

PRIVACY POLICY VOTORANTIM ENERGIA WEBSITE

The purpose of this Privacy Policy is to present to you ("You", "User") who access VOTORANTIM ENERGIA's website at http://www.venergia.com.br/ ("Service" or "Website"), essential information about how your personal data is gathered and treated once you access the website. ("Corporation", "VE", "we").

This Privacy Policy is available for reading and consultation by the User at any time at http://www.venergia.com.br/.

1. Data gathered and how it was gathered

Data provided by User. When using our Service for certain purposes, you may provide us with some Personal Data by means of contact forms, subscription to newsletters, sending resumes, among others. All Personal Data provided by you during your use of the Service will be stored by us and treated in accordance with this Policy, which includes your name, email address, telephone number, contact information, the company or institution you represent or work for, your area of expertise, professional qualifications and academic record (curriculum vitae), and other information that you enter yourself in open fields on the Website ("Comments" or "Message" field on contact forms, for example).

Data automatically gathered by the Website. Our Service automatically gathers certain technical information, including, but not limited to, the type of device used to access the Service, your connection IP address (with date and time of access), your approximate geographic location, the unique identification number of your device (such as MAC Address or IMEI), information about your use of the Service, the software or browser used to access the Service, the operating system and its version of the device used, among other things.

Cookies and other tracking technologies. VE may also use standard technology to gather information from Users, such as cookies, web-beacons, device fingerprinting, among others, in order to ensure the performance of the purposes necessary for the operation of the website, understand how you use the Service, which pages you access more often, which content is more interesting, improve your browsing experience and website performance, as well as targeting/advertising, according to item 4 of this Policy.

2. Purposes of Treatment

Data necessary for the provision of the Service. The personal data gathered by the service will be used primarily for the provision of the Service. We use such data only for the purposes described in this Policy. As we cannot provide such functionality or service without the requested data, its gathering and treatment is based especially on such necessity. Thus, we will use, for example:

- Basic technical data (such as IP address, browser and type of device) to enable you to access the Website;
- Data from the specific contact form to enable you to schedule visits to our Power Plants;
- Data from the specific contact form to make contact and negotiate a possible partnership with potential suppliers and power generators that make such a registration;
- Data from a resume or registration in a selection process for job vacancies to enable the selection of candidates for such vacancies.

Data necessary for communication and disclosure. Some data is gathered and used to enable communication between you and VE through the channels available on the Website and for sending, for example, newsletters and



news about our products and services. You can cancel the receipt of institutional messages about our products and services, the receipt of the newsletter and even other types of communication at any time, through a link available in the message itself or by contacting us. This data is gathered and treated based, especially, on the fulfillment of such legitimate interests, of VE and User, when User expresses his/her interest in such communications when using the Service and its functionalities.

Data gathered for compliance with legal obligations. We are required by law to retain certain basic log data of access to our Service, including, but not limited to, the IP address of the originating connection, with date and time. Such data is retained for at least 6 months. Any other data may also be stored for compliance with legal obligations.

Data collected for Service improvement and technical support. We may use, for example, technical information gathered from your device to facilitate the support process and provide technical assistance in case of bug or malfunction of the Service. We also use the data gathered, primarily, but not exclusively, from your device's use of the Service and technical information to improve the Service, by adding functionality or improving other aspects and its browsing. Such use of data is based on a legitimate interest of VE in offering you the best possible experience on the Website.

Secondary Purposes. The Company may also use the data gathered for secondary purposes that are not conflicting or excessive in relation to the purposes listed above, always in compliance with the Brazilian legislation, based on its legitimate interest, except in cases in which the User's legal rights and guarantees prevail.

3. Data Retention

Provision of the Service and functionalities. The data gathered and used to enable the use of the Service and its functionalities, including those voluntarily provided by the User, will be kept as long as the relationship between the User and VE exists, and, without its retention, it is not possible to provide the corresponding functionalities of the Service. This applies especially to the registrations, submissions, scheduling requests and contacts with VE made by the User on the Website.

Service improvement and technical support. The data gathered to enable the improvement of the Service and for the provision of technical support will be kept for the time necessary to implement or provide the specific assistance requested by the User and may be deleted permanently or anonymized to compose aggregate database for statistical purposes.

Legal obligations. The data gathered and maintained for the purpose of compliance with legal obligations by the Corporation will be kept for the period of time indicated by law.

Protection of rights. Any relevant data, always considering the minimum necessary, may be stored beyond the period described above, for the purpose of protection of VE's rights by judicial or extrajudicial means.

4. Cookies and tracking technologies

Cookies are files or information that can be stored on your devices when you access the Website. Generally, a cookie contains the name of the originating website, its lifetime and a value, which is randomly generated.



VE uses cookies to facilitate your use and to better tailor the Website to your interests and needs, as well as for us to compile information about the use of our websites and services, helping us to improve their structure and content. Cookies may also be used to speed up your future activities and experiences on the Website.

After the User consents to the use of cookies, when using the Service, VE will store a cookie on its device to remember this in the next session.

