



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. TERMS AND DEFINITIONS

Not applicable.

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 the Taxpayer Registry under number 33.131.541/0001-08, headquartered at Córrego da Mata, S/N, P.O. Box 08, ZIP CODE 38183-903, in the city of Araxá/MG ("CBMM") believes that the electronic records and other Personal Data left by you ("Holder") when using CBMM's websites and services ("Services") are extremely relevant. Thus, the purpose of this Privacy Procedure is to regulate, in a simple, transparent and objective way, which personal data shall be retained, as well as when and how they may be used.

5.2. Application and Scope

This Procedure applies to Services related to any of CBMM's brands and activities, including all those listed on CBMM's official websites, as well as all its products.

This Procedure is aimed at CBMM customers and the general public and provides information on how we process their Personal Data. If you are an employee, provider or supplier of CBMM, or if you are participating in a specific project or



activity with CBMM, you can consult the applicable privacy notice made available by CBMM.

5.3. Definitions

- **Personal Data:** Any data that indirectly identifies or allows the identification of individuals.
- **Sensitive Personal Data:** A special category of Personal Data referring to racial or ethnic origin, religious belief, political opinion, trade union membership or participation in religious, philosophical or political organizations, data relating to health, or to gender identity or sexual orientation, genetic or biometric data relating to individuals.
- **Data Subject:** Individual to whom the Personal Data processed by CBMM refers, such as former, present or potential customers, employees, contractors, business partners and third parties.
- **Processing:** Any operation performed using the Personal Data, such as those referring to: collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of information, modification, communication, transfer, diffusion or extraction.
- **Anonymization:** Process through which the Personal Data can no longer be directly or indirectly associated with an individual, considering the reasonable technical means available at the time of Processing.
- **Controller:** Natural or legal person, governed by public or private law, responsible for defining the means and purposes of using your personal data.
- **Operator:** Natural or legal person, governed by public or private law, who processes personal data on behalf of the controller, such as: service provider.
- **DPO (Data Protection Officer):** Person appointed by the controller and operator to act as a communication channel between the controller, data subjects, and the Supervisory Authorities existent in the countries in which CBMM processes personal data.
- **Supervisory Authorities:** Public administration body responsible for ensuring, implementing, and monitoring compliance with legislation relating to privacy and data protection of the relevant country.

5.4. What personal data do we use?

CBMM may collect information and Personal Data from two different ways:

(i) **Personal Data provided by Data subjects:** CBMM collects all Personal Data actively entered or shared by Data subjects when getting in contact or accessing CBMM's portals, such as full name, email, taxpayer number, address and telephone. Regardless of which Personal Data Subject's actively provides to

CBMM, we shall only use those effectively relevant and necessary for achieving the purposes informed to them on a case-by-case basis.

(ii) Third-party data: CBMM, in the exercise of its activities, may also process personal data of customers, partners, external public in general, such as name, image, taxpayer number, date of birth, among others, for the purpose to establish any contractual relationship, or to carry out campaigns, projects, among other actions developed by CBMM on its premises and/or with the local community.

(iii) Personal Data collected automatically by CBMM: CBMM also collects a series of information automatically, such as: features of the access device, browser, IP (with date and time), IP origin, information about clicks, accessed pages, search terms entered in our portals, among others. To collect such data, CBMM uses some standard technologies, such as cookies, pixel tags, beacons and local shared objects, to improve Data subjects' experience browsing the Services, according to their habits and preferences.

5.5. How do we Use Cookies?

Cookies are files or information that may be stored on your devices when you visit CBMM's websites or use its online services. Generally, a cookie contains the name of the website that originated it, its lifetime and a value, which is randomly generated.

CBMM uses cookies to facilitate use and to better adapt its pages to the interest and needs of Data subjects, as well as to compile information about the use of its websites and services, helping to improve its structures and contents. Cookies may also be used to speed up your future activities and experiences on our portal. The cookie policy established by CBMM is available on the website (legal information).

5.6. Types of Cookies

- **Necessary:** These cookies are essential for CBMM pages to load correctly and allow you to browse our sites and use all functionalities.
- **Preferences:** These cookies allow CBMM pages to remember your choices to provide a more personalized experience. They also allow 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 pages, providing information about the areas visited, the time spent on the site and any problems encountered, such as error messages.
- **Marketing:** These cookies are used to provide more content that is relevant and of interest to Data subjects. They can be used to present more targeted advertising or limit the times ads are shown on CBMM pages. They also allow measuring the effectiveness of a CBMM advertising campaign. These cookies may also be used to indicate to CBMM pages the sites that Data subjects have



visited and, as a result, CBMM may share this information with third parties, such as contracted advertising agencies.

