



# **PRIVACY POLICY - CUSTOMERS AND PARTNERS**

**[WWW.EAHTRADING.COM](http://WWW.EAHTRADING.COM)**

## **1. OBJECTIVE**

The Privacy Policy ("Policy") is intended to regulate the terms and conditions of Processing of Personal Data of customers and business partners by EAH("EAH TRADING"). For the execution of its activities, EAH TRADING will proceed to the Processing of Personal Data, pursuant to Annex I.

Annex I also establish the person in charge of the Processing of Personal Data of EAH TRADING, including its purposes. Annex I forms an integral part of this Policy. This Política may be made available and disseminated by different means and supports.

The purpose of this policy is to enforce the principles and standards of current Brazilian legislation regarding the Security and Protection of Personal Data, in particular the General Data Protection Law (Law 13.709/18).

In this sense, this document intends to explain in a clear and accessible way how information and data are collected, used, shared and stored by our systems.

## **2. SCOPE**

This Policy Applies to all customers and partners of EAH TRADING. This Policy is an integral part of the relationship between EAH TRADING and its stakeholders. In case of conflict between the provisions of the instrument that regulates the relationship between EAH TRADING and its interested parties and in this Policy, the provisions of this Policy shall prevail. Anything that is not specially regulated in this Policy, the provisions of the applicable instrument will apply.

## **3. EAH RESPONSIBILITIES**

Interested parties shall observe and ensure compliance with this Policy and, when necessary, call the Executive Board, HR and/or Quality for consultation on situations involving conflict with this Policy or through the occurrence of situations described therein. It's Essential that each person, in addition to knowing, disseminate the practices and guidelines set forth in the Policy.

## **4. TERMS AND DEFINITIONS**

For the purposes of this Policy, the definitions below shall have the following meanings:

"INTERESTED PARTIES" – customers, business partners, employees or trainees of EAH TRADING, current or past, including their family members, whenever applicable;

"PERSONAL DATA" – data or information identified or identifiable of Employees, and that may be subject to Treatment under the responsibility and direction of EAH TRADING;

"PERSONAL DATA OF THIRD PARTIES" - data or information identified or identifiable from third parties, including, but not limited to, customers, among others, and that may be subject to Treatment under the responsibility and direction of EAH TRADING;

"LGPD" – Law n. 13,709, of August 14, 2018, as amended by Lei n. 13,853, of July 8, 2019, as well as guidelines, regulations, and instructions issued by competent public entities or authorities on the matter;

"THIRD PARTY POLICIES" - any instrument, term, policy or proposal signed or accepted by EAH TRADING with third parties, involving LGPD matters and the Processing of Personal Data of Third Parties;

"TREATMENT" – any operation carried out with Personal Data, such as those relating to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

## **5. COMPLIANCE WITH APPLICABLE LEGISLATION**

Personal Data will be processed by EAH TRADING, in strict accordance with this Policy, the LGPD, applicable legislation and Third Party Policies, whenever necessary. EAH TRADING does not commercially exploit Personal Data in any way or nature. Personal Data will only be processed for the purposes for which it is intended. EAH TRADING does not process personal data relating to philosophical or political beliefs, party affiliation, religious faith, private life, race or ethnicity, among others, unless strictly necessary for the execution of its activities or by legal requirement. EAH TRADING will keep duly documented the Processing of Personal Data in a correct, detailed and updated way.

## **6. EXERCISE OF RIGHTS BY THE EMPLOYEE**

EAH TRADING hereby recognizes the necessity and relevance of the protection and processing of personal data under its control and responsibility. In this sense, Employees may, under the terms of the LGPD and other applicable legislation, access, review, correct, block, eliminate and request the updating of their Personal Data with EAH TRADING at any time. EAH TRADING will respond to the requests of Employees and will adopt the appropriate measures and measures, under the terms of this Policy, the LGPD and other applicable legislation.

In addition, the data subject will be informed about the possibility of not providing consent and about the consequences of this denial, as well as the revocation of consent for the processing of their personal data.

## **7. REPRESENTATIONS AND WARRANTIES**

The Collaborators hereby expressly authorize the Processing of Personal Data for the purposes described in Annex I. EAH TRADING will request the necessary, specific and convenient authorizations and consents of the Collaborators to ensure compliance with the Processing of Personal Data to the Policy, LGPD, applicable law, and whenever necessary, the Third Party Policy.

