

TITTLE:

Privacy Policy to Clients, Suppliers, Employees and Third-Parties

TYPE:

Norm

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1. Presentation

Cooperativa Regional de Cafeicultores em Guaxupé Ltda. - Cooxupé (“COOXUPÉ”) acknowledges its responsibility regarding Brazilian Law # 13.709 from August 14th, 2018, concerning protection of Personal Data of its clients, suppliers, employees and third-parties which do any kind of service or use its services. The establishment of the current Privacy Policy reinforces its commitment towards valuating the privacy of people that have relationships with COOXUPÉ.

We do understand that the use of personal data by COOXUPÉ shall be carried out in a responsible manner, and compliant to Brazilian legislation, as well as to infra-legal norms to be edited by public authorities.

2. Objectives

The current policy aims to drive COOXUPÉ’s action before questions regarding protection of Personal Data from its clients, suppliers, employees, and third-parties in general that may have their data processed by COOXUPÉ.

3. Application

The current policy integrates a set of actions, carried out by Cooxupé, meant to protect Personal Data, and it produces immediate effect.

4. Principles

COOXUPÉ carries out activities of Personal Data processing always observing the good faith and the following principles, listed in the General Data Protection Law (“Principles”):

Purpose: We carry out Personal Data processing for rightful, specific and explicit purposes, with no possibility of further processing apart from the purposes presented to the Data Owners.

Adequacy: We carry out Personal Data processing according to the purposes informed to the Data Owners, and within the processing context.

Necessity: Personal Data processing is limited to the minimum necessary to reach the purposes, assuming that COOXUPÉ does not keep data in its data basis without clear purpose.

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Free access: We guarantee the Data Owners to consult their data, which we keep in our basis, as well as to require its exclusion and/or correction.

Data Quality: COOXUPÉ guarantees to the Data Owners, accuracy, clearness, relevancy, and updating of data, according to the necessity and for the accomplishment of its processing purpose.

Transparency: We provide the Data Owners with clear, accurate and easily accessible information about Personal Data processing.

Security: We do apply technical and administrative measures which are able to protect Personal Data from unauthorized accesses, and from accidental or illegal situations of destruction, loss, tampering, communication or diffusion.

Prevention: We do adopt measures in order to prevent the occurrence of damages due to Personal Data processing.

Non-discrimination: We do not carry out Personal Data processing with illicit or abusive discriminatory purposes.

Liability and accountability: We do adopt effective measures, which can prove observance and fulfillment of personal data protection norms and the effectiveness of such measures.

5. Responsibility for personal data processing

The company responsible for personal data processing is: **COOPERATIVA REGIONAL DE CAFEICULTORES EM GUAXUPÉ LTDA - COOXUPÉ**, located at Rua Manoel Joaquim Magalhães Gomes, 400, Vila Santa Bárbara Guaxupé-MG, CEP: 37800-000, registered under CNPJ (Brazilian National Registry of Private Individual) # 20.770.566/0001-00.

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6. Personal data owners

The current Policy considers as personal data owners: (i) clients and/or potential clients; (ii) visitors; (iii) service/product providers and/or potential service/product providers; and (iv) employees and/or potential employees, apprentices and trainees; and (v) third-parties who contact Cooxupé whether via its Service Channels or at its facilities (“Data Owners”).

In case of Personal Data collection from children or adolescents, it will be carried out always observing their best interest, concerning parental or legal guardians’ permit. COOXUPÉ, deemed controller, must keep public the information about the type of data collected, the means by which it will be used, and the procedures for exclusion, rectification, addition, and anonymisation of personal data. Lastly, COOXUPÉ will provide in a simple, clear and accessible manner, regarding physical-motor, perceptive, sensory, intellectual and mental characteristics of the user, with application of audio-visual resources when adequate, aiming to promote necessary information to parents or legal guardian, adequate to the child’s understanding as well.

7. Personal Data collected

Personal Data may be collected from Data Owners either to or for the reason of commercial, legal, financial, occupational, or marketing purposes.

