
PRIVACY POLICY

GENERAL INFORMATION

ASAD GROUP values the privacy and protection of personal data of its users, customers, employees, partners, suppliers and all other data subjects and is committed to ensuring that these rights are respected, in compliance with Law No. 13,709/2018 - General Data Protection Law ("LGPD") - and other applicable laws on the subject. This Privacy Policy ("Policy") applies to all users and customers of the solutions offered by ASAD GROUP and aims to inform how their personal data will eventually be collected, processed, stored, shared and otherwise processed when accessing and using our institutional website (<https://www.grupoasad.com/>), or when interacting with ASAD GROUP by any other means, in accordance with applicable privacy and data protection laws. If you have any questions about the content of this Policy, please contact our legal department directly at juridico@grupoasad.com.

How do we collect your personal data?

Normal access to our website does not require the provision of personal data, however, when you access and use our site, or when you interact with GRUPO ASAD through other means, we may collect your personal data in different ways, such as those indicated below:

1. By directly providing information by you, such as when you fill out your data to subscribe to our newsletter, or when you contact GRUPO ASAD through the "Contact Us" area or through other means or communication channels, such as phone or messages on our social networks.
2. Through automatic collection of data through your browser tools and other technologies, such as cookies (see the Cookie Policy).

What data do we collect?

1. **User registration data.** When you are a user of the site and interact with GRUPO ASAD to sign up for our newsletter or when you contact GRUPO ASAD through the "Contact Us" area, we will process personal data such as your full name, email, and telephone number.
2. **Usage and device data.** We will process data related to your use of the site, such as date and time of access, IP address of your device, pages visited, geolocation, browser used, type of device, language preference, features used, country and language settings, among others.
3. **Other information.** We will process additional data that may be voluntarily inserted into communications sent to GRUPO ASAD through the site's "Contact Us" area, email, mail, phone or any other means.

What are the purposes for which we process your personal data?

GRUPO ASAD processes your personal data for various purposes, according to your relationship with the company and the way you interact with us.

Some of the main purposes for which we collect, process or otherwise handle your personal data include the following:

1. **a) To promote our activities.** We will process your personal data to send you our newsletter and information about our services, products, research, studies, news or any other content or material we produce, in order to promote our activities;

2. b) To respond to your inquiries, compliments, complaints, suggestions, and communicate with you. When you contact us, whether through our website, by phone, by email, or any other means of communication, we will process your personal data to be able to communicate with you, responding to your inquiries, compliments, complaints, or suggestions, as well as any message you may have sent us, including for the communication of technical problems with the use of our website.

3. c) For marketing, sending information about our products or services. If you already have a commercial relationship or have interacted with GRUPO ASAD previously, or have registered to receive materials and information from GRUPO ASAD through the website, we may process your personal data for marketing and/or for sending information about our provided products or services.

4. d) To conduct satisfaction surveys. We may process your personal data when conducting satisfaction surveys with our customers, to identify whether the products or services we offer are being received positively and what can be changed to improve their usability and operability.

5. e) To analyze the usage of our website. Access to the website may involve the installation or request for authorization to install cookies on the device used for access, which aim to collect information related to browsing activity and may serve to improve the functioning of the site and its tools. Cookies may also be used to collect and store information about the visit habits and preferences of each user, with the intention of enabling a better experience for the user, adopting improvements to the site and the content provided to visitors. For more information, please access our Cookie Policy.

6. f) To ensure the security of our platforms. We will process your personal data to ensure the security of the website, by evaluating unusual patterns in its use, among other actions that may indicate a cyber attack or a threat to the confidentiality, integrity, or availability of our systems.

7. g) To comply with legal, regulatory obligations, or court orders. When we need to comply with legal, regulatory obligations, or court orders, we will process your personal data that may be necessary for such purposes, including by sharing such data with public authorities and the Judiciary.

8. h) To defend ourselves in judicial, administrative, or arbitral proceedings. When necessary, we will process your personal data that may have been shared to defend our interests in judicial, administrative, or arbitral proceedings brought by you or third parties against us, or brought by us against you or third parties.

9. i) To ensure the safety of our facilities and employees. If you visit our physical facilities, we will process your personal data that may have been shared to ensure the safety of our employees and facilities, including the security of the information we store, whether personal data, trade secrets, or other corporate information.

10. j) To ensure the protection of your health, the health of our employees, and third parties. If you visit our physical premises, we will process your personal data that may be shared to ensure that you, our employees, or third parties do not show symptoms of an infectious disease (especially COVID-19) that could compromise everyone's health.

11. l) Holding meetings, video conferences or phone conferences. We will process your personal data to hold meetings, video conferences, or phone conferences, including, depending on the means used, your image and voice, as well as identification and electronic correspondence data, to send invitations and links for access to meetings.

