	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 1 of 12

Personal and Sensitive Data Privacy Policy

This Privacy Policy for Personal and Sensitive Data contains information about how we process personal and sensitive data, whether automated or not, considering the personal data of subjects who relate to our companies. Its purpose is to clarify interested parties about the types of data processing carried out, the reasons and the way in which this data can be updated, managed or even eliminated.

Brasilata, its branches and/or sites will be addressed in other documents as an Organization. Employees and contracted interns will be treated as inventors and outsourced workers will be treated as collaborators.

The requirements of Federal Law No. 13,709/2018 - Personal Data Protection Law - LGPD and may be updated as a result of internal or external regulatory updates to the Organization.

1) The Organization

Founded in 1950 as *Indústria Comércio e Estamparia Brasung Ltda.*, whose production was focused on tinsplate lids for food and cosmetic packaging. In 1963, it was acquired by the *Heleno & Fonseca* group, with the chairman of the group, Engineer Waldemar Accacio Heleno, taking over the company. In 1965, with the change and expansion of its facilities, it incorporated *Estampbrás Ltda.*, which now has its lithographic department. In 1967, it began producing cans of paint and chemical products, with its corporate name changed to *Brasilata*. From 1972 onwards, a great cycle of expansions began, projecting the company into the future.

In 1981, *Brasilata* diversified geographically by acquiring the facilities of the gaucho company *Killing Reichert S/A Metalográfica*, located in the state of Rio Grande do Sul, the Estrela manufacturing site, and introducing conical and cylindrical buckets into its range of products.

In 1987, it implemented its winning Project Simplification suggestion program. In 1990 it underwent an expansion aimed at exporting part of the production to neighboring Uruguay and Argentina.


In 1992, it implemented its third manufacturing site in Rio Verde – GO, focused on the production of cans for the food segment, already operating within the concepts of GMP (Good Manufacturing Practices).

In 2006, it expands the factory in São Paulo, where the platform for exporting components is located, from which patented products are shipped all over the world, and in 2011, operations at the Recife - PE site begin.

2015 marks the implementation of Corporate Governance and the establishment of a board of directors.

In 2019, in view of the development of the company and in order to better serve the company's growing interest in the State of São Paulo, it opens a branch in the city of Jundiaí, where it transfers its entire industrial park, previously crowded in the Barra Funda region.

In 2021, the head office permanently changes its address to the Administrative Building at the same address as the newly opened branch in Jundiaí.

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 2 of 12

It is now recognized in its sector and has periodically received awards and recognition, such as the 5 times it was elected amongst the most innovative companies by *Época Negócios*. Supported by integrity, transparency, simplicity and effectiveness, this evolution is credited to the cultivation of good relationships with its inventors and partners. Constantly committed to people's current and future well-being. Within this guideline, to ensure adequate working conditions for its employees and inventors, the Organization considers aspects related to health, safety, environment, quality and, above all, respect for a correct social ethical posture.

Brasilata operates as a packaging manufacturer, a reference in the production of metal packaging, offering efficient and customized solutions for various applications such as paints, chemicals and the food industry. It has four manufacturing sites in Brazil, attributing its success and growth to its "Inventors", this is how we formally sign the contract with everyone who starts in the organization, everyone can contribute to the maximum with their potential and performance.

In addition to *Brasilata*, we also have *Loja da Lata* and *Brasilata Trading*.

2) Our Data Protection Officer (DPO)

The definition of our Data Processing Officer may not be definitive, during the adaptation process there may be the indication of substitutes, depending on the moment or the set of knowledge or skills necessary for its progress.

Our Data Processing Officer may or may not work alone, may have a dedicated team or have collaborators associated in a matrix, depending on the need at the time.

Certain areas must have representatives who will receive the demands of the Data Processing Officer, and must respond to them with a certain priority.

The activities of the Data Controller may be carried out by an external service provider, with partial or total dedication, as defined by the company and respecting the attributions defined in the Process Management of the Data Controller.

Our Data Processing Officer can be accessed or contacted through the following e-mail address:

encarregado.lgpd@brasilata.com.br


3) How we deal with the rights of subjects of personal data

Following the enactment of the General Law on Data Protection (LGPD), our websites (www.brasilata.com.br and www.lojadalata.com.br) have contained a specific section on Data Privacy

*When using the Organization's website, it is expected that the user is at least 18 (eighteen) years old and that he is in his full capacity to understand the use and accept the Data Processing Consent Term, necessary for interact with the website. Otherwise, they must be supervised by their father or mother or a legal guardian.

