

# AUSTRAL



H O L D I N G

PRIVACY POLICY  
2023

## CONTENTS

<b>Introduction .....</b>	<b>3</b>
<b>Data collection.....</b>	<b>3</b>
<b>Data collected.....</b>	<b>4</b>
<b>Use of data.....</b>	<b>5</b>
<b>Data Disposal.....</b>	<b>5</b>
<b>Purpose of data .....</b>	<b>6</b>
<b>Data transfer .....</b>	<b>7</b>
<b>Use of Cookies .....</b>	<b>7</b>
<b>Update of this Policy.....</b>	<b>9</b>

**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. The purpose of this policy is to guarantee the transparency of the processing or disposal of information collected for the performance of our services.

Within the Company's activities, the personal data defined in Law 13.709/2018, the General Data Protection Law ("LGPD"), can be processed at various stages and by various areas. For this reason, the Austral Group has mapped the activities that may contain this type of information and they are covered by the legal bases defined by the LGPD. If there is no legal requirement to use the data, it is disposed of in accordance with the company's Data Management policy, following the best Information Security practices.

Personal data is, for the purposes of current legislation, any information relating to an identified or identifiable natural person, while sensitive personal data is information on issues relating to: racial or ethnic origin; religious conviction; political opinion; membership of a trade union or a religious, philosophical or political; health or sex life; and genetic or biometric information. Therefore, any information that may be listed as one of these two categories will be treated by Austral Group in accordance with the provisions of this document.

**Data collection**

This is the first stage in the processing of personal data or sensitive personal data. This data can be collected via e-mail, portal, due diligence tools, etc.

- Only the minimum necessary for the activity to take place will be collected;
- The Company monitors the types of data being collected, in what activities and for what purposes they 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**

This section sets out the main personal data and sensitive personal data that may be collected by the Company in order to carry out its daily activities:

- Name and surname;
- CPF;
- Civil or professional identity documents;
- Nationality;
- Marital status;
- Profession;
- Age;
- Position;
- Sex;
- Home and/or business address;
- Bank details;
- E-mail;
- Phone numbers;
- 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 Austral Group. This use will also follow the guidelines established and disseminated internally, set out below:

- All data used by the Company will be subject to the legal bases established in the General Data Protection Act;
- The data will be handled 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 comply with it;
- 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 assessed and, where applicable, the amount of shared data will be minimized at the time of transfer;
- Any transfer of data 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 an international transfer of data, the Company will ensure that the recipient country or organization has an adequate level of protection for the processing of the data or falls within one of the provisions defined in the legislation.

**Data Disposal**

Disposal or elimination of the data is one of the rights of the holders and one of the duties of the Company, provided for in legislation, from the moment there are no longer any legal

bases justifying its existence in the organization's internal environment. Accordingly, the Austral Group undertakes to follow the premises set out below:

- All data collected or received unnecessarily must be disposed of in a timely manner;
- When disposal is requested by the data subject, the data will be deleted from the Company's records, except as provided for by law; and
- The disposal procedure will be carried out in accordance with the best Information Security practices.

### **Purpose of data**

The Austral Group has several possible purposes for processing the personal and sensitive personal data of its counterparties. 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 business-related requests;
- The data can be used, when necessary, for the execution of the contract in the regulation of possible 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 the Prevention of Money Laundering, Fraud and Terrorist Financing;
- The data collected may be used to comply with any other relevant legal obligation;
- The data may be used in promotions and marketing actions by partners hired by the Company to manage this issue;
- The data can be used to create consumer demographic and socioeconomic profiles; to gather statistical and market information; to analyze the success of ads;

- to improve products or algorithms; to prepare reports and business intelligence metrics; and to announce the creation of services, products and functionalities;
- 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 considers that it is applicable, the express and clear consent of the owner will be requested.

**Data transfer**

- The data collected or received by the Austral Group 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 event of transactions and corporate operations involving the Company, if necessary, the data collected or received may be transferred in order to enable the operation to be carried out; and
- Data may be transferred by court order or, where applicable, in cases of legal proceedings where the use of the information is required.

**Use of Cookies**

*Cookies* are files, containing small groups of information, added to your device or your computer when you access the Austral Group's websites to provide you with a personalized browsing experience. Cookies do not damage your computer and/or device and are used to evaluate website traffic and can also be used for advertising or other analytical purposes.

Austral Group websites use session (essential) cookies, with the aim of recording browsing data, as well as marketing and performance cookies, with the aim of improving

the user's browsing experience or advertising. Other cookies may be used if the logged-in areas of the websites are accessed.

- **Analytical cookies** : These cookies collect information about how visitors use our site, allowing us to analyze patterns in visitor behavior and use this information to improve the experience within the site. For this purpose, we only collect anonymized *cookies*.

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

Cookie	Description	Duration
<b>_ga</b>	Used to distinguish users in Google Analytics	2 years
<b>_gid</b>	Used to distinguish users in Google Analytics	24 hours
<b>_ga_&lt;container-id&gt;</b>	Used to maintain session status	2 years

- **Marketing cookies** : These cookies are used to track visitors to 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
<b>Google Ads - gtag.js</b>	The cookie identifies the device of a user who has previously visited the site. It is used for targeted ads	2 years
<b>_opt_awmid</b>	Optimize. Used for campaigns associated with Google Ads campaign IDs.	24 hours



<b>_opt_awcid</b>	Optimize. Used for campaigns associated with Google Ads customer IDs.	24 hours
<b>_opt_awkid</b>	Optimize. It is used for campaigns associated with Google Ads criteria IDs.	24 hours
<b>_opt_awgid</b>	Optimize. Used for campaigns associated with Google Ads ad group IDs	24 hours
<b>Facebook Ads - Meta Pixel Code</b>	The Facebook Remarketing cookie allows us to optimize and display ads on Facebook and other third-party sites, based on users' previous visits to our site and interaction with our ads and content on Facebook.	

You can accept or reject cookies at any time by accessing our preferences panel again.

### **Update of this Policy**

This policy will be reviewed annually, or whenever the Company deems it necessary, and any changes to this document will be made available on the Austral Group's communication channels.