

Sustainea Bioglycols External Privacy Policy

1. Introduction

At Bioglycols and Services Ltda. (“**Sustainea**” or “**we**”), we are committed to safeguarding the privacy and protecting the personal data entrusted to us by our clients, suppliers, partners, job applicants, visitors to our website, and other individuals with whom we interact (“**data subjects**” or “**you**”).

This Privacy Policy (“**Policy**”) is intended to clearly, objectively, and transparently explain how we collect, use, store, and protect personal data in the context of our business activities, always in compliance with applicable legislation — in particular, Law No. 13,709/2018 (General Data Protection Law – “**LGPD**”) — and in line with best practices in data privacy and protection governance.

This Policy may be updated periodically to reflect changes in legislation or in Sustainea’s privacy and data protection practices. Therefore, we recommend regularly reviewing the updated information available on our website.

The terms used in this Policy will have the meanings attributed to them by the LGPD, whenever applicable, or as defined in the text itself. If you have any questions, please refer to the glossary included in Item 10 of this Policy.

If you have any questions or requests regarding the content of this Policy, you may contact our Data Protection Officer (“**DPO**”) using the contact information provided in Item 9.

2. Who does this Policy apply to?

This Policy applies to all individuals who access or use Sustainea’s website and its features in any way, as well as to those with whom we maintain business or institutional relationships (whether directly or as representatives of organizations), and whose personal data is therefore processed by us. Examples include:

- Legal representatives and employees of clients, service providers, suppliers, partners, government authorities, and companies within the same corporate group;
- Individuals who use the website to apply for job openings, participate in recruitment processes, or access the available communication channels;
- Individuals involved in or otherwise connected to community engagement initiatives located near Sustainea’s operations;
- Candidates applying for job positions offered by Sustainea;
- Individuals who are related to Sustainea employees and have been identified by them for specific purposes, such as the provision of benefits or the assessment of conflicts of interest and related parties;
- Visitors to Sustainea’s physical premises.

3. What personal data do we collect?

To carry out our activities, it is necessary for us to process certain personal data, including:

- **Identification data**, such as name, signature, nationality, identification document numbers (such as, as applicable, RG, CPF, passport, or foreign ID), copies of these documents, information about the data subject's job title and workplace, and other information that may be requested depending on the contractual or legal relationship between Sustainea and the data subject (or the organization the data subject represents, or an Sustainea employee);
- **Contact data**, such as address, phone number, and email (especially corporate contact details);
- **Cookie data**, such as IP address, browsing data, device type, and operating system, collected automatically when accessing the website;
- **Additional data from job applicants**, such as academic and professional background, spoken languages, certifications, age, date of birth, gender, and photograph (when included in résumés by the data subjects themselves);
- **Communication data**, such as the content of emails and messages sent by data subjects through the communication channels available on the website;
- **Verification data**, including identification data, information on family relationships, and politically exposed person (PEP) status, processed for the purposes of due diligence and risk assessment of suppliers and clients, or for verifying conflicts of interest and related parties in the case of Sustainea employees;
- **Video surveillance footage**, recorded and stored in a non-individualized manner;
- **Photographic and video images**, captured during corporate events, site visits, and other institutional activities, upon signing of an Image Use Authorization Form.

This personal data may be provided: **(i)** directly by the data subjects themselves; **(ii)** by legal entities to which the data subjects are connected as representatives or employees; or **(iii)** by Sustainea employees, in the case of individuals with family ties. It may also appear in documents handled by Sustainea in the course of its activities, such as articles of incorporation, powers of attorney, invoices, and other contractual instruments.

Additionally, in certain situations, we may collect personal data directly from public or publicly available sources, such as government databases, private platforms used for professional purposes, and corporate social networks where the data subjects themselves have shared their information.

3.1 Sensitive personal data

We may process **data related to political party affiliation** exclusively when necessary to identify **politically exposed persons (PEPs)**, in the context of the verification and due diligence procedures

described in Item 4 of this Policy. This processing will be carried out based on an appropriate legal basis, in accordance with legal limitations, the principles established under the LGPD, and with appropriate safeguards in place.

As a rule, Sustainea **does not collect or process other categories of sensitive personal data**. However, occasional access to such data may occur when it is **provided voluntarily and unsolicited by the data subject (or by third parties)**, for example, in résumés submitted by job candidates or in communications sent through Sustainea's service or whistleblower channels. In such cases, Sustainea will always process the sensitive data within the limits of applicable legislation.

