



## **1. OBJECTIVE**

To establish guidelines on how Personal Data of CBMM customers and the general public is processed.

## **2. FIELD OF APPLICATION**

It applies to CBMM Customers and the general public, except employees and their dependents.

## **3. DEFINITIONS AND ACRONYMS**

See 5.3

## **4. RESPONSIBILITIES AND AUTHORITIES**

### **4.1. CBMM**

- Follow the guidelines set out in this document.

## **5. MAIN PROVISIONS**

### **5.1. External Privacy and Data Protection Notice**

Companhia Brasileira de Metalurgia e Mineração, a private legal entity registered with CNPJ under nº 33.131.541/0001-08, headquartered at Córrego da Mata, S/N, P.O. Box 08, CEP 38183-903, in the municipality of Araxá/MG ("CBMM"), considers the physical, electronic, and other Personal Data records left by you ("Data Subject") when using various CBMM sites and services ("Services") to be extremely relevant. This External Privacy Notice ("Notice") serves to regulate, in a simple, transparent, and objective manner, which personal data will be obtained, as well as when and how they may be used.

### **5.2. Application and Scope**

This External Privacy Notice applies to Services related to any of CBMM's brands and activities, encompassing all its products listed on CBMM's official websites. This External Privacy Notice is also aimed at CBMM's third parties, dependents

of employees, local community residents, and the general external public, and it encompasses how we handle the Personal Data of these individuals.

### **5.3. Definitions**

- **Anonymization:** Process by which Personal Data loses the possibility of association, directly or indirectly, with an individual, considering the reasonable and available technical means at the time of Processing.
- **Binding Corporate Rules:** Mechanism used to carry out international data transfers between companies of the same economic group.
- **Controller:** Natural or legal person, public or private, responsible for defining the means and purposes of using your personal data.
- **Data Processing:** Any operation performed with Personal Data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.
- **Data Protection Officer (DPO):** Person nominated by the controller and operator to act as a communication channel between the controller, data subjects, and Supervisory Authorities in the countries where CBMM processes personal data. • **Processor:** Natural or legal person, public or private, who processes personal data on behalf of the controller, such as a service provider.
- **Data Subject:** Natural person (individual) to whom the Personal Data processed by CBMM refers.
- **International data transfer:** Transfer of personal data to a foreign country or international organization of which the country is a member.
- **Personal Data:** Any data that identifies or indirectly allows the identification of a natural person.
- **Sensitive Personal Data:** Special category of Personal Data related to racial or ethnic origin, religious belief, political opinion, union membership or membership in a religious, philosophical, or political organization, health data, or data related to gender identity or sexual orientation, genetic or biometric data related to a natural person.
- **Supervisory Authorities:** Public administration body responsible for ensuring, implementing, and supervising compliance with privacy and data protection laws of the relevant country. In Brazil, the supervisory authority is called the National Data Protection Authority (ANPD).
- **Third Parties:** Any natural or legal person who is not a direct or indirect part of the CBMM brand, such as clients and partners, dependents of employees, local residents, etc.



#### **5.4. What personal data do we use?**

CBMM, in the performance of its activities, may collect information and Personal Data in the following ways:

(i) General external public: CBMM may process Personal Data actively entered or shared by the Data Subject for registration purposes when contacting through service channels or accessing CBMM's official portals, such as full name, email, CPF, address, position or function, company, phone number, among others. Regardless of which Personal Data the Data Subject actively provides to CBMM, we will only use those that are effectively relevant and necessary to achieve the purposes declared to the Data Subject on a case-by-case basis.

(ii) Local community residents: CBMM is present in the daily lives of residents near the industrial park in Araxá, conducting programs, events, and campaigns with local residents. Additionally, considering CBMM's business activities, there are legal obligations to be developed with the local community. When carrying out any of the mentioned actions and/or fulfilling a legal obligation, CBMM may process personal data and sensitive personal data of local residents, including minors, such as name, address, age, identification of guardians, image, health data, among other personal data collected directly from the data subjects, to enable community participation in promoted actions or to comply with relevant legislation.