At any time, the User may revoke his/her consent to the cookies, so he/she must delete the cookies from the Service using the settings of his/her preferred browser. For more information on how to proceed with the management of cookies in browsers:

- Internet Explorer: https://support.microsoft.com/pt-br/help/17442/windows-internet-explorer-delete-manage-cookies
- Mozilla Firefox: https://support.mozilla.org/pt-BR/kb/ative-e-desative-os-cookies-que-os-sites-usam
- Google Chrome: https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=pt-BR
- Safari: https://support.apple.com/pt-br/guide/safari/sfri11471/mac

Finally, we remind you that if the User does not accept some cookies from the Website, certain services may not function optimally.

5. Security and confidentiality

Logical and organizational security. VE considers all information gathered through the Service confidential, ensuring that it will be treated and stored according to the determinations of this Policy and by adopting the appropriate logical and organizational security measures, according to the degree of sensitivity of the data and the risks inherent to the activity. Such measures will follow the industry best practices standard, using, for example, encryption, secure connections, multifactor authentication, among others. VE declares that it has all the adequate and reasonable internal security policies to guarantee the correct treatment of the data.

Access Restriction. VE will apply, as applicable and defined in Decree No. 8,771/2016, the appropriate controls for access restriction to the data treated, including the establishment of responsibilities, access policies, user authentication mechanisms for data access, creation of inventory and treatment records, encryption at rest, among others.

6. Communication and shared use

Transmission to processors. VE may transmit the data gathered through the Service to service providers, subcontractors or other suppliers acting, under the direction of VE, in the processing of such personal data as processors. Such transmission is made in accordance with the provisions of the General Data Protection Law, the Operators adopting all actions required by law to ensure the security and confidentiality of the data communicated.

Communication to third parties. VE may share the data gathered through the Service with third parties in the situations described below:

a) To protect VE's interests in any type of dispute, including lawsuits;



- b) In the case of transactions and corporate changes involving VE, in which case the transfer of information will be necessary for the continuity of services and product delivery; or
- c) By court order or by request of administrative entities legally authorized therefor.

Shared use. VE may carry out the shared use of data with public entities, at their request, for projects of interest to VE and/or of public interest, and the Corporation undertakes to provide Users with all applicable information, as set forth in the General Data Protection Law, whenever such shared use occurs.

7. Data Holder Rights

Holder Rights. The holder of the personal data gathered and treated has the following rights, in accordance with the General Data Protection Law No. 13,709/2018:

- a) Confirmation of the existence of the treatment;
- b) Access to data;
- c) Correction of incomplete, inaccurate or outdated data;
- d) Anonymization, blocking or deletion of unnecessary, excessive data or data treated in violation of the law;
- e) Portability of data to another service or product provider, safeguarding VE's commercial and industrial secrets;
- f) Deletion of data treated with the consent of the holder, except in the case of legal guardianship and others provided by law;
- g) All pertinent information, as required by Law and made available in this document and in other places accessible to the User;
- h) Revocation of consent, when the treatment is based on it.

Form and conditions of exercise. The aforementioned rights will be guaranteed and can be exercised under the exact terms described in the General Data Protection Law.

Exclusion of data. The exclusion of data stored by VE may be requested under the conditions established by the General Data Protection Law, by email [dpo@venergia.com.br]. The Corporation shall endeavor its best efforts to comply with all requests for exclusion, where applicable, as soon as possible. **Such exclusion, when covering data necessary for the operation of the Service, will also result in the termination of the provision of such services, and the User will not be able to use the Service.** Even in this case, VE may keep the personal data stored, without subjecting such data to active treatment, in order to comply with its legal obligations of data custody or for judicial defense of its interests.

8. Responsible for Treatment

The treatment of the data gathered is carried out by VE or by third parties under VE's guidance, and VE is responsible for the legality of the project as a whole. Any request, complaint, request for information or exercise of rights of the holder may be made by written message to the address [dpo@venergia.com.br], containing at least the following information and documents:

- a) Applicant's full name;
- b) Applicant's ID card and CPF numbers;
- c) Email address used to register on the Website;
- d) Telephone number used to register on the Website;
- e) Description of the request.



Any other information or documents may be requested to fulfill the request, in case there are doubts about the veracity of the information provided or the identity of the applicant.

9. General Provisions

Governing Law and Jurisdiction. This Policy is governed by the Brazilian Law. The court of São Paulo/SP is exclusively elected to settle any disputes arising out of this Policy, in prejudice to any other, however privileged it may be.

Changes. Our service may change from time to time. Accordingly, we may unilaterally modify this Privacy Policy at any time. Whenever there is a material change to this Policy, you will be notified through the contact information provided by you or by a notice on the Website. In the notice, you will have access to the new text of the Privacy Policy, as well as a summary of the changes made. Upon such notice, by continuing to use the Service, you automatically agree to the new terms of the Policy. If you do not agree to the changes and wish to cancel and delete your account, please send an email to dpo@venergia.com.br. The most current version of this Policy will always be available at: https://www.venergia.com.br/institucional/relatorios-e-documentos/.

10. Contact us

If you have questions or requests about this Privacy Policy, our practices, or our service, please contact: dpo@venergia.com.br.