## 1    General Information

This **Privacy Policy** contains information about how **CODEX UTILITIES/Imagem Sistemas** handles, in whole or in part, automated or not, personal data that may be necessary for the services performed or contracted.

The objective is to clarify to interested parties about the types of data that are collected, the reasons for the collection and how the data subject can consult, update or request the deletion of this information.

This Privacy Policy was prepared in accordance with Federal Law no. 12.965 of April 23, 2014 (Civil Rights Framework for the Internet) and Federal Law no. 13.709, of August 14, 2018 (Personal Data Protection Law), hereinafter referred to simply as "**applicable legislation**".

This Privacy Policy may be updated as a result of any regulatory update, which is why the data subject is invited to periodically consult this document.

## 2    Principles

**Imagem Sistemas**, as well as its **Suppliers**, **Service Providers and Third Parties** involved undertake to comply with the requirements set out in the applicable legislation, in compliance with the following principles:

- ✓ Personal data will be collected, in an appropriate and limited way for specific, explicit legitimate purposes, and cannot be further processed in a manner incompatible with these purposes (purpose, adequacy and necessity);

  The holders of personal data will be guaranteed access, updates and information on the processing of their personal data (free access, quality and transparency);

✓ Personal data will be treated securely, protected from unauthorized or unlawful processing, and against accidental loss, destruction, or damage, adopting appropriate data security measures (Security and Prevention).

## 3 Personal Data Treatment

The collection of personal data will depend on the consent of the holder, which is dispensable in the following cases:

✓ For compliance with a legal or regulatory obligation by the controller;

✓ To carry out studies by a research agency, wherever possible, the anonymisation of personal data is guaranteed;

✓ Where necessary for the performance of a contract or preliminary procedures relating to a contract to which the holder is a part of, at the request of the data holder;

✓ For the regular exercise of rights in judicial, administrative or arbitration proceedings;

✓ For the protection of health, with a procedure performed by health professionals or by health entities;

✓ When necessary to meet the legitimate interests of the parent company or third parties, except where fundamental rights and freedoms of the holder that require the protection of personal data prevail.

### 3.1. Collected Data

Among the various data subjects with which **Imagem Sistemas** relates (shareholders, customers, employees, suppliers, and partners), personal data may be collected as described below:

✓ Name;

✓ Birth date;

✓ Biometrics (restricted to employees);

✓ Facial recognition (restricted to employees);

✓ E-mail Address;

- ✓ Postal address;
- ✓ Phone number;
- ✓ CPF Number;
- ✓ ID number;
- ✓ Company, position/function
- ✓ Data relating to person location.

In some cases other types of data not expressly provided for in this Privacy Policy may be collected.

### 3.1.1. Sensitive Data

Additional care will be taken for processing personal data classified as sensitive, as established by current legislation.

### Collection Means and Purposes
### 3.2.1. Informed contact data

When a customer, visitor or prospect fills out an online form, visits our website or other social media, or contacts us by email, phone or messages, we collect and store the data you provide, including:

- Name and Contact Information
- Company information, if any;
- The character of communication;
- The intent of the interaction and the action we take in response to the request;
- Any action the contact takes (for example, if they register to participate in an offered event, or if they request to receive documentation).

Note: Customer, visitor or prospect data may be supplemented through collections on social media or other digital sources for analysis and  formation of the prospecting base
The data collected is exclusively for the purpose of interacting with the requester for commercial purposes and for the promotion of our products and services.

### 3.2.2. Data related to signed contracts

For the fulfillment of employment contracts (employees), supply, or provision of services between any companies of **Imagem Sistemsa** and third parties, personal data related to or necessary for its execution will be collected and stored.

The parties involved in such formalizations, including employees, are committed to full and unrestricted compliance with applicable legislation and this Policy, under penalty of breach of contract without prejudice to the application of applicable legal penalties.

### 3.3. Purpose of processing personal data

The personal data collected will always have the purpose of meeting the provisions of the object of the respective contracts, and must facilitate, expedite and fulfill the commitments established between the Parties.

The processing of personal data for purposes not provided for in this Privacy Policy will only occur with the consent of the data subject or the premises established in art. 7º of Federal Law 13.709/2018

### 3.4. Period for Retention of Personal Data

The personal data collected will be kept according to defined periods, except in cases of compulsory legal retention.

The data subject is guaranteed the right to delete the data before the end of the agreed period.

### 3.5. Sharing personal data

Personal data, on the occasion of any relationship, whether work or business, will only be shared with third parties with the consent of the holder.

## 4   Data Subjects' Rights

**a)** Not providing or withdrawing consent

Not providing or withdrawing your consent at any time, not compromising the lawfulness of the processing of your personal data prior to withdrawal. Consent may be withdrawn by email at: dpo@img.com.br, or by mail to the following address:
Rua Itajaí, 80, Room 803 – Condomínio Centro Empresarial Taquari - ZIP: 12.246-858

**b)** Transparency

Confirm the existence of the processing of personal data, access them, and obtain information about the public or private entities with which the data have been shared.

**c)** Correction

Request that the personal data be completed and/or corrected, as it deems necessary.

**d)** Elimination

Request the deletion of the personal data. For example, if it is no longer needed for the purposes it was originally collected for.

**e)** Data Portability

In certain circumstances, it may be requested data portability to another entity, when technically feasible

**f)** File complaints

Submit complaints to the data controller (DPO) or the supervisory authority (ANPD), if you suspect that the processing of your personal data is in disagreement with current legislation.

## 5    Roles and responsibilities in the processing of personal data

### 5.1. Responsible for Data Processing

The parent company (**Imagem Sistemas**) determines the purposes, mechanisms and assumes ultimate responsibility for the personal data processed in the organization.

In some situations, **Imagem Sistemas** acts as an operator, processing personal data provided by external controllers (customers), and assuming responsibility for protection and privacy in compliance with legal obligations.

### 5.2. Data Protection Officer (DPO)

The professional designated as Data Protection *Officer (DPO)* is responsible for informing, advising and disseminating the culture of privacy, as well as accepting complaints and communication from data subjects, providing clarifications, adopting measures, and interacting with the national authority.

At **Imagem Sistemas**, the data protection officer is **Ivone Mariko Masago**, who can be contacted by e-mail: dpo@img.com.br.

## 6    Information Security

**Imagem Sistemas** adopts technical and administrative security measures capable of protecting personal data from unauthorized access and accidental situations of destruction, loss, alteration, communication, or any form of inappropriate or illicit treatment.

We follow standards in information security management to protect confidential information such as financial information, intellectual property and any other personal data.

Access to systems is protected by local authentication on desktops using username/password to access the management application.

**Imagem Sistemas** also undertakes to communicate to the holder and the national authority, within a reasonable period, the cases of violations that have the potential to cause relevant risk or damage.

## 7  Legal Basis for the Processing of Personal Data

By "Accepting the Terms and Conditions" of this Policy, the employee or business partner (customers, suppliers, service providers) is consenting to this Privacy Policy.

## 8  Applicable law and venue

For the settlement of disputes arising from this instrument, Brazilian law shall be fully applied. Any disputes must be presented in the court of São José dos Campos, headquarters of **Imagem Sistemas**.