## **8. PROCESSING BY THIRD PARTIES**

For the execution of its activities, the Personal Data of Employees may be subject to Treatment by third parties duly contracted and authorized by EAH TRADING ("Subcontractors"), as operators. The Subcontractors will be subject to and subject to rules, obligations and duties of confidentiality, secrecy and protection of privacy, consistent with the provisions of this Policy, the LGPD and the provisions of the applicable legislation. In addition, Personal Data may be shared by court order or determination of authorities with jurisdiction and competence for this purpose, for the defense and protection of the rights and interests of EAH TRADING, among other cases considered necessary or convenient, at the sole discretion of EAH TRADING. Subcontractors may be reviewed and updated from time to time at the sole discretion of EAH TRADING. The list of Subcontractors can be found in Annex I.

## **9. TREATMENT BY CLIENTS**

The Employees hereby declare and acknowledge that, for the performance of certain activities and services with customers, customers may request the Processing of certain Personal Data of Employees, including accessing, collecting, storing and using for the purpose of participation in bidding processes, maintenance and compliance with the respective applicable contract with EAH TRADING. In addition, failure to provide such Personal Data may constitute an impeditive reason for not participating in the bidding process, or even for the celebration, maintenance, extension or execution of its services and activities, which may result in contractual non-compliance by EAH TRADING with the client, and subject to fines and and circumfertation. This Personal Data may be changed or supplemented from time to time, upon request of EAH TRADING, to serve its customers and other legitimate interests. EAH TRADING will keep Employees duly informed about the Processing of their Personal Data carried out by customers. EAH TRADING will only authorize the Processing of Personal Data for the specific purpose of the Contract signed between EAH TRADING and its customers.

## **10. INFORMATION SECURITY**

EAH TRADING has an adequate Information Security Policy, updated and consistent with the best information security practices, considering the currently existing state of the art, best practices in the sector, nature and purpose of the Treatment, and its impacts, under the terms of the LGPD and applicable legislation. The Employee will implement and maintain, at all times, the necessary security measures, which may be determined by EAH TRADING, which may be reviewed and amended from time to time, or even determined by a third party designated by him, and for the strict purpose of adapting and ensuring the compliance of EAH TRADING with the provisions of this Policy, in the LGPD and other applicable legislation, and whenever necessary, with the Third Party Policy.

## **11. RETENTION OF PERSONAL DATA**

Without prejudice to the provisions of Annex I, EAH TRADING may retain and maintain the Personal Data, for the time strictly necessary, and under the following conditions: (i) as long as the basis, nature and purpose of the Processing of Personal Data by EAH TRADING remains valid and in effect; (ii) by judicial order or determination of authorities with jurisdiction and competence for that purpose; (iii) for the resolution of any dispute or dispute; and (iv) for compliance with a particular legal provision under applicable law. The same will apply in the case of Processing of Personal Data by customers.

## **12. DELETION OF PERSONAL DATA**

Personal Data will be deleted under the following conditions: (i) whenever they are no longer necessary to fulfill the purposes of the Treatment, in accordance with this Policy, with the LGPD and other applicable legislation, and whenever necessary, with the Third Party Policy; (ii) when there is no longer a legal basis for retention; (iii) whenever requested by the holder, using his right to revoke the consent provided for in the LGPD, being informed the holder about the consequences of this request, as well as the effective deletion of the data; (iv) by determination of the ANPD (National Data Protection Authority).

For disposal purposes, all --.

(v) or when it is not permitted in accordance with this Policy, LGPD and other applicable legislation, and whenever necessary, with the Third Party Policy. The same will apply in the case of Processing of Personal Data by customers.

