

PRIVACY POLICY

Welcome to our Privacy Policy! At **Grupo Flexível**, we take your privacy and the protection of your Personal Data seriously. This document explains how we process Personal Data, what your rights are, and how to exercise them.

1. KEY CONCEPTS

This table defines the key concepts related to the processing of Personal Data, as provided for in current legislation, namely:

TERM	CONCEPT
Sensitive Personal Data	Any information related to an identified or identifiable natural person that reveals more intimate aspects of their identity, which may include racial or ethnic origin, religious belief, political opinion, membership of trade union or institution of a religious, philosophical or political nature, data regarding health or sex life, as well as genetic or biometric data, when linked to a natural person.
Personal Data	Information related to a natural person, which can identify them or make it possible to identify them, such as name, ID, social security number, telephone, e-mail address, street address, and others.
Processing	It is any form of use we may make of your Personal Data, including, but not limited to, the following activities: collection, storage, access, sharing, transmission, classification, reproduction, deletion, and evaluation.
Data Subject	It is you, the natural person to whom the Personal Data refers.
Data Controller	It is the one who decides how and why Personal Data will be processed. In other words, it is the one who defines what will be done with the information collected and is responsible for ensuring that this processing is in accordance with the law.
Data Processor	It is the one who processes the Personal Data on behalf of the Controller. Their responsibilities include following the Controller's instructions, implementing appropriate security measures, and assisting in fulfilling the rights of Data Subjects, ensuring the protection and confidentiality of the information processed.
Company	It is us, Grupo Flexível.
Policy	This Privacy Policy.

2. WHAT KIND OF PERSONAL DATA DOES THE COMPANY PROCESS?

The types of Personal Data and how the Company collects them depends on how you interact with us and the purpose of that interaction. The following table lists the different types of Personal Data that may be collected in different situations, as well as the specific purpose for data collection.

PURPOSE	PERSONAL DATA
If you apply for a selection process in our Company, your data will be used for profile analysis, qualification assessment and vacancy matching, as well as communications related to the progress of the selection process, such as invitations to interviews or feedback on the result.	Name, ID, social security number, address, marital status, date of birth, e-mail address, social media, telephone number, WhatsApp, parents' name.
Checking your activities on our website in order to identify your browsing pattern and understand how we can improve our services (analytics).	Cookies, browsing data, IP address, date and time of access, duration of visit, approximate location,

	pages accessed, browser type and version, operating system type and version.
If you wish to purchase products or are a potential prospect of the Company, your data will be used to facilitate negotiation, formalize a purchase contract, in addition to enabling us to follow up your order and communicate any related update.	Name, ID, city, e-mail address, telephone number.
If you are a supplier of the Company, your data will be used for approval and management of our business relationship, as well as execution of the supply contract.	Name, ID, e-mail address, telephone number, videos of the security system in the Company's facilities.
If you are an employee of the Company, your data will be used to ensure the management and security of internal networks, executing your employment contract, providing the necessary tools for the performance of your duties, as well as creating usernames and access to internal systems so that you can carry out your activities efficiently and securely.	Name, e-mail address, telephone number, users' IP, date of birth, videos and images of the security system in the Company's facilities.

3. DOES THE COMPANY COLLECT PERSONAL DATA FROM CHILDREN AND ADOLESCENTS?

The Company collects Personal Data from users aged 14 (fourteen) to 18 (eighteen) years, in the event that they choose to participate in selection processes for job vacancies as Apprentices. This data collection will be carried out only with the prior and verifiable consent of parents or legal guardian.

4. DOES THE COMPANY COLLECT SENSITIVE PERSONAL DATA?

The Company may collect Sensitive Personal Data when you, on your own initiative, submit your resume to participate in a job selection process. This data may include information about your health, racial or ethnic origin, and other, as necessary for the evaluation of your application and in accordance with applicable law.

In addition, Sensitive Personal Data can also be processed in other specific situations, such as in compliance with legal or regulatory obligations, for the protection of health in corporate benefits programs, and when necessary to ensure the safety and well-being of employees.

The processing of this data will always be based on appropriate legal grounds and upon the adoption of security measures to ensure your protection and privacy.

5. LINKS TO THIRD PARTIES

Our website may contain links or action buttons that redirect to third-party websites, applications, or platforms, such as Facebook, Instagram, WhatsApp, and LinkedIn. This does not imply any endorsement or responsibility by the Company for the content, practices, or any occurrences in these external environments. By accessing these links or interacting with these platforms, the User will be subject to the respective Terms of Use and Privacy Policies of these companies, being solely responsible for their interactions and information shared. The Company shall not be responsible for data processed by third parties.

6. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We operate in partnership with other companies, which develop our internal systems enabling the Company's activities, always seeking to improve the quality and agility of our services. All information collected about you is confidential, however, we may share it with third parties if necessary to:

- a) **Provide our services:** Your Personal Data may be shared with some of our partners and suppliers to enable us to provide our services. This includes, but is not limited to, companies that provide hosting services for storing our database, companies that host our website and e-mails, companies that develop financial and commercial management systems, and marketing companies.
- b) **Access to our website:** Your Personal Data may be shared with some of our partners and providers of web analytics services, to enable you to access our website securely, and to enable us, based on an evaluation of your interactions with our website, to understand how to improve our services and your experience in accessing our website.
- c) **Protection of rights:** Your Personal Data may be shared with third parties, if necessary to protect your rights and interests, comply with a court order (for example, with law firms, accounting firms, the Judiciary...)
- d) **Data sharing with partners and corporate service providers:** As an employee of the Company, your Personal Data may be shared with human resources software providers, for contracting life insurance, health plan, dental plan, compliance with obligations related to occupational safety and medicine, providing transportation vouchers, issuing corporate credit cards and registering in a corporate travel accountability application. This sharing is carried out in order to facilitate benefits management, ensure legal compliance, and optimize administrative processes related to your corporate functions and benefits.

In all cases, your Personal Data will be shared with third parties only to fulfill the purposes described herein and to the strict extent necessary for such purpose to be achieved. The Company will request third parties to maintain the confidentiality and security of the information shared.

7. WHAT ARE YOUR RIGHTS AS A PERSONAL DATA SUBJECT?

- a) **Confirmation of access:** You can request us to inform you if we are processing your Personal Data, and if so, you can request information about what data is being processed, for what purpose, and you can even request access to this data. Your request will be evaluated and responded to as soon as possible, within the available technical and operational conditions and the parameters established by law.
- b) **Correction:** You can request that your data be corrected, if it is outdated, incorrect, or incomplete.
- c) **Anonymization, blocking or deletion:** You can request: **(a)** the anonymization of your Personal Data so that it may no longer be related to you and therefore ceases to be Personal Data; **(b)** blocking your Personal Data by temporarily suspending our possibility of processing them for certain purposes; and **(c)** the deletion of your Personal Data, in which case we will delete all of your Personal Data without any possibility of reversal.
- d) **Information about sharing:** You have the right to know which public and private entities we share your Personal Data with. In item 3 of this Policy you will find information about our relationships with third parties that may involve Personal Data sharing. In any case, if you have questions or need more details, you have the right to request further information from us.
- e) **Consent:** You have the right to receive clear and complete information about the possibility and consequences of not providing your consent when requested by the Company. Your consent, where

required, must be free and informed. Therefore, whenever we ask for your consent, you are free to deny it – in such cases, it is possible that some services cannot be provided.

- f) Revocation of consent:** If you have consented to any purpose for processing your Personal Data, you can choose to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out prior to revocation. If you withdraw your consent, we may be unable to provide you with certain services, but we will let you know when this occurs.
- g) Opposition:** The law authorizes processing your Personal Data even without your consent. In such situations, we will only process your Personal Data if we have legitimate reasons or an overriding legitimate interest duly justifiable, such as to comply with a legal obligation or to support and promote the Company's activities. In case you do not agree with any purpose for processing your Personal Data, you may file an opposition, requesting interruption.

8. IMPORTANT NOTICES

For your security, whenever you submit a request to exercise your rights, the Company may request some additional information and/or documents so that we can prove your identity, seeking to prevent fraud. We do this to ensure everyone's safety and privacy.

In some cases, the Company may have legitimate reasons to fail to comply with a request to exercise rights. These situations include, for example, cases where retaining data is necessary to comply with legal or regulatory obligations, or to enable the defense of the Company or third parties in disputes of any nature.

In addition, some requests may not be replied immediately, but the Company is fully committed to responding to all requests within a reasonable period of time and always in accordance with the applicable laws.

9. HOW LONG WILL PERSONAL DATA BE STORED?

Regarding the processing time and its termination, we inform you that we may keep and process your Personal Data as long as they are relevant to achieve the purposes listed in this Policy.

All Personal Data collected will be deleted from our servers when requested by the Data Subject or when they are no longer necessary or relevant to offer our services, unless there is any other reason for keeping stored, such as any legal obligation to store data or the need to keep data stored to protect rights.

10. HOW DO WE PROTECT YOUR PERSONAL DATA?

Our responsibility is to take care of your Personal Data and use it only for the purposes described in this Policy. To ensure your privacy and the protection of your Personal Data, we adopt technological resources to guarantee the security of all data processed by the Company. Among the security measures implemented, we use access controls to data processing systems and environments, barriers against improper access to databases (including antivirus and firewall), among other information security controls.

11. HOW CAN YOU CONTACT US ABOUT YOUR PERSONAL DATA?

The Company is fully committed to meeting your rights and ready to receive your requests and take all the necessary steps to meet them, quickly and easily.

If you believe that your Personal Data has been processed in a manner that is incompatible with this Policy or your choices as a Data Subject, or, yet, if you have any questions, comments, or suggestions regarding this

Policy and the way we process your Personal Data, please contact us. We have a Data Protection Officer (DPO) who is ready to help you with any issue. Please contact Everton Simette at everton.simette@grupoflexível.com.br.

12. CHANGES TO THE PRIVACY POLICY

As we are always improving our services and the way we operate, this Privacy Policy may be updated to reflect such improvements. Thus, we strongly recommend that you periodically visit this page so that you are aware of any changes and/or updates.

Latest update: 12/Feb/2025.