

VILLARES METALS

# Data Protection Statement

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This Data Protection Declaration was drafted and approved by the company VILLARES METALS SA, with address at Rua Alfredo Dumont Villares, 155, Jardim Santa Carolina, Sumaré / SP - CEP 13178-902, registered with CNPJ under nº 42.566.752 / 0004- 07 (hereinafter simply “VILLARES METALS”).

## 1. INTRODUCTION

This Data Protection Statement details the measures that VILLARES METALS takes to protect your privacy when you visit this website or provide information to VILLARES METALS in any way, such as through e-mails or forms filled out by request or not from VILLARES METALS (hereinafter the “Information”).

The date of this Declaration is indicated at the bottom of the page and can be updated at any time. Our suggestion is that you read the Statement periodically to be aware of the latest privacy measures taken by VILLARES METALS.

This Data Protection Statement applies to all third parties, customers, suppliers and potential candidates for open positions published on the VILLARES METALS website, as well as to all services that VILLARES METALS offers to its partners, customers and website visitors.

## 2. INFORMATION

Information can be divided between:

- 2.1. Data you provide to VILLARES METALS, such as, for example, personal information such as your name, e-mail address, telephone number, billing and bank information, employment status, fingerprint, etc., passed through a process of filling out a form, CV sent or included in the VILLARES METALS Human Resources database or otherwise.

If you are applying for a job published on our website, when submitting a resume or otherwise, such data may include your application form and references, contact and emergency contact details, as well as information regarding your professional background, training performed and their schooling.

In cases involving 'Confidential data', a subset of the data category you provide, VILLARES METALS considers confidential data, for example, confidential customer data, individual's home phone number, bank account, income tax return, phone number social security, interview notes, resume, digital printing, etc.

If your relationship with us includes providing VILLARES METALS with Confidential Data, we will protect your information. We will not distribute Confidential Data outside VILLARES METALS if you so request, and we will give you the opportunity to choose not to share this information, as the case may be, as mentioned herein.

and

2.2. Data we obtain from your use of our website and / or services, such as information we collect through cookies when you use our services and / or website, and when you visit a website that contains our advertising and / or content. See the link below for more information on cookies and data processed by VILLARES METALS. ( link to topic above)

Most of the information found on the VILLARES METALS website is available without personal details being provided. When you visit our website, we retain the following details:

- Device information: VILLARES METALS may collect device-specific information, such as its hardware model and version of its operating system, unique device identifiers and mobile network information, including phone number.
- Internet Protocol (IP) Address: All devices connected to the Internet are designated with an individual number known as an "Internet Protocol ( IP)" address . The Internet Protocol address can also be used to identify the location from which a device is connected to the Internet.
- All details regarding the web pages you visit on our website.
- Device event information, such as problems that occurred, hardware configuration, system activities, browser type and language adopted, date and time of your request and URL ( Uniform Resource Locator ) reference.

- Any details you voluntarily provide (for example, phone number, survey information and / or website registration).

This information is used when necessary:

- To answer your queries.
- To keep you updated with the services we provide, through informational, contacts to inform details of products or services that we think may be of interest to you, or otherwise. You can contact VILLARES METALS and choose not to have your data stored, in case you are no longer interested in receiving this information.
- To provide, maintain, protect and improve information, to develop new information, for administrative purposes such as payroll processing and to protect VILLARES METALS and its users from fraud and / or to report potential crimes.
- To offer you personalized content and suggestions on our page.
- To provide to third parties.

When you are asked to provide personal information, that data will be treated in accordance with the legislation regarding the processing of personal data. This means that personal data will only be collected and processed for the purpose of providing information. VILLARES METALS is committed to taking the best possible security measures to prevent misuse by third parties of personal details disclosed to us by visitors to our website.

Our website also features links to other websites over which VILLARES METALS has no control, and therefore, in such cases, VILLARES METALS is unable to offer any warranty with respect to the Data Protection Statement of those websites and cannot accept responsibility in such a case. We advise you to consult the Data Protection Statements specific to those websites, before visiting them.

