

TÍTULO:

Privacy Policy for Cooperative Members

TIPO:

Norm

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1. Presentation

Cooperativa Regional de Cafeicultores em Guaxupé Ltda. - Cooxupé ("COOXUPÉ") acknowledges its responsibility under Law nº. 13709, dated August 14, 2018 (LGPD), in relation to the protection of personal data and sensitive personal data of its (i) cooperative members and potential cooperative members (candidates), including, where applicable, (ii) the spouse/partner and family members of cooperative members and potential cooperative members; (iii) the condominium partners of cooperative members and potential cooperative members; and (iv) persons authorized by cooperative members or potential cooperative members (legal representatives and/or proxies). For other stakeholders, the 'PRIVACY POLICY FOR CUSTOMERS, SUPPLIERS, EMPLOYEES AND THIRD PARTIES' has been established.

COOXUPÉ undertakes to handle personal data and sensitive personal data responsibly, in compliance with Brazilian legislation and any infra-legal regulations that may be issued by the competent authorities.

The main purpose of the data processing described in this Policy is to comply with the guidelines established in COOXUPÉ's "ARTICLES OF ASSOCIATION", especially Art. 8.

This Policy is applicable to all natural persons mentioned above whose data is processed by COOXUPÉ, as well as to parties who process data controlled or operated by the Cooperative.

2. Purpose

This Policy is intended to guide COOXUPÉ's actions with regard to the security and privacy of personal data and sensitive personal data.

3. Consensus/approval

- COMPLIANCE
- TAX LEGAL
- HUMAN RESOURCES AND SHARED SERVICES
- INFORMATION TECHNOLOGY
- COMMERCIAL SUPERINTENDENCE
- CONTROLLERSHIP AND INFORMATION TECHNOLOGY SUPERINTENDENCE
- COOPERATIVE DEVELOPMENT SUPERINTENDENCE
- FINANCE AND DEVELOPMENT SUPERINTENDENCE
- LOGISTICS AND OPERATIONS SUPERINTENDENCE
- ROASTING AND NEW BUSINESS SUPERINTENDENCE
- BOARD OF DIRECTORS

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4. Principles

COOXUPÉ carries out the processing of personal data and sensitive personal data always observing good faith and the following principles, listed in the General Data Protection Law (LGPD):

Purpose: We process personal data and sensitive personal data for legitimate, specific and explicit purposes, without the possibility of further processing in a manner incompatible with the purposes presented to the Data Subject;

Adequacy: We process personal data and sensitive personal data in accordance with the purposes informed to the Data Subject and in the context of the processing;

Necessity: The processing of personal data and sensitive personal data is limited to the minimum necessary to achieve the specific purposes and is not stored by COOXUPÉ without a defined purpose;

Unrestricted access: We ensure that Data Subjects can consult their data that we keep in our databases, as well as request its deletion and/or rectification, except in the cases otherwise provided for by law;

Data quality: COOXUPÉ ensures data subjects the accuracy, clarity, relevance and up-to-dateness of the data, in accordance with the need and for the fulfillment of the purpose for which it is processed;

Transparency: We provide the Data Subject with clear, precise and easily accessible information on the processing of personal data and sensitive personal data;

Security: We use technical and administrative measures to protect personal data and sensitive personal data from unauthorized access and accidental or unlawful destruction, loss, alteration, communication or dissemination;

Prevention: We take measures to prevent damage from the processing of personal data and sensitive personal data;

No discrimination: We do not process personal data and sensitive personal data for unlawful discriminatory or abusive purposes;

Liability and accountability: We have adopted effective measures capable of verifying compliance with personal data protection regulations and sensitive personal data.

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5. Children, adolescents and the elderly data

COOXUPÉ undertakes to treat personal data and sensitive personal data of children, adolescents and elderly people responsibly, in accordance with legal provisions. For the data of children and adolescents, processing will be carried out on the basis of their best interests, with the express consent of their parents or legal guardians, including by means of technological resources. COOXUPÉ, as the controller, will ensure transparency regarding the types of data collected, the ways in which they are used and the procedures for deleting, correcting, updating and anonymizing the data. In addition, COOXUPÉ undertakes to provide clear and accessible information, appropriate to the users' ability to understand.