3.2 Children's and adolescents' data

As a rule, we do not process personal data of children or adolescents. However, if it becomes necessary to process the data of such individuals within the scope of the activities mentioned in this Policy, we will ensure that all appropriate measures are taken to protect this data, always acting in the best interests of the data subjects, in compliance with the LGPD and other applicable laws and regulations.

4. For what purposes do we process your data?

We may process the personal data listed in Item 3 of this Policy, strictly as necessary, for the following purposes:

- **Performance of contractual and pre-contractual obligations:** to carry out client pre-engagement activities, as well as to negotiate, execute, manage, and fulfill obligations established in contracts and agreements of various kinds with clients, suppliers, and partners;
- **Compliance with legal and regulatory obligations:** to meet legal and regulatory requirements arising from the legislation applicable to Sustainea's activities;
- **Customer service and whistleblowing channels:** to enable communication with data subjects, including through the channels available on the website (such as the "Contact Us" form), to respond to requests related to this Policy and the LGPD, and to receive, record, and investigate reports submitted through institutional channels, including the ethics channel;
- **Prospecting and external communication:** to identify leads and potential clients, send institutional and informational content to contacts in our mailing lists, and interact with media outlets and journalists to distribute press releases and other public communications;
- **Events and institutional engagement:** to organize, promote, and participate in events, training sessions, and other institutional initiatives, including processing the personal data needed for registration, attendance confirmation, access control, and other arrangements;
- **Administrative and project routines:** to schedule appointments and meetings, organize business travel, and send packages or physical documents to clients, suppliers, notary offices, or

other company units, as well as to conduct technical assessments and evaluate business risks, goals, and strategies;

- **Visitor management and physical security:** to prevent unauthorized access to Sustainea facilities, including, among other measures, the registration and access control of visitors and the use of video surveillance systems;
- **Information verification and due diligence:** to perform integrity checks, risk assessments, and financial due diligence on suppliers and clients, as well as to identify conflicts of interest and related parties connected to employees, including, as necessary, processing identification data of legal representatives or employees of clients and suppliers, and of third parties indicated by employees, as well as family relationship information;
- **Community engagement in areas of influence:** to carry out communication, engagement, and relationship-building activities with communities located near Sustainea's operations in the United States, and to document the outcomes of these initiatives in institutional reports;
- **International operations:** to enable communication with international affiliates, technical partners, and foreign public entities, especially in the United States, including the exchange of communications and signing of documents containing personal data of representatives;
- **Use of cookies on the website:** to collect browsing data aimed at improving user experience and conducting usage analyses for statistical and marketing purposes;
- **Defense of interests:** to exercise Sustainea's legal rights in judicial, administrative, arbitral, or extrajudicial proceedings, including in lawsuits or claims filed against Sustainea for any reason;
- **Recruitment and selection:** to conduct recruitment processes for job openings at Sustainea, including résumé review, interviews, and the creation and management of a talent pool;
- **Other legitimate purposes:** the personal data listed in Item 3 may also be processed for other purposes that are not inconsistent with or excessive in relation to the purposes listed above, always in compliance with applicable Brazilian law, and based on the legitimate interests of Sustainea or third parties, except where the rights and legal guarantees of the data subject prevail.

5. With whom do we share personal data?

We may share personal data with other entities within Sustainea's corporate group, as well as with public or private entities, as necessary for the conduct of our activities. Such sharing may include service providers, financial institutions, regulatory bodies, government authorities, and other third parties.

These sharing activities are carried out strictly within the limits necessary to comply with legal obligations, in accordance with applicable law and best practices in data protection, and with the aim of preserving the security, confidentiality, and integrity of the personal data processed.

In situations where law enforcement, administrative, or judicial authorities request access to personal data, and such requests are properly supported by applicable law, Sustainea may comply with the request. Likewise, data may be shared when necessary to defend Sustainea's interests in disputes, investigations, administrative proceedings, or legal actions.

5.1 International transfers of personal data

Given our operations in other countries, such as Japan and the United States, certain Sustainea activities require the sharing of personal data with entities located abroad, including affiliates, service providers, institutional partners, and foreign public authorities.

These transfers are made to enable the execution of contracts, partnerships, and other operations necessary for Sustainea's international activities, always in compliance with the principles of the LGPD — especially those of necessity, purpose, and security.

