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WAYCARBON WEBSITE
PRIVACY ADMINISTRATIVE POLICY

Id: POL_F&P: 008
Version: 02
Date: 20/03/2025

1. PURPOSE

WayCarbon is committed to the privacy and security of its clients' personal data. Therefore, this Privacy Policy presents the methods of collection, use and eventual transfer of personal data of clients or other users who access our website. By accepting this Policy, you agree to the way in which Waycarbon processes your personal data and the terms set forth therein, so please read them carefully.

By using our services and agreeing to the processing of data, you understand that we collect and use your personal information in the ways described in this Policy, in accordance with the General Personal Data Protection Law (GDPL) - Federal Law No. 13.709/2018, the consumer provisions of Federal Law 8.078/1990 and other applicable rules of the Brazilian legal system.

Therefore, WayCarbon Soluções Ambientais e Projetos de Carbono S.A., simply referred to as "WayCarbon", a private law legal entity, enrolled with CNPJ under No. 08.294.685/0001-38, headquartered in Belo Horizonte/MG, at Rua Bernardo Guimarães, n° 166, 6° andar, Funcionários, CEP: 30.140-080, in the role of data processing agent and controller, is obliged to comply with the provisions of this Privacy Policy.

2. SCOPE

Applicable to all employees, interns, directors, statutory persons, service providers and any person acting on behalf of WayCarbon or having a relationship with the company.

3. DEFINITIONS

a. Personal data

Information related to an identified or identifiable individual, that is, any information that, directly or indirectly, allows the identification of that person.



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b. Sensitive personal data

Sensitive personal data is data that reveals intimate or private information about a person, such as: racial or ethnic origin, religious belief, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data. This data is considered sensitive because it can be used to discriminate against or harm the person.

e. Holder

Individual to whom the Personal Data that will be processed refer.

d. Processing

Any action carried out with Personal Data, such as those related to the collection, production, obtaining, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

e. Data controller

Individual or corporation, under public or private law, who decides on the processing of personal data. The data controller is responsible for ensuring the protection of the personal data processed.

f. Data processor

Individual or corporation, under public or private law, who carries out the processing of personal data on the orders of the controller. The data processor is responsible for complying with the instructions of the controller and ensuring the security of the personal data processed.

g. Supervisor (DPO)

Professional appointed by WayCarbon to act as a communication channel to respond to internal requests and those of our clients, regarding the Processing of Personal Data, as well as requests that may come from the National Data Protection Authority, who can be contacted by email: lgpd@waycarbon.com



4. GENERAL RULES

4.1 4.1 Purposes of Personal Data Processing

The main purpose of the GDPL is to protect the rights regarding the privacy of individuals' Personal Data, ensuring that there will be no processing of Personal Data for discriminatory purposes, nor in disagreement with those informed to the holder. In addition, the legal justifications that instruct the processing of data are determined, namely:

- I. Satisfactory execution of contracts;
- II. Guarantee of copyright and protection of user privacy;
- III. Compliance with legal obligations;
- IV. Due diligence for contracts signed with customers;
- V. Management of personal documents;
- VI. Protection of information contained in processes and systems;
- VII. Enabling the provision of its services;
- VIII. Meeting the legitimate interests of WayCarbon.

Exceptionally, WayCarbon may process data for other purposes, but always based on the legal bases permitted by the GDPL.

4.2 Third-party services

This Privacy Policy applies only to information provided to WayCarbon.

Our services may occasionally incorporate services provided by third parties and, as such, the information provided to us may be shared with them. However, if a customer has the option to choose a product/service offered by a third party, or integrate it into WayCarbon's services on their own, they will be subject exclusively to the third party's Privacy Policies for that product/service, which may contain provisions different from those found in this document. WayCarbon is not responsible for the privacy practices of third parties.

4.3 Data collected

4.3.1. Data you provide to us

- a. To contact us, you can send a message in the tab "Fale Conosco".



