

Privacy Policy (General Data Protection Law, “LGPD”)

ECOGEN-JUR-10-01

Controller: Ecogen Brasil Soluções Energéticas S.A., with office at Avenida das Nações Unidas, No. 14.171, 11th Floor, rooms 1.102 and 1.103, Brooklin Novo, CEP: 04794-000, São Paulo – SP, Brazil, CNPJ: 05.401.842/0001-79 (Ecogen).

This is the Privacy Policy (“Policy”) which provides for the collection, use, processing and sharing of information and the Treatment of Personal Data carried out by Ecogen, when using the electronic address provided by Ecogen: www.ecogenbrasil.com.br, in accordance with the applicable legal provisions, such as Federal Law No. 12,965, of April 23, 2014 (“MCI”), Decree No. 8,771/16, Federal Law No. 13,709, of August 14, 2018 (“LGPD”), as well as the other laws and regulations applicable to any Treatment of Personal Data (“Applicable Data Protection Legislation”).

When started in capital letters, the terms "Treatment", "Controller", "Operator", "Data Owner", "Owner" and "Personal Data" will have the meanings assigned to them in the LGPD.

Below you ("User") will find information on how we use your Personal Data, for what purposes your Personal Data is used, with whom your Personal Data is shared and what control and information rights the User may have.

This Privacy Policy is divided as follows:

1. Summary of our Treatment activities
2. Personal Data Collection and use
3. Legal Bases for the Treatment of Personal Data
4. Automated Decision Making
5. Cookies
6. Sharing of Personal Data
7. Security
8. Retention of Personal Data
9. User Rights

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1. Summary of our Treatment activities

The following summary provides a quick overview of the Treatment activities that are undertaken on our website. The User will find more detailed information under the indicated sections below.

- When the User visits our website for informational reasons, only limited Personal Data will be Treated to provide the website to the User.
- Whenever the User shares their CV with us for the purposes of applying for a job position, we will review strictly for the purposes of the collection and we may share it with other entities of the Mitsui Group that may be interested in analyzing the opportunity. The User is solely liable for the accuracy and completeness of the information provided for us and shall not provide us with any information other than what is needed for the purposes of evaluating if your experience matches the job description.
- Furthermore, we may use analytic cookies for producing statistical analysis of Personal Data we collect from the User, for the purposes of improving our website.
- Additionally, we improve your Website experience with third party content.
- The User's Personal Data may be disclosed to third parties that might be located outside your country of residence; potentially, different data protection standards may apply, without prejudice to the fact that the transference shall always be to a country that offers similar and adequate degree of protection for personal data or that we are able to offer and demonstrate that the principles of the law and rights of the data subject are guaranteed as provided for under the LGPD.
- We have implemented appropriate safeguards to secure your Personal Data and retain your personal data only as long as necessary.
- Under the legislation applicable, the User may be entitled to exercise certain rights with regard to the Treatment of your Personal Data.

2. Personal Data Collection and Use

Technical Data. When the User visit our website, we automatically collect information about the User which will contain Personal Data only in limited cases and which is automatically recognized by our server, such as your IP address, information about browsing actions and patterns, screen resolution and operating system, information about general internet usage and referring websites.

- We use such information only to assist us in providing an effective service (e.g. to adapt our website to the needs of your end user device), to guarantee the website's stability and security and to collect broad demographic information for aggregate use.
- **Identity and Contact Data.** We collect Personal Data informed when the User contact us, including your name, e-mail, position, telephone, and company.
- **Content Information.** We collect Personal Data informed when the User apply for a job position, including information inserted in your resume.

Personal data that is collected as described above is retained for, at least, twelve (12) months and, subsequently, duly deleted when the purpose of the Treatment of Personal Data is completed.

3. Legal bases and Purpose of the Treatment of Personal Data

Execution of Contract or preliminary procedures:

1. Sign up for Ecogen's mailing and newsletter.
2. Sending a request through Contact Us to contact Ecogen.
3. Assistance to requests made by Ecogen's Contact Us.

Legitimate Interest:

1. Improvement of the Ecogen website performance.
2. Use of cookies and functionalities to collect information and Personal Data, such as IP address and demographic information.
3. Ensure the stability and security of the Ecogen Website.

4. Carrying out internal procedures such as audits and investigations.

Consent:

1. Sending a resume for employment opportunities at Ecogen

Compliance with legal obligation and regular exercise of rights in process:

1. When necessary to comply with the applicable legal obligations or for the purpose of regular exercise of law in judicial, administrative or arbitration proceedings.

4. Automated decision making

We do not use your Personal Data for automated decision making which produces legal effects concerning you or similarly significantly affects the User.

