



# PRIVACY POLICY

PIEMONTE HOLDING



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## PIEMONTE GROUP PRIVACY POLICY

Piemonte Group is committed to exceeding expectations and achieving excellence, a philosophy that also includes respect for your privacy and the protection of your Personal Data. Therefore, we have developed this Privacy Policy ("Policy") to explain in a simple and objective manner how Piemonte Group handles and protects your Personal Data, as well as to detail how you can exercise your rights regarding it.

Piemonte Group is responsible for the Personal Data you share with us or that is shared by third parties with legitimate authority to do so. For the purposes of Applicable Data Protection Legislation, Piemonte Group will be the Controller of your Personal Data. Whenever you encounter the terms "Piemonte Group," "we," "our," or "us," we are referring to:

- **Piemonte Holding de Participações S.A.**, a privately held corporation, headquartered in the City and State of Rio de Janeiro, at Rua Lauro Muller, nº 116, 41st floor – rooms 4102 (part) and 4103, Botafogo, ZIP Code: 22.290-160, registered with the CNPJ/ME under nº 05.280.180/0001-26; and
- **Elea Digital Infraestrutura e Redes de Telecomunicações S.A.**, a privately held corporation, headquartered in the City and State of Rio de Janeiro, at Rua Lauro Muller, nº 116, 40th floor - room 4004, Botafogo, ZIP Code: 22.290-160, registered with the CNPJ/ME under nº 35.980.592/0001-30.

This Policy applies to all contractors, clients, visitors, candidates, individual micro-entrepreneurs (MEIs), partners, and legal representatives of clients, client users, leads, and any other third parties who interact with Piemonte Group, hereinafter referred to as “you,” “Data Subject,” “your,” or “you.”

Please note that this Policy is a supplement to the Applicable Data Protection Legislation. In the event that the Applicable Data Protection Legislation conflicts with this Policy or imposes stricter requirements, the Applicable Data Protection Legislation will prevail. This Policy also applies in the absence of specific legislation to ensure that we adopt a rigorous approach to integrity and privacy issues within Piemonte Group.

You should carefully read the information below to understand the Processing of your Personal Data. Our goal is to ensure that you understand this Policy; therefore, if you have any questions, please contact us through our Data Protection Officer at the following email addresses: [juridico@piemonteholding.com](mailto:juridico@piemonteholding.com) or [lgpd@eleadatacenters.com](mailto:lgpd@eleadatacenters.com).

## **1. WHAT IS PROCESSING AND WHAT IS THE APPLICABLE LEGISLATION?**

According to the General Data Protection Law (Law No. 13.709/2018 or "LGPD"), “Processing” refers to any operation performed with Personal Data, including, but not limited to, collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation, information control, modification, communication, transfer, dissemination, or extraction.

For the purposes of this Privacy Policy, whenever we mention the Applicable Data Protection Legislation, we are specifically referring to the LGPD, the Brazilian Civil Rights Framework for the Internet (Law No. 12.965/2014 and Decree No. 8.771/2016), and any other laws and regulations related to privacy, confidentiality, and protection of Personal Data that are applicable. Additionally, it includes

all guidelines, norms, rules, ordinances, regulations, and codes of practice and conduct issued by the National Data Protection Authority ("ANPD") or any other relevant supervisory authority.

## 2. PRINCIPLES WE OBSERVE FOR THE PROCESSING OF PERSONAL DATA

Piemonte Group is diligently and in good faith committed to complying with all the principles established in the Applicable Data Protection Legislation when processing your Personal Data. To this end, Piemonte Group makes the best efforts to ensure that the Processing of your Data occurs under the following terms:

- **Legitimate Purpose:** Processing is carried out for a legitimate, specific, explicit, and informed purpose.
- **Compatibility with the Purpose:** Processing is compatible with the purposes informed, according to the context of the Processing.
- **Data Minimization:** Processing is limited to the minimum necessary to achieve the purpose, being proportional and not excessive concerning the purposes.
- **Transparency:** Information about the Processing is clear, precise, and easily accessible, including details about the respective Agents (Controllers and Processors) involved in the Processing, as well as ensuring easy and free consultation on the form of Processing and the entirety of your Personal Data.
- **Non-Discrimination:** Processing is carried out for non-discriminatory, lawful, or nonabusive purposes concerning its aims.
- **Security:** Piemonte Group adopts technical and administrative measures capable of proving compliance with personal data protection standards and preventing and protecting Data against unauthorized access, accidental or unlawful destruction, loss, alteration, communication, disclosure, or any other damage.