See established below the categories of personal data which we do use, as well as personal data usually processed in each category (“Personal Data”),

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PERSONAL DATA CATEGORY	PROCESSED PERSONAL DATA
Name and Initials	Name (full name or parts) Signature Date of birth Place of birth
Características Pessoais	Gender Nationality Marital status System of marriage Voice / audio / record Photograph (when there is no risk of use for discriminatory purposes) Video (when there is no risk of use for discriminatory purposes)
Parentage and Relationship	Degree of parentage Tutor/Trustee Partner Authorized
Identification from official agencies / bodies	CPT - Brazilian registry of private individual RG - Brazilian General registration CNH - Brazilian driver's license Voter Registration ID Certificate of Marriage Certificate of Birth Certificate of Death Vehicle plate number Renavam - rade / chassis number CUPS - work and social security card Government Benefits Card Passport/Visa Reservista - Military Reserve Identification Social Security insurance type CAEP/CEI - National Social Security Institute registration CCIR - Certificate of Registration of Rural Property INCRA - National Institute of Settlement and Rural Reform NT - Worker Identification Number CAK - environmental rural registration Recibo IRRF - Income Tax receipt Cartão de produtor rural - Rural Producer Card PIS/PASEP - Government plans for social security MOP - Regulations for transportation of hazardous goods NRF - Brazilian Federal Revenue control Subscription to professional class council State registration number of rural producer
Residential information / contact	Residential Address Residential telephone Private email address Private cellphone number Private social media address
Information about education and complementary courses	School level / degree
Professional information	Occupation / position Name of employee Corporate address Corporate telephone Corporate email address Corporate cellphone Employee registration number Previous work record / history
Trade information - procurement / sell	Number of fiscal document Profile of consumption Client registration number (Cooxupé/SMC identification) Supplier registration number (Cooxupé/SMC identification)
Financial information	Bank information (bank, agency, account) Credit score Further financial information Revenue
Juridical information	Legal / administrative process
Information of rural property	Name of the property Address of the property Telephone of the property Cooperative registration ID (Cooxupé/SMC) Farm ID (Rural property ID) Geolocation of the property Email of the property Geolocation of the device
Information about mobile devices and desktop/laptop computer	IMEI and IP MAC Address and/or serial number
Credit card information	Number of the card Expiration date of the card Card codes numbers (CVV, CVZ, CID)
Health related information (sensible personal data)	ICD (International Classification of Diseases) CAT (Communication of labor accidents) Public Healthcare System card - SUS Vaccination card Private healthcare plan card Clinical history Disability person (PCD) Diagnosis / clinical treatment Occupational Health Attestation (ASSO) Admittance, diemical or parodiical clinical exam Clinical issues/complaints
Sensible overall information (Sensible Data)	Overall information Religious or philosophical beliefs Political position and affiliation Union Membership Race or ethnic origin Sexual orientation Biometrical data Video (when there is risk of use for discriminatory purposes) Photograph (when there is risk of use for discriminatory purposes)

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8. How to collect personal data

Personal Data are collected, specially by the following ways:

Personal Data provided by Data Owner on-site – We do collect Personal Data necessary to start and keep commercial and/or contractual relationship with the owner of the data which is provided on-site at our administrative, commercial or industrial units.

Personal Data provided by Data Owner remotely – we do collect Personal data necessary to begin and maintain commercial and/or contractual relationship with the owner of the data provided from our virtual service channels, social media service, among other channels provided by us.

9. Destination of personal data received

The Personal Data indicated above are received, in short, for the following activities:

- Registration of third-parties and clients on ERP ORACLE system;
- Enforcement of businesses with foreign and/or domestic market, in conditions where product traceability is mandatory for accomplishing sales of coffee.
- Video-monitoring for purposes of security at COOXUPÉ's facilities.
- Registration of suppliers (enterprises and natural persons) on ERP ORACLE system whether for hiring services or buying goods for internal consumption;
- Registration of independent carriers on NDD TRANSPORTES system;
- Data collection and receipt of copy of documents of clients, suppliers, service providers, and third parties in order to elaborate or analyze the respective contractual drafts.
- Outsource of independent professionals for the execution of general services in corporate events;
- Conduction of recruiting processes and admission of employees, issuing Labor Contracts and accomplishment of occupational and social security-related obligations;
- Registration of Engineer employees at CREA's website (Regional Council of Engineering) in order to allow the emission of ART (Technical Responsibility Note);
- Concession of internship and visits, issuing the respective contract;
- Conduction of integration and assessment processes, by COOXUPÉ's Department of Labor Security and Medicine (DRH- SESMT), for employees