6. Category of personal data and sensitive personal data processed

Below are the categories of data we process:

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PERSONAL DATA CATEGORY	PROCESSED PERSONAL DATA
Name and Initials	Name (full name or parts)
Personal characteristics	Signature
	Date of birth
	Place of birth
	Gender
	Nationality
	Marital status
	System of marriage
	Voice / audio / recording
Membership and Relationships	Photography (when there is no risk of use for discriminatory purposes)
	Video (when there is no risk of use for discriminatory purposes)
	Degree of kinship
	Tutor/Curator
Identification generated by official bodies	Partner
	Authorized
	CPF - Brazilian registry of private individual
	RG - Brazilian General registration
	DRIVER'S LICENSE
	Voter Registration
	Marriage certificate
	Birth certificate
	Death certificate
	Vehicle license plate
	Renavam/Chassi
	CTPS - Work and social security card
	Government welfare card
	Passport/Visa
	Army Reservist
	Type of insured person
	CAEPF/CEI
	CCR
	INCRA
	NIT
	CAR
	Income Tax receipt
	Rural producer card
	PIS/PASEP
	MOFP
	NIRF
	Class council registration
	Rural producer's state registration
Residential/contact information	Residential address
	Residential phone number
	Personal e-mail
	Personal cell phone number
	Personal social media address
Information on education and additional courses	Level of education/training
Professional information	Occupation/position
	Name of employer
	Corporate address
	Corporate phone number
	Corporate e-mail
	Corporate cell phone number
	Employee registration
	Employment history
Purchase/sale information:	Tax document number
	Consumption profile
	Customer's registration (Cooxupé/SMC Identifier)
Financial information	Supplier's registration (Cooxupé/SMC Identifier)
	Bank details (bank, branch and account)
	Credit score
	Other financial information
Legal information	Income
Rural property information	Judicial and/or administrative proceedings
	Property name
	Property address
	Property phone number
	Producer's registration (Cooxupé/SMC Identifier)
	Farm ID (rural property identifier)
	Property Geolocation
Information on mobile devices and computer/notebook	Property E-mail
	Device geolocation
	IMEI and IP
Credit card information	MAC address and/or serial number
	Card number
	Card expiration date
	Card CVV, CVC2, CID
Health information (Sensitive personal data)	ICD (International Classification of Diseases)
	CAT (Communication of labor accidents)
	National health card/SUS
	Vaccination card
	Health insurance card
	Medical history
	People with disabilities (PwD)
	Medical Diagnosis/Treatment
	Occupational Health Certificate (ASO)
	Admission/dismissal and periodic medical examinations
General sensitive information (Sensitive personal data)	Medical claims
	Genetic information
	Religious or philosophical beliefs
	Position and Political affiliation
	Trade union affiliation
	Race or ethnic origin
	Sexual preference
	Biometric data
	Video (when there is a risk of use for discriminatory purposes)
	Photography (when there is a risk of use for discriminatory purposes)

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7. How personal data and sensitive personal data are collected

Personal data and sensitive personal data are provided by the data subject or their guardian/legal representative at our administrative, commercial and industrial units or remotely through our virtual service channels, social media service, systems, applications, electronic addresses, among other mechanisms that we make available.

8. Data processing activities

The personal data and sensitive personal data listed above are processed, in **summary**, in the following activities:

