

PRIVACY POLICY

With this **Privacy Policy**, **SUCRANA** reaffirms its commitment to the privacy of personal data and the security of information of the users to its *website*, whether they are occasional visitors, customers, suppliers, partners, contractors, or employees, and aims to disclose and clarify how it collects and processes the personal data of those visitors, when they access or make use of the services offered therein.

When using "we", "us", "our" and "**SUCRANA**" in this document, we refer to **SUCRANA Assessoria e Tecnologia S/S Ltda**, a firm headquartered in the city of Jaboticabal, state of São Paulo, Brazil, as well as, by extension, to its directors, officers, agents, employees, and contractors.

When accessing our *website*, you will share with us some non-personal and personal information, in the ways herein described and in accordance with the rules set forth in the Brazilian **LGPD – Lei Geral de Proteção de Dados** (“Data Protection General Law”).

We are also committed to comply with the provisions corresponding to those of the **LGPD** that are established in international digital privacy and data protection laws, such as the *European General Data Protection Regulation (GDPR)*. However, in the event of a conflict between international legislation and Brazilian laws, the provisions of Brazilian laws shall always prevail.

We remind our website’s foreign users that, as both **SUCRANA** and its *website* hosting server are headquartered in Brazil, and since as yet there is no international consensus on a legislation for the protection of digital services privacy, any and all lawsuits, or arbitration processes, related to personal data privacy must be held in Brazilian Portuguese language, the venue must be the city of Jaboticabal, state of São Paulo, Brazil, and that all decisions will be based on the Brazilian laws and on the Arbitration Chamber’s regulations, regardless of the language, place of origin or domicile of the litigant(s).

1. What data do we collect about you and why?

We collect your non-personal and personal Information for the following purposes:

- a) To provide and operate the services offered on our *website*.
- b) To monitor the security of our *website*, systems, and networks.
- c) To provide our users with ongoing assistance and technical support.
- d) To allow us to contact you and send general or personalized service-related notices and promotional messages.
- e) To aggregate or infer statistical data to improve the services we offer.

f) To comply with any applicable laws and regulations.

The information we collect may include:

- Name
- Date and time of visit
- Phone numbers
- IP address
- E-mail address
- ID numbers
- Links, hyperlinks, and services clicked during the visit etc.

We may also use some *software* tools to measure and collect session's information, including page response times, duration of the visits to certain pages, page interaction information, and methods used to browse away from the page.

We do not request, collect, or record any sensitive personal information, such as race, sex, gender, income, political or religious preferences, nor collect any type of data of children and adolescents, as our *website* is intended exclusively for persons over 18 (eighteen) years of age.

Our *website* has no advertising whatsoever addressed to underage persons.

2. How do we collect your data?

We collect your personal and non-personal data through the following means:

- **Website:** When you fill out forms, send us comments and queries, contact our team, or register on our platform, the *website* will save your data for later retrieval and processing.
- **Messages and communications:** When you contact our team, either through *WhatsApp™*, *SMS*, *E-mail*, or any other type of digital means, some of your data may be stored for future checking and to ease our communication with you.
- **Offline:** Some data may be also collected not through the *website*, but at events or exhibitions, where you may share with us your *E-mail* address and other information.
- **Use of Cookies**, as explained under item 3, below.

2.1. Consent

It is from your consent, obtained in a specific way for each of the purposes described above, that we process your personal data.

“**Consent**” may be defined as the free, informed, unequivocal and revocable manifestation, whereby you authorize **SUCRANA** to store and process your personal data.

By using our services and sharing your personal data, you tacitly declare that you have read and understood this document and that, therefore, you are fully aware of, and agree with, the provisions herein, that you were duly informed about your lawful rights and about how to exert them, and that you are over 18 (eighteen) years old.

Furthermore, by accessing our *website* and allowing the installation of *Cookies* in your device, you declare that you are aware of, and consent to, the collection of your browsing data, as explained below under item 3.