VILLARES METALS may use your email address, when provided, to inform you about our services, as well as inform you of future improvements and changes. We may use information collected through cookies and other technologies, such as pixel tags (technology placed on a website or email to track activity, often used in conjunction with cookies), to improve the user experience, the quality of our services and from the website itself.

In order to comply with Law No. 13,709 / 2018 - General Data Protection Law (LGPD), VILLARES METALS will ask for your consent before using information for a purpose other than that established in this document. VILLARES

METALS is headquartered in different locations around the world, so you can process your information on a server located in a country other than your own.

### **3. VARIOUS SECURITY LEVELS**

Technical and organizational security measures have been implemented to prevent the loss, illegal use or alteration of the information received by VILLARES METALS.

The information processed will be accurate, updated, legal, fair and transparent to the data in question, as provided by law, in which case VILLARES METALS will communicate to the owner of the information about what will be done with such data and for what reason. In this regard, personal data will only be kept for as long as necessary and will only be used for the original intended purpose.

The data will be processed securely to ensure that there is no unauthorized access or disclosure beyond what is necessary to achieve the intended purpose. For this reason, VILLARES METALS uses several levels of security that depend on the different services that are offered.

The level of security depends on whether or not stricter records are required. For services offered at the lowest level, which do not require registration, only a limited amount of data is generated by the use of cookies and login .

Some services are offered at a higher level of security. This means that users of these services are required to register when disclosing certain details to VILLARES METALS, which will take the necessary measures regarding this data to ensure the protection of your privacy.

### **4. LEGAL REQUIREMENTS**

Purpose, proportionality, right to access and correct, consent, violation and right to be forgotten and data portability

The purpose of processing data is to have a good overview of the market in the countries where VILLARES METALS operates, a detailed analysis of our website traffic and how it is used by Internet users, and to have the most complete information from customers, suppliers and third parties of VILLARES METALS. VILLARES METALS will not sell personal data in any way, including through mailing lists.

All data will be used for internal use only. In the context of proportionality, VILLARES METALS argues that the data collected is sufficient, relevant and not excessive, in view of the purpose of the processing informed above.

VILLARES METALS will store your data for a period not exceeding that legally permitted, and in any case for a period not exceeding that necessary to achieve the aforementioned processing objectives. Every natural person who is able to

prove his identity will have the right, in line with Law No. 13.709 / 2018 - General Data Protection Law (LGPD), upon request, to change his data and to obtain, from the data controller, a confirmation about your personal data and whether or not they are being processed, where and for what purpose, and, in the case of direct marketing, oppose this at no cost. The request for consent and to withdraw consent must be made in a specific, clear and objective manner.

In the event of a data breach with a potential risk to the rights and freedoms of individuals, a notification of the breach must be issued by the data processor (VILLARES METALS or any identifiable part) within 72 hours of first knowing the breach. The consequent notification to customers, controllers and / or other relevant persons will be made immediately after the first knowledge of such data breach.

## **5. CONTACT ADDRESS AND HOW TO CONTACT US WITH REGARD TO OUR DATA PROTECTION STATEMENT**

The processing of data by VILLARES METALS is subject to Brazilian legislation, in particular Law No. 13,709 / 2018 - General Data Protection Law (LGPD).

For any questions or comments regarding the Data Protection Declaration, you can contact the department responsible for processing, at the following addresses:

By email: [data-privacy-villaresmetals@villaresmetals.com](mailto:data-privacy-villaresmetals@villaresmetals.com)

By mail: VILLARES METALS Legal Department, established at Rua Alfredo Dumont Villares, 155, Jardim Santa Carolina, Sumaré / SP - CEP 13178-902.

In addition, you have the right to file a complaint if you believe that we do not meet the requirements of Law No. 13,709 / 2018 - General Data Protection Act (LGPD) with respect to your personal data.

This Data Protection Statement is dated September 2, 2020.