PROCESSING ACTIVITIES	PROCESSING ACTIVITIES	PROCESSING ACTIVITIES
Judicial and extrajudicial actions, administrative procedures, official letters and subpoenas	Corporate Communications	Rural Patrolling
Admission, Dismissal, Elimination, Exclusion, Transfer of Quotas, Blocking and Unblocking of Cooperative Members	Competitions and awards	Cooperative member satisfaction survey
Divestment and transfer of assets	Accounts payable, accounts receivable and other financial transactions	Health insurance for cooperative members
Expansion of services and products (VECT.AG and INSURANCE BROKER)	Hiring, evaluating and paying suppliers of products and services with or without ancillary obligations	Assembly process
Credit analysis and approval	Access control on Cooxupé premises	Specialty Coffee Program
Analysis and preparation of draft contracts, powers of attorney and contract management	Royalty control	"Portas Abertas" Program
Laboratory analysis and technical report	Due Diligence	Socio-environmental, technical and commercial programs and partnerships
Technical Assistance	Doing business with the foreign market and/or the domestic market, in situations where product traceability is a requirement for coffee sales.	Educational programs
Compliance with audits, inspections, certifications and programs	Coffee Shipments	CECAFÉ Futures Registers
Meeting transportation demands and vehicle sales	Submission of statements, information on legal obligations and monitoring of compliance with government bodies	Debt renegotiation and default accounts
Non-Compliance response (RNC)	Harvest estimates	Information security, infrastructure, administration and development of systems and technologies
Registration in general	Invoicing, tax bookkeeping and issuing tax forms	Property security
Whistleblowing Channel - 'Ombudsman', Integrity Program, Privacy and Risk Management Program	Trade fairs and events	General internal or external services
Sales cancellations and returns	Accounting management	Training and development of cooperative members
Fundraising and relations with financial institutions	Marketing and Advertising	Selling products and services and issuing the relevant transaction documents
Coffee classification and reclassification	Meteorology and Georeferencing	Environmental Education Hub (NEA)
Purchase of raw coffee beans with the conclusion of the respective contracts and issue/management of Rural Product Notes (CPR)	Purchase of raw coffee beans with the conclusion of the respective contracts and issue/management of Rural, including through AGROBOM	-----

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Personal data and sensitive personal data are processed in accordance with the following legal bases:

- **Consent** – we use this legal basis to legitimize processing in processes that the Data Subject can choose whether or not to carry out;
- **Compliance with legal or regulatory obligations** – We use this legal basis to comply with legal and regulatory requirements;
- **Execution or preliminary procedures related to contracts** – we use the legal basis for the processes provided for in the ARTICLES OF ASSOCIATION, purchase/sale of products, contracting or provision of services, conclusion of other contracts and legal business, collections, issue of invoices, among others;
- **Regular Exercise of Rights** – we use this legal basis for the regular exercise of rights in judicial, administrative or arbitration proceedings;
- **Legitimate Interest** – we use this legal basis to meet the legitimate interests of COOXUPÉ or the Data Subjects;
- **Credit Protection** - we use this legal basis for the processing of personal data in the generation and approval of credit analyses;
- **Fraud Prevention and Security of the Holder** – we use this legal basis for the processing related to the identification and authentication of registration in electronic systems and the monitoring of COOXUPÉ premises.

9. Retention of personal data and sensitive personal data

Personal data and sensitive personal data will be kept for the duration of COOXUPÉ's contractual relationship with the Data Subject and, after this relationship is terminated, for the fulfillment of legal obligations and the exercise of their rights, including for compliance verification purposes. Once the purpose of the processing has been completed, the data will be discarded or anonymized.

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10. External data sharing

COOXUPÉ, when necessary, shares personal data and sensitive personal data with suppliers of products and services and/or other publics that help us operate, provide, improve, integrate and support the processing activities mentioned in item 8 above.

In cases where data is transferred internationally, COOXUPÉ will adopt the appropriate safeguards to ensure security and privacy, as established in the 'POLICY FOR INTERNATIONAL TRANSFERENCE OF DATA', available at <https://www.cooxupe.com.br/politicas-cooxupe-lgpd/>.

Personal data and sensitive personal data of Data Subjects are not sold under any circumstances.

11. Measures to protect personal data and sensitive personal data

COOXUPÉ has a solid Information Security Policy, which is regularly revisited through audits and inspections and updated in line with the best information security practices.

