



## PRIVACY POLICY

The IBAR Group is committed to accountability and transparency towards you. We are concerned with always maintaining a relationship based on friendship, trust and mutual respect, also assuming a commitment in relation to the processing of your personal data.

Our website has been developed with the aim of getting closer to you and seeking to improve your experience with us.

Through our policy you will be able to understand how we use and share your personal information, as well as the mechanisms and procedures used to process your personal data, what your rights are and how to exercise them.

### 1. CONTROLLER AND OFFICER DATA

The IBAR Group acts as a controller of the personal data processed for the exercise of its activities and is made up of different companies:

Name	Address	Contact
INDÚSTRIAS BRASILEIRAS DE ARTIGOS REFROTÁRIOS – IBAR LTDA.	Avenida Ibar, nº 250, Calmon Viana, Poá-SP, CEP [Zip Code] 08559-470	+55 11 4634-6600
GLOBAL SERVICE CONTROLE TÉRMICO E MANUTENÇÃO REFROTARIA LTDA.	Avenida Ibar, nº 250, casa 3, Calmon Viana, Poá-SP, CEP 08559-470	+55 11 4634-6600



COLUMBUS COMERCIAL E REPRESENTAÇÃO DE NEGÓCIOS LTDA.	Avenida Ibar, nº 02, sala 2, Calmon Viana, Poá - SP, CEP 08559-470	+55 11 4634-6600
BIRITIBA MIRIM MINERACAO LTDA.	Estrada De Mogi-Salesópolis, without number, KM 72, Fazenda Hiroy, Biritiba-Mirim - SP, CEP 08940-000	+55 11 4634-6600
IBAR NORDESTE LTDA.	Fazenda Campo De Dentro, without number, Brumado – BA, CEP 46100-000	+55 77 3441-3636
NUTEC IBAR FIBRAS CERÂMICAS LTDA.	Avenida Ibar, nº 250, galpão 2, Poá-SP, CEP 08559-470	+55 11 4634-6600

The IBAR Group's Personal Data Officer is Dr. Fabiana Sumi, who can be contacted through the Holder's Portal [https://portaldotitular.ibar.com.br/titular\\_ibar](https://portaldotitular.ibar.com.br/titular_ibar).

## 2. ABOUT OUR POLICY AND PERSONAL DATA PROCESSING AGENTS

It is important for you to know that this policy aims to provide an overview of the processing of personal data and, therefore, not all situations provided for in this instrument will apply to you.

The personal data processing policies have been prepared in order to standardize and systematize the processing of personal data by all the Group's companies. So, regardless of the company you share your data with, this Policy reflects the way all our companies handle your personal data.



Considering that we are a Group, the data you share with one of our companies may be processed by any of the companies in the Group, according to economic and logistical needs. This does not mean that there will be a deviation in the purpose of the processing, that you will be harmed in any way or that you will not be able to exercise your rights. Regardless of which company processes your personal data, we always observe the purpose of the processing, the privacy of your data, and all your rights in relation to them.

If you have any questions about this policy or the processing of your personal data, or want to forward any request regarding your personal data, do not hesitate to contact us through the data holder's channel, [https://portaldotitular.ibar.com.br/titular\\_ibar](https://portaldotitular.ibar.com.br/titular_ibar). Our personal data protection officer, Dr. Fabiana Sumi, will review your message and get back to you within 15 days.

The IBAR Group acts as the controller of the processing of personal data arising from the relationship it maintains with you. If you wish to contact the Group directly, please send an email to [ibarlgpd@ibar.com.br](mailto:ibarlgpd@ibar.com.br) or a letter to the address Av. Ibar, 2, Calmon Viana, Poá, CEP 08559-470, SP.

The IBAR Group may outsource part of the processing of personal data, when necessary. Down below you will find some information about our relationship with processing operators and your rights in this situation.

This policy may be amended and updated to reflect any changes in the way we treat personal data or legal changes. We encourage you to read this policy carefully and to check this page regularly to see if any changes have been made to our Privacy Policy.



