

LD Celulose
Personal Data
Protection



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Introduction and Scope

01

At LD Celulose S.A. (“LDC”, “us”, “we”) we are committed to the protection of personal information (*personal data*) of users (*data subject*) that we have access to in the course of our business.

Any *processing of personal data* in our business activities is done on the basis of the relevant statutory data protection regulations, in particular the Brazilian General Data Protection Law (Law No. 13.709/2018 – “LGPD”).


Words and expressions in *italic* have the meaning that LGPD assigns to them.

This Personal Data Protection Notice (“Notice”) clarifies how we handle *personal data* in our business activities.

Personal data is the information/data that identifies or can identify persons with whom we deal in our business activities. These persons (sometimes referred to in this Notice as “you”) are the *data subjects*.

Data subjects may be our employees, suppliers, service providers (even if temporary), administrators, board members, shareholders. *Data subjects* may also be our clients’ and/or suppliers’ employees, service providers (even if temporary), administrators, board members, shareholders. These persons may also be referred to as “Notice Beneficiaries”.

References made in this Notice to personal data include reference to *special categories of personal data* (such as data related to gender, ethnicity, health and others) that we may process.



LDC will be a *controller* of personal data every time we decide how to handle, keep, process, *treat, use, the personal data* in our business activities. If applicable, we can be a *processor* if the decision on how to handle, keep, process, *treat, use, the personal data* in our business activities is made by and informed to us by another entity, such as some of our suppliers and clients. LDC may also be a *processor* in some situations, where LDC processes *personal data* of related group companies, thus following the instructions of these companies.

This Notice may be updated and modified from time to time and will be revised whenever necessary to reflect technological advances, changes in legislation and market realities.

Please contact our Data Protection Officer (“DPO” or “*Encarregado*”), at the email address below, if you have any doubts, questions or understand that there may have been a breach of this Notice; and/or, you suspect of any compromise of *personal data* handled by LDC. Our Notice Recipients are instructed to do this as well.

If you want to submit a data subject request, please refer to the specific section of our website, where you will find the appropriate form.

Contact details for the Data Protection Officer (“DPO”): [encarregadodpoLDC\(at\)lenzing.com](mailto:encarregadodpoLDC(at)lenzing.com).

Definitions

02

- ▶ a) DPO: Data Protection Officer

Responsibilities

03

LDC's responsibilities for the processing of personal data described in this Notice are limited to efforts to adopt good practices, pursuant to Article 32 of the LGPD.

Application

04

Applicable to all LDC employees, Factory and Forest operations.

Process Description

05

Information on Personal Data Processing

What types of personal data does LDC handle/processes, for what purpose and on what legal basis and how does LDC collect and process personal data?

a) Contract performance and regulatory and legal requirements: As a *controller of personal data*, we collect and *process personal data* in our relationships with our employees, potential employees, business partners in general (service providers, even if temporary, suppliers, subcontractors, clients), officers, managers, as well as in dealing with members of the board of directors and shareholders, in our corporate and contractual documents and forms. The *processing of personal data* is mainly based on our duties towards meeting legal and regulatory requirements, as well as at the request of the *data subject* (or of the entity he/she relates to) in order to form and to perform contracts and carry out our business activities and legitimate interest.

b) The *personal data* collected are those necessary for the relevant activities (hiring employees, quotations for services and products, registration of professionals) including personal data such as, but not only: name, surname, telephone, address, e-mail, identity, tax identification (CPF), gender, date of birth, gender, title, job position/description, as well as information regarding the entity/person represented by the data subject, such as: company's name, company's identifiers (registration or tax number (CNPJ, etc.), address, supervisor, service or product category, products, materials and manufacturing process and connection with LDC. Other personal data may be collected and processed as indicated in the website notice. In some situations (e.g for land lease purposes), information of spouses and even children (if children are land owners) may be collected and *processed* for purposes of the relevant contracts.

- c) There may also be collection and *processing of special categories of personal data* of our employees (sensitive data), in order to comply with contracts, legal and regulatory obligations, notably but not only by the human resources area, personnel departments as well as for facility's security's purposes (e.g. security camera images/biometrics).
- d) The provision of the *personal data* is necessary to enter into a possible contract with LDC, for the performance of the contract and for legal and regulatory requirements. Failure to provide such personal data will result that a contract cannot be concluded and therefore no cooperation with you (or the business partner you are related to) can be entered into.
- e) The collection and sharing of *personal data* can be done by interactions in the most diverse ways, aiming at speed and security: through integration of LDC's systems directly with LDC's customers' systems; by access in shared cloud environment; by e-mail; by physical support (papers); by insertion, by LDC's staff, subcontractors and their staff in LDC's systems, platforms and applications of third parties; by capture according to the website Notice; by phone or applications for order/service order processing, contract formation, performance of contractual activities, customer service, commercial, marketing and human resources approaches, in selection processes.
- f) If you disclose/provide/share other persons' *personal data* to us (e.g. you, as an employee of the supplier applying, disclose *personal data* of other persons in your organization), you represent to us that you have obtained consent of this person to disclose his/her *personal data* to us for the purpose that you inform us, or that you process his/her personal data on any other legal basis, such as legitimate interests and, hence, have the right to disclose/provide these personal data.
- g) Based on the nature and purpose of the business activity to be entered with the business partner, the *personal data* collected may be used to provide to you (and the business partner you relate to) information about our developments, events and our products and services.