## **13. OBLIGATIONS AND RESPONSIBILITIES OF EMPLOYEES**

In the exercise of its activities, the Employee may have access to and process the Processing of Personal Data of Collaborators and Third Parties. In this sense, the Contributor declares and agrees:

- a) proceed and act, at all times, in strict accordance with the provisions of this Policy, the LGPD and other applicable legislation, and whenever necessary, with the Third Party Policy;
- b) not to proceed with the Processing of Personal and Third Party Data for the purpose of various or contrary to the provisions of this Policy, the LGPD, and other applicable legislation, and whenever necessary, with the Third Party Policy;
- c) not to adopt any behavior or conduct, including by omission, that implies or results in a violation of the provisions of this Policy, the LGPD and other applicable legislation, and whenever necessary, with the Third Party Policy;
- d) allow the confirmation by EAH TRADING, or a third party designated by it, of the destruction of Personal Data and Third Parties, with the finality and strict of ensuring the compliance of EAH TRADING and the Employee with the provisions of this Policy, the LGPD, and other applicable legislation, and

whenever necessary, with the Third Party Policy;

- e) not to keep or retain Personal and Third Party Data for longer than is strictly necessary and indispensable for the fulfillment of its obligations, duties and responsibilities before EAH TRADING, and whenever applicable, under the terms of this Policy, the LGPD and other applicable legislation;
- f) participate in training, courses, trainings, events, related to the Processing of Personal Data or LGPD, which may be determined by EAH TRADING;
- g) collaborate with EAH TRADING in fulfilling its obligations in relation to this Policy, LGPD and other applicable legislation, and whenever necessary, with the Third Party Policy, including, but not limited to, in the investigation, mitigation and remediation of any breach of Personal Data and third parties, before third parties and competent authorities;
- h) notify EAH TRADING in the event that it identifies any event, indication or signal that may interfere or compromise its ability to ensure the compliance of EAH TRADING and the Employee, with respect to the provisions of this Policy, LGPD, and other applicable legislation, and whenever necessary, the Third Party Policy; and
- i) notify EAH TRADING immediately of any unauthorized, improper or unlawful processing, loss, destruction, incident, corruption, damage, alteration, disclosure or unauthorized, improper or unlawful access to any Personal and Third Party Data ("Breach"), including any suspicion or attempt.

## **14. CHANGES TO THE POLICY**

This Policy may be amended from time to time at the sole discretion of EAH TRADING, to ensure its compliance with the LGPD and other applicable legislation. EAH TRADING will inform the Employee of any changes to this Policy and Third Party Policies.

## **15. QUESTIONS AND CLARIFICATIONS**

If there is any doubt or need for clarification regarding the application of this Policy or Third-Party Policies, as well as to submit a complaint about possible violation of data protection laws and compliance with requests related to their rights, Employees may contact the data processing officer of EAH TRADING, in accordance with Annex I.

## **16. PENALTIES**

Failure to comply with the Policy may give rise to the application of penalties in accordance with current legislation, according to the severity of the occurrence. The Court of the District of --, is elected as the competent to resolve any issues that may arise from this document, with express waiver of any other, however privileged.

## **17. SITUATIONS NOT CONTEMPLATED**

This Policy presents general guidelines, and some specific situations may not be

contemplated.

What is expected in these cases is that each one acts with responsibility, prudence and ethical awareness, evaluating the best way forward with the certainty that the appropriate solution will always be governed by common sense and the values we cherish.

It is up to the Human Resources area to keep this document updated, in accordance with the one disclosed by the group internationally, bringing its content to the attention of everyone in the EAH TRADING Group.

## **18. INTERNATIONAL DATA TRANSFER**

EAH TRADING has two commercial partners and service providers in Brazil and abroad and, in this sense, uses a technical infrastructure on a global scale with the objective of optimizing the efficiency, performance and security of services. Therefore, your personal data may be transferred to other countries for data processing and storage, in accordance with the terms and purposes defined in our Privacy Policy. By authorizing the processing of Personal Data from this Policy, the Contributor is consenting to the processing, transfer and storage of this information in other countries.

EAH TRADING may process your personal data, including storage, in Brazil or abroad. In any case, EAH TRADING will adopt the necessary technical and legal measures and safeguards to ensure compliance with this privacy policy and your rights related to the protection of personal data.

## **19. DURATION**

This Policy takes effect on the date of its publication, revoking and replacing any previous communication on the subject and will remain in force for an indefinite period.