(iii) Job applicants: When applying for a job, CBMM may process personal data provided by the applicant, such as name, date of birth, address, phone number, email, marital status, academic background, previous experiences, among others. These data will be used exclusively to allow the applicant's participation in the selection process, including the identification and choice of the most suitable candidate for the position. CBMM will only process the necessary data for this purpose. The applicant can also obtain more information about the processing of their personal data through the External Privacy Notice for applicants.

(iv) Dependents of employees: CBMM may process personal data of employees' dependents, including minors, such as name, date of birth, individual registration, image, among other data, during the employee's admission phase or while the employment contract lasts. These data will be processed to allow the inclusion and use of benefits offered to employees that are extendable to dependents, to enable dependents' participation in programs and events conducted by CBMM, and to fulfill legal obligations related to these data subjects.

(v) Partners and Clients: In the exercise of its activities, CBMM may also process personal data of clients and partners, such as name, image, individual registration, date of birth, company, position or function, among others, provided by the data subject in registrations or events, to enable the participation of interested parties in CBMM's BID's, request technical and commercial proposals,



place purchase orders, manage payment of invoices, establish contractual relationships, conduct audits, receive communications about the CBMM brand, and related activities.

(vi) Personal Data automatically collected by CBMM: CBMM also collects a series of information automatically, such as device characteristics, browser, IP (with date and time), IP origin, click information, accessed pages, search terms entered on our portals, among others. For this collection, CBMM will use standard technologies such as cookies, pixel tags, beacons, and local shared objects, which are used to improve the Data Subject's browsing experience on the Services, according to their habits and preferences.

### 5.5. How do we use cookies?

Cookies are files or information that can be stored on your devices when you visit websites or use CBMM's online services. Generally, a cookie contains the name of the site it originated from, its lifespan, and a randomly generated value. CBMM uses cookies to facilitate use and better adapt its pages to the interests and needs of Data Subjects, as well as to compile information about the use of sites and services, helping to improve their structures and content. Cookies can also be used to speed up your activities and future experiences on our portal. CBMM's cookie policy can be viewed on the website (legal information).

### 5.6. Types of cookies

- **Necessary:** These cookies are essential for CBMM's pages to load correctly and allow you to navigate our sites and use all functionalities.
- **Performance:** These cookies allow CBMM's pages to remember your choices to provide a more personalized experience. They also enable Data Subjects to watch videos and use social tools, comment fields, forums, among others.
- **Statistics:** These cookies help us understand how visitors interact with CBMM's pages, providing information about visited areas, time spent on the site, and any issues encountered, such as error messages.
- **Marketing:** These cookies are used to provide more relevant content and of interest to Data Subjects. They can be used to present more targeted advertising or limit the number of times it is displayed on CBMM's pages. They also allow measuring the effectiveness of a CBMM advertising campaign. Additionally, these cookies can be used to indicate to CBMM's pages the sites the Data Subject visited, and CBMM may share this information with third parties, such as contracted advertising agencies.
- **Social networks:** These cookies are set by a range of social network services that we have added to the website to allow you to share our content with your



friends and acquaintances. They can track your browsing on other websites and create a profile of your interests. This may affect the content and messages you see on other websites you visit.

If you do not allow these cookies, you may not be able to use or see these sharing tools. After the Data Subject consents to the use of cookies when using CBMM's pages, the site will temporarily store a cookie on their device to remember this in the next session. It is possible to disable the automatic collection of certain Personal Data through our preference center available in our cookie banner. The Data Subject should be aware that if these technologies are disabled, some features offered by the site that depend on the processing of such data may not function correctly. For more information, access our cookie policy available on our website.

### 5.7. How do we use data?

CBMM processes Personal Data in order to enter into contractual relationships or to manage, provide, expand and improve Services to Data subjects, adapting them to their preferences and tastes, as well as to create new services and products to be offered to Data subjects.

