

AUSTRAL



H O L D I N G

PRIVACY POLICY

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Introduction

The Austral Group, formed by Austral Participações S.A; Austral Seguradora S.A. and Austral Resseguradora S.A., reaffirms its commitment to the security and privacy of its counterparties' data. This policy aims to ensure transparency in the treatment or disposal of information collected for the execution of our services.

Within the Company's activities, the personal data defined in Law 13.709/2018, General Data Protection Law ("LGPD"), may be processed in several stages and by several areas. Because of this, Grupo Austral keeps mapped the activities that may contain this type of information and they are framed in the legal bases defined by the LGPD. If there is no legal requirement for the use of the data, it is discarded according to the Company's Data Management policy, following the best Information Security practices.

Personal data is, for the purposes of current legislation, any information related to an identified or identifiable natural person, while sensitive personal data is information on topics related to: racial or ethnic origin; religious conviction; political opinion; membership in a union or organization of a religious, philosophical or political nature; health or sex life; and genetic or biometric information. In this way, any information that may be listed as one of these two categories will be treated by Grupo Austral as provided in this document.

Data Collection

This is the first step in the processing of personal data or sensitive personal data. This data can be collected via email; portal; due diligence tools, etc.

- Only the minimum necessary for the activity to be carried out will be collected;
- The Company monitors the types of data being collected, in which activities and for what purposes it will be used; and
- The data collected will be stored following all the security principles and procedures established by the Company, in accordance with the applicable legislation.

Data Collected

The main personal data and sensitive personal data that may be collected by the Company to carry out its daily activities are set out in this section:

- Name and surname;
- CPF;
- Civil or Professional Identity Documents;
- Nationality;
- Marital status;
- Profession;
- Age;
- Position;
- Sex;
- Residential and/or business address;
- Bank details;
- Email;
- Phones;
- Date of birth;
- IP address;
- Photos or copies of documents; and
- Any other specific data necessary for the execution of the Company's daily activities or compliance with legal obligations.

Use of Data

The data collected will be used for the execution of the services provided by Grupo Austral. This use will also follow the guidelines established and disseminated internally, set out below:

- All data used by the Company will be framed in the legal bases established in the General Data Protection Law;

- The data will be processed within the Company's secure environment, or when necessary within the environment of third parties who must follow the best privacy practices, and the established confidentiality standards will be respected;
- Once the purpose of the processing has been listed, the use of the data will strictly respect the determined;
- Access to the personal data collected will be limited to those who need the information;
- Once the transfer of data is necessary for the execution of the service, its granularity will be evaluated and, when applicable, the amount of data shared will be minimized at the time of transfer;
- All data transfer to third parties will be carried out through a secure environment and in accordance with the hypotheses provided for in the legislation; and
- In the event of international data transfer, the Company will ensure that the recipient country or organization has an adequate level of protection for the processing of the data or fits into one of the provisions defined in the legislation.

Data Disposal

The disposal or elimination of data is one of the rights of the holders and one of the Company's duties, provided for in legislation, from the moment that there are no more legal bases that justify its existence in the organization's internal environment. In this way, Grupo Austral undertakes to follow the premises set out below:

- Any data collected or received unnecessarily should be disposed of in a timely manner;
- When the disposal is requested by the data holder, it will be excluded from the Company's records, except as provided for in legislation; and
- The disposal procedure will be carried out according to the best Information Security practices.

Purpose of Data

Grupo Austral has several possible purposes for the processing of personal and sensitive personal data of the counterparties. Thus, the main possibilities for using the information received or collected by the Company are set out below, but are not exhaustive. Therefore, the holder is aware that:

- The data may be used, when necessary, for the execution of the contract or prior procedures related to it, such as sending a quotation and fulfilling requests related to the business;
- The data can be used, when necessary, for the execution of the contract in the adjustment of any claims;
- The data may be used, when necessary, for the execution of the contract or for any other purposes related to the services provided by the Company;
- The data collected may be used to comply with regulatory obligations for the purposes of Prevention of Money Laundering, Fraud and Terrorist Financing;
- The data collected may be used to comply with any other pertinent legal obligation;
- The data may be used in promotions and marketing actions by partners hired by the Company to manage this topic;
- The data can be used to create demographic, consumption and socioeconomic profiles; for the collection of statistical and market information; for ad success analysis; for the improvement of products or algorithms; preparation of reports and business intelligence metrics; and to announce the creation of services, products and features;
- The data collected or received may be used in any other processing not described herein, according to the Company's legitimate interest, provided that all applicable requirements of current regulations are respected; and
- When the Company understands that it is applicable, the express and clear consent of the holder will be requested.

Data Transfer

- The data collected or received by Grupo Austral may be transferred to its business partners, such as other Insurers and other Reinsurers, as well as Insurance Brokers, Reinsurance Brokers and suppliers, in the development and provision of services, always respecting the rules of confidentiality and the provisions of current legislation;
- The information may be transferred to regulators or government entities;
- In the case of transactions and corporate transactions involving the Company, if necessary, the data collected or received may be transferred in order to enable the operation to be carried out; and
- The data may be transferred by court order or, where applicable, in cases of legal proceedings where the use of the information is necessary.

Use of Cookies

Cookies are files, containing small groups of information, added to your device or your computer when accessing Grupo Austral websites to provide a personalized browsing experience. Cookies do not harm your computer and/or device and are used to evaluate website traffic and can also be used for advertising or other analytical purposes.

The Austral Group websites use session cookies (essential) in order to record browsing data, as well as marketing and performance, in order to improve the user's browsing experience or advertising. Other cookies may be used if the logged areas of the websites are accessed.

- *Analytical cookies*: These cookies collect information about how visitors use our website, in order to allow us to analyze patterns of behavior of these visitors, and thus use this information to improve the experience within the website. For this purpose, we only collect *anonymized* cookies.

Unlike session cookies, analytics cookies are only installed when the user accepts them.

Cookie	Description	Duration
_Ga	Used to distinguish users in Google Analytics	2 years
_gid	Used to distinguish users in Google Analytics	24 hours
ga<container-id>	Used to maintain session state	2 years

- **Marketing cookies:** These cookies are used to track visitors across websites. The intention is to show relevant and interesting advertising to the user.

Unlike session cookies, marketing cookies are only installed when the user accepts them.

Cookie	Description	Duration
Google Ads – gtag.js	The cookie identifies the device of a user who has visited the website before. It is used for targeted advertisements	2 years
_opt_awmid	Optimizes. Used for campaigns associated with Google Ads campaign IDs.	24 hours
_opt_awcid	Optimizes. Used for campaigns associated with Google Ads customer IDs.	24 hours
_opt_awkid	Optimizes. It's used for campaigns associated with Google Ads criteria IDs.	24 hours

_opt_awgid	Optimizes. Used for campaigns associated with Google Ads ad group IDs	24 hours
Facebook Ads - Meta Pixel Code	The Facebook Remarketing cookie allows us to optimize and display ads on Facebook and other third-party websites, based on users' previous visits to our website and interaction with our ads and content on Facebook	

You can accept or reject cookies at any time by going back to our preferences panel.

Updating this Policy

This policy will be reviewed at least every two years or whenever the Company deems necessary, and any changes to this document will be made available on Grupo Austral's communication channels.