## ANNEX I

### PROCESSING OF PERSONAL DATA AND PURPOSE FOR EMPLOYEES

| Personal Data and its Categories                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Categories of Personal Data (including by third parties) | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Initial Data                                             | Full name, contact number (phone and mobile phone), date of birth, e-mail.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| General Data                                             | Full name, full address (including zip code), contact number (phone and mobile), date of birth, professional emails, CPF.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Accreditation Data                                       | <p>Data contained in the RG, RNE or Passport; Photo; Identification document of the country of origin, in the case of foreigners, when the Agreement on Travel Documents of the OSUR MERC States Parties and Associated States applies; Data contained in the CPF; Data contained in the Marriage Certificate or annotation, for the purpose of justifying the divergences in the data of the documents arising from the name change; Data contained in the CNH, when necessary due to the credential spócie; Data contained in professional registration cards, such as CREA and OAB, when presented by the accredited as a photo ID; Address; Telephone; Email;</p> <p>Proof of vaccination, for the purpose of confirming vaccination against yellow fever; Data contained in the CTPS, employment contract, provision of services or any other document presented to prove employment or provision of services; Residence history of the last 10 years, if you have lived in another country; Criminal history; Identification Vest Number and Code; and Digital and facial biometric data of employees of public agencies, to comply with ANAC Resolution No. 515.</p> |
| Accident Data                                            | Work accidents, agent using the user, generating situation, nature of the injury, reasons for absence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Simple Data                                              | Full name, CPF, RG, position.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Closing Data                                             | Nature of the closure, grounds, severance funds, indemnities, causes and history.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| System Data                                              | Access and registration to systems, networks, applications, tools, resources and programs under the control and responsibility of EAH (or licensees), IRS and / or Airports, including, login logs, passwords, access and exit records of Systems, web pages visited, schedules.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

*(sensitive personal data: personal data on racial or ethnic origin, religious belief, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or*

*biometric data, when linked to a natural person)*

| Item | Purpose and Categories of Personal Data Used                                                     |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                            |
|------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | Purpose of the Processing of Personal Data                                                       | Foundation                                                                                                                                                                                       | Categories of Personal Data                                                                                                                                                                                                                                                                |
| (a)  | Registration and processing in public bodies and authorities (labor, tax and social security)    | <ul style="list-style-type: none"> <li>▪ Contract Execution</li> <li>▪ Legitimate Interest</li> <li>▪ Assent</li> <li>▪ Compliance with legal, fiscal and social security obligations</li> </ul> | <ul style="list-style-type: none"> <li>▪ General Data</li> <li>▪ Sensitive Data</li> <li>▪ Vale-Transporte Data</li> <li>▪ Meal Voucher Data</li> <li>▪ Simple Data</li> <li>▪ Family Data</li> <li>▪ Accident Data</li> <li>▪ Compensation Data</li> <li>▪ Closing Data</li> </ul>        |
| (b)  | Participation in events, trainings, courses, formations and trainings                            | <ul style="list-style-type: none"> <li>▪ Legitimate Interest</li> <li>▪ Assent</li> </ul>                                                                                                        | <ul style="list-style-type: none"> <li>▪ Simple Data</li> <li>▪ Data for Professional Practice</li> </ul>                                                                                                                                                                                  |
| (c)  | Exercise of services with customers                                                              | <ul style="list-style-type: none"> <li>▪ Contract Execution</li> <li>▪ Legitimate Interest</li> </ul>                                                                                            | <ul style="list-style-type: none"> <li>▪ [to be filled]</li> </ul>                                                                                                                                                                                                                         |
| (d)  | Monitoring and supervision of compliance and work duties                                         | <ul style="list-style-type: none"> <li>▪ Contract Execution</li> <li>▪ Legitimate Interest</li> <li>▪ Assent</li> </ul>                                                                          | <ul style="list-style-type: none"> <li>▪ Professional Data</li> <li>▪ System Data</li> </ul>                                                                                                                                                                                               |
| (e)  | Information security of EAH Systems (confidentiality, integrity and availability of your assets) | <ul style="list-style-type: none"> <li>▪ Contract Execution</li> <li>▪ Legitimate Interest</li> <li>▪ Assent</li> <li>▪ Compliance with legal obligation</li> </ul>                              | <ul style="list-style-type: none"> <li>▪ Professional Data</li> <li>▪ System Data</li> </ul>                                                                                                                                                                                               |
| (f)  | Access to EAH facilities                                                                         | <ul style="list-style-type: none"> <li>▪ Contract Execution</li> <li>▪ Legitimate Interest</li> <li>▪ Assent</li> <li>▪ Compliance with legal obligation</li> </ul>                              | <ul style="list-style-type: none"> <li>▪ Biometric Data</li> <li>▪ Simple Data</li> </ul>                                                                                                                                                                                                  |
| (g)  | Access to facilities governed by the Federal Revenue Service and/or ANAC                         | <ul style="list-style-type: none"> <li>▪ Contract Execution</li> <li>▪ Legitimate Interest</li> <li>▪ Assent</li> <li>▪ Compliance with legal obligation</li> </ul>                              | <ul style="list-style-type: none"> <li>▪ Biometric Data</li> <li>▪ Simple Data</li> <li>▪ Accreditation Data.</li> </ul>                                                                                                                                                                   |
| (h)  | Compliance with determination by competent authority                                             | <ul style="list-style-type: none"> <li>▪ Compliance with legal obligation</li> </ul>                                                                                                             | <ul style="list-style-type: none"> <li>▪ General Data</li> <li>▪ Initial Data</li> <li>▪ Financial Data</li> <li>▪ Accident Data</li> <li>▪ Simple Data</li> <li>▪ Data for Professional Practice</li> <li>▪ Sensitive Data</li> <li>▪ Professional Data</li> <li>▪ System Data</li> </ul> |