## 3. PERSONAL DATA WE MAY COLLECT FROM YOU

According to the Applicable Data Protection Legislation, "Personal Data" are any information related to an identified or identifiable natural person, directly or indirectly. "Sensitive Personal Data" are also protected by the Applicable Data Protection Legislation and include any Personal Data regarding racial or ethnic origin, religious belief, political opinion, membership in a union or a religious, philosophical, or political organization, data concerning health or sexual life, genetic or biometric data when linked to a natural person.

Depending on the context of the Processing carried out by Piemonte Group, the Personal Data we process are as follows:

- ☐ Name ☐ Address
- ☐ Surname ☐ Telephone or mobile phone
- ☐ CPF e RG (Brazilian personal ☐ Work and Social Security Card identification numbers) (CTPS)
- ☐ Images/Photos ☐ Marital Status
- ☐ Health Data ☐ Nationality
- ☐ E-mail ☐ Signature
- ☐ Position, function and/or profession ☐ Credit history
- ☐ Bank details ☐ Professional and academic experiences

#### **4. HOW WE COLLECT YOUR PERSONAL DATA**

Piemonte Group collects your Personal Data directly from you or through third parties (for example, companies that provide security services for the data centers), via email, QR Code readers, lists and/or physical documents, SharePoint, Microsoft Teams, LinkedIn, WhatsApp, or through the Piemonte Group website. All Personal Data that we process are and will remain confidential.

#### **5. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?**

Piemonte Group processes your Personal Data for specific and defined purposes, which are informed before collection, and does not perform subsequent processing that is incompatible with these purposes, in accordance with the Applicable Data Protection Legislation.

The purposes for which Piemonte Group processes your Personal Data are as follows:

- To contact potential clients to schedule meetings for project development and future sales;
- To control visitor access to Piemonte's offices;
- To draft contracts to be signed with clients;
- To enable audits for certification processes, meet client demands, or comply with court orders;
- To enable user registration and the use of the service desk according to client definitions;
- To grant visitor access to Piemonte Group's facilities;
- To log client requests and facilitate ongoing contact;
- To monitor systems and environments of Piemonte Group;
- To record external access to Piemonte Group's data centers;
- To select and recruit new employees;
- To select employees for Security and IT departments;
- To track user registrations in Active Directory;
- To request Security's access to the data center;
- To document incidents within Piemonte Group's environments;
- To conduct compliance analyses of candidates for Piemonte positions and assess hiring risks;
- To enter into confidentiality agreements with third parties;
- To register and control access to SAP;
- To register clients in Salesforce and SAP, ensuring that individuals who signed the contract have the legal authority to do so.

## **6. LEGAL BASES USED FOR THE PROCESSING OF YOUR PERSONAL DATA**

The processing of your Personal Data will be carried out only when there is an appropriate legal basis in relation to the purpose of the processing, in compliance with the Applicable Data Protection Legislation. The legal basis will depend on the purpose and the Personal Data involved in the processing. Typically, the applicable bases for the processing carried out will be as follows:

<b>LEGITIMATE INTEREST</b>	<p>Piemonte Group relies on the processing of Personal Data under this legal basis when, after applying the legitimate interest balancing test, it determines that the processing in question will not adversely affect the Data Subjects in any way. We use this legal basis, for example, to:</p> <ul style="list-style-type: none"> <li>i. Protect our physical premises, including blocking access by unauthorized individuals to the facilities (asset security issues);</li> <li>ii. Document incidents within Piemonte Group's environments;</li> <li>iii. Facilitate access to the data center; iv. Among other purposes.</li> </ul>
<b>EXECUTION OF CONTRACT</b>	<p>This legal basis applies when the processing of Personal Data is necessary for the execution of contracts or preliminary procedures related to the contract to which the Data Subject is a party.</p> <p>We use this legal basis, for example, to:</p> <ul style="list-style-type: none"> <li>i. Conduct compliance evaluations of suppliers;</li> <li>ii. Draft contracts suppliers in SAP;</li> <li>iii. Receive commercial proposals; and iv. Register supplier in SAP.</li> </ul>
<b>EXERCISE OF LEGAL RIGHTS</b>	<p>At times, it will be necessary to process Personal Data for the defense of Piemonte Group's rights in judicial, administrative, or arbitration proceedings.</p> <p>This will occur, for example, when processing is necessary to facilitate the monitoring of civil and business cases involving Piemonte Group.</p>

## 7. WITH WHOM DOES PIEMONTE GROUP SHARE YOUR PERSONAL DATA?



We respect your privacy and are committed to not sharing your Personal Data, except (i) if expressly authorized by you or, at the very least, by one of your representatives; or (ii) with third parties under certain circumstances.

