted, investigated, rectified, and documented;

15. To ensure that, in the event of a data breach, all interested parties will be notified, according to the requirements and deadlines provided for in the applicable laws;

16. To ensure the existence of a person responsible for documenting, implementing, and reporting policies, procedures, and practices relating to privacy and data protection;

17. To take information security controls, both technical and administrative, sufficient to ensure appropriate levels of protection for personal data;

18. To provide policies, standards, and procedures for the protection of personal data to all interested and authorized parties, such as: employees, partners, engaged third parties and, where relevant, clients;

19. To ensure the education and awareness of employees, partners, engaged third parties and, where relevant, partners and clients, about the personal data protection practices adopted by the Law Firm;

20. To continuously improve Personal Data Protection Management through the definition and systematic review of privacy and personal data protection goals at all levels of the law firm;

21. To ensure non-discrimination in the processing of personal data, making it impossible for them to be used for discriminatory, unlawful or abusive purposes;

22. To ensure full compliance with Personal Data protection laws and regulations.

4. This policy applies to any personal data processing operation carried out by the Law Firm, regardless of the medium or country where the data is located, provided that:

1. The processing operation is carried out in Brazilian domestic territory;

2. Its purpose is the offer or supply of goods or services or the processing of data of data subjects located in the domestic territory;

3. The personal data has been collected in the domestic territory.

5. Roles and Responsibilities

1. Responsibilities of Information Security Steering Committee – CGSI

2. To review, revise, and approve policies and standards relating to the protection of personal data;

3. To ensure the availability of the necessary resources for an effective Management of Personal Data Protection;

4. To ensure that the processing of personal data is carried out in keeping with this Policy and the applicable laws;

5. To disseminate this Policy and carry out the necessary actions to spread a culture of protection of Personal Data in the Law Firm's environment.

2. Responsibilities of Personal Data Protection Officer

1. To receive complaints and communications from the relevant personal data subjects, as well as provide clarifications and adopt the necessary measures;

2. To receive communications from the Brazilian Data Protection Authority and take the necessary measures;

3. To guide the members and engaged third parties regarding the practices to be taken in relation to the protection of personal data;

4. To meet all other assignments, as directed by the Brazilian Data Protection Authority, set forth in supplemental rules published by said Agency;

5. To support CGSI in its resolutions;

6. To perform activities in liaison with the Information Security staff to amend information security rules and procedures as necessary to enforce PPDPP;

5.2.7. To support the management against personal data breaches, ensuring appropriate dealing and reporting, within a reasonable time, the ANPD and data subjects impacted by the breach, whenever it poses a relevant risk or damage to the relevant data subjects.

3. Responsibilities of All Members of Information Technology Areas

1. To ensure that Information Security policies, standards and procedures are amended in order to meet the requirements of this Policy;

2. To take security measures, both technical and administrative, capable of protecting personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate or unlawful processing, pursuant to the minimum standards recommended by ANPD;

3. To handle information security incidents involving personal data, ensuring they are found, stopped, removed, and recovered within a reasonable time;

4. To support the Personal Data Protection Officer in reporting to the domestic authority and to the relevant personal data subject should security incidents happen that may pose a relevant risk or damage to data subjects.

4. Responsibilities of Information Users

1. To read, understand, and fully comply with the terms of this Policy as well as other applicable personal data protection rules and procedures;

2. To forward any questions and/or requests for clarification about this Policy, its rules, and procedures to the Personal Data Protection Officer, or to the Information Security Management Committee, accordingly;

3. To report to the Personal Data Protection Officer any event that breaches this Policy or harms or may harm the Personal Data processed by the Law Firm;

4. To execute the Term of Use of the Law Firm's Information Systems, thus stating awareness and full acceptance of the provisions of this Policy, as well as other security rules and procedures, undertaking liability for their compliance;

5. To be liable for noncompliance with this Policy, rules, and procedures pertaining to the processing of Personal Data, as defined below, in item 6, referred to as "Penalties and Punishments."

6. Penalties and Punishments

1. Policy breaches, whether accomplished or by mere omission or unaccomplished attempt, as well as other rules and procedures for the protection of personal data, will be subject to penalties ranging from verbal warning, written warning, unpaid suspension to justifiable discharge, or removal from the company, depending on the type of relationship maintained with the Law Firm.

2. Breach events will be reviewed by the Information Security Management Committee, duly sorted according to breach severity, the effect achieved, the recurrence, and taking into account the requirement to fulfill the provisions of the Articles of Organization of the Ernesto Borges Law Firm regarding the Liability of Partners, or in the case of falling into one of the cases provided for in Article 482 of the Consolidation of Labor Laws, depending on the concrete situation ascertained, being then submitted to the Risk Management and Compliance Officer.

3. In the case of engaged third parties or service providers, the CGSI should review the occurrence and submit it to the Risk Management and Compliance Officer to resolve on the effectiveness of penalties and punishments according to the terms provided for in the relevant agreement.

4. In the case of breaches that imply unlawful activities, or that may imply risks to the relevant personal data subjects or damage to the Law Firm, the offender will be liable for the damages, and the relevant judicial measures will be applied, without prejudice to the terms described in items 6.1, 6.2 and 6.3 of this Policy.

7. Policy Management

1. The guidelines established in this Policy and in the other rules and procedures for personal data protection are not exhausted, owing to the continuous technological development, applicable laws, and the constant emergence of new threats and requirements. Thus, it is not a enumerative list, and it is the obligation of the user of the Law Firm's information to take, whenever possible, other security measures in addition to those provided herein, in order to guarantee the protection of personal data processed by Ernesto Borges Advogados. Omitted cases will be reviewed by the Information Security Steering Committee for further resolution.

2. The Privacy and Personal Data Protection Policy was approved by the Information Security Management Committee, alongside the Board of Directors on November 9, 2021 and became effective as of this date. It is the responsibility of the Information Security Steering Committee to ensure the update at intervals not surpassing one (01) year.

8. Version History

VERSION	DATE	CHANGES
08	04/08/2025	Updating the layout, template, and letterhead.

ERNESTO BORGES NETO
GENERAL EXECUTIVE BOARD

RENATO CHAGAS CORRÊA DA SILVA
RISK MANAGEMENT AND COMPLIANCE BOARD

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OPERATIONS BOARD

LIDIANE MIQUILINI ALVES
PEOPLE, MANAGEMENT, AND INNOVATION BOARD

ERNESTO BORGES
ADVOGADOS

Certificate of Electronic Signatures:
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