

## DP WORLD SANTOS PRIVACY NOTICE

This Privacy Notice applies to customers, suppliers, service providers, business partners and any visitor of DP World Santos. It describes what personal data we collect and process, why and how we process such data, with whom we share it, and other information. Furthermore, it describes what the rights of the data subject of this data and how you can contact us to clarify questions and learn more about our privacy and personal data protection practices.

This Privacy Notice is based on the Brazilian General Data Protection Act (Law No. 13,709/18, the "LGPD"), DP World Santos' Personal Data Policy and Information Security Policy, including, but not limited to, other laws, regulations and policies applicable to the company's operations.

### 1. TO WHOM THIS PRIVACY NOTICE APPLIES

This Privacy Notice applies to:

- ✓ Customers
- ✓ Suppliers
- ✓ Service providers (including freelancers and self-employed workers)
- ✓ Job Applicants
- ✓ Visitors

If you are a DP World Santos' employee, this Privacy Notice does not apply to you. Please see the Privacy Notice for DP World Santos Employees, available on the DP World Santos Intranet.

### 2. PERSONAL DATA WE COLLECT

For the exercise of our business, we collect the following categories of personal data:

- ✓ **Registration or contact data:** information related to name, civil identification documents, address, telephone number, email, registration in a class agency, vehicular data, among others.
- ✓ **Occupational or professional data:** information related to the company with which you are linked, actual position or function, work history, among others.
- ✓ **Transaction data:** information related to business you have done with DP World Santos, services you have contracted or provided, among others.
- ✓ **Financial data:** information related to banking data, compensation history, among others.
- ✓ **Access data:** connection cookies required to enable the basic functions of our website, such as page access and browsing.

- ✓ **Sensitive personal data:** for legal or regulatory reasons or for security purposes, DP World Santos may collect and process your sensitive personal data, such as biometric data for access to the port terminal and health data that attests to the service provider's ability to perform the contracted functions.

In general, we collect your personal data directly from you. However, to the extent that your personal data is obtained in any other way, the processing of your data will be made in accordance with this Privacy Notice.

### 3. HOW WE USE YOUR PERSONAL DATA

We collect and process your personal data only for **specific and legitimate purposes**, aimed to the execution and performance of our business. In this sense, we generally process your personal data for:

- ✓ preparing and execute proposals and agreements for the provision of port services of DP World Santos;
- ✓ preparing and performing proposals and agreements for supply and provision of services to DP World Santos;
- ✓ comply to our legal and regulatory obligations;
- ✓ enable access to DP World Santos' facilities and port terminal;
- ✓ managing and performing terminal operations (for example, loading, unloading, transportation and storage of cargo, scheduling visits, conducting surveys, issuing the corresponding documentation, etc.);
- ✓ promoting social events and professional training; and
- ✓ filling job opportunities at DP World Santos.

In certain cases, we may process your personal data based on the legitimate interests of DP World Santos. This **legitimate interest** may include, for example, promotion of business and institutional relationships, satisfaction analysis, development of business strategies, etc. We will not process your personal data when your fundamental rights and freedoms prevail over our interest.

Furthermore, for other purposes not provided for above, we may process personal data with your **consent**. In such cases, this Privacy Notice may be supplemented by specific terms and conditions, presented to you before we obtain your consent.

We also highlight that our website makes use only of necessary connection **cookies**, which help to make a website useful, enabling basic functions such as browsing and page access to protect areas of the website.

The website may not function properly without these cookies. For the purposes of this Privacy Notice, we do not use such cookies for any secondary purpose - only to enable your browsing and use of the website.

The **sensitive personal data** will be processed strictly for compliance of DP World Santos with its legal and

regulatory obligations, or to ensure its security in the Corporation's electronic identification and authentication processes and systems. Any sensitive personal data processing beyond these assumptions will only be made with your express consent (or as authorized by LGPD).

By default, DP World Santos maintains a relationship with the adult public. However, we maintain several social programs with the community, some of which are aimed at children and adolescents. For specific cases in which we use **personal data of children** (up to 12 years old), the collection and processing of such data will only occur with the specific and detached consent of a parent or legal guardian, as provided for in our Personal Data Policy.