- Social networks: These cookies are set by a number of social networking 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 can 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 Data subjects' consent to the use of cookies, when using CBMM pages, the website temporarily stores 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 Holder must be aware that, if these technologies are disabled, some features offered by the website, which depend on the processing of said data, may not function correctly. For further information, access our cookies 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 procedure 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 of the CBMM group, incorporated or operating in any country, which undertake to use the information for the same purposes indicated in this Procedure.
- ii. With partner companies and suppliers, to develop Services offered to Data subjects.
- iii. With authorities, government entities or other third parties, for the protection of CBMM's interests in any type of conflict, including lawsuits and administrative proceedings.
- iv. In case of transactions or corporate changes involving CBMM, in which case the transfer of information is necessary for the continuity of the Services; or,
- v. Upon court orders or requests from government authorities.

5.9. International Data Transfer

Additionally, some of the transfers indicated above may take place outside Brazil, notably to countries where the business group operates. CBMM undertakes to do so only to countries which provide a level of Data Protection compatible with the applicable law provisions or upon the use of guarantees and safeguards, such as specific provisions, standard clauses, global corporate standards, among others; as well as upon the specific consent of Data subjects or under the other circumstances authorized by law and regulated by the National Personal Data Authority.

5.10. How do we keep Personal Data secure?

CBMM uses reasonable and legally required means available on the market to preserve the privacy of the Personal Data collected. This way, it adopts various technical and administrative security measures capable of protecting Personal Data from unauthorized access and from accidental or unlawful situations of



destruction, loss, alteration, communication or any other form of inappropriate or unlawful processing.

In addition to the technical efforts, CBMM also adopts institutional measures to protect Personal Data, and has an information security and privacy governance program applicable to all its activities and governance structure, which is constantly updated.

Although CBMM makes all efforts to preserve privacy and protect Data subjects' Personal Data, no information transfer is totally secure. Therefore, CBMM cannot fully guarantee that all information it receives and 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 of Data subjects' sole responsibility.

CBMM undertakes to inform the Holder and data protection bodies of any security incidents that may pose significant risks or losses to the Data subjects, after prior notification and validation of the request.

5.11. Retention of Information Collected

In order to protect Data subjects' privacy, Personal Data processed by CBMM shall be deleted (i) at the end of the retention period established for the processing of those Personal Data; (ii) when data are no longer useful for the purposes for which they were collected; or (iii) when Data subjects request their deletion, unless their maintenance is expressly authorized by applicable law or regulation, or when their retention for other purposes is legally required, or to comply with a legal or regulatory obligation, transfer to a third party - provided that Personal Data Processing requirements are met - and for CBMM's exclusive use, including for the exercise of its rights in lawsuits and administrative proceedings.

5.12. Data Subjects' Rights

In compliance with the applicable regulations, regarding Personal Data Processing, CBMM respects and guarantees Data subjects the possibility of submitting requests to:

- i. confirm that their Personal Data were processed;
- ii. access their Personal Data;
- iii. edit any incomplete, inaccurate or outdated Personal Data;
- iv. anonymize, block or delete Personal Data which are unnecessary, excessive or processed in violation of the law;



- v. take their Personal Data to another service or product supplier, upon Data subjects' express request;
- vi. delete any Personal Data processed based on Data subjects' consent;
- vii. obtain information about the public and private entities with whom CBMM shared their Personal Data;
- viii. obtain information about the possibility of denying consent, as well as of the consequences of such denial;
- ix. revoke consent;
- x. oppose any Processing carried out in the event of waiver of consent, if not in compliance with the law.

These rights may be exercised by sending a request to our Officer through this [link](#), for further evaluation and adoption of other measures by CBMM.

Data subjects are aware that the exclusion of essential information for the management of their account with CBMM shall imply the termination of their registration, with the consequent cancellation of the Services provided.

CBMM will make every effort to fulfil such requests in the shortest possible time and according to the complexity of each case.

Finally, Data subjects must be aware that their request may be legally rejected, either for formal reasons (such as the inability to prove their identity) or legal (such as the request to delete Personal Data whose retention by CBMM is authorized by law).

6. (DPO) DATA PROTECTION OFFICER

The data officer, also called DPO (Data Protection Officer), is the professional responsible for communication between CBMM, Data Subjects, and the National Data Protection Authority.

We announce that the role of Personal Data Protection Officer at CBMM is performed by Daniel M.

7. QUESTIONS

If you have any questions about our privacy procedure, or any other matters related to personal data processing carried out by CBMM, please get in touch with our Data Protection Officer (DPO), via [link](#).



8. FINAL PROVISIONS

CBMM reserves the right to review this privacy notice, to insert necessary changes, at the frequency it best understands, always respecting the maximum period of 2 (two) years, without prior communication to the Data Subject. If there are any changes, the new versions will be immediately published on the Website.

9. EXHIBITS

Exhibits 1 - Revision Records.



HISTORY OF REVISIONS
APPENDIX 1

Nº: **PR.00055**

Version: **00**

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VERSION	ITEM	HISTORY OF REVISION	REVIEW DATE
00	All	Initial issuance of the document replacing Version 3.0.	07.04.24