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designated by contractors and service providers towards the accomplishment of the objects of contracts within COOXUPÉ's facilities, regarding the compliance with norms of labor safety and medicine;

- Execution of payments by COOXUPÉ, including through Individual Taxpayer Payment Receipt (RCPI);
- Trade of products or services by COOXUPÉ, issuing respective Invoices;
- Pricing and stock management;
- Elaboration and approval of analysis of credit for third-parties;
- Clearance of credit for third-parties;
- Procurement of green coffee beans from third-party rural producers (non-members), entering into the respective contracts and issuing Rural Product Bills (RCP);
- Receipt, shipment and warehousing coffee, maize and other products for resale;
- Assessment of default from third-parties and clients, in order to take extrajudicial actions of charging including an eventual inclusion of defaulters into credit protection bodies;
- Extrajudicial debt renegotiation;
- Elaboration of dossiers in order to file lawsuits for credit recovery by COOXUPÉ (third parties and clients judicial debt collection);
- Participation of Personal Data Owner in fairs and other events promoted by COOXUPÉ;
- Edition and release of the newspapers Coisa Nossa and Folha Rural (printed and online versions), social media, and other communication channels of COOXUPÉ.

All Personal Data collected are used for contracting or providing services, for acquisition or sourcing of products, and for formalization of other labor and commercial relationships, with respect to Data Owner's privacy. By these means, all Personal Data and information are processed as confidential, and they are only used for the purposes described herein.

Personal Data are processed according to their adequacy to the following legal basis ("Legal Basis"):

- **Consent** – We do use consent in order to legitimate the processing of Personal Data of processes to which the Data Owner can opt whether to realize or not;
- **Accomplishment of legal or regulatory obligation** – We use this legal base in order to meet legal statements;

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- **Contracts enforcement** – We use contracts enforcement legal base for processed related to buying/selling products, contracting or providing services, enforcement of other contracts and juridical businesses, charging, emission of bills, among others;
- **Regular exercise of rights** – We use this legal base for regular exercise of rights in judicial, administrative or arbitral proceedings;
- **Legitimate interest** – We use Legitimate Interest in order to perform satisfaction surveys, audience perception campaigns, marketing or to meet legitimate interests of COOXUPÉ or third parties;
- **Credit protection** – We use this Legal base in order to legitimate personal data processing for generation and approval of credit analysis;
- **Fraud prevention** – We use this legal base in order to legitimate personal data processing regarding the monitoring of people who transit at COOXUPÉ's facilities aiming at ensuring security on site.

10. Personal data conservation

Personal Data will be conserved for as long as the contractual relation between COOXUPÉ and the Personal Data Owners and, once such relation ends, in order to meet legal obligations and the exercise of its rights, including for purposes of compliance verification.

After the object of Personal Data processing ends, the information will be discarded or turn anonymous, following adequate politics.

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11. Sharing of data with third parties

COOXUPÉ shares Personal Data with third parties who back us in operation, sourcing, development, integration and support commercial, legal and credit-analysis activities. As a general rule, sharing with third parties will occur under the following hypothesis:

- Under the hypothesis in which the Data Owner agrees with the sharing;
- Whenever the transference is necessary due to the accomplishment of legal obligations or under court order;
- When the transference is necessary for the regular performance of rights under judicial, administrative or arbitral proceedings;
- when it is necessary for the enforcement of a contract;
- When it is necessary to meet legitimate interests of Data Owner, of COOXUPÉ or third Parties;
- When it is necessary for credit evaluation and protection.

COOXUPÉ will also be able to share its users' Personal Data with public bodies.

Exceptionally, in case the Data Owner represents foreigner companies or otherwise needed to meet requirements from contract with the Data Owner, COOXUPÉ will be allowed to transfer Personal Data to another country. In such case, when possible, COOXUPÉ will guaranty adequate safety measures in order to ensure protection of Personal Data, demanding such measures in contract.