|     |                                                                                   |                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                   |                                                                                                                                                                             | <ul style="list-style-type: none"> <li>▪ Closing Data</li> <li>▪ Biometric Data</li> <li>▪ Accreditation Data</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                |
| (i) | Safeguarding the rights of EAH (any consultations, claims, demands and processes) | <ul style="list-style-type: none"> <li>▪ Compliance with legal obligation</li> <li>▪ Legitimate Interest</li> <li>▪ Regular exercise of rights</li> <li>▪ Assent</li> </ul> | <ul style="list-style-type: none"> <li>▪ General Data</li> <li>▪ Initial Data</li> <li>▪ Financial Data</li> <li>▪ Accident Data</li> <li>▪ Simple Data</li> <li>▪ Data for Professional Practice</li> <li>▪ Sensitive Data</li> <li>▪ Professional Data</li> <li>▪ System Data</li> <li>▪ Closing Data</li> <li>▪ Biometric Data</li> <li>▪ Accreditation Data</li> </ul>                                                                                                                                              |
| (p) | Realization of Partnerships, Joint-Ventures or sale of equity interest            | <ul style="list-style-type: none"> <li>▪ Legitimate Interest</li> <li>▪ Regular exercise of rights</li> <li>▪ Assent</li> </ul>                                             | <ul style="list-style-type: none"> <li>▪ General Data</li> <li>▪ Initial Data</li> <li>▪ Vale-Transporte Data</li> <li>▪ Meal Voucher Data</li> <li>▪ Health Insurance Data</li> <li>▪ Financial Data</li> <li>▪ Compensation Data</li> <li>▪ Accident Data</li> <li>▪ Simple Data</li> <li>▪ Data for Professional Practice</li> <li>▪ Sensitive Data</li> <li>▪ Clinical Data</li> <li>▪ Family Data</li> <li>▪ Professional Data</li> <li>▪ System Data</li> <li>▪ Closing Data</li> <li>▪ Biometric Data</li> </ul> |

SHARING OF PERSONAL DATA WITH THIRD PARTIES (this list will be updated from time to time at EAH 's sole discretion):

| Current Suppliers                                                                                                                 | Purpose                                                                                                                                                                                                     | Categories of Personal Data                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>▪ EAHSYS</li> </ul>                                                                        | <ul style="list-style-type: none"> <li>▪ Freight forwarding process</li> </ul>                                                                                                                              | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪</li> </ul>                                                                                                                  |
| <ul style="list-style-type: none"> <li>▪ Join RH:</li> <li>▪ <a href="https://joinrh.com.br">https://joinrh.com.br</a></li> </ul> | <ul style="list-style-type: none"> <li>▪ Personnel department system, storage of employee data, admission, dismissal, movement of people, registration of training and registration of speakers.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Initial data</li> <li>▪ General data</li> <li>▪ Remuneration Data</li> <li>▪ Data for Professional Practice</li> <li>▪ Professional Data</li> </ul> |

