

	NOTICE REGARDING INTERNATIONAL DATA TRANSFER GENERAL DATA PROTECTION LAW (LGPD)	JUR-10-02
		Review: 00
	RESPONSIBLE AREA: Legal	12/2025

Notice Regarding International Data Transfer

This notice regarding International Data Transfer (“Notice”) it is managed and provided by **Ecogen Brasil Soluções Energéticas S.A.**, enrolled with the National Register of Legal Entities (C.N.P.J.) under nº 05.401.842 /0001-79 (**“Ecogen Brasil”**) and **Ecogen Rio Soluções Energéticas S.A.**, enrolled with the National Register of Legal Entities (C.N.P.J.) under nº 73.688.855/0001-20 (**“Ecogen Rio”**) and it concerns how Ecogen Brasil and Ecogen Rio process the international transfer of personal data of individuals located in Brazil or data collected in Brazil to other countries (“We”, “us” and “our”), collectively referred to simply as “Ecogen”.

We use the personal data collected through this website and by other lawful means as set out in this Notice and in accordance with the General Data Protection Law (LGPD) and the resolutions of the National Data Protection Authority (ANPD) (“Data Protection Laws”) apply, including when international transfers are necessary.

Below is the information regarding the international sharing and transfer of data, contact details for the designated parties, and the responsibilities of the Data Controllers.

Definitions

- “Personal Data”: means any information relating to an identified or identifiable natural person, including, but not limited to, name, identification number, location data, or online identifier.
- “Processing” (and verbal variations): means any operation performed with Personal Data, including collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction or any type of disclosure or other use.

Data Sharing and International Transfer

We will not disclose your Personal Data to third parties except in the following cases:

- To our processor Mitsui & Co., Ltd. (“Mitsui Tokyo”) in Japan, which may access our system for the purposes of analyzing data on litigation, training, resume submission, security measures, income tax calculations, general employee data, meetings, business

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development, internal audit, projects, and whistleblowing channels related to compliance matters. We have a data processing agreement in place with Mitsui & Co. Tokyo to ensure an adequate level of data protection.

- To our processor Mitsui & Co., Inc. (“Mitsui USA) in the United States, which may access our system for data analysis purposes related to compliance, including training, research, and whistleblowing channels, as well as other corporate training focused on the professional development of employees. We have a data processing agreement in place with Mitsui & Co. Inc. USA to ensure an adequate level of data protection.
- In the event that we undergo a reorganization or are acquired by a third party, any Personal Data we hold about you may be transferred to that company or third party in accordance with applicable law.
- Personal Data transferred to Mitsui & Co, Ltd., Mitsui & Co. Inc. or to the Companies may be subsequently transferred to other recipients, only if necessary and to the extent necessary for the fulfillment of the purpose for which your Personal Data was collected, and provided that (i) the same data protection standards in Data Protection Laws are observed and (ii) the necessary measures are taken to ensure that such transfer occurs in accordance with the requirements of applicable laws.
- For Companies, your personal data may be subsequently transferred to other recipients, Only if necessary and to the extent necessary to fulfill the purpose for which your Personal Data was collected, and provided that the same data protection standards in Data Protection Laws are observed and (ii) the necessary measures are taken to ensure that such transfer occurs in accordance with the requirements of applicable laws.
- We may disclose your Personal Data if legally authorized or required (for example, if required by law or court order) in accordance with Data Protection Laws.

Contact Information for Designated Parties

We request that you send any questions, concerns, or comments you may have regarding this Notice or any requests related to Personal Data to us at:

Av. Das Nações Unidas, 14.171, 11º floor, suites 1102 and 1103,
Marble Tower, Brooklin Novo -São Paulo, SP – Zip code.: 04794-000

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Email: tatiana.shioji@ecogenbrasil.com.br

In charge: Tatiana Shioji

The information that the User provides when contacting us will be processed to fulfill their request and will be deleted once their request has been answered. Alternatively, we will restrict the processing of said information in accordance with the legal requirements regarding retention.

Data Processing Agents Responsibility

Ecogen Brasil is the exporter of your Personal Data and, like the Companies that also act as controllers of your Personal Data, is responsible for complying with legal obligations, including security, transparency, and respect for your rights as a data subject.

Changes to this Notice

We reserve the right to update this Notice periodically. The current version will Always be published on our website. Last update: December 19th, 2025. Please visit the website regularly and check our current Notice accordingly.

For more information, questions or requests, please use our contact details indicated in the Contact of Designated Parties section above.