## WHAT IS PERSONAL DATA?

Personal data is all information relating to a natural person (individual) that may be requested from you and that identifies or makes identifiable the natural person to which it refers. Some examples of personal data are: name, number or identity document, IP number, browsing data, address, among others.

Whenever any personal data is requested, it is important that you are aware of this policy and how to exercise your rights.

The processing of personal data is regulated, in Brazil, by the General Personal Data Protection Law (Law No. 13.709, of August 14, 2018).

For a better understanding of the data processed by the IBAR Group, we describe below the data used by category:

- **Order request data:** this is the data of customers, legal representatives or commercial representatives of customers and that is requested by the IBAR Group for the sale of its products and services. Also included in this category are data requested by the IBAR Group for credit limit analysis, when requested by the customer to deliver products or provide services.
- **Supplier data:** this is the data that we request from our suppliers or from suppliers' legal or commercial representatives for the submission of a commercial proposal, execution of a contract for the supply of services or products, as well as any data of suppliers' employees necessary for the execution of the supply contract (such as data of drivers of freight transport).
- **Service provider data:** data requested from service providers, their legal or commercial representatives, or their employees and that are necessary for



maintaining the business relationship, contracting services, or managing the contract.

- **Candidate data:** when the IBAR Group opens a job vacancy, it is common to request some information from the candidates, such as name, contact email, employment history and other information that may be relevant to the candidate's participation in the selection process.
- **Employee data:** data collected from IBAR Group employees at the time of hiring, such as name, CPF [Individual Taxpayer Registration], RG [ID Card], employment record card, PIS [Social Integration Program], as well as the requested data necessary to comply with the legal obligation with e-social and that enable the company to offer benefits, such as health plan.
- **Dependent data:** data on employees' dependents and that may be requested by the IBAR Group to comply with a legal obligation or to provide benefits to which the employee is entitled, such as inclusion in the health plan, when applicable.
- **Visitor data:** these are the data requested from those who visit the IBAR Group's physical facilities for possible access control.
- **Data of legal representatives:** these are the data requested from the legal representative of children and adolescents so that the processing can be carried out.
- **Virtual visitor data:** these are cookies that may be collected, as the case may be, from visitors of our website.



### 3. COLLECTION OF PERSONAL DATA

The IBAR Group does not condition access to the content available on its website to the provision of your personal data. However, some functions of our website may not function perfectly without the processing of personal data (such as our contact us service).

We will always inform you when the collection of personal data is necessary for the provision of the services or so that we can comply with your request. In this regard, we will also inform you when your decision not to provide us with the requested data may affect our ability to provide you with our products and services.

Your personal data may be collected in the following cases:

- I. When you contact us by email or through the contact us system;
- II. When you submit your resume to us or participate in a selection process;
- III. Where we are providing services to you or the business you represent;
- IV. When you make your personal data public;
- V. When you visit our website;
- VI. As a result of the commercial or contractual relationship we have with your employer;
- VII. When you are at one of our physical addresses and your image is captured by our security cameras or we request some information for identification, also for security reasons.

When browsing our website, you may be led, via link, content or services, to other electronic addresses that may collect your information and have their own Privacy Policy. We are not responsible for the content, treatment or policy of third parties and, therefore, it is up to you to access the Privacy Policy of the platforms outside the environment of the websites maintained by the IBAR Group, and it is your responsibility to accept or reject it.



#### 4. PURPOSE AND PROCESSING OF PERSONAL DATA

Your personal data may be used for various purposes, which will always be informed to you at the time of collection.

We have prepared the table below that describes the main reasons why we process your personal data and what data is used in each case.