#### 4. WITH WHOM WE SHARE YOUR PERSONAL DATA

Your personal data may be shared with:

- ✓ **Other entities of DP World Santos economic group:** Some of the systems we use are hosted and enabled by other companies of our economic group, and your personal data may be stored and processed in these systems. In addition, we may share this data with these companies to the extent that it is necessary to report any situation related to you, such as reports of occurrences, late payments and potential or existing litigation.
- ✓ **Service Providers:** As part of DP World Santos' business operation, we use the services of some third-party providers (for example, cloud service providers, accounting and law firms, etc.). As necessary, we will share your data with these third-parties only to fulfill the purposes described in this Privacy Notice. The processing made by these third-parties will be carried out in accordance with the instructions provided by DP World Santos.
- ✓ **Sharing required by law or regulation:** We may also share your personal data with Governmental entities, regulatory agencies, investigation bodies and other third parties for the strict compliance with legal or regulatory duties.

In any case, we will ensure that your personal data will be processed with at least the same standards of data protection and information security and protection practiced by DP World Santos.

In relation to the **international transfer** of your personal data, when necessary (for example, with other entities of your economic group or service providers that store and process the data outside Brazil), we will ensure that the transfer will only take place (a) to countries with an adequate degree of personal data protection; or

(b) when we have safeguards to protect your personal data (for example, standard contractual clauses or binding corporate rules governing the adequate data processing matters).

## 5. HOW LONG WE STORE YOUR PERSONAL DATA

In general, we keep your data as long as we have a contractual relationship with you, to comply with legal and regulatory obligations or to regularly exercise our rights in legal, administrative or arbitration proceedings.

We will only store and process your personal data as long as we have at least one purpose and a legal basis for it. At the end of the processing of your personal data, and if there is no reason to retain it, we will delete your personal data securely and permanently.

## 6. HOW WE PROTECT YOUR DATA

We keep **records of the processing operations** we perform, in order to have control and visibility over the activities involving your personal data.

We also adopt **technical and administrative security measures** to prevent the disclosure, unauthorized access and sharing, loss, destruction, alteration or unlawful processing of such data.

Furthermore, we implement and maintain a **Privacy Governance Program** to ensure that your data is protected, which comprises in a Personal Data Policy, Information Security Policy, Incident Response Plan, periodic trainings, among other policies and practices aimed to protect your personal data.

## 7. WHAT ARE YOUR RIGHTS

As a data subject, LGPD assures you several rights before DP World Santos. At any time, you may request:

- ✓ the **confirmation of existence** or **access** to your personal data;
- ✓ the **correction or update** of your personal data;
- ✓ the **deletion, blocking** or **anonymization** of your personal data;
- ✓ **information about the shared use** related to all third-parties (public and private parties) with whom DP World Santos has shared your Personal Data;
- ✓ the **portability** of your personal data to another service provider, as applicable;
- ✓ the **revocation of the consent** given to DP World Santos and the **deletion** of the corresponding personal data, as applicable.

- ✓ the **opposition** to any processing not based on consent.

To attend requests, we may request additional information from you, only to verify your identity before submitting processing details of your personal data.

We will inform you when it is not technically possible to block or anonymize the personal data, and in such cases, you may choose to delete such data. Furthermore, you understand that deletion, blocking, anonymization or opposition may not apply in cases where DP World Santos has legal, regulatory and contractual obligations or retains such data for the purpose of regularly exercising its rights.

The contact data for requesting the abovementioned rights is as follows.

## **8. HOW TO CONTACT US**

If you have any questions about this Privacy Notice or any requests concerning your personal data, please contact us through the channels below:

[privacidade@dpworld.com](mailto:privacidade@dpworld.com)

### **DP World Santos Data Protection Officer:**

Elder Coppi

[encarregado@dpworld.com](mailto:encarregado@dpworld.com)

### **Address:**

Estrada Particular da CODESP s/nº  
Ilha Barnabé – Santos/SP – Brazil  
CEP 11095-710.

\* \* \*

This Privacy Notice is Release 00, dated 07/17/2020.