With whom does LDC share Personal Data?

- a) LDC will share *personal data* with its staff (employees, officers, members of the board of directors and shareholders), third parties such as service providers, subcontractors and their staff who must have access and handle *personal data* for the exercise of their functions and activities with LDC (e.g. health plan operators/brokers, transport and meal voucher companies, etc., in connection to LDC's employees).
- b) LDC may share *personal data* with third parties for operational purposes, as well as to make available, improve, protect and personalize LDC's services and products; to send internal marketing communications and other communications relating to our activities and for other legitimate purposes permitted by law.
- c) Some of LDC's technology infrastructure partners/providers will eventually provide services to us from other countries. Whenever we store your *personal data* with these partners, configuring the international transfer of personal data, the respective transfer will be made in accordance with the LGPD and other applicable laws.
- d) Furthermore, LDC may share *personal data* with its group companies; in negotiating mergers and selling LDC's assets; in response to authorities' requests in accordance with the applicable laws; in an aggregated and/or anonymized way so that it cannot be used to identify the *data subject*; the *data subject* is notified and authorizes LDC to share his/her *personal data*; internationally, only for entities in countries with at least the same degree of protection as the LGPD.

Where is Personal Data Stored?

- a) *Personal data* is stored in LDC's cloud infrastructure at our contracted processors, contractually bound to preserve security and protection of *personal data*.
- b) LDC will keep *personal data* for the period allowed under applicable laws, in view of the need to comply with legal or regulatory obligations, or order of a competent authority.

How Does LDC Protect Personal Data?

- a) We keep the record of the *personal data processing* carried out, pursuant to LGPD. We also keep *personal data* safe and protected against unauthorized or illegal *processing* and its loss, destruction or damage.
- b) LDC has an information security incident response plans with a view to mitigating, remedying and/or reporting any incidents as determined by applicable standards.
- c) We prepare *personal data* protection impact report in cases where the *processing* of personal data may generate risks to civil liberties and fundamental rights.

How does LDC handle Data Subject's Rights?

- a) As *controller of personal data*, LDC will respond to requests from the *data subjects* about inaccuracies or out-of-date information, at the request of the *data subject* to the *Encarregado/DPO* through the e-mail indicated at the beginning of this Notice.
- b) In certain situations, LDC must immediately comply with the requirements of the *data subjects* to exercise the rights provided for in the LGPD. If LDC cannot to comply with them immediately, the *data subject* will be notified within 15 (fifteen) days, or another period indicated by the Brazilian Data Protection Authority (ANPD).
- c) If it is not possible to immediately respond to the request, LDC will promptly send a response to the *data subject*, communicating, when this is the case, that LDC is not a *data processing agent (controller or processor)* and indicating, whenever possible, the responsible agent; or indicating the factual or legal reasons that prevent the submission of an immediate response that fully meets the *data subjects'* demand.
- d) With regard to the rights to confirm the existence or access to *personal data*, LDC will respond immediately (in a simplified format), as determined by item I of Article 19 of the LGPD, or within 15 (fifteen) days (by means of a clear and complete statement indicating the origin of the data, the lack of registration, the criteria used and the purpose of the *treatment*, observing the LDC's commercial and industrial secrets), as determined by item II of Article 19 of the LGPD.
- e) For LDC to be sure that the person asking making the request is the *data subject* who can actually make it, the application must be accompanied by proof of identity and we may also establish other actions for confirmation. This is a security measure to ensure that *personal data* is not inadvertently disclosed. LDC may also contact the *data subject* for more information regarding the request.
- f) If the request is particularly complex, LDC will notify the *data subject* of the need for more time and set a new deadline for response, in addition to keeping him updated on the progress of the request.
- g) The rights of *data subjects* provided for in Article 18 of the LGPD are, in general: confirmation of *processing*; access to personal data stored/processed; correction of *personal data*; *Anonymization*, blocking or deletion of *personal data*; portability; elimination of *personal data*; information on with whom and which countries *personal data* has been shared; where consent is basis for processing; revocation of consent; information of what happens if consent is not provided.