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In order for us to contact you, you must provide your full name, email address, contact telephone number, company, position and area in which you work;

- b. You can leave comments on posts published on our Blog. To do so, you must provide your full name and email address;
- c. To receive the Newsletter, you must register by providing your full name, email address and company name. By subscribing to our Newsletter, you authorize WayCarbon to keep your email address for future direct marketing communications;
- d. If you are interested in downloading any of our Case Studies, you must provide your full name, email address, company, position and area of work. In addition, you can check the consent checkbox to receive new communications;
- e. To purchase ESG Academy courses, you will be redirected to the website <https://esgacademy.com.br/>. Once you have chosen the course, you will need to create a registration, in which you must provide your full name, CPF, RG, full address, contact telephone number and payment method (credit card, PIX or Bank Slip);
- f. If you are interested in joining the WayCarbon team, when you access the "Vacancies" tab, you will be redirected to the website <https://waycarbon.gupy.io/>. On the Gupy website, accessed with a login and password, your data will be subject to Gupy's Privacy Policy (access the full text at <https://www.gupy.io/aviso-de-privacidade-site>).

4.3.2. 4.3.2. Data we collect about you and the Use of Cookies

We may collect information about your computer or device, including your IP address, location, operating system, browser information, information about your visit, your browsing history and how you interact with our website. This type of data is collected by cookies and related technologies. When you first visit our website, you will receive a message advising you that cookies and similar technologies are in use. You can disable non-essential cookies by changing your browser preferences. To better understand how they work, you can visit Waycarbon's Cookie Policy.

4.4 Non-sharing

It is worth noting that WayCarbon, under no circumstances, shares your Personal Data with third parties not previously listed. If you receive contact from unidentified third parties, please contact us via email: lgpd@waycarbon.com that we will investigate what happened.



4.5 Who we share your data with

WayCarbon is authorized to share your Personal Data with other data processing agents, if necessary for the purposes set forth in this term, in compliance with the principles and guarantees established by Law No. 13.709/2018, pursuant to art. 7, Paragraph 5 of said law.

WayCarbon uses reliable services and technologies, which follow applicable security standards and are subject to the obligation of confidentiality and data protection. Your data will be shared with the following third parties, always in accordance with this policy and applicable legislation:

- a. **Government Authorities:** to (i) comply with legal, judicial, administrative determinations and official letters from competent authorities, as well as to (ii) take or provide legal, judicial and administrative measures to defend our rights set out in this Policy, including in any judicial or administrative proceedings. Government Authorities, police authorities, data protection authorities, public entities and/or other government organizations are understood as.
- b. **Cloud Storage Providers:** to third party cloud service providers to host the data processed by WayCarbon. In these circumstances, your Data remains stored and processed by WayCarbon.
- c. **Business partners and companies in the same conglomerate:** to run, improve and expand our business and services, and/or develop new businesses.
- d. **Business procedures:** we may also share your data in the event of corporate transactions, such as mergers, acquisitions and incorporations involving WayCarbon.

4.6 Storage of personal data

In order to ensure the applicability of information security principles through the introduction of solid and standardized security controls, if applicable, WayCarbon partners will be asked to implement the same practices, in addition to adopting a culture of privacy and data protection internally.

The data processed will remain stored in WayCarbon systems throughout the contractual relationship, according to the duration of the initial purpose or due to the period determined by legal and/or regulatory obligation.

4.7 Your rights as a data holder

Article 18 of the General Personal Data Protection Law establishes the following rights for data subjects :



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- a. Confirm with WayCarbon the existence of personal data processing and request, at any time, access to such data;
- b. Request from WayCarbon the correction or update of data that is incomplete, inaccurate or outdated;
- c. Request the deletion of data from WayCarbon systems, within the minimum legal period related to data storage;
- d. Request the traceability of your data by requesting information from public and private entities with which WayCarbon has shared data;
- e. Request data portability to another service provider;
- f. Request the blocking or deletion of personal data, in the event of unnecessary or excessive collection or inadequate processing;
- g. Revoke consent, after it has been granted, as well as request the deletion of data obtained under its protection.

We aim to respond to requests made by you within 15 business days.

