

# **GENERAL POLICY FOR THE PROTECTION OF PERSONAL DATA**

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**AMCEL - AMAPÁ FLORESTAL E CELULOSE S.A.**

**MAY**

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**2021**

## 1. INTRODUCTION

**AMCEL - AMAPA FLORESTAL E CELULOSE SA ("AMCEL")**, a legal entity governed by private law, registered under CNPJ No. 05.995.840/0001-55, headquartered at Rua Claudio Lucio Monteiro, s/n, Port Area, Novo Horizonte neighborhood, CEP 68925-001, Santana – AP, is a Brazilian sustainable forest management company, whose objective is to reforest, process and export eucalyptus chips produced in accordance with the most demanding quality standards, to supply the pulp, paper and wood products industry with raw material.

The company operates in the reforestation, processing and export of eucalyptus chips produced in accordance with the most demanding quality standards, to supply the pulp, paper and wood products industry with raw material. Currently, AMCEL's shareholding control is held by the Japanese Groups Nippon Paper Industries and NYK – Nippon Yusen Kabushiki Kaisha. From this long trajectory of excellence and innovation, and adapting to the best standards of Governance, comes the rigorous adjustment to the highest standards of respect for privacy and protection of its personal data.

Due to this, and always seeking a constant evolution in the provision of its services, **AMCEL** has adapted itself, with excellence, to the practices related to the privacy and protection of its personal data, developing, therefore, this **General Data Protection Policy**.

## 2. OBJECTIVE

This **General Data Protection Policy** has the main objective of materializing **AMCEL's** concern with privacy and sensitive personal data pursuant to Law 13.709 of August 14, 2018.

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Thus, this Policy will describe what measures must be taken to ensure the protection of its privacy and integrity in the treatment of your personal data, informing and disclosing all means of contact available with us, if you want to exercise any of your rights or ask questions if here not resolved.

Thus, with the materialization of this Policy, we guarantee:

- ❖ What is the treatment of personal data and what are AMCEL's guidelines for those who process Personal Data on its behalf;
- ❖ Compliance with current data protection legislation, in addition to other important practices to securely handle Personal Data;
- ❖ The protection of **AMCEL's** reputation, ensuring that the Personal Data entrusted to us are treated in accordance with what is required by law, including with regard to its storage time;
- ❖ **AMCEL's** protection against the risks of incidents related to the improper treatment of Personal Data and other violations of current data protection legislation, thus ensuring that all Rights of the Owners are preserved.

Finally, it is asserted that **AMCEL's** main objective, more than the mere fulfillment of legal obligations, is to strengthen our structure with ethics and transparency, nurturing relationships in a safe manner with all those who daily collaborate with our growth.

### 3. REFERENCE LEGISLATION FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA

The laws applicable to this Policy are:

- i. Federal Constitution of 1988;

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- ii. Law No. 13.709/2018, the General Personal Data Protection Law (LGPD);
- iii. Civil Code;
- iv. Law No. 12.965/2014, the Brazilian Civil Rights Framework for the Internet;
- v. Internal standards and procedures constantly improved, approved by the competent authorities and made available to all employees.
- vi. The Consolidation of Labor Laws Decree Law No. 5452

#### 4. APPLICATION AND SCOPE

This Policy is applicable to all personal data processed by **AMCEL** and is part of the Data Processing Policy approach, which is in accordance with the main regulations governing Data Protection in Brazil.

Thus, the application of this Policy extends to interns, apprentices and trainees, service providers, suppliers, business partners, consultants, auditors and third parties, as well as public bodies and entities with which there may be interaction, and any other party that has a relationship with **AMCEL**, whether individuals or legal entities, for profit or not,

Finally, we intend for this Policy to go beyond compliance with the company's internal procedure, becoming a true standard of behavior.

Failure to comply with the rules set forth herein by any employee or person to whom the application of this Policy is extended, without distinction of position or function, will result in administrative measures, without prejudice to other sanctions.

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## 5. PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

**AMCEL** will handle the processing of Personal Data in accordance with applicable legislation and the company's internal and external policies. Therefore, in order to comply with our obligations as holders of Personal Data, the principles listed below will be taken into account:

- a) Personal Data will only be processed for legitimate, specific, explicit purposes under the terms of the law;
- b) The processing of personal data will be compatible with the purposes informed to the holder;
- c) The processing of Personal Data will be limited to the minimum necessary for the performance of its purpose;
- d) Commitment to guarantee the holder of Personal Data free and easy consultation on how **AMCEL** treats their Personal Data;
- e) Acting, in a transparent way, guaranteeing to the holders the provision of clear, accurate and easily accessible information on the processing of their Personal Data;
- f) Adoption of suitable technical and administrative measures to protect personal data from unauthorized access and possible incidents, seeking to prevent the occurrence of damage;
- g) Adoption of practical measures, sufficient to comply with and comply with personal data protection rules.

## 6. GENERAL GUIDELINES

**AMCEL** collects and handles personal data in a transparent and ethical manner, storing the information in secure environments and in compliance with current legislation. Therefore, it undertakes to adopt the appropriate measures to maintain the absolute secrecy and confidentiality of all information and personal data that it has access to or that it may have.

**AMCEL** is aware of and acts in such a way that the Personal Data collected is adequate, relevant and not excessive in relation to the purposes for which they are collected and/or will be processed, not retaining them for periods longer than those necessary to achieve their purposes, except as otherwise required by applicable laws or regulations or where there is specific consent to do so.

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In addition, **AMCEL** contractually requires from third parties, business partners and those they relate to, the adoption of mechanisms capable of safeguarding personal information and data to which they have access due to the ongoing business partnership. Therefore, it ensures that all its contracts are made with partners who are concerned with the privacy and protection of your personal data and who will always act in an ethical and transparent manner with regard to the business relationship and with the holders involved in the operation.

Also, in cases where it is necessary to share the personal data of customers, employees or partners, whether due to compliance with the law, court order or a competent body overseeing the activities carried out by **AMCEL** and/or third parties, this information must be disclosed only in the strict terms and within the limits required for its disclosure, and the holders of the information disclosed, as far as possible, will be notified of such disclosure so that they can take the appropriate protective measures.

## 7. OUR COMMITMENT

This Policy was also designed to demonstrate our commitments to the protection of Personal Data. They are:

- ❖ Keep any Personal Data secure and only access and use them when necessary to do our job;
- ❖ Protect Personal Data against misuse and illegal processing;
- ❖ Keep Personal Data for as long as necessary to achieve its purpose;
- ❖ Explain clearly and transparently to the holders about the treatment of their Personal Data, in accordance with this Policy and other **AMCEL** Policies.
- ❖ Do not share Personal Data with third parties unless we have performed due diligence and have appropriate agreements and contracts in force.
- ❖ Respect the rights of holders provided for in the legislation on privacy and data protection in force.

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## 8. OUR CONTACT

For any questions about this Policy, or any complaints or requests (such as access, objections or correction requests), please contact us through the following channel:

E-mail: [lgpd@amcel.com.br](mailto:lgpd@amcel.com.br)

Cell phone: (96) 999157-2794

## 9. HISTORY OF REVIEWS AND VERSION CONTROL

Elaboration date	Current revision date	Maker/Approver	Version
10.May.2021			

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