<b>Reason why your data is collected by the IBAR Group</b>	<b>Legal hypothesis that underlies the processing of your data</b>	<b>Categories of personal data used to achieve the purpose of the processing</b>
To provide our services: the processing may be necessary for us to enter into the contract and to be able to perform all our obligations set out therein	<ul style="list-style-type: none"><li>▪ Contract execution</li><li>▪ Legitimate interest</li><li>▪ Credit protection</li></ul>	Order request data Employee data Supplier data Service provider data
Respond to your request: You may voluntarily submit a request or questions to us through the available communication channels, and it may be necessary to collect some information in order to be able to respond to you satisfactorily	<ul style="list-style-type: none"><li>▪ Contract execution</li><li>▪ Legitimate interest</li><li>▪ Consent</li><li>▪ Preliminary procedures related to the contract</li></ul>	Order request data Candidate data



<p>Keeping in touch with you: with your consent, we may keep your personal data so that we can include you on our broadcast list and keep you informed about our marketing campaigns and business development activity. We can also keep your contact to enable contract negotiation and management.</p>	<ul style="list-style-type: none"> <li>▪ Consent</li> <li>▪ Preliminary procedures related to the contract</li> </ul>	<p>Order request data Candidate data Supplier data Service provider data</p>
<p>Defending interests in judicial or administrative proceedings: if necessary, we may use your personal data before judges and administrative bodies</p>	<ul style="list-style-type: none"> <li>▪ Regular exercise of rights in judicial, administrative or arbitration proceedings</li> <li>▪ Credit protection</li> </ul>	<p>Employee data Order request data Candidate data Supplier data Service provider data Virtual visitor</p>
<p>Comply with a court order or administrative request: in some situations, we may receive notifications to provide information about the processing carried out or specifically about the processing carried out with your data (when we need to provide clarifications to the National Data Protection Authority, for example).</p>	<ul style="list-style-type: none"> <li>▪ Legitimate interest Compliance with a legal or regulatory obligation</li> <li>▪ Regular exercise of rights in judicial, administrative or arbitration proceedings</li> </ul>	<p>Employee data Order request data Candidate data Supplier data Service provider data Virtual visitor</p>





<p>Organization of the selection process and hiring: we may process your personal data when we open vacancies and you apply to participate in our selection process or when you decide to register in our resume database. In this case, we want to understand your professional career and see if the vacancy offered fits your profile. If you start working with us, we may process your personal data to proceed with your hiring.</p>	<ul style="list-style-type: none"> <li>▪ Consent</li> <li>▪ Legitimate interest</li> <li>▪ Preliminary procedures related to the contract</li> </ul>	<p>Candidate data Employee data</p>
<p>Preventing and responding to potential or actual fraud or illegal activity: we may process personal data to protect ourselves against possible fraud and to cooperate with the authorities, in accordance with the law, to investigate any illegal activities.</p>	<ul style="list-style-type: none"> <li>▪ Legitimate interest</li> <li>▪ Compliance with a legal or regulatory obligation</li> <li>▪ Regular exercise of rights in judicial, administrative or arbitration proceedings</li> </ul>	<p>Employee data Order request data Candidate data Supplier data Service provider data Virtual visitor</p>



<p>Comply with legal or regulatory obligations: we process your personal data to comply with our legal and regulatory obligations, such as tax and labor obligations, honoring our commitments</p>	<ul style="list-style-type: none"> <li>▪ Compliance with a legal or regulatory obligation</li> </ul>	<p>Employee data Dependents data Order request data Supplier data Service provider data Virtual visitor</p>
<p>Protect the life and physical safety of everyone who is in our physical environments: IBAR Group values the physical safety of those who are in our physical environments, which is why we keep a record of everyone who has access to our environments, as well as keep surveillance cameras at strategic points of the companies</p>	<ul style="list-style-type: none"> <li>▪ Protection of life or physical safety of the holder or a third party</li> <li>▪ Ensuring fraud prevention and the safety of the holder</li> </ul>	<p>Employee data Dependents data Order request data Supplier data Service provider data Virtual visitor</p>



<p>For customization of our website: when browsing our website, you can give us your consent for the collection of the following personal data: logs, cookies, IP address, browser used, preferred language and pages accessed. This information is not essential for the provision of the services offered by the IBAR Group, but it helps us to get to know you better and improve your experience with us. Some cookies collected may be essential for the correct functioning of our website. We will let you know when it happens</p>	<ul style="list-style-type: none"><li>▪ Consent</li><li>▪ Contract execution</li></ul>	<p>Virtual visitor data</p>
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The IBAR Group may process data of children and adolescents in the following situations:

Reason why the data is collected by the IBAR Group	Legal hypothesis that underlies the processing of child and adolescent data	Categories of personal data used to achieve the purpose of the processing
<p>Inclusion as a dependent in benefits offered to employees: the IBAR Group may offer benefits to its employees (such as health insurance or dental insurance), which may admit the inclusion of dependents. Whenever applicable, inclusion may depend on the provision of some specific information to the insurance administration, without which it will not be possible to include the dependent.</p>	<p><b>Children:</b> consent</p> <p><b>Adolescents:</b> contract execution</p>	<p>Dependents data Legal guardians data Employee data</p>
<p>Comply with legal or regulatory obligations: we process personal data of children and adolescents to comply with our legal and regulatory obligations, such as tax and labor obligations, honoring our commitments.</p>	<p><b>Children:</b> consent</p> <p><b>Adolescents:</b> compliance with legal or regulatory obligation</p>	<p>Dependents data Visitors data Legal guardians data Employee data</p>



<p>Comply with a court order or administrative request: in some situations we may receive notifications to provide information about the processing carried out or specifically about the processing carried out with the data of children and adolescents (when we need to provide clarifications to the National Data Protection Authority, for example).</p>	<p><b>Children:</b> consent</p> <p><b>Adolescents:</b> Legitimate interest; compliance with legal or regulatory obligations; regular exercise of rights in judicial, administrative or arbitration proceedings</p>	<p>Dependents data Visitors data Legal guardians data Employee data</p>
<p>Defending interests in judicial or administrative proceedings: if necessary, we may use the personal data of children and adolescents before judges and administrative bodies</p>	<p><b>Children:</b> consent</p> <p><b>Adolescents:</b> Regular exercise of rights in judicial, administrative or arbitration proceedings</p>	<p>Dependents data Visitors data Legal guardians data Employee data</p>



<p>Protect the life and physical safety of everyone who is in our physical environments: IBAR Group values the physical safety of those who are in our physical environments, which is why we keep a record of everyone who has access to our environments, as well as keep surveillance cameras at strategic points of the companies</p>	<p><b>Children:</b> consent  <b>Adolescents:</b> protection of the life or physical safety of the holder or a third party; ensuring fraud prevention and the safety of the holder</p>	<p>Dependents data  Virtual visitor  Legal guardians data  Employee data</p>
<p>Hiring a young apprentice: we may process personal data of adolescents when we open young apprentice vacancies and the teenager applies to participate in our selection process, or when the teenager decides to register in our resume database. In this case, we want to understand if the vacancy offered fits the adolescent's profile. If the teenager starts working with us, we may process their personal data to proceed with their hiring</p>	<p><b>Adolescents:</b> consent; legitimate interest; preliminary procedures related to the contract</p>	<p>Candidate data  Employee data</p>



We have installed security cameras in several places in our physical environment, which are duly indicated with informative signs. The storage period is from 04 to 60 days depending on the units that are part of the IBAR Group.

## 5. DATA SHARING AND STORAGE

The IBAR Group does not use your personal data with the intention of commercializing or sharing it for profit or economic purposes.

This does not mean, however, that your personal data is not shared by us. Due to logistics and internal organization of the group, your personal data may be shared:

- With competent judicial, administrative or governmental authorities, whenever there is a request or court order. Your data may also be shared with judicial and administrative authorities and entities whenever it is necessary for the IBAR Group to present a defense or promote the regular exercise of a right, as well as for compliance with legal or regulatory obligations (such as issuing invoices, for example).
- With data operators, which are partner companies that work with the IBAR Group: we may share data from service providers and employees with service providers, whenever necessary, to ensure the regular performance of our activities. In this sense, we can share data with travel organization solution companies, e.g. for business trip planning.
- Automatically in case of corporate transactions, such as merger, acquisition and incorporation.
- When the IBAR Group provides services, depending on the nature of the service and the type of activity that will be performed by our team, it may be necessary to share with



customers some personal data of our employees. We will specifically advise our team about when data is shared and for what reason.