The above rights may be exercised in the manner established by the GDPL, exclusively by the holder of the personal data or by his/her legal representative, by email: lgpd@waycarbon.com.

1. **Note 01:** For your security, we may request additional information to help us confirm the identity of the applicant.
- ii. **Note 02:** If the request cannot be met, the requester will be informed of the reason. For example, in the case of a request for data deletion, the request will be denied in compliance with the statute of limitations for any legal action or other legal obligation to which we are subject.

4.8 How WayCarbon protects your information

WayCarbon strives to protect your privacy and your Personal Data from unauthorized access, destruction, loss, alteration, communication, disclosure or any form of illegal processing or processing that is not in accordance with the Law.

We undertake to adopt the technical and organizational measures capable of protecting your personal data from unauthorized access and from situations of destruction, loss, alteration, communication or dissemination of such data.

WayCarbon, however, is exempt from liability for the exclusive fault of third parties, such as in the case of attacks by hackers or crackers that corrupt security systems to access user data, or for the exclusive fault of the user him/herself, such as in the case in which the user him/herself transfers his/her data to third parties.



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WayCarbon undertakes to inform the user of any proven breach of the security of their personal data that may pose a high risk to their individual rights and freedoms. By "personal data breach" we mean a security breach that causes, accidentally or unlawfully and demonstrably, the destruction, loss, alteration, disclosure or unauthorized access to personal data transmitted, stored or subject to any other type of processing.

Finally, WayCarbon undertakes to treat the user's personal data with complete confidentiality, in accordance with current legislation. We clarify that, internally, the Personal Data collected is accessed only by duly authorized professionals, respecting the principles of proportionality, necessity and relevance for the purposes of our business.

4.9 Access and correction of information

If you wish to access and/or update the data provided to WayCarbon, please contact our team via email: lgpd@waycarbon.com. However, we reserve the right to retain essential information to protect our interests, always supported by the legal bases established by the GDPL.

5. CHANGES TO THIS POLICY

WayCarbon reserves the right to change this privacy policy at any time without prior notice. When we make material changes to this Policy, we may provide appropriate notice, depending on the circumstances, by displaying a prominent notice on our Platforms or by sending you an email, if you are registered. Therefore, it is important that you read any notice carefully and visit this policy regularly to check for updates. Changes will be effective immediately upon posting of the Policy on the WayCarbon website.

6. GENERAL PROVISIONS

- a. You are fully responsible for the accuracy of the data provided for the purposes described herein;
- b. WayCarbon is not subject to processing or treating any of your data if there are reasons to believe that such processing may cause any violation of any applicable law, or if you are using our services, products and website for any illegal, illicit or contrary or immoral purposes;
- c. The database structured through data collection is the property and responsibility of WayCarbon, so that its use, access and sharing, when necessary, will be carried out within the limits, terms and purposes described in this Policy.



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7. EXPLANATORY NOTES

7.1 How to contact WayCarbon about this Privacy Policy

If you have any questions, comments, suggestions or requests regarding this Privacy Policy or the use and disclosure of personal information, please contact us by email at lgpd@waycarbon.com, so that we can respond to you in a timely manner.

If you wish, you can also send us a letter, in writing, to our headquarters in Belo Horizonte/MG, at Rua Bernardo Guimarães, nº 166, 6º andar, Funcionários, CEP: 30.140-080.

7.2 The nature of the information on the website

The content of the website is provided by WayCarbon (owner of the website "WayCarbon.com") for general guidance on the company's products and services, with the aim of providing users with institutional information of general interest.

Some of our content consists of technical articles, produced by WayCarbon experts. These articles are protected by copyright. Unauthorized use of any material contained on the website may violate copyright, trademark and other laws.

8. APPROVAL AND VALIDITY

This standard shall come into force on March 20, 2025 (March twentieth, two thousand and twenty five), repealing all provisions to the contrary, and shall remain in force until another provision is enacted. Its content shall be subject to periodic review, at least annually.

9. ANNEXES

N/A.

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Assinaturas

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Anexos

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