

TÍTULO:

Policy For International Transference Of Data

TIPO:

Norm

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1. Presentation

Cooperativa Regional de Cafeicultores em Guaxupé Ltda. - Cooxupé (“COOXUPÉ”) is committed to respecting the privacy of its members, potential members, customers, potential customers, suppliers, potential suppliers, employees, potential employees and other stakeholders, as well as the protection and security of their personal data and sensitive personal data.

This Policy is applicable to all natural persons whose data is transferred internationally by COOXUPÉ, as well as to the parties who carry out the international transfer of data controlled or operated by the Cooperative, or to those who may receive such data under the terms of this Policy.

2. Purpose

This Policy establishes an effective, accountable and transparent framework to ensure compliance with the requirements for the international transfer of Personal Data provided for in LAW n°. 13709, DATED AUGUST 14, 2018 (LGPD) and CD/ANPD RESOLUTION n°. 19, DATED AUGUST 23, 2024.

The guidelines set out in this Policy must be interpreted in conjunction with the ‘PRIVACY POLICY FOR COOPERATIVE MEMBERS’ and the ‘PRIVACY POLICY FOR CUSTOMERS, SUPPLIERS, EMPLOYEES AND THIRD PARTIES’.

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. Permitted cases of international data transfer

COOXUPÉ may, when necessary, transfer personal data and sensitive personal data to recipients located in international territory, as provided for in article 33 of the LGPD and Art. 9 of CD/ANPD RESOLUTION nº. 19/2024, in the following cases:

- when necessary for the performance of a contract or preliminary procedures related to a contract; for compliance with a legal or regulatory obligation; and/or for the regular exercise of rights in judicial, administrative or arbitration proceedings;
- to countries or international organizations that provide an adequate level of protection for personal data as provided for in the LGPD and complementary rules, as recognized by an adequacy decision issued by the National Data Protection Authority (ANPD);
- when the transfer is necessary for the protection of the life or physical safety of the Data Subject or Third Parties;
- when the NATIONAL DATA PROTECTION AUTHORITY (ANPD) authorizes the transfer;
- when the Data Subject has given his or her specific and prominent consent to the transfer, with prior information on the international character of the operation, clearly distinguishing it from other purposes; or
- when COOXUPÉ offers and proves guarantees of compliance with the principles, the rights of the Data Subjects and the data protection regime provided for in the LGPD, in the form of: (a) specific contractual clauses for a given transfer; (b) standard contractual clauses; (c) global corporate standards; and (d) regularly issued seals, certificates and codes of conduct.

5. Execution of transfer of personal data to international territory

COOXUPÉ will only transfer personal data and sensitive personal data to individuals or legal entities outside Brazilian territory, or allow access to the data by such related parties, when it is satisfied that the data will be processed legitimately and protected adequately by the recipient, including, but not limited to, recipients located in the following international territories:

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COUNTRY NAME	DOES IT HAVE DATA PROTECTION AND PRIVACY LEGISLATION?	COUNTRY NAME	DOES IT HAVE DATA PROTECTION AND PRIVACY LEGISLATION?
South Africa	Yes	Greece	Yes
Germany	Yes	Hong Kong	Yes
Argentina	Yes	Ireland	Yes
Australia	Yes	Israel	Yes
Austria	Yes	Italy	Yes
Belgium	Yes	Japan	Yes
Canada	Yes	Latvia	Yes
China	Yes	Lithuania	Yes
Cingapore	Yes	Malaysia	Yes
Colombia	Yes	Norway	Yes
South Korea	Yes	The Netherlands	Yes
Costa Rica	Yes	Panama	Yes
Denmark	Yes	United Kingdom	Yes
United Arab Emirates	Yes	Czech Republic	Yes
Spain	Yes	Russia	Yes
United States	Yes	Sweden	Yes
Finland	Yes	Switzerland	Yes
France	Yes	-----	-----

In **summary**, personal data and sensitive personal data are transferred by COOXUPÉ to international territories in the following processing activities:

- Doing business with the foreign market, in situations where product traceability is a requirement for coffee sales;
- Trade fairs and events;
- Compliance with audits, inspections, certifications and programs;
- Due Diligence;
- Socio-environmental, technical and commercial programs and partnerships;
- Fundraising and relations with financial institutions;
- Competitions and awards;
- Storage of systems and other technologies in repositories ('cloud') located abroad.

6. Liabilities

Employees and/or other stakeholders who transfer personal data and sensitive personal data internationally, or those who receive such data under the terms of this Policy to carry 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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7. Record management

COOXUPÉ will keep all relevant records to administer this Policy.

8. 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: <https://www.cooxupe.com.br/lgpd/>

9. Additional references

- PRIVACY POLICY FOR CUSTOMERS, SUPPLIERS, EMPLOYEES AND THIRD PARTIES
- PRIVACY POLICY FOR COOPERATIVE MEMBERS