2.2. Revoking Consent and Rejecting Cookies

At any time, and at no cost, you may revoke your consent, change permissions, block, or reject *Cookies*; however, bear in mind that such revocation, blocking or rejection may hinder the proper performance of some or all the functionalities of the *website*.

You may also configure your browser to reject any installation of *Cookies*, but also in this case, some or all the functionalities of the *website* may become unavailable.

Otherwise, you may configure your browser to delete all installed *Cookies* and to clean up your browsing data after each session, or else, use some specific software to clean up your computer, such as *CCleaner™*, *BleachBit™*, *Revo™*, *Norton Utilities™*, and others.

3. Cookies

A *Cookie* is a small data package that is installed on your device (computer, *tablet*, or *smartphone*) whenever you access a *website*, to collect some specific information that your browser sends back to the *website*.

Cookies allow us to identify and track our *website’s* visitors, as well as to monitor on each visit, how the *website* is used and the users’ preferences.

We use the following types of *Cookies*:

1. **Session Cookies** are active only while the *website* is accessed and aim to improve your experience as a user and allow the identification of occasional *website* malperformances.
2. **Permanent Cookies** remain installed on your device’s memory even after the session is closed. These *Cookies* are installed each time you visit the *website* and aim to facilitate your navigation, based on the personal preferences shown in your previous visits.

These *Cookies* may have distinct functions and purposes, such as.

1. **Essential Cookies** are necessary for *website's* proper performance and ensure the availability of the services offered to the users.
2. **Performance Cookies** collect anonymous information about how users interact with the tools available on the *website*.
3. **Functionality Cookies** are associated with the memory of the data provided; these *Cookies* allow the *website* to recall any choices previously made by the user.
4. **Analytical Cookies** are *Cookies* that monitor and analyze the use of the tools and functionalities of the *website*; they also facilitate the detection of *website* failures or misfunctions.
5. **Security Cookies** prevent users' data from being vulnerable to malicious attacks by third parties. The information collected by these *Cookies* is stored in an encrypted format.

4. How and for how long will your data be stored?

Your collected personal data will be used and stored in our systems as long as they are necessary for the delivery of the services, or for the purposes listed in this **Privacy Policy** to be achieved.

In general, we will keep your data while the contractual relationship between you and **SUCRANA** lasts. After the storage period, the personal data will be deleted from our databases or anonymized, except for the conditions provided for in the legislation:

- a) Compliance with legal or regulatory obligation by **SUCRANA**.
- b) Study by a research body, guaranteed, whenever possible, the anonymization of personal data.
- c) Transfer to a third party, provided that the data processing requirements set forth in the legislation are respected; or
- d) Exclusive use of **SUCRANA**, being prohibited their accessing by a third party, and provided that the data are anonymized.

In other words, we will maintain under our guard, despite the deletion of other data, the personal information about you that is essential for our compliance with legal, judicial, and administrative determinations, and/or for the exercise of our right of defense in judicial and administrative proceedings.

5. What do we do to keep your data safe?

To ensure that your personal information is secure, we use hardware and software specifically designed for protecting your privacy, thereby guaranteeing the confidentiality, integrity, and inviolability of your data.

The security measures also involve the appropriate tools for control, monitoring and security of the access to the stored information.

Among the measures we adopt, we may mention:

- Only authorized persons have access to your personal data.
- Signature of a confidentiality commitment by those who may have access to your data.
- Storage in a safe and adequate environment.
- Cryptography SSL (“*Secure Socket Layer*”).
- *Firewalls*.
- Intrusion detection system.
- Constant monitoring of networks.
- Use of secure passwords.

Caveat

Though we are deeply committed to adopting the best procedures to avoid security incidents, it must be pointed out that no virtual page is entirely safe and risk-free. It is possible that, despite all our security protocols and tools, problems solely attributable to the fault of third parties may occur, such as cyber-attacks by *hackers*, or as a result of the negligence or recklessness of the user.