In accordance with the **LGPD and ANPD Resolution No. 19/2024**, Sustainea **adopts appropriate safeguards for personal data protection**, where applicable, including contractual instruments containing standard clauses approved by ANPD for transfers to affiliates, partners, and service providers, or other valid legal mechanisms, as provided in Article 33 of the LGPD.

If you have questions regarding international transfers of personal data, you may contact the Data Protection Officer through the channel indicated in Item 9 of this Policy.

6. How is personal data stored?

We store the personal data described in this Policy only for as long as necessary to fulfill the purposes for which it was collected, or for the duration required to:

- Exercise Sustainea's legal rights in judicial, administrative, or arbitral proceedings, taking into account the applicable statutes of limitations;
- Comply with legal or regulatory obligations;
- Serve the legitimate interests of Sustainea or third parties, always respecting the data subject's legitimate expectations.

If you have any questions regarding how long we may store personal data, you may contact the Data Protection Officer using the channel indicated in Item 9 of this Policy.

7. How do we protect your personal data?

We make our best efforts to protect the data we process by implementing appropriate technical and organizational measures to safeguard such information against unauthorized or unlawful processing, accidental loss, destruction, or damage. This includes, for example, storing personal data in a secure operational environment with segmented access restricted to authorized personnel.

The security measures we adopt are aligned with industry standards and are appropriate for the nature of the personal data we process, following best practices available in the market.

Nevertheless, we emphasize that it is not possible to guarantee absolute security of personal data due to the very nature of information technology, which makes Sustainea potentially susceptible to technical failures and malicious actions by third parties.

8. What are your rights as a data subject?

We ensure that data subjects can submit requests based on the rights provided under the LGPD, which include:

- Confirmation of the existence of personal data processing;
- Access to the personal data being processed;
- Correction of incomplete, inaccurate, or outdated personal data;
- Anonymization, blocking, or deletion of data that is unnecessary, excessive, or processed in noncompliance with applicable law;
- Portability of processed data;
- Deletion of personal data processed based on consent, except in situations provided for under applicable law;
- Information about the public and private entities with whom personal data is shared;
- Information about the possibility of withholding consent and the consequences of such refusal; and
- Revocation of consent, where applicable.

If you wish to exercise any of the rights listed above, or if you believe your data is being processed in a manner that is inconsistent with the purposes described in this Policy, you may submit your request using the contact information provided in Item 9 of this Policy.

9. Contact and Data Protection Officer

We are available to address any questions arising from this Policy or regarding how we process personal data, as well as to receive requests from data subjects. To do so, you may contact the Data Protection Officer using the information below:

- **Name:** Lefosse Advogados
- **Email:** dataprotection@sustaineabio.com

10. Glossary

“ANPD”:	means the Brazilian Data Protection Authority (Autoridade Nacional de Proteção de Dados);
“controller”:	means the natural or legal person, under public or private law, who is responsible for decisions regarding the processing of personal data;
“personal data”:	means the information related to an identified or identifiable natural person (Article 5, I of the LGPD);
“sensitive personal data”:	means the personal data concerning racial or ethnic origin, religious beliefs, political opinions, membership in a union or organization of a religious, philosophical, or political nature, data concerning health or sex life, genetic or biometric data, when linked to a natural person (Article 5, II of the LGPD);
“cookies”:	means the small text files that may be stored in your browser when visiting a website, used to enable features, improve user experience, or collect data for analytical and marketing purposes;
“Data Protection Officer”:	means the individual or legal entity appointed by the controller to act as a communication channel between the controller, data subjects, and the ANPD (Article 5, VIII of the LGPD);
“LGPD”:	means the Law No. 13.709/2018 – Brazilian General Data Protection Law;
“data subject”:	means the natural person to whom the processed personal data refers (Article 5, V of the LGPD);
“website”:	Sustainea’s institutional website, available at https://sustaineabio.com/ ;
“Sustainea”:	Bioglycols and Services Ltda., registered in CNPJ (taxpayer registration) under n. 46.058.030/0001-50, is considered the controller of the personal data processed for the purposes described in this Policy;
“processing”:	means any operation carried out with personal data, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation, modification, communication, transfer, dissemination, or extraction (Article 5, X of the LGPD).

This Policy was last updated on September 09th, 2025.