By no means are Data Owners' Personal Data sold to third parties.

12. Measures for protection of personal data

COOXUPÉ has a solid Information Security Policy, which is regularly reviewed by audits and assessments, and it is consistently updated with the best practices of information security.

The main measures adopted by COOXUPÉ to protect your Personal Data:

- **Secrecy:** All COOXUPÉ's employees are subject to secrecy, and any contracted third-party are obliged to sign a term of secrecy, in case he/she dis not part to the agreement signed between the parts;

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- **Transparency.** COOXUPÉ always maintains its users informed about changes in procedures for Personal Data processing, aiming to protect privacy and security of data, including the establishment of adequate practices and policies. The Data Owner may request information regarding where and how Personal Data are stored, protected and used;
- **Isolation.** Access to Personal Data is individually granted to authorized persons. The sector responsible in Information Technology department enables accesses according to authorizations granted, and it keeps a log of authorizations. Authorized personnel are given only strictly necessary access to the systems in order to perform their activities.
- **Rights of personal data owner.** COOXUPÉ enables exercise of Data Owners rights in an easy and accessible channel;
- **Monitoring.** COOXUPÉ uses security reports to monitor access standards in order to identify and mitigate potential threats. The most critical administrative operations, including access to the system, are recorded to provide track for audit in case accidental or non-authorized changes are done;
- **Communication of security incident.** In case of occurrence of any security incident that may cause relevant risk or harm to user's data, COOXUPÉ will notice the National Authority of Data Protection ("ANDP"), once it is installed, and, regarding the specific case, it will notify the user, in both the cases, within reasonable time, with information about the description of the nature of personal data affected, including indication of technical and security measures deployed to protect data, related risks, and measures that will have been or will be adopted to reverse or mitigate the effects of the loss.

For the aforementioned purposes, "Security Incident" means a break in security that leads to unauthorized access, accidental or illicit situations of destruction, loss, change, communication or any form of inadequate or illicit treatment.

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13. Rights of data owners

The Data Owner will be able to exercise his/her rights either directly or by means of a legally constituted nominee.

Your rights consist of:

- (i) request confirmation of existence of personal data processing;
- (ii) to have access to the data;
- (iii) correction of incomplete, inaccurate or out-of-date data;
- (iv) anonymisation;
- (v) Block or elimination of unnecessary or excessive data, or processed in non-compliance with current law;
- (vi) the portability of data to another supplier of service or products;
- (vii) information regarding public or private entities with which we do share their data.

Such requests shall be followed to the service channel: <https://www.cooxupe.com.br/lqpd/>

Inaccurate or outdated data are corrected as soon as the Data Owner notices us about discrepancies. Those corrections will be kept in our files as historical confirmation of the change.

14. How to contact Cooxupé

In case there is any question concerning the current Privacy Policy, or even about updating, altering, correction or elimination any information, the Data Owner may contact COOXUPÉ by the following channel: <https://www.cooxupe.com.br/lqpd/>

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15. Changes in the Policy

The current Policy may undergo updates. By these means, we do recommend that one may visit our website periodically in order to acknowledge the changes. In case there are relevant changes that demand new authorization from you, we will release a new Privacy Policy.

It is fundamental the user to make sure that he/she will attentively read any sent notification when it relates to changes in the Policy.

16. Committee for Privacy and Personal Data Processing

Cooxupé's Committee for Privacy and Personal Data Processing is composed by The Manager of Compliance Department, Manager of Human Resources and Shared Services, Manager of Information Technology, Manager of Law and Fiscal Department, and the Coordinator of Infrastructure and Production.

The Committee of responsible for:

- Discussing and recommending necessary adequacy for protection and privacy of personal data and/or sensible personal data, and further necessary actions towards meeting Brazilian General Law for Data Protection;
- Discussing and recommending necessary actions towards tackling risks related to protection and privacy of personal data and/or sensible personal data;
- Discussing and recommending necessary actions towards treating security incidents that might involve personal data and/or sensible personal data;
- Assessing the effectiveness of Cooxupé's Privacy And Personal Data Processing Program.