12. m) To receive referrals from third parties. We will process your personal data when we receive referrals from third parties about your potential interest or the potential interest of your organization in contracting our products or services, allowing us to contact you later to present our solutions.

13. n) For the purpose of conducting internal audits. We will process your personal data 3 fo necessary for the purpose of conducting internal audits 3 four platforms and systems, including financial, tax, and accounting audits, compliance audits with laws and regulations to which we are subject, audits of financial controls and risks, audits for the reorganization, sale, assignment, or transfer of 3 four3 all 3 four assets, audits required by Government Authorities, or any 3 fou audits that are necessary or relevant for the proper development 3 four business

LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

We process your personal data in accordance with the legal bases provided for in articles 7 and 11 of the LGPD, such as:

- **Compliance with legal or regulatory obligations.** In certain situations, we process your personal data based on the need to comply with a legal or regulatory obligation.
- **Contractual performance.** When we enter into a contract with you, or when we are conducting preliminary procedures related to the contract, we will process your personal data that is necessary for the performance of the contract.
- **Regular exercise of rights.** We may process your personal data when necessary to enable the regular exercise of our rights in contracts, or in administrative, judicial, or arbitral proceedings, such as, for example, the indication of your registration data in a lawsuit filed by you against GRUPO ASAD.
- **Protection of life or physical integrity.** We will process your personal data when necessary for the protection of life or physical integrity, yours or third parties, such as when measuring your temperature before allowing you to enter one of our physical facilities, to ensure that you do not show signs of infection by infectious diseases that could contaminate our employees or third parties.
- **Legitimate interest.** We will process your personal data when we have a legitimate interest in processing, except where your fundamental rights and freedoms prevail, such as when we promote our activities through sending emails to our clients.
- **Guarantee of fraud prevention and the data subject's security.** We will process your personal data when necessary to ensure fraud prevention and the data subject's security in identification processes.

When we do not have another legal basis that allows the processing of your personal data, we may process your personal data based on your freely given, informed, and unambiguous consent, which can be revoked at any time, free of charge and easily.

We will ensure that you are informed in a transparent manner, and when necessary, other actions will be taken to ensure the legality of this processing. For further details on the legal basis used in a specific processing of personal data carried out by us, please contact our legal department at: juridico@grupoasad.com

PERSONAL DATA OF CHILDREN AND ADOLESCENTS

The site is not intended for individuals under the age of 18, and we do not voluntarily collect personal data from children and adolescents. We recommend that minors' use of the site is always supervised by their parents and/or legal guardians. If we become aware that we have collected personal data from children and adolescents, we will take appropriate measures to delete this information from our records and databases. If the user is under 18 and wishes to use the site, the respective parents' and legal representatives' consent will be necessary for the processing of the child's or adolescent's personal data.

PERSONAL DATA STORAGE TIME

Personal data is stored according to the following parameters:

- (i) for the time required by law, respecting the statute of limitations and legal or regulatory obligations;
- (ii) for the period necessary to achieve the specific purposes of each treatment, with data retention for the shortest possible duration;
- (iii) for the time necessary to safeguard the regular exercise of GRUPO ASAD's rights in judicial, administrative, or arbitration proceedings.

In this sense, the retention periods for each category of personal data are defined by GRUPO ASAD according to the specific characteristics of each treatment, including the nature of the data, the purposes of the treatment, existing legal or regulatory obligations, and other relevant criteria for this definition.

For more information on specific retention periods, please contact our Data Protection Officer.

INTERNATIONAL TRANSFER OF PERSONAL DATA

Considering the possibility of operating in different countries and the possibility of computer systems on a global basis, including cloud data storage services, your personal data may be transferred internationally, in accordance with applicable laws.

Not all of these transfers will be made to countries that have the same level of data protection conferred by Brazilian laws.

We will implement the necessary safeguards to ensure that your personal data receive an adequate level of protection, as required by applicable law, and to ensure that such transfers are in compliance with this Policy. In these cases, we will only carry out international transfers to companies that demonstrate compliance with requirements that are comparably similar to those of Brazilian laws and that demonstrate the adoption of technical and administrative measures capable of protecting your personal data. Personal data transferred to other countries may also be subject to local rules and laws.

INFORMATION SECURITY

The personal data that you provide us through the website are collected, processed, and protected in accordance with security and confidentiality standards, and used only for the purposes for which they were collected, as described in this Policy. GRUPO ASAD adopts different technological and process security measures to protect your personal data against unauthorized access or illegal or accidental situations of destruction, loss, misuse, alteration, destruction, or any other form of inappropriate treatment. Your data is stored in a secure operational environment that is not accessible to the public.

Among the measures we take to protect your personal data are: access controls, monitoring of access to local networks and remote connections via VPN, user authentication, antivirus, firewall, backup maintenance, periodic testing and scanning of systems, among others.