Whenever personal data is shared, we will take all available measures within our reach to ensure that all information security standards are observed, with strict compliance with the purposes described herein.

Internally, your data will be accessed by duly authorized professionals, always respecting the principles of purpose, adequacy and necessity for the performance of our services.

We will notify you if any security or privacy incident occurs involving the processing of your personal data, as well as what measures have been taken to contain the incident and how this event may impact you directly.

Your personal data will be stored for the period of time necessary for the fulfillment of the purposes of the processing in question. The holder's channel is always available for you to answer questions regarding the processing of your personal data, the justification for storage, purpose of the processing and the time we can retain your data.

The IBAR Group may store your personal data on its own servers (in Brazil) or in a cloud environment and server. In the latter case, there may be processing of your personal data (data processing and transfer) outside of Brazil. The IBAR Group will make sure that all national standards for the protection of personal data are followed.

## 6. RIGHTS OF THE HOLDER

In order for you to understand the processing completely, clearly and safely, it is important that you know your rights, established in article 18 of the General Personal Data Protection Law.





We indicate your rights below:

Your right	What changes in practice?
Information on the processing	We have a duty to provide all information requested by you about the processing of your data, including information about the existence of the processing.
Easy access to data	You can manage your data at any time through our <a href="https://portaldotitular.ibar.com.br/titular_ibar">holder channel <u>https://portaldotitular.ibar.com.br/titular_ibar</u></a> .
Correction of incomplete data	You can request the correction of incomplete, inaccurate, or outdated data.
Opposition to processing	You have the right to object to the processing and to know the consequences of this opposition (including the possible impossibility of providing services).
Anonymization, blocking, or exclusion of unnecessary data	If you believe that we are processing data that is unnecessary, excessive or without legal basis, you can contact us and we will review your request
Data portability	You can request the portability of your data to another service or product supplier. Portability will be carried out observing the industrial and commercial secrets of the IBAR Group.
Information on data sharing	You can request information about data sharing and the third parties with whom we share your data.



Information about consent	We will ask for your consent to carry out some specific processing (such as for marketing purposes, for example). In this case, you can solve all your doubts about our consent policy.
Revocation of consent	You can revoke your consent at any time. The effects of the revocation are generated from the date of delivery of the request.
Data exclusion	You can request the exclusion of the data processed based on consent. We note that this right is not absolute and a case-by-case analysis will be carried out to verify the feasibility of exclusion.
Complain to government authorities	If you deem it necessary, you can complain about the processing of personal data directly to the National Data Protection Authority.
Data security	The IBAR Group must make sure that the processing of your personal data is carried out securely.

## 7. HOW TO DISABLE COOKIE COLLECTION

We strongly encourage you to read our Cookie Policy to better understand how this data is used by us and in what situations.

In any case, if you do not agree to the collection, you can deactivate Google Analytics through the Add-on of your browser, available at the link <<https://tools.google.com/dlpage/gaoptout?hl=pt-BR>>. You can learn more about Google Analytics privacy information in "How Google uses data when you use our partners' websites or apps" at <<https://google.com/intl/pt-BR/policies/privacy/partners/>>.



By changing the Google Analytics cookie options, you can choose to receive a message whenever a cookie is stored on your computer and/or that your browser does not accept cookies from the Portal.

## 8. CONTACT OF THE PERSON IN CHARGE

If you have any questions about this Privacy Policy, you may contact our Data Protection Officer through the holder's channel [https://portaldotitular.ibar.com.br/titular\\_ibar](https://portaldotitular.ibar.com.br/titular_ibar).

The provisions herein are in accordance with the best international practices for the protection of personal data and privacy.

This Privacy Policy will be governed and interpreted in accordance with Brazilian law, in Portuguese, and the venue of the District of the city of São Paulo in the State of São Paulo is elected to settle any dispute or controversy involving this document in the relations maintained with users, except for the specific exception of personal, territorial or functional jurisdiction by the applicable legislation.