In it, you can send, by e-mail to the person in charge of protection of personal data, what type of request you want to make to the Organization, regarding the possible treatments that we may have done or are doing with your data, within our relationship or out of necessity. itself, and may ask, if applicable:

- Whether your personal/sensitive data is being handled, if so, how is it being processed.
- For corrections to be made to your personal/sensitive data
- For your personal/sensitive data to be deleted
- To suspend your consent to the processing of personal/sensitive data

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 3 of 12

- To revoke your consent
- For a copy of your personal/sensitive data
- To complain or ask questions about how we are processing the data
- What kind of protection we use to protect the personal data we process.

If the request for information on the processing of personal/sensitive data is from children or adolescents, we strongly recommend that it be made by their father, mother or legal representative, identifying themselves as such when sending the first request.

Data will only be collected for the declared purpose and cannot receive any other type of treatment other than those that meet this purpose, in compliance with the principle of data minimization or in accordance with conditions established by the Organization.

The data collected will be treated securely, protected against unauthorized access and protected against accidental loss, destruction or damage. Appropriate protection and prevention measures are adopted and established in the Organization to guarantee its Confidentiality, Integrity and Availability.

The sites use an SSL certificate (Secure Socket Layer) that guarantees that personal data is transmitted in a secure and confidential way, so that the transmission of data between the server and the user occurs in an encrypted form.

3.1) What personal data do we ask for/collect?


In general, we collect data as follows:

- Brasilata does not directly collect personal data from candidates for job openings, since these openings are posted through social media (facebook; Instagram, LinkedIn, etc.) and the candidate applies their interest in digital platforms of registration, selection and recruitment.
- Brasilata does not collect contact data with its sites or questions and complaints, which must be addressed via e-mail address.
- Loja da Lata, as it trades certain products, only collects information that will be necessary to contact, offer products and communicate launches, and those necessary to formalize a purchase order and deliver products, such as:
 - Name
 - Email address
 - CPF
 - Contact Telephone Number.
 - Date of Birth
 - Delivery address

Many of these requests and information may require us to submit additional documents to make sure we are delivering the information to the right person. In these cases, the request will always come from the e-mail address belonging to the Data Protection Officer of the organization, i.e. encarregado.lgpd@brasilata.com.br and you should only ever reply to this address.

3.2) What additional data may be requested/collected so that we can give you an answer?

Digitized versions of:

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 4 of 12

- identity document (ID Card, CPF, Driver's License etc.),
- Power of attorney,
- Legal guardianship,
- etc.

We would like to remind you that not all requests, however valid they may be, can be fully met, as there are legal, regulatory (legal bases) and contractual obligations with customers, suppliers or producers, which oblige us to keep your information, but we will always do as possible to minimize the amount of information held about you.

3.3) What personal data is collected in the customer relations sections of our websites?

As mentioned above, the information for making contact and offering products and launches, by email, in addition to those necessary for formalizing a commercial relationship and if you wish to contact us using the form in the Contact section:

Loja da Lata - Newsletter

- Name
- Email

Loja da Lata - Contact

- Name:
- Email address
- Contact phone number
- An open message field for you to type in. Loja da


Lata - Commerce

- Full name
- Email address
- CPF
- Contact phone number
- Date of birth - for sending greetings message
- Password for registration
- Address (street, number, additional reference, district, Postal Code, city, state)

4) Personal data and the respective processing purposes

Today, the collection and processing of personal data of non-Organization employees occurs mainly through:

- Our Contact channels, where we receive queries and complaints about our services and service delivery.
- Access to Brasilata sites by drivers, service providers and visitors, to carry out activities contracted by the Organization, its customers or suppliers.
- Through Loja da Lata obtaining data from customers or future customers for the sale or marketing of products.
- Through Loja da Lata for prospecting new customers, retaining customers in the process of ending a relationship, recovering customers who no longer have a relationship with the Organization and sending

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 5 of 12

The data collected in the CONTACT channel forms are received by a single area, in each unit, which can carry out internal surveys and exchange information with other areas internal to the Organization, but without providing the personal data of those who requested/informed them, only the doubt or complaint.