We maintain administrative, technical, and physical safeguards to support the protection of personal information you share with us. These actions are associated with efforts to prevent security incidents, but we know that it is not possible to guarantee the absolute security of your data, especially against attacks perpetrated by malicious individuals who may be highly sophisticated and innovative, with techniques and methods previously unknown, even by the best information security tools. The security of your data also depends on the reasonable measures adopted by you in the use of your devices and software. If you identify or become aware of something that may compromise the security of your personal data, or some possible vulnerability on our website or systems, please contact us.

DATA SUBJECT RIGHTS

You have a series of rights regarding your personal data, and GRUPO ASAD is committed to fully respecting them. Among the rights available to you are:

Confirmation and Access to Data

The right to confirm the existence or non-existence of the processing of your data and to request a copy of your personal data collected by us.

Rectification

The right to request the correction of your incomplete, inaccurate, or outdated personal data.

Anonymization, blocking or deletion

The right to request the anonymization, blocking, or deletion of your personal data in cases where unnecessary or excessive data is processed or processed in violation of the LGPD.

Portability

The right to request the portability of your personal data to other content platforms in accordance with the regulations issued by the National Data Protection Authority, provided that commercial and industrial secrets are respected, if any.

Information on the possibility of denying your consent

The right to receive information about the possibility of not providing your consent when consent is the applicable legal basis, indicating the consequences of this denial.

Revocation of Consent

The right to revoke your consent to the processing of your personal data at any time. To revoke your consent, simply communicate your decision to the GRUPO ASAD Data Protection Officer. It is important to know that revocation of consent does not invalidate or make unlawful any personal data processing activities that have been carried out before the revocation.

Deletion of data processed with consent

The right to request the deletion of your data in cases where your consent is the legal basis for a specific processing activity, except when necessary for compliance with legal or regulatory obligations or for the defense of our interests in judicial, administrative, or arbitral proceedings.

Objection to processing

The right to object to any processing of data, indicating your reasons for doing so, in cases where consent is not the applicable legal basis for processing your personal data and when the processing is in violation of the law. GRUPO ASAD will evaluate whether your opposition is justified or not, taking necessary measures to suspend the processing or informing the reasons why it understands that the processing is lawful and permitted.

Information about sharing

The right to receive information about public and private entities with whom we share your personal data.

Complaint

The right to file a complaint regarding the processing of your personal data carried out by GRUPO ASAD before the National Data Protection Authority. However, we hope that before doing so, you give us the opportunity to respond to any questions or complaints you may have directly.

All these rights can be exercised by you at any time, free of charge, unless charging a fee is permitted under current legislation or regulations, and GRUPO ASAD undertakes to make its best efforts to respond to your requests transparently and promptly.

You may request information about the processing of your personal data carried out by GRUPO ASAD, as specified above, by sending an email with details of your request to juridico@grupoasad.com.

To ensure that your rights are being exercised by you or your duly appointed legal representative, GRUPO ASAD may request necessary information or proof regarding your identity to prevent fraud and ensure your privacy, so that your personal data is not shared with unauthorized persons.

We will respond to your requests within a reasonable timeframe in accordance with applicable law, bearing in mind that we may only respond to some requests after receiving the above-mentioned confirmations. We will keep you informed and updated on the progress of your request.

THIRD-PARTY WEBSITES

Our website may provide links to third-party websites and platforms. These websites have their own privacy policies, which may not be compatible with this Policy. We recommend that you review the respective privacy policies of these third parties to learn about the data protection practices they adopt. GRUPO ASAD is not responsible for the regularity of data protection practices on third-party websites or their content, which is not validated, ratified, or endorsed in any way by GRUPO ASAD.

HOW TO CONTACT US

If you have any questions about this Policy or about how your personal data is handled by GRUPO ASAD, or if you want to contribute complaints, suggestions, or comments about our personal data processing practices, please do not hesitate to contact us at juridico@grupoasad.com. Our team is ready to answer all your questions or complaints, being the point of contact for your communication with GRUPO ASAD regarding the processing of your personal data.

CONTROLLER'S DATA

ASAD PARTICIPAÇÕES E EMPREENDIMENTOS LTDA, a limited liability company registered with CNPJ/MF under number 44,153,102/0001-12, headquartered at Rua Sebastião Fabiano Dias, nº 210, rooms 1111 and 1211, Belvedere neighborhood, in Belo Horizonte/MG - CEP: 30,320-690, is the Controller of your personal data, as defined by the General Data Protection Law.

PRIVACY POLICY UPDATES

This Policy is valid as of October 6, 2022. GRUPO ASAD reserves the right, at any time and at its sole discretion, to modify or update any part of the terms of this Policy that does not materially affect your rights or obligations hereunder. Therefore, Users are advised to periodically check for any updates or modifications to this Policy. The updated version will always be published on this website.