Annex 1 – Clarifications and Examples

| Processing Agents | See controller and processor |
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| Anonimization | <p>These are technical methods of unlinking the personal data from the data subject, without there being, by existing reasonable techniques, a way to reconstruct the 'path' to link the personal data to the data subject again.</p> <p>Examples: randomization of data, in which the link between them and the data subject is removed by applying some permutation of data; and generalization, in which the data is correlated to a broader set of identifying data, for example: instead of stating that the employees of Company XYZ are mostly of a certain race or gender, it is stated that in industry segment of a certain geographical region of the country, the majority of employees are of a certain race and gender.</p> <p>Note that pseudoanonymization is different from anonimization. Pseudoanonymization uses techniques such as cryptography with a secret key (by applying the key, the personal data will again be linked to the data subject, therefore, it will not be anonymized); tokenization (by applying the token, it is known that the user was a certain individual/personal/data subject).</p> |
| Brazilian Data Protection Authority (ANPD) | ANPD is the body that applies the LGPD: it regulates, supervises, applies penalties, issues regulations explaining legal issues, and prepares guidelines. |
| Database | It is every system, computerized or not, for archiving and maintaining data. It is a repository or container for a collection of data files. |
| Block | If ANPD or any judicial authority determines the blocking of data, the processing agents will be temporarily suspended from using them, either for any specific purpose or for any purpose. However, the suspension of data processing does not exempt the processing agents from keeping the data protected in accordance with the LGPD. |
| Consent | It is the statement in which the data subject allows the processing of certain personal data. The request must be made by the processor or controller in a clear and transparent manner, and must mention the specific and limited use and suitable for the intended purpose of use. |
| Controller | The controller is responsible for decisions related to the processing of personal data. Among other things, the controller decides what data will be processed, how and for what purpose. E.g.: a company controls the personal data of its employees. |

| Processing Agents | See controller and processor |
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| Anonymized data | It is personal data that, having gone through some anonymization process, cannot be linked/linked to its owner. For example, this happens when a set of sensitive data (such as the self-declaration of the ethnicity of an employee) becomes statistical data (the percentage of employees that identify each ethnicity, etc.). |
| Personal Data | Any information that could lead to personal identification (full name, CPF, address, affiliation, biometrics, etc.). |
| Special Category of Personal Data | It is a type of personal data (sensitive data), so it is considered to have a real possibility of misuse for discriminatory purposes and harmful to individuals, such as race/ethnicity, religion, political opinions, sexual behavior and genetic or biometric data (such as facial biometrics or DNA). |
| Elimination | Deletion of Personal Data. It is different from blocking, as the processing agent to whom the Brazilian Data Protection Authority (ANPD) or a judicial authority determines the deletion of personal data will no longer be able to use them. |
| Encarregado/DPO | <p>LGPD sets out that processors and controllers must have a person in charge and a person responsible for mediating communications between the data subject, the controller and the Brazilian Data Protection Agency. It can be an employee of the company, a director, a partner or even a third party hired by the company.</p> <p>It is recommended that the encarregado/DPO be someone with communication skills, in order to report/communicate with data subjects and authorities in case of a crisis of breach/violation of personal data used by data processing agents.</p> |
| Processor | It is the one who handles personal data on behalf of another entity, that is, on behalf of the controller. E.g.: payroll processing the payroll of the employees of a certain company will be the processor of the personal data of the employees. It must follow the instructions of the data controller but cannot commit irregularities/violations to the LGPD under the pretext of following the controller's instructions. |
| Research Body | These are entities that use personal data for specific purposes, which may benefit the community and, therefore, subject themselves to different rules for the processing of data and requests for consent from data subjects. |
| Data subject | Individual to whom the personal data refer. It is the one who has the last word in any matter related to the processing of his/her personal data. It is the one who, in cases where consent is required for certain processing of personal data, must express his unequivocal and informed consent. |

| Processing Agents | See controller and processor |
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| International Transfer | It occurs when personal data is transferred outside Brazil. The transferor must ensure that, in the country receiving them, the level of data protection is at least equal to that provided by the LGPD. |
| Data Processing | These are all actions carried out with the data subject's personal data. Note that among the terms used to describe the activities that configure processing there is the word access. In order to carry out practically all other actions indicated in the definition of the law, it is necessary, first, to access personal data; so, if there is access, there is processing. |
| Shared use of data | There will be data sharing, under the terms of the LGPD, when certain personal data processing activities are carried out by one or more public entities for legal purposes, or between public and private entities upon authorization. |

NOTE 1: In preparing this table, different materials were consulted, with highlight to the following sources:

- a) www.iapd.org.br
- b) www.dataprivacy.com.br/iapp
- c) www.fiemg.com.br
- d) www.guiaigpd.com.br/igpd-commented/