|                                                                                                                                                            |                                                                                                                                                               |                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                            |                                                                                                                                                               | <ul style="list-style-type: none"> <li>▪ Closing Data</li> <li>▪ Data from</li> <li>▪ Professional Data</li> <li>▪ Closing Data</li> <li>▪ Family Data</li> <li>▪ Sensitive Data</li> </ul> |
| <ul style="list-style-type: none"> <li>▪ EAH ACADEMY:</li> <li>▪ <a href="https://system.eahtrading.com">https://system.eahtrading.com</a></li> </ul>      | <ul style="list-style-type: none"> <li>▪ Platform for distance education training of the company</li> </ul>                                                   | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ Professional Data</li> </ul>                                                                                               |
| <ul style="list-style-type: none"> <li>▪ Service Domain:</li> <li>▪ <a href="https://www.softcreationzz.com">https://www.softcreationzz.com</a></li> </ul> | <ul style="list-style-type: none"> <li>▪ Accounting treatment, accounts payable, accounts receivable, billing and accounting</li> </ul>                       | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ Financial Data</li> </ul>                                                                                                  |
| <ul style="list-style-type: none"> <li>▪ Tank:</li> </ul>                                                                                                  | <ul style="list-style-type: none"> <li>▪ Organization and financial system</li> </ul>                                                                         | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ Quickbooks:</li> </ul>                                                                                            | <ul style="list-style-type: none"> <li>▪ EAH America's Financial System</li> </ul>                                                                            | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ Financial Data</li> </ul>                                                                                                  |
| <ul style="list-style-type: none"> <li>▪ Omie</li> </ul>                                                                                                   | <ul style="list-style-type: none"> <li>▪ Financial system</li> </ul>                                                                                          | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ Financial Data</li> </ul>                                                                                                  |
| <ul style="list-style-type: none"> <li>▪ Power BI:</li> </ul>                                                                                              | <ul style="list-style-type: none"> <li>▪ Analysis of indicators and business intelligence</li> </ul>                                                          | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ Gsuite:</li> </ul>                                                                                                | <ul style="list-style-type: none"> <li>▪ Email and storage accounts (Gmail and Google drive)</li> </ul>                                                       | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ System Data</li> <li>▪ Sensitive data</li> <li>▪ Accreditation data</li> </ul>                                             |
| <ul style="list-style-type: none"> <li>▪ Trello:</li> </ul>                                                                                                | <ul style="list-style-type: none"> <li>▪ Management system and monitoring of tasks and activities of employees</li> </ul>                                     | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ Ecovadis:</li> </ul>                                                                                              | <ul style="list-style-type: none"> <li>▪ collaborative platform for monitoring suppliers' sustainable development performance</li> </ul>                      | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ EAHSYS HMG:</li> </ul>                                                                                            | <ul style="list-style-type: none"> <li>▪ Operating system for testing, homologation and training based on our operations.</li> </ul>                          | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ Siscomex Single Portal:</li> </ul>                                                                                | <ul style="list-style-type: none"> <li>▪ System of the Federal Revenue, for the accomplishment of activities and processes of importation of goods</li> </ul> | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ Accreditation data</li> </ul>                                                                                              |
| <ul style="list-style-type: none"> <li>▪ Mantra</li> </ul>                                                                                                 | <ul style="list-style-type: none"> <li>▪ System of the Federal Revenue, for the accomplishment of activities and processes of importation of goods</li> </ul> | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ Accreditation data</li> </ul>                                                                                              |
| <ul style="list-style-type: none"> <li>▪ Currier</li> </ul>                                                                                                | <ul style="list-style-type: none"> <li>▪ Goods delivery services</li> </ul>                                                                                   | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ SICAF</li> </ul>                                                                                                  | <ul style="list-style-type: none"> <li>▪ Registration of suppliers in the federal government's procurement portal</li> </ul>                                  | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ Whatsapp business</li> <li>▪</li> </ul>                                                                           | <ul style="list-style-type: none"> <li>▪ Communication and messaging system</li> </ul>                                                                        | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |
| <ul style="list-style-type: none"> <li>▪ Dimension Condominium</li> </ul>                                                                                  | <ul style="list-style-type: none"> <li>▪ Entrance and Access to the facilities of the Condominium and the EAH office in Rio de Janeiro.</li> </ul>            | <ul style="list-style-type: none"> <li>▪ Initial Data</li> <li>▪ Sensitive Data</li> <li>▪ Accreditation Data</li> </ul>                                                                    |
| <ul style="list-style-type: none"> <li>▪ Wework</li> </ul>                                                                                                 | <ul style="list-style-type: none"> <li>▪ Entrance and access to the</li> </ul>                                                                                | <ul style="list-style-type: none"> <li>▪ Initial Data</li> </ul>                                                                                                                            |