CBMM may centralize the Personal Data collected, which may be used in other Services related to all CBMM's brands, respecting the purposes set forth herein and Data subjects' consent, whenever required by law.

In some cases, CBMM may also process Personal Data whenever necessary to comply with legal or regulatory obligations.

Besides, CBMM may also process Personal Data based on its legitimate interest (or the legitimate interest of another company in the group), always according to Data subjects' expectations, and never at the expense of their interests, rights and fundamental freedoms.

Additionally, information collected may be, upon Data subjects' consent, used for advertising purposes, such as to send information about CBMM's brands, products, promotions and discounts, as well as to promote events or conduct surveys related to CBMM's activities.

CBMM may also collect data relating to the image, as it uses security cameras and **video monitoring systems**, in order to guarantee the security of its assets and the protection of the lives and physical safety of employees and other passersby who are within CBMM premises and/or other companies in the group. It is worth mentioning that security cameras are positioned in common use environments, identified by signs and notices that allow Data subjects to know the locations where there is video monitoring, in addition to providing easier



access to this policy and the exercise of their rights, guaranteeing inviolability of fundamental rights to privacy and image.

#### **5.8. Who will we share data with?**

CBMM is an economic group that works in partnership with various companies in Brazil and worldwide, which list is available [here](#). This way, CBMM may share information collected through its pages or by contacting Data subjects, in the following cases:

- (i). With other companies in the CBMM Group, established or operating in any country, which commit to using the information for in the same purposes indicated in this External Privacy Notice;
- (ii). With partner companies and suppliers, in the development of Services aimed at the Data Subject;
- (iii). With authorities, government entities, or other third parties, to protect CBMM's interests in any type of conflict, including legal actions and administrative processes;
- (iv). In the case of transactions and corporate changes involving CBMM, in which case the transfer of information will be necessary for the continuity of services; or,
- (v). By court order or request from administrative authorities with legal competence to request it.

#### **5.9. International Data Transfer**

Additionally, it is possible that some of the transfers indicated above may occur outside Brazil, notably to the countries where the business group operates, such as China, Singapore, the United States, Switzerland, and the Netherlands, applying in this case the Binding Corporate Rules (BCR), which were established to legitimize the international data transfer between companies of the same CBMM group. CBMM also commits to carrying out international data transfers only to countries that provide an adequate level of personal data protection as provided by applicable law or by using applicable guarantees and safeguards.

#### **5.10. How do we keep Personal Data secure?**

CBMM uses reasonable means available in the market and legally required to preserve the privacy of the Personal Data it collects. Thus, it adopts various technical and administrative security measures to protect Personal Data from

unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication, or any form of inappropriate or unlawful processing. In addition to technical efforts, CBMM also adopts institutional measures aimed at protecting Personal Data, maintaining an information security and privacy governance program applied to its activities and governance structure, constantly updated. Although CBMM makes the best efforts to preserve the privacy and protect the Personal Data of Data Subjects, no information transmission is completely secure, so CBMM cannot fully guarantee that all information it receives or sends will not be subject to unauthorized access through methods developed to improperly obtain information. For this reason, we encourage Data Subjects to take appropriate measures to protect themselves, such as keeping all access credentials (usernames and passwords) confidential, as such information is personal, non-transferable, and the exclusive responsibility of the Data Subjects. CBMM commits to informing the Data Subject and data protection authorities of any security incidents that may pose significant risks or harm to Data Subjects, after prior notification and validation of the request.

#### **5.11. Retention of information collected**

To protect the privacy of Data Subjects, the Personal Data processed by CBMM will be retained as long as necessary to fulfill the purpose for which they were collected or for the periods established by specific laws and/or regulations, being eliminated

- (i) after the retention period established for the Processing of that Personal Data expires;
- (ii) when they are no longer useful for the purposes for which they were collected;  
or
- (iii) when the Data Subject requests their elimination, except if their retention is expressly authorized by applicable law or regulation or when their retention is necessary for another purpose based on a legal basis that justifies retention or, still, for compliance with a legal or regulatory obligation, transfer to a third party – provided that the requirements for Processing Personal Data are respected – and exclusive use by CBMM, including for the exercise of its rights in judicial or administrative processes.