4.1) USE OF COOKIES

Our sites use Cookies* in general, being able to keep information about the origin of the access, the IP address of who is accessing the site, facilitated connection to social networks, presentation of advertisements directed to the visitor of the site or still manage the session of the visitor where your identification is required.


Cookies collected are: source: <https://www.cookieserve.com/>

Brasilata – <https://brasilata.com.br>

Cookie	Domain	Type ↑↓	Description	Duration
_ga	.brasilata.com.br	Analytics	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	2 years
_gid	.brasilata.com.br	Analytics	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.	1 day
XSRF-TOKEN	brasilata.com.br	Necessary	The cookie is set by Wix website building platform on Wix website. The cookie is used for security purposes.	2 hours
laravel_session	brasilata.com.br	Necessary	laravel uses laravel_session to identify a session instance for a user, this can be changed	2 hours
_gat	.brasilata.com.br	Performance	These cookies are installed by Google Universal Analytics to throttle the request rate to limit the collection of data on high traffic sites.	1 minute

Loja da Lata - www.lojadalata.com.br

Cookie	Domain	Type ↑↓	Description	Duration
_fbp	.lojadalata.com.br	Advertisement	This cookie is set by Facebook to deliver advertisement when they are on Facebook or a digital platform powered by Facebook advertising after visiting this website.	3 months
_ga_KFCYZRD0KL	.lojadalata.com.br	Analytics	This cookie is installed by Google Analytics.	2 years
_ga	.lojadalata.com.br	Analytics	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the	2 years

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 6 of 12


Cookie	Domain	Type ↑↓	Description	Duration
			site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.	
_ga_2XY9PR2RQQ	.lojadalata.com.br	Analytics	This cookie is installed by Google Analytics.	2 years
_gid	.lojadalata.com.br	Analytics	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.	1 day
_gat_gtag_UA_140899258_1	.lojadalata.com.br	Analytics	This cookie is set by Google and is used to distinguish users.	1 minute
sesLoja4NPKPKNJLog_id_depto	www.lojadalata.com.br	Other	No description	session
sesLoja4NPKPKNJSessao	www.lojadalata.com.br	Other	No description	session
ASPSESSIONIDQGQSDQTA	www.lojadalata.com.br	Other	No description	session
page	www.lojadalata.com.br	Other	No description	1 year

5) The Legal basis for processing

- Inventor data is supported by a legal basis related to the establishment of employment contracts.
- The data of spouses, children and dependents of inventors will be supported by Terms of Consent.
- The data of candidates for job openings will be supported by the legal basis of Terms of Consent.
- The data presented to the CONTACT channel will be supported by Terms of Consent.
- The data collected and processed by *Loja da Lata* are supported by the legal basis of the contract and the Term of Consent registered in the supplier's or sales Code of Conduct.
- The data collected by *Loja da Lata* is supported by a relationship for the purchase and sale of products (contract).
- Data collected from drivers, visitors and service provider employees are supported by the provision of the service and Terms of Consent.

6) Retention Period for personal data

- The retention period for personal data, referring to the CONTACT channel, is 2 years.
- The retention period for CV data received, either through the website, employment agencies or equivalent, is 01 year.
- The CVs received, until the beginning of the validity of the law, will be treated individually, and may be eliminated or kept, which will require the request for agreement with the corresponding Term of Consent for Data Processing.

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 7 of 12

Eventually, to comply with legal and security obligations, to combat fraud, in addition to guaranteeing the fulfillment of contracts, this data may remain in our custody longer than declared.

7) Sharing of data with third parties and for what purpose

There is no sharing of data, from non-employees, received by the means mentioned above, outside the conditions established by the Organization.

We may share personal data for law enforcement purposes, that is, if a judge or an authority with legal competence requires the institution to share personal data for an investigation, we will share it. The same occurs in cases of labor lawsuits, where we use the same legal basis for sharing data with the labor courts.

The same occurs in cases of labor lawsuits, where we use the same legal basis for sharing data with the labor courts. Contact information that may remain temporarily on the site, which may represent the collection of data, whose maintenance of the site may be outsourced for specific developments, dedicated maintenance, provide delivery services of information registered in the forms of these sites. The contracts provide for Confidentiality, Secrecy and Non-Disclosure clauses of information, to protect not only the Organization but also the personal data of data subjects who interact through this medium.

