



Finepack

Data Protection Policy

We at **Finepack Indústria Técnica Embalagens Ltda**, have developed this Data Protection Policy thinking about the security of data collected by our company, from all individuals, including, but not restricted to current, future or potential job applicants, employees, customers, consumers, children, suppliers, contractors/subcontractors or any third parties, with "Personal Data" defined as any data that relates to an identified or identifiable individual.

The General Law of Personal Data Protection (Law 13.709):

This Law provides for the processing of personal data, including in digital media, by natural person or legal entity of public or private law, in order to protect the fundamental rights of freedom and privacy and the free development of the personality of the natural person.

1. Information about the organization responsible for the processing:

Finepack collects and uses some personal data belonging to those who use our communication channels. We position ourselves as controllers of this data and act in accordance with Federal Law No. 13709 (General Law on Personal Data Protection).

We take care of the protection of your personal data, and therefore we make available this privacy policy, which contains important information about:

- What data we collect and its purposes;
- Your rights regarding your personal data;
- How to contact us.

2. Personal data and respective purposes of processing:

We collect personal data that the individual expressly offers when using the communication channels intended for the selection process.

This data is collected for the purpose of selecting candidates for recruitment.

The data collection occurs at the time of the individual's application and when hired by the organization.

3. Legal basis of the treatment:

The legal basis for the processing of personal data is nothing more than a legal basis, provided by law, which justifies it. Every personal data processing operation must have a legal basis and it corresponds:

- Non-sensitive personal data

Finepack treats the non-sensitive personal data of all individuals with the consent of the data subject, in order to comply with the controller's legal or regulatory obligations.

- Sensitive personal data

Finepack treats sensitive personal data of all individuals with the consent of the data subject in order to fulfill legal or regulatory obligations of the controller.

- Consent

Certain personal data processing operations performed in our communication channels will depend on the prior agreement of the user, who must express it in a free, informed and unequivocal manner.

The individual may revoke his/her consent at any time, and if there are no legal hypotheses that allow or demand the storage of the data, the information through consent will be excluded.

The individual may also disagree with any personal data processing operation based on consent. In these cases, however, it is possible that he may not be able to use some functionality of the communication networks that depends on that operation. The consequences of lack of consent for a specific activity are informed prior to treatment.

- Compliance with legal or regulatory obligations

Some personal data processing operations, above all data storage, will be carried out so that we can fulfill obligations provided by law or other normative provisions applicable to our activities.

4. Period of retention of personal data:

The personal data collected are stored and used for a period of time that corresponds to that necessary to achieve the purposes listed in this document and that considers the rights of their holders, the rights of Finepack and the applicable legal or regulatory provisions.

When the data storage periods have expired, they are removed from our control bases or anonymized. They will be saved when there is the possibility or necessity of storage due to legal and regulatory dispositions.

5. Sensitive data:

Communication channels may collect sensitive data, such as: Racial or ethnic origin, religious beliefs, political opinions, union membership, religious organization membership, philosophical organization membership, political organization membership, genetic data, biometric data, user health, sexual orientation.

We emphasize that we will collect and use sensitive personal data only with the specific and outstanding consent of its holders, except, if applicable, in cases in which Federal Law No. 13709 allows the treatment of this type of data based on other legal bases distinct from consent.

Therefore, the treatment of sensitive personal data will only be carried out for specific purposes expressed in this policy or duly informed to individuals by other means.

6. Rights of all individuals:

Users of communication networks have the following rights, conferred by the protection of personal data:

- Confirmation of the existence of treatment;
- Access to data;
- Correction of incomplete, inaccurate or outdated data;
- Anonymization, blocking or deletion of unnecessary, excessive or processed data in breach of the law;
- Data portability to another service or product provider, upon express request, in accordance with the regulations of the national authority, observing commercial and industrial secrets;
- Elimination of personal data processed with the consent of the holder, except in cases provided for by law;
- Information from public and private entities with which the controller has performed the shared use of data;
- Information on the possibility of not providing consent on the consequences of negative;
- Revocation of consent;

It is important to note that under Federal Law No. 13709 there is no right to delete data processed on the basis of legal bases other than consent, unless the data are unnecessary, excessive or processed in breach of the law.

The holder may exercise his rights, but to ensure that the individual who intends to exercise his rights is, in fact, the holder of the personal data subject of the request, we may request documents or other information that may assist in their proper identification in order to safeguard our rights and the rights of third parties. This will only be done, however, if absolutely necessary, the applicant will receive all related information.

7. Data sharing with third parties:

We do not share personal data with third parties, only in cases of legal, regulatory or legal requirements. In order to comply with any order issued by public authority.

8. How to contact us:

For clarification of any questions about this privacy policy or about the personal data we handle, please contact our Head of People & Management, through one of the channels below:

Email: taliane@finepack.com.br

Telephone: (11) 4496-8800