

TITLE: PRIVACY AND PERSONAL DATA PROTECTION POLICY

APPROVALS

DEPT.	DATE	SIGNATURE	DEPT.	DATE	SIGNATURE
ADM/FINANCIAL			Technology and Information Security		

DEPARTMENT RESPONSIBLE FOR PRAPARING: HUMAN RESOURCES_____

1. INTRODUCTION

Continental Parafusos is a Brazilian company with over 50 years of history, and a national leader in the fasteners and special metallurgical products market.

The company operates in strict compliance with legal requirements and has a strong commitment to information security, particularly regarding the privacy and protection of personal data to which it may have access as part of its business. In accordance with the General Data Protection Law (LGPD – Law 13.709/2018), it outlines all practices adopted for the collection, processing, and storage of data and information.

Data collection activities -both online and offline-, when shared by the owner with Continental Parafusos, confirm their free and express knowledge and agreement with the terms stipulated in this Privacy Policy.

2. KEY DEFINITIONS

LGPD: General Data Protection Law (Law No. 13.709/2018), which governs the processing of personal data, including digital means, by individuals or legal entities, public or private, in order to protect the fundamental rights of freedom, privacy, and the free development of an individual's personality.

Personal Data: Any information that identifies or can identify an individual.


Sensitive Personal Data: Personal data related to racial or ethnic origin, religious belief, political opinion, union membership, or affiliation with religious, philosophical, or political organizations, as well as data concerning health, sex life, genetics, or biometrics, when linked to a natural person.

Data Subject: The natural person who's personal and/or sensitive personal data is being processed.

Controller: A natural or legal person, under public or private law, who is responsible for decisions regarding the processing of personal and/or sensitive personal data.

Processor: A natural or legal person, under public or private law, who processes personal and/or sensitive personal data on behalf of the controller.

Data Processing: Any operation or set of operations involving personal and/or sensitive personal data, such as collection, production, reception, classification, usage, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.

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Consent: Express and unequivocal authorization given by the data subject or their legal representative, in writing or by another means that demonstrates their will, allowing Continental Parafusos to collect and process their personal data for a previously defined purpose.

ANPD: The National Data Protection Authority is the public administration body responsible for ensuring, implementing, and supervising compliance with the LGPD.

Incident: Unauthorized access or accidental or unlawful situations of destruction, loss, alteration, communication, or any improper or unlawful processing of data.

E-Social: The Digital Bookkeeping System for Tax, Social Security, and Labor Obligations. It is a government system that unifies the submission of information about employees and interns.

3. DATA PRIVACY STATEMENT

The practices described in this Privacy Policy apply exclusively to the processing of personal data in Brazil and are subject to the applicable local laws, particularly Law No. 13.709/2018 (General Data Protection Law, or “LGPD”).

Continental Parafusos does not collect or process personal data without necessity, a specific purpose, or on a compatible legal basis.

Processed personal data will only be accessed by individuals who have the appropriate access level and need-to-know basis, ensuring that such data will not be visible to employees or service providers unrelated to the intended purpose.

4. SHARING OF COLLECTED DATA

Continental Parafusos is committed to adopting the best practices in information security and data processing, prioritizing the protection and integrity of the personal data of its clients, employees, partners, and other data subjects. It also implements administrative, technical, and physical safeguards to maintain data integrity and avoid potential harm.


As permitted by the LGPD, Continental Parafusos may subcontract companies to conduct full or partial data processing activities.

In such cases, these companies are required to maintain confidentiality and ensure the privacy and security of the data they access, and are prohibited from using the data for other purposes or combining it with other information they hold.

Data may be shared when necessary with:

- Clients, employees, partners, and service providers involved in institutional activities;
- Hosting service providers, platform maintenance providers, email hosting providers, event management platforms, and service providers for training sessions, lectures, fairs, exhibitions, and events;
- The Public Prosecutor’s Office, in cases where reporting or legal compliance is required.

5. RIGHTS OF DATA SUBJECTS

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At any time, the data subject may exercise the following rights, which will be evaluated, justified, and addressed where applicable, by contacting Continental Parafusos:

- **Right of access:** Request and receive a copy of your personal data, with clarifications about how it was obtained, the criteria used, the processing purpose, and with whom it has been shared.
- **Right of rectification:** Request the correction of incomplete, inaccurate, or outdated personal data, upon verification of the validity of the new information.
- **Right to anonymization, blocking, or deletion:** Request anonymization, blocking, or deletion of data being processed in violation of this policy or applicable legislation.
- **Right to object:** Object to the processing of personal data when it is being done without consent and is believed to infringe on rights.
- **Right to deletion:** Request the deletion of personal data that is no longer necessary or relevant to the provision of services, unless retention is legally or contractually justified.
- **Right to withhold consent:** Refuse consent-based processing at any time.
- **Right to review:** Request review of decisions made solely through automated processing, if they affect personal interests.
- **Right to data portability:** Request portability of personal data in a structured and interoperable format.

The data subject may also limit the use and disclosure of their data or revoke consent, except in cases where data retention is legally, contractually, or publicly required.

Continental Parafusos reserves the right to disclose or provide personal data to comply with legal or procedural requirements, if required by tax, judicial, or administrative authorities, subject to prior notice to the data subject, unless prohibited by law or court order.

These rights may be exercised via the communication channels provided in the “**CONTACT**” section of this policy. Identity verification will be required, through ID copy or equivalent means, as required by law.

6. PROCESSING OF CHILDREN’S AND ADOLESCENTS’ PERSONAL DATA

Continental Parafusos does not knowingly request, collect, process, store, or share personal data of minors, except in cases provided by law or with explicit consent from their parents or legal guardians, in accordance with applicable legislation.

If any such processing occurs unintentionally, we will immediately remove the child’s or adolescent’s personal data from our records.

7. TERMINATION OF DATA PROCESSING

Continental Parafusos will retain personal data only for the duration necessary to fulfill the purposes for which the data was collected, as described in this policy or as required by applicable legal obligations.

At the end of the processing, data will be deleted within the scope and limits of the organization's technical capabilities, unless retention is authorized under applicable legislation.

8. SECURITY MEASURES

Continental Parafusos adopts technical and organizational security measures to protect your personal data against unauthorized access and against accidental or unlawful destruction, loss, alteration, communication, or disclosure.

9. POLICY CHANGES

Continental Parafusos may amend this Privacy Policy to comply with applicable laws. These changes may be required due to legislative updates, guidance from supervisory authorities, or other legal developments.

Whenever a relevant condition in this Privacy Policy is altered, such changes will become valid, effective, and binding once the new version is published on the Continental Parafusos website.

Continental Parafusos encourages all stakeholders to review this Privacy Policy regularly to stay informed on how personal data is being handled.

10. CONTACT

If you have any questions about the processing of personal data, or wish to exercise your rights under this Privacy Policy or report a violation of it, you should contact the Data Protection Officer (DPO), currently held by Leda Paiva, via email:

- privacidade_lgpd@continentalparafusos.com.br

11. REVISION CONTROL

Rev. No.	Date	Alt. Page	Alt. Item	Description of the Change
00	02/09/22			Initial drafting.
01	14/07/25			Text revision and language adapted for internal use.