#### **5.12. Data subjects' rights**

In compliance with applicable regulations regarding the Processing of Personal Data, CBMM respects and guarantees the Data Subject the possibility of submitting requests based on the following rights: i. confirmation of the existence of Processing; ii. access to Personal Data; iii. correction of incomplete,



inaccurate, or outdated Personal Data; iv. anonymization, blocking, or elimination of unnecessary, excessive, or unlawfully processed Personal Data; v. portability of Personal Data to another service or product provider, upon express request by the Data Subject; vi. elimination of Personal Data processed based on the Data Subject's consent; vii. obtaining information about public or private entities with which CBMM shared their Personal Data; viii. information about the possibility of not providing consent, as well as being informed about the consequences in case of refusal; ix. revocation of consent; x. opposition to Processing carried out in cases of consent exemption, if in non-compliance with the law. These rights may be exercised by sending a request to our Data Protection Officer (DPO) through this link, for subsequent evaluation and adoption of further measures by CBMM. The Data Subject is aware that the deletion of essential information for managing their account with CBMM will result in the termination of their registration, with the consequent cancellation of the Services provided. CBMM will make every effort to respond to such requests as quickly as possible and according to the complexity of each case. Finally, the Data Subject should be aware that their request may be legally rejected, either for formal reasons (e.g., inability to prove their identity) or legal reasons (e.g., request for deletion of Personal Data whose retention by CBMM is authorized by law).

## **6. (DPO) DATA PROTECTION OFFICER**

The Data Protection Officer (DPO) is the professional responsible for communication between CBMM, data subjects, and Supervisory Authorities, as well as guiding and managing the privacy and data protection program established by CBMM. We inform you that the role of Data Protection Officer (DPO) at CBMM is performed by Daniel Lopes Martins.

We also inform you that, in case of absence or impediment of the appointed Data Protection Officer (DPO), the role will be performed by Patrícia Castanheira Guimarães Braga, formally designated as a substitute, to ensure that there are no disruptions in serving the rights of data subjects and Supervisory Authorities.

## **7. DO YOU HAVE ANY QUESTIONS?**

If you have any questions about our External Privacy Notice or any other matters related to the processing of personal data carried out by CBMM, please contact our Data Protection Officer (DPO) through the [link](#).





**8. COMMUNICATION CHANNEL WITH THE SUPERVISORY AUTHORITY**

To comply with resolutions and legislation related to privacy and data protection, CBMM has provided an exclusive channel for serving representatives of Supervisory Authorities, which can be accessed through the data subjects' rights portal.

**9. FINAL PROVISIONS**

CBMM reserves the right to review this External Privacy Notice to make necessary changes, at the frequency it deems appropriate, always respecting a maximum period of 2 (two) years, without prior communication to the Data Subject. If there are any changes, the new version will be immediately published on the institutional website.

**10. EXHIBITS**

Exhibits 1 - Revision Records.



**HISTÓRICO DAS REVISÕES/  
HISTORY OF REVISIONS**  
**ANEXO 1/ APPENDIX 1**

Nº: PR.00055

Versão: 1.0

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<b>VERSÃO VERSION</b>	<b>ITEM</b>	<b>HISTÓRICO DA REVISÃO HISTORY OF REVISION</b>	<b>DATA DA REVISÃO REVIEW DATE</b>
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00	Todos <u>All</u>	Emissão inicial do documento em substituição Versão 3.0. <i>Initial issuance of the document replacing Version 3.0.</i>	18.03.24 03.18.24
1.0	Todos <u>All</u>	Revisão geral do documento e ajustes nos itens 5.9 e 6 <i>General review of the document and adjustments to items 5.9 and 6.</i>	17.03.25 03.17.25