In the event of security incidents that may represent risk or may result in damages relevant to you or to any of our users, we will communicate the occurrence to those affected and to the *Brazilian Data Protection Authority*.

6. Data Sharing

SUCRANA does not share any of your personal data with third parties without your prior authorization.

However, there are some instances in which your data may be shared with third parties, regardless of your permission:

- a) Compliance with a legal determination, requests, or court orders by the competent judicial, administrative, or governmental authorities.
- b) In case of corporate transactions, such as merger, acquisition, or incorporation.
- c) Protection of **SUCRANA** rights in any type of conflict, including those of judicial content.

6.1. International transfer of data

We do not transmit any personal data internationally.

In case of acquisition of new *software*, contracting cloud storage or any other event that may involve international transfer of personal information, such information will be previously audited, and the transfer will occur in strict compliance with the determinations of the law.

7. Responsibilities

We strive to ensure the commitment and responsibility of the agents involved in our internal data processing.

We endeavor to keep our *software* and other computer resources always updated, to better protect the data and information under our custody.

We also undertake to keep this **Privacy Policy** updated, observe its provisions, and ensure its faithful compliance.

If the *Brazilian National Data Protection Authority* requires the adoption of measures in relation to the processing of data conducted by us, we undertake to follow them strictly.

7.1 Disclaimer

As mentioned on Item 5, above, although we strive to adopt high security standards to prevent incidents, it is important to keep in mind that there is no such a thing as an entirely risk-free virtual page.

In this sense, we are not liable for:

- a) Any consequences arising from the negligence, recklessness, or malpractice of users in relation to their individual data. We only guarantee, and are responsible for, the security of the data gathered and processed as described in this document, and with the provisos mentioned under item 5, above.
- b) Malicious actions of third parties, such as hacker's attacks, unless proven culpable or deliberate misconduct of **SUCRANA**.
- c) Inveracity of the information entered by the user in the records necessary for the use of our services; any consequences whatsoever arising from false information, or information entered in bad faith by the user, will be entirely user's liability.

8. What are your rights?

We assure to our *website* users all their rights as the legitimate holders of their personal information.

Thus, you can, without any charge and at any time:

- a) Request the confirmation of the existence of data being processed or already processed by **SUCRANA**, in a simplified way or in a clear and complete format.
- b) Access your data and request them in a legible hardcopy or in an electronic, secure, and suitable format.
- c) Correct your data, when requesting the editing, correction or updating of these.
- d) Limit your data - through anonymization, blocking or deletion - when unnecessary, excessive, or treated in non-compliance with the Brazilian legislation.
- e) Request the portability of your data, through a report of the registration data held by **SUCRANA**.
- f) Delete your consented processed data, except in those cases provided for in the law.
- g) Be informed of the public and private entities with which **SUCRANA** has shared your data, if any.
- h) Revoke your consent, deauthorizing the processing of your data.
- i) Be informed about the possibility of not providing your consent, and the consequences of this denial.

9. How can you exert your rights as a holder?

To exert your rights as a legitimate holder of your personal information, kindly contact **SUCRANA** through:

E-mail: sucrana@sucrana.com.br

Phone: + 55 16 3209-2727

To ensure your correct identification as the holder of the personal data object of the request, we may ask you for document numbers or other information that can prove your identity. In this case, you will be informed in advance.

10. Changes to this Privacy Policy

We reserve the right to modify this **Privacy Policy** at any time; therefore, we strongly recommend your reviewing it periodically.

Changes and clarifications will take effect immediately upon their notification and posting on our *website*.

11. Data Protection Officer

Should you have any queries regarding this **Privacy Policy**, desire to assert your rights as a holder or wish further clarifications regarding our processing of your personal data, we kindly request you to contact our **Personal Data Protection Officer**, *Ms. Viviane Bedim Costa Cesar*, through the following channels:

E-mail: sucrana@sucrana.com.br

Phone: + 55 16 3209-2727