Analysis

For statistical analyses, Ecogen uses a tool called RD Station Marketing, as well as the Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States (“Tools”) to collect information about the use of this website.

Ecogen uses the information we get from the Tools only to determine the most useful information Users are looking for, and to improve and optimize this Website.

The information generated about your use of the website will be transmitted to and stored by the Tools on servers in Brazil (RD Station Marketing) and in the United States (Google Analytics). The Tools collects only the IP address assigned to the User on the date you visit this site, rather than your name or other identifying information. The provider will use this information in order to evaluate the use of the website, to compile reports on website activities and to provide other services relating to website and internet use to Ecogen.

For further information regarding the Tools, please consult the Terms of Services, the principles of security and the Privacy Policy of the Tools.

Cookies

Cookies are data files that are placed on a computer when it is used to visit a Website. These cookies may be used for many purposes, including, without limitation, tracking user preferences or web pages visited while using the Website. Most web browsers are set to accept cookies by default. **If you prefer, the User can usually set your browser to remove or reject cookies but note that doing so does not necessarily affect third party flash cookies used in connection with our Website.** Please note that if the User chooses to remove or reject cookies, this could affect the availability and functionality of the Website. In addition, please be aware that if the User chooses to block cookies, some advertising preferences that are dependent on cookies may not be able to be respected.]

5. Sharing for Personal Data

We will not disclose your Personal Data to any third parties, except in the following hypothesis:

- Ecogen uses cloud storage services to make the Site available. We have a Data Treatment Agreement in place with the supplier in order to secure a proper level of data protection.
- In the event that we undergo re-organization or are sold to a third party, any Personal Data we hold about the User may be transferred to that re-organized entity or third party in compliance with applicable law.
- We may disclose your Personal Data if legally entitled or required to do so (for example if required by law or by a court order).
- In case the User apply for a job position we may share your CV with other companies of the Mitsui Group that may be interested in analyzing your CV, including companies headquartered abroad. **Whether the User do not allow us to share your resume with Mitsui's companies please inform us by email.**

6. Security

We have reasonable state of the art security measures in place to protect the User Personal Data under our control against the loss, misuse and alteration. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorized personnel have access to Personal Data. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

The User should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information that the User submit via our website whilst it is in transit over the internet and any such submission is at your own risk.

7. Personal Data retention

We strive to keep our Treatment activities with respect to your Personal Data as limited as possible. In the absence of specific retention periods set out in this Policy, your Personal Data will be retained only for as long as we need it to fulfil the purpose for which we have collected it and, if applicable, as long as required by statutory retention requirements.

Upon expiry of the applicable retention period, we will securely discard the Personal Data in accordance with applicable laws and regulations.

8. User rights

Under the legislation applicable, the User may be entitled to exercise the following rights, if applicable:

1. require (i) information whether your Personal Data is retained and (ii) access to and/or duplicates of your Personal Data retained, including the purposes of the Treatment, the categories of Personal Data concerned, and the data recipients as well as potential retention periods.
2. request rectification, removal or restriction of your personal data, e.g. because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the Treatment was based has been withdrawn.

3. refuse to provide or – without impact to data Treatment activities that have taken place before such withdrawal – withdraw your consent to the Treatment of your Personal Data at any time, when the Processing of Personal Data is based on consent.
4. object the Treatment of the Personal Data, on grounds relating to a particular situation that the User understand there is violation of the applicable data protection law. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by the User we will either stop processing your Personal Data or present you our compelling legitimate grounds for an ongoing Treatment;
5. take legal actions in relation to any potential breach of User rights regarding the Treatment of your Personal Data, as well as to lodge complaints before the competent data protection regulators; and/or
6. require (i) to receive the Personal Data, which the User have provided to us, in a structured, commonly used and machine-readable format and (ii) to transmit those Personal Data to another controller without hindrance from our side; where technically feasible the User shall have the right to have the Personal Data transmitted directly from us to another controller.

9. Contact

The User may (i) exercise the rights referred to above or (ii) pose any questions or (iii) make any complaints regarding the Personal Data Treatment by contacting us under the contact details set out below.

Ecogen Brasil Soluções Energéticas S.A.

Avenida das Nações Unidas, nº. 14.171, conjuntos 1102 e 1103, Torre B, Brooklin Novo,
CEP: 04794-000

Phone: (11) 2199-3700

The Personal Data that the User provides when contacting us will be processed to handle your request and will be erased when your request has been answered. Alternatively, we will restrict the Treatment of the respective personal data in accordance with statutory retention requirements.

This Policy Review 1 will take effect on March 22, 2021 and will remain in effect indefinitely.

10. Policy Changes

This Policy may be modified at any time, according to the purpose or need for adequacy and compliance with the provision of the law or whenever the Company deems necessary.