The main measures adopted by COOXUPÉ for the security of your personal data and sensitive personal data:

- **Contractual Security:** All contracts, whether for employees and/or suppliers, that process personal data and sensitive personal data have specific clauses relating to data protection;
- **Transparency:** COOXUPÉ always keeps users informed of changes in procedures for processing personal data and sensitive personal data in order to protect data privacy and security, including the establishment of appropriate practices and policies. The Data Subject can request information on where and how the data is processed;
- **Isolation:** Access to personal data and sensitive personal data is granted to authorized personnel. The responsible sector in the Information Technology department releases access according to the authorizations granted and keeps a record of authorizations. Authorized personnel receive access to the systems that is strictly necessary to carry out their work activities;
- **Holder's Rights:** COOXUPÉ makes it possible for Data Subjects to exercise their rights through an easy and accessible channel;
- **Monitoring:** COOXUPÉ uses security mechanisms to monitor access patterns to identify and mitigate potential threats. The most critical administrative operations, including access to the system, are logged to provide an audit trail if unauthorized or accidental changes are made;

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- **Security Incident Reporting:** In the event of a security and privacy incident, COOXUPÉ will adopt the measures provided for in the LGPD, RESOLUTION CD/ANPD nº. 15/2024 and internal policies. COOXUPÉ's stakeholders can report a security and privacy incident through the channel available at: www.cooxupe.com.br/ouvidoria

12. Data subjects' rights

The Data Subject may exercise their rights directly or through a legally constituted representative.

The rights consist of:

- (i) request confirmation of the existence of the processing;
- (ii) have access to the data;
- (iii) correction of incomplete, inaccurate or outdated data;
- (iv) anonymization, blocking or deletion of data that is unnecessary, excessive or processed in breach of the provisions of the Law;
- (v) portability of data to another service or product provider, upon express request, in accordance with the regulations of the national authority, observing commercial and industrial secrets;
- (vi) deletion of personal data processed with the consent of the data subject, except in the cases provided for in art. 16 of the LGPD;
- (vii) information about the public or private entities with whom we share the data;
- (viii) information about the possibility of not giving consent and the consequences of refusing;
- (ix) revocation of consent, under the terms of § 5 of Art. 8 of the LGPD.

Inaccurate or outdated personal data and sensitive personal data will be corrected as soon as the Data Subject informs us of the inconsistencies. These corrections will be kept in our archive as historical confirmation of the change.

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13. Information and contact

If you have any questions about this Policy or how we handle your Personal Data, please contact us via the customer service channel: www.cooxupe.com.br/lqpd/

14. Changes to this Policy

This Policy may be updated. We therefore recommend that you visit our website periodically so that you are aware of the changes. COOXUPÉ will keep all relevant records to administer this Policy.

15. Privacy and Personal Data Processing Committee

COOXUPÉ'S PRIVACY AND PERSONAL DATA PROCESSING COMMITTEE is composed of the COMPLIANCE MANAGER/DATA OFFICER, HUMAN RESOURCES AND SHARED SERVICES MANAGER, INFORMATION TECHNOLOGY MANAGER, TAX LEGAL MANAGER and INFRASTRUCTURE AND PRODUCTION COORDINATOR.

The Committee is responsible for:

- Discuss and recommend the necessary adjustments for the security and privacy of personal data and/or sensitive personal data and other actions necessary to comply with the LGPD;
- Discuss and recommend actions necessary to handle risks related to security and privacy of personal data and/or sensitive personal data;
- Discuss and recommend actions necessary to deal with security incidents involving personal data and/or sensitive personal data;
- Monitor the effectiveness of COOXUPÉ's Privacy and Personal Data Processing Program.

16. Liabilities

Employees and/or other stakeholders who process personal data and sensitive personal data when carrying out activities for COOXUPÉ must act in full compliance with the legislation in force and the rules that establish the guidelines on the subject at the Cooperative. Violations of the precepts set out in this Policy may result in severe administrative sanctions and civil and criminal penalties, applied alone or cumulatively.

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17. Additional references

- ARTICLES OF ASSOCIATION
- PRIVACY POLICY FOR CUSTOMERS, SUPPLIERS, EMPLOYEES AND THIRD PARTIES
- POLICY FOR INTERNATIONAL TRANSFERENCE OF DATA'