Third parties may include:

(a) Authorities or Other Relevant Entities, to:

- i. Fulfill our legal or regulatory obligations;
- ii. Investigate potential rights violations;
- iii. Ensure your safety and the safety of others, for example, by sharing your Personal Data with law enforcement and fire services;
- iv. Detect or prevent fraud and technical difficulties;
- v. Exercise our rights or enable our clients, visitors, employees, partners, or other service providers to exercise their rights;
- vi. Investigate, prevent, or take action related to illegal, suspicious, or actual activities, or to cooperate with public authorities; and
- vii. Comply with legal obligations or any other requirements from government and judicial bodies. We will limit this sharing to what is required to meet these obligations.

(b) Clients. We may also share your Personal Data with our clients to ensure the execution of the contract between Piemonte Group and the client, as well as to ensure that the contractual obligations agreed upon between Piemonte Group and the client are being properly fulfilled.

(c) Piemonte Group. To manage our activities more efficiently, we may share Personal Data with companies within the Piemonte Group.

(d) Our Professional Advisors, including but not limited to legal advisors and auditors.

(e) Our Business Partners (Service Providers and Supplier). Piemonte Group maintains a rigorous process for hiring business partners, service providers, and clients, selecting only trusted third parties to carry out commercial activities and process Personal Data on our behalf ("Data Processors"). When necessary to share your Personal Data with these business partners, we provide only the Personal Data required for the third party to fulfill its obligations. Additionally, our contracts include data protection clauses that require our business partners to commit to the same level of protection and privacy for your Data as Piemonte Group would if processing it directly, which includes confidentiality obligations, reasonable security

measures, compliance with all principles of data processing under the Applicable Data Protection Legislation, among others.

- (f) Individuals or Legal Entities Involved in Corporate Transactions such as corporate restructuring, mergers, acquisitions, or consolidations involving Piemonte Group.

If you would like more information about the sharing of Personal Data in a specific context, please contact us through our Data Protection Officer at the following email addresses: [juridico@piemonteholding.com](mailto:juridico@piemonteholding.com) or [lgpd@eleadacenters.com](mailto:lgpd@eleadacenters.com).

## **8. HOW LONG DO WE PROCESS YOUR PERSONAL DATA?**

We will store your Personal Data only for the period necessary to fulfill the processing purposes for which it was collected, as described in this Privacy Policy. Additionally, we may retain your Personal Data for an additional period to comply with our legal or regulatory obligations, for the regular exercise of our rights in judicial, administrative, or arbitration processes, or to address any of your needs, such as responding to a request.

If there is no longer a legal basis applicable to the processing of your Personal Data, it will be removed from our systems and records or anonymized, meaning that the information will no longer be able to identify or make you identifiable.

If you wish to obtain more information about the retention period of your Personal Data, please contact us through our Data Protection Officer at the following email addresses: [juridico@piemonteholding.com](mailto:juridico@piemonteholding.com) or [lgpd@eleadacenters.com](mailto:lgpd@eleadacenters.com).

## **9. INTERNATIONAL TRANSFER OF PERSONAL DATA**

Occasionally, Piemonte Group may transfer your Personal Data outside Brazil, for example, for storage on international servers. In such cases, we will transfer your Personal Data securely and in compliance with the Applicable Data Protection Legislation.

Most often, the transfer will be to countries or international organizations that provide a level of protection for Personal Data equivalent to that required by the Applicable Data Protection Legislation. Since some countries may not have adequate legislation regulating the processing and international transfer of Personal Data, we adopt measures to ensure that third parties comply with the commitments established in this Notice. These measures may include reviewing the third parties' privacy and security standards and/or entering into appropriate contracts with specific clauses on the processing of Personal Data.

## **10. ARE YOUR PERSONAL DATA SECURE?**

Piemonte Group makes every effort to ensure the security and protection of your Personal Data, implementing administrative, technical, and physical measures to prevent unauthorized access, loss, or any other security incidents, striving to safeguard your privacy and the confidentiality of your Personal Data.