8) International transfer and for what purpose

The Organization may share personal data at the request of customers with Headquarters or branches abroad, interested in the origin and sustainability characteristics and certification of production methods. The signature of the Code of Conduct of the Supplier or Seller, ensures the equivalent of the Term of Consent for the treatment and international transfer of data.


The Organization does not share personal/sensitive data internationally of inventors and/or collaborators, outside the conditions established in contracts, NDAs, Codes of Ethics and Conduct and that do not respect the conditions established for this operation in the LGPD.

9) Processing for legitimate interest

The Organization will prioritize the processing of personal data through legal bases involving the consent of their subjects, when necessary for the execution of contracts or for the fulfillment of legal or regulatory obligations. The processing of personal data will take place to meet the legitimate interests of the company only in residual cases and when it is really necessary to achieve a certain purpose, always respecting the rights of the subjects involved in the treatment.

10) Sending email marketing and how the subject may withdraw consent, after granting it initially

The Organization uses e-mail marketing resources for activities related to *Loja da Lata* products, in situations of customer retention and recovery of former customers. Customer prospecting can take place through the use of data resulting from incomplete registrations, where it is expected to obtain or re-establish a commercial relationship, which will serve as a legal basis for data processing.

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 8 of 12

The removal of personal data from the home delivery databases is carried out within the website itself, ensuring the maintenance of fiscal, accounting, tax information, amongst others, arising from the established commercial relationship, with retention time corresponding to the fiscal/accounting regulations/tax.

11) Automated decisions;

The Organization does not use automated decision-making resources based on browsing history or corresponding resources, the use of Cookies on its website does not have this purpose and offers products by email to people interested and registered on the websites.

12) Protection of personal/sensitive data, children and teenagers

The Organization has an Information Security Policy, which generally contains the mechanisms and protections adopted to protect the information and physical assets and information processing of the Organization. Our employees have their membership registered and must follow it in their day-to-day activities.

Processes and practices of physical and logical security, cryptography, management and segregation of access to resources and systems, control of users and passwords, classification of information, amongst others, were adopted as mechanisms of governance and protection of privacy and data protection.

This material/documentation is available to the Organization, being known by its employees and, in general, by its service providers, directing everyone's actions to maintain a high level of commitment, through training, awareness campaigns and internal and external events.


Our suppliers and service providers, related to the processing of personal/sensitive data, through formalization in their contracts, have specific clauses on Confidentiality, Secrecy and Non-Disclosure of information, whether related to the provision of services or to the information they have access to.

Our databases are stored locally or in the cloud, depending on the needs of the corresponding business process. Protected by security mechanisms and methods, in accordance with established service agreements and within the terms mentioned in the previous paragraphs, duly in accordance with current data legislation.


We recognize that there are no total guarantees that information cannot be improperly accessed, improperly disclosed, improperly altered or eventually destroyed, whether due to failures or internal/external agents, however we have monitoring mechanisms against cyber attacks, information recovery processes, Security Incident Management procedures and a Data Breach or Loss Incident Management procedure that is the responsibility of the Data Protection Officer.

13) What must be available to the data subject, before the start of the processing of their personal data, so that, as applicable, they can evaluate the terms of the website or service

This policy will be available for consultation on the same page that lists the Data Protection Officer for the Organization. If you have difficulty understanding it, or if any term is left unexplained, contact our Supervisor, direct your questions or complaints through our website, Data Privacy section, which will be answered within the period stipulated by the ANPD.

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 9 of 12

This policy was prepared in August 2021, validated and approved for publication in August 2021, only published during the term of the law.

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 10 of 12

Glossary

*Cookies: These are small files that we transfer to your browser or device (such as a cell phone or tablet) that allow us to recognize your browser or device, and to know how and when the pages and Platforms are visited, as well as how many people access the Platforms. They can be useful, for example, for us to make the Platforms fit your screen, better understand your preferences and offer you more efficient Products, Businesses and Experiences. source <https://privacidade.grupoboticario.com.br>

Source <https://www.serpro.gov.br/lgpd/menu/a-lgpd/glossario-lgpd>

Data subject: the individual that the personal data being handled refers to

Data Protection Officer: the person appointed by the data controller or owner to act as a point of contact between controller, data subjects and the National Data Protection Authority (ANPD);

Personal data: information related to the identified or identifiable individual. For example:

- Name,
- CPF,
- ID No.,
- address,
- Mobile Phone Number,
- e-mail etc.

