



CONSENT POLICY

The transparency and security of the personal data processing are relevant to the IBAR Group, which is why this Consent Policy was developed. You will find rules on the collection and revocation of the consent given by the holder to the IBAR Group, when necessary for the regular performance of our activities.

This policy must be observed by all employees of the IBAR Group.

The terms used in this Policy shall be interpreted in accordance with the definitions established in the General Personal Data Protection Law ("LGPD").

In case of doubts regarding the application of this policy or the need to collect consent, you should contact the area manager and/or the person in charge of personal data protection by email ibarlgpd@ibar.com.br. **Do not proceed with the processing (use) of personal data until you are sure about compliance with the LGPD.**

The processing of personal data carried out in disagreement with this Policy may have serious consequences for the IBAR Group, as it constitutes a serious legal violation. Failure to comply with this Policy will be analyzed by the responsible human resources sector, the conduct will be investigated, and the employee will be aware of the possibility of applying sanctions related to any failure to apply this Policy.

This Policy may be updated whenever the IBAR Group deems it necessary. Any change will be widely disclosed by the IBAR Group, by direct email to all employees, and any changes will take effect immediately.

1. CONSENT

Personal data processing will be considered lawful, for the purposes of applying the LGPD, when it is based on one of the legal justifications provided in articles 7 and 11 of the law.

Thus, in some situations, as mapped by the IBAR Group and duly registered on the LGPDnow (<https://portallgpd.ibar.cleveris.com.br/ibar>) legal compliance platform, it will be necessary to collect the consent of the personal data holders to proceed with the treatment. This would be the case of receiving resumes during selection processes, for example.



The control over the timeliness of the information contained in the LGPDnow platform is carried out by the person in charge of personal data protection.

Whenever an activity depends on consent to be considered legal, the person in charge of personal data protection will notify the person in charge of the area and the appropriate security measures will be taken (notice of the employees involved in the processing) to proceed with the collection of consent.

To be considered valid, consent must be provided by the holder of personal data in writing, in a prominent form, or by means that demonstrates the manifestation of the holder's will. In addition, consent must provide for specific purposes, reflecting a free, informed and unequivocal manifestation of the holder, which is why the use of opt-out technologies to collect consent is prohibited.

The IBAR Group shall store the proof of consent.

Attached is the template of the consent form that must be observed in all activities of the IBAR Group.

2. CHILDREN'S DATA PROCESSING

The LGPD establishes that the processing of children's personal data (people up to 12 years of age) can only be carried out by collecting specific and prominent consent, given by at least one of the child's parents or legal guardian. The only exception is the processing of children's data to contact guardians, in which case the data can be processed only once and its storage and sharing is prohibited.

Thus, attached you will also find the template of the consent collection term for the processing of children's personal data.



3. RIGHTS OF THE HOLDER

The holders must be informed about their rights, provided in article 18 of the LGPD, and the IBAR Group must keep public information about the types of data collected, how they are used and the procedures that the holder must adopt to exercise their rights.

As a rule, the holder can exercise their rights through the holder's channel https://portaldotitular.ibar.com.br/titular_ibar or send a request directly to the person in charge, Fabiana Sumi, by email ibarlgpd@ibar.com.br.

Employees should not, under any circumstances, deny rights or comply with requests for the protection of personal data without the necessary knowledge to do so. Thus, it is mandatory that all requests be directed to the specific channel developed for this issue.

4. REVOCATION OF CONSENT

At any time, the holder can revoke the consent given and you should be prepared for this situation. The revocation does not invalidate or make illegal the processing carried out previously, nor does it imply the immediate deletion of all the data of the holder.

Observe the policy for controlling access, storage and deletion of personal data before proceeding with any disposal of personal data. If you have any questions, please contact the area manager or the person in charge of personal data protection.

The revocation will be carried out directly through the IBAR Group's Holder Portal.

If the holder revokes the consent offered, the person in charge of personal data protection must take steps within the IBAR Group to delete the data or, if applicable, retain and cease all personal data processing activities for the purpose for which the consent was revoked.