To this end, Piemonte Group has a privacy and Personal Data protection governance program that includes ongoing and structured actions for managing risks related to your privacy, monitoring risk mitigation actions, developing and disseminating internal policies and standards on data protection and information security, among other initiatives, with the aim of complying with the Applicable Data Protection Legislation and adopting best market practices.

Finally, we are attentive to the storage of your Personal Data in secure environments, employing the technical and organizational security measures required by law, considering the state of technology, and ensuring the integrity, security, and confidentiality of the Personal Data processed by Piemonte Group.

## **11. YOUR PERSONAL DATA PROTECTION RIGHTS**

An essential part of the LGPD is recognizing the rights to privacy and protection of Personal Data of the Data Subjects. Therefore, according to the LGPD, you may exercise, as applicable to your case, the following rights concerning your Personal Data:

- (a) Confirmation of the Existence of Processing: The right to inquire whether we process your Personal Data and what Personal Data we process.

- (b) Access: The right to access the Personal Data we hold about you or, in some cases, to receive a copy of this Personal Data in electronic format.
- (c) Correction: The right to request the correction of your Data if it is incomplete, inaccurate, or outdated. You are responsible for keeping your information correct and updated, and you may update it at any time.
- (d) Anonymization, Blocking, or Erasure: The right to request the anonymization, blocking, or erasure of unnecessary or excessive Personal Data, or Personal Data processed in noncompliance with LGPD provisions.
- (e) Portability: The right to request the transfer of the Personal Data we collect about you to another service or product provider, upon express request, according to ANPD regulations, observing commercial and industrial secrets.
- (f) Erasure\*: The right to request the erasure of your Personal Data whenever it is processed based on your consent.
- (g) Information: The right to receive information about the processing of your Personal Data, including the public and private entities with which we may share your Personal Data.
- (h) Revocation of Consent: Whenever we process your Personal Data based on your consent, you have the right to request the revocation of this consent at any time. Upon request for revocation, we will immediately cease processing, unless we have another legal basis. You also have the right to be informed about the possibility of not providing consent and the consequences of refusal.
- (i) Complaint\*\*: The right to contact and/or petition the ANPD to file a complaint against our Personal Data protection practices. However, we request that you do not hesitate to contact us before filing any complaint with the ANPD.

\*There are situations where Piemonte Group must retain your Personal Data, which may mean we cannot fulfill your request for erasure. In such cases, we will send you a communication explaining the reasons preventing deletion, which may include the regular exercise of our rights in legal proceedings, compliance with legal obligations, among others.

**\*\*You have the right to contact and/or petition the ANPD to file a complaint against Piemonte Group's data protection and privacy practices. However, we request that you contact us using the information below before filing any complaint with the competent data protection authority so that we can try to resolve your query or complaint promptly.**

If you wish to exercise any of the rights listed above or have questions about their applicability and scope, please contact our Data Protection Officer at the following email addresses: [juridico@piemonteholding.com](mailto:juridico@piemonteholding.com) or [lgpd@eleadatacenters.com](mailto:lgpd@eleadatacenters.com).

## **12. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be reviewed by the Piemonte Group at any time. We recommend that you periodically visit this Policy to stay updated on how we handle your Personal Data. Whenever we make significant changes to the content of this Policy, which involve:

- i. the specific purpose, manner, and duration of the Processing;
- ii. the identification of the Data Controller; or
- iii. the sharing of Personal Data by the Data Controller and its purposes, you will be notified before the changes become applicable to you.

## **13. DATA PROTECTION OFFICER**

If you believe that your Personal Data is being processed in a manner inconsistent with this Policy or with your choices as a Data Subject, or if you have any questions, comments, or suggestions related to this Policy or how we handle your Personal Data, please contact our Data Protection Officer at the following email addresses: [juridico@piemonteholding.com](mailto:juridico@piemonteholding.com) or [lgpd@eleadatacenters.com](mailto:lgpd@eleadatacenters.com).

## **14. APLICABLE LAW AND JURISDICTION**

This Policy is governed and interpreted exclusively according to the laws of the Federative Republic of Brazil. The Central Court of the District of Rio de Janeiro, Brazil, is designated to resolve any claims, disputes, conflicts, or controversies involving this Policy, prevailing over any other, regardless of how privileged it may be or become.

These terms and conditions were last reviewed on July 26, 2024.