Sensitive Personal Data: personal data about racial or ethnic origin, religious belief, political opinion, union membership, or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data, when linked to an individual; Examples:

- racial or ethnic origin,
- religious conviction,
- political opinion,
- affiliation with a union or organization of a religious nature,
- philosophical or political,
- data relating to health or sex life,
- genetic or biometric data, when linked to an individual.

The Personal data of children and teenagers: the Child and Teenager Statute (ECA) considers a child to be a person up to 12 years of age and a teenager to be between 12 and 18 years of age. In particular, the LGPD determines that information on the processing of personal data of children and adolescents must be provided in a simple, clear and accessible manner in order to provide the necessary information to the parents or legal guardian and adequate to the child's understanding.


Controller: an individual or an organization, public or private, that is responsible for decisions regarding the processing of personal data

Operator: an individual or an organization, public or private, who processes personal data on behalf of the controller

National data protection authority: public agency responsible for ensuring, implementing and supervising compliance with this Law throughout the country

Handling: every activity involving personal data; such as those referring to:

- access - ability to communicate with a device, storage medium, network drive, memory, register, file, etc., in order to receive, supply, or delete data
- storage - action or result of keeping or keeping data in a repository
- archiving - act or effect of keeping data registered although it has already lost its validity or has expired
- evaluation - act or effect of calculating value on one or more piece of data
- classification - way of ordering data according to some established criteria

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 11 of 12

- collection - collecting data for a specific purpose
- communication - transmit information relevant to data action policies
- control - action or power to regulate, determine or monitor actions on data
- Disclosure - act or effect of releasing, propagating, or copying data
- distribution - act or effect of disposing of data according to some established criteria
- Deletion - act or effect of deleting or destroying data from the repository
- extraction - act of copying or removing data from the repository in which it was found
- modification - act or effect of data alteration
- processing - act or effect of processing data
- production - creation of goods and services based on data processing
- reception - act of receiving data at the end of transmission
- reproduction - copying pre-existing data obtained through any process
- transferring - moving data from one storage area to another, or to a third party
- transmission - movement of data between two points by means of electrical, electronic, telegraphic, telephone, radioelectric, pneumatic devices, etc.
- use - act or effect of using data

Shared Use of Data: Where Personal Data is communicated, disseminated, transferred abroad, and linked together by Public Authorities in accordance with their legal responsibilities or between Public Authorities and private entities, reciprocally, under specific authorization, relating to a process for which the authorities or private entities are entitled to handle the data.

Definition of Personal Data: Source <https://www.serpro.gov.br/igpd/menu/protecao-de-dados/dados-pressoais-igpd>


If information allows the identification, directly or indirectly, of an individual who is alive, then it is considered personal data:

- Name,
- ID No.,
- CPF,
- Sex,
- Date and place of birth,
- Phone number
- Home address,
- Location via GPS,
- Portrait Photograph,
- Health record,
- Bank card,
- Income
- Payment history,
- Consumption habits,
- Leisure preferences;
- IP (Internet Protocol) address and
- cookies*,
- etc.

Definition of Sensitive Data, children and teenagers:

Source <https://www.serpro.gov.br/igpd/menu/protecao-de-dados/dados-sensiveis-igpd>

Any that reveals:

	LGPD	
	Brasilata - Personal and Sensitive Data Privacy Policy	
Author: José Edilson Lira Junior	Date Approved: Nov 30, 2021	Code: LGPD-0003/0
Approved by: Alexandre Gonçalves		Page 12 of 12

- Racial or ethnic origin,
- Religious or philosophical convictions,
- Political opinions,
- Trade union membership,
- Genetic issues,
- Biometrics or
- Anything about a person's health or sex life.

List of Legal Bases: Source <https://www.serpro.gov.br/lgpd/menu/protecao-de-dados/dados-sensiveis-lgpd>

- Consent
- legal liability;
- Public policies;
- Studies from research bodies;
- Law - contracts or Procedure;
- The preservation of life or preventing harm to people;
- guardianship procedures for those work in health or social care;
- Fraud prevention against data subjects.