|   |                                                           |                                                                                                  |
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| • | facilities of the building and the EAH office in Karachi. | <ul style="list-style-type: none"> <li>• Sensitive Data</li> <li>• Accreditation Data</li> </ul> |
|---|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------|

## ANNEX II

### PROCESSING OF CARGO DATA AND ITS PURPOSE FOR CUSTOMERS AND SUPPLIERS

| Cargo Data and its Categories   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Load Data Categories            | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Initial Data                    | Customer (with CNPJ), Customer Reference, POL, POD, Shipper, Incoterm, Modal, customer contact responsible for the process, consignee of the cargo (with CNPJ), reference agent, FFH (freight forwarder responsible for the freight forwarding), OFF (cargo agent at the origin), DFF (cargo agent at the destination), Priority of the load, weight, volume, Special handling at source, Special handling of destination, type of cargo.                                                                                                                                                                                                                                                                                                                                                                                |
| General Data                    | Customer (with CNPJ), Customer Reference, POL, POD, Shipper, Incoterm, Modal, customer contact responsible for the process, consignee of the cargo (with CNPJ), reference agent, FFH (freight forwarder responsible for the freight forwarding), OFF (freight forwarder at the origin), DFF (cargo agent at the destination), Priority of the load, weight, volume, Bro Source ker, Broker at destination, destination coordinator, coordinator at origin, Special handling at source, Special handling destination, quantity of items, type, Length, Width, height, CBM, Gross weight, cargo readiness, cargo readiness.                                                                                                                                                                                                |
| Credendata and release of cargo | All information contained in House, Master, Invoice, packing list, DGD, MSDS, Place of collection, Trucking and Co., Estimated date of receipt in the warehouse of origin, Place of delivery of cargo, warehouse receipt, photos,<br>Customer, Customer Reference, POL, POD, Shipper, Incoterm, Modal, customer contact responsible for the process, consignee of the cargo, reference agent, FFH (freight forwarder), OFF (freight forwarder at origin), DFF (agent of charge at the shipment of the load), DFF (agent of reference load at destination), Cargo priority, weight, volume, Source broker, Destination broker, destination coordinator, origin coordinator, Special handling at source, Special destination handling, quantity of items, type, Length, Width, height, CBM, Gross weight, cargo readiness. |
| Financial data                  | Customer, CNPJ, full address of the company, invoice, invoice, debit note.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Company Registration Data       | Fancy name, corporate name, full address (including zip code), contact number (telephone and mobile phone), date of foundation, financial and operational contact emails, CNPJ.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Current Suppliers                  | Purpose                                                                                          | Data Categories                                                                                                                 |
|------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>EAHSYS – Basic Registration</b> | Module where we put all the information of the registers pertinent to all operational processes. | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- Financial Data</li> <li>- Company registration data</li> </ul> |
| <b>EAHSYS – Pricing</b>            | Module where the registration of purchase rates agreed with suppliers                            | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- Financial Data</li> </ul>                                      |

|                                                                                                     |                                                                                                             |                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                     | is carried out                                                                                              | <ul style="list-style-type: none"> <li>- Company registration data</li> </ul>                                                                                                                     |
| <b>EAHSYS – CRM</b>                                                                                 | Commercial module, where commercial prospects are registered.                                               | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General data</li> <li>- Financial Data</li> <li>- Company registration data</li> </ul>                                           |
| <b>EAHSYS – PM</b>                                                                                  | Module where commercial proposals are registered.                                                           | <ul style="list-style-type: none"> <li>- Company registration data</li> <li>- Initial Data</li> <li>- General data</li> </ul>                                                                     |
| <b>EAHSYS – Operations</b>                                                                          | Module where the entire operation is recorded, from the monitoring of cargo readiness to financial closing. | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General data</li> <li>- Financial Data</li> <li>- Company registration data</li> <li>- Accreditation and release data</li> </ul> |
| <b>EAHSYS - DWSYS</b>                                                                               | Module used in the EAH America warehouse, to control cargo handling.                                        | <ul style="list-style-type: none"> <li>- General data</li> <li>- Accreditation and release data</li> </ul>                                                                                        |
| <b>EAHSYS - CLR</b>                                                                                 | Module used for organizing container loading.                                                               | <ul style="list-style-type: none"> <li>- General data</li> <li>- Accreditation and release data</li> </ul>                                                                                        |
| <b>EAHSYS - DLC</b>                                                                                 | Customer utilization system, showing the data recorded in the OPERATIONS module.                            | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General data</li> <li>- Financial Data</li> <li>- Accreditation and release data</li> <li>- Company registration data</li> </ul> |
| <b>EAHSYS – FINANCIAL</b>                                                                           | Module where the financial sector performs the movements of payment, receipt, exchange and calculation.     | <ul style="list-style-type: none"> <li>- General data</li> <li>- Financial Data</li> <li>- Accreditation and release data</li> </ul>                                                              |
| <b>EAHSYS - Calls</b>                                                                               | Module where calls and non-conformities are registered and monitored, controlled by the Quality team.       | <ul style="list-style-type: none"> <li>- General data</li> <li>- Financial Data</li> <li>- Accreditation and release data</li> </ul>                                                              |
| <b>Service Domain:</b><br><a href="https://www.softcreationz.com">https://www.softcreationz.com</a> | Accounting treatment, accounts payable, accounts receivable, billing and accounting                         | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- Financial Data</li> <li>- Registration data of the company</li> </ul>                                                            |

|                                |                                                                                                           |                                                                                                                                                                                                   |
|--------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Tank:</b>                   | Organization and financial system                                                                         | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- Financial Data</li> <li>- Company registration data</li> </ul>                                                                   |
| <b>Quickbooks:</b>             | EAH America's Financial System                                                                            | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- Financial Data</li> <li>- Company registration data</li> </ul>                                                                   |
| <b>Omie</b>                    | Financial system                                                                                          | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- Financial Data</li> <li>- Company registration data</li> </ul>                                                                   |
| <b>Power BI:</b>               | Analysis of indicators and business intelligence                                                          | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- Financial Data</li> <li>- Load data</li> <li>- Accreditation and release data</li> </ul>                                         |
| <b>Gsuite:</b>                 | Email and storage accounts (Gmail and Google drive)                                                       | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General data</li> <li>- Financial data</li> <li>- Company registration data</li> <li>- Accreditation and release data</li> </ul> |
| <b>AWS</b>                     | Cloud repository to store all EAH data and systems                                                        | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General data</li> <li>- Financial data</li> <li>- Company registration data</li> <li>- Accreditation and release data</li> </ul> |
| <b>EAHSYS HMG:</b>             | Operating system for testing, homologation and training based on our operations.                          | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General data</li> <li>- Financial data</li> <li>- Company registration data</li> <li>- Accreditation and release data</li> </ul> |
| <b>Siscomex Single Portal:</b> | System of the Federal Revenue, for the accomplishment of activities and processes of importation of goods | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General data</li> <li>- Financial data</li> <li>- Company registration data</li> <li>- Accreditation and release data</li> </ul> |
| <b>Mantra</b>                  | System of the Federal Revenue, for the accomplishment of activities and                                   | <ul style="list-style-type: none"> <li>- Accreditation</li> </ul>                                                                                                                                 |

|                          |                                               |                                                                                          |
|--------------------------|-----------------------------------------------|------------------------------------------------------------------------------------------|
|                          | processes of importation of goods             | and release data                                                                         |
| <b>Whatsapp business</b> | Communication system and exchange of messages | <ul style="list-style-type: none"> <li>- Initial Data</li> <li>- General Data</li> </ul> |



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