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1 OBJECTIVE

The purpose of this Privacy and Data Protection Management Standard is to provide information on how Brava Energia S.A. and/or its subsidiaries ("Brava Energia" or "Company") carries out, as the controller of personal data, the processing of personal data, explaining clearly and transparently how we process and protect the personal data that, for various reasons, they are processed, accessed, collected and/or stored by Brava Energia and what are the rights of data subjects by virtue of these processing activities. The security of personal data is vital for the Company and for the continuity of our business, and Brava Energia's main objective is to treat the personal data under its care ethically and securely.

2 APPLICATION AND SCOPE

This Privacy and Data Protection Management Standard is applicable to Brava Energia and its subsidiaries that have access to any personal data processed by Brava Energia.

The precautions and rules provided for in this Management Standard apply especially to all customers, business partners, investors and any other interested party that relates to Brava Energia, as well as service providers, suppliers and all groups and companies that relate, at some point, to Brava Energia. In addition, the adoption of this regulation may be a requirement to carry out commercial business or institutional partnerships with Brava Energia.

3 REFERENCE DOCUMENTS

- Law No. 13,709, of August 14, 2018, LGPD – General Law for the Protection of Personal Data.
- Guidelines for Cookies and Personal Data Protection of the ANPD - National Agency for the Protection of Personal Data.

4 DEFINITIONS

ANNYMIZATION: use of reasonable technical means available at the time of processing, through which personal data loses the possibility of direct or indirect association with an individual.

NATIONAL AUTHORITY: Public administration body responsible for ensuring, implementing, and supervising compliance with the LGPD throughout the national territory.

LEGAL BASIS: hypothesis that authorizes the processing of personal data, as provided for in article 7 of the LGPD.

BLOCKING: temporary suspension of any processing operation, by keeping personal data or database.

COLLECTION: collection of personal data for specific purposes.

CONSENT: free, informed and unequivocal manifestation by which the holder agrees to the processing of his or her personal data for a specific purpose.

CONSERVATION: the act or effect of keeping personal data stored even though the purpose for which it was collected has already been achieved or the processing period has ended.

CONTROLLER: natural or legal person, under public or private law, who is responsible for decisions regarding the processing of personal data.

CONTROL: action or power to regulate, determine or monitor actions on personal data.

ANNYMIZED DATA: data relating to the holder who cannot be identified, considering the use of reasonable technical means available at the time of its processing.

PERSONAL DATA: information related to the identified or identifiable natural person.

ELIMINATION: exclusion of data or data set stored in a database, regardless of the procedure employed.

DATA PROTECTION OFFICER (DPO): person appointed by the controller to act as a communication channel between the controller, the data subjects, and the National Data Protection Authority (ANPD).

INFORMATION SECURITY GUARANTEE: the ability of systems and organizations to ensure the availability, integrity, confidentiality and authenticity of information.

OPERATOR: natural or legal person, under public or private law, who processes personal data on behalf of the controller.

PROCESSING: the act or effect of processing data. See "data processing".

HOLDER: natural or natural person to whom the personal data that is the object of processing refers.

TRANSFER: Moving data from one storage area to another, or to a third party.

INTERNATIONAL DATA TRANSFER: transfer of personal data to a foreign country or international organization of which the country is a member.

TRANSMISSION: movement of data between two points by means of electrical, electronic, telegraphic, telephone, radioelectric, pneumatic devices, etc.

DATA PROCESSING: any operation carried out with personal data.

SHARED USE OF DATA: communication, dissemination, international transfer, interconnection of personal data or shared processing of personal databases by public bodies and entities in compliance with their legal competences, or between these and private entities, reciprocally, with specific authorization, for one or more processing modalities permitted by these public entities, or between private entities.

USE: act or effect of using the data.

5 RESPONSIBILITY AND AUTHORITIES

5.1 Executive Board

- Define the strategy for the governance of personal data in the Company.
- Monitor compliance with Brava Energia's Privacy Governance Program.
- Supervise the proper use of personal data in Brava Energia's activities.
- Provide guidelines for the Data Officer (DPO) to correctly communicate to the ANPD and the data subject regarding the possible occurrence of a security incident that may cause relevant risks or damage to the data subjects.
- Ensure transparency, ethics and compliance in the processing of personal data within the scope of the Company.
- Provide guidelines for meeting the rights of the holders of personal data processed by the Company.
- To annually monitor and monitor the update of the Registry of Data Processing Operations - ROPA.
- Define the strategy for cases of international transfer of personal data under the terms of the LGPD and other ANPD resolutions.
- Approve the Incident Response and Remediation Plan.

5.2 Legal

- Assist in decision-making about a possible notification of an incident and/or breach of personal data.
- Support the DPO in the analysis of requests for rights of personal data subjects.
- Ensure, with the support of the DPO, that all of the Company's contracts contain privacy clauses appropriate to the applicable legislation and regulations and according to the nature of the contract.
- Provide legal support in the event of personal data security incidents.

- Provide legal support in the interpretation of legislation and regulations relating to the protection of personal data.

5.3 Subcommittee on Data Protection and Information Security

- Propose changes and/or updates to this Privacy regulation and related documents.
- Evaluate problems related to the processing of personal data and direct solutions.
- Guide the work of the DPO and the Information Security manager.
- Support the preparation of the Incident Response and Remediation Plan.
- Monitor the execution of Brava Energia's Privacy Governance Program and propose necessary adjustments and corrections.
- Support the implementation and dissemination of guidelines for personal data operators who relate to Brava Energia with a view to full compliance with the LGPD, as directed by the Company's leadership.
- Guide the preparation of the Personal Data Protection Impact Assessment (RIPD), in the applicable cases.

5.4 All Employees

- Identify in its activities those that involve the processing of personal data.
- Ensure the proper use of personal data in its activities.
- To comply with its activities in accordance with the provisions of this document and other internal policies and regulations of the Company.
- To be aware of this Privacy regulation and other internal regulations related to the protection of personal data.
- Report to the DPO, directly or through the dpo@bravaenergia.com email, any questions or incidents regarding the processing of personal data.

5.5 Personal Data Protection Officer or DPO (Data Protection Officer)

- Know and implement the legal and regulatory provisions in force in the country and their updates, as well as sectoral standards and good market practices that refer to privacy and protection of personal data.
- Dialogue with the National Authority for the Protection of Personal Data (ANPD), providing information and adopting the necessary measures.

- Establish general criteria for communication with data subjects, responding to their requests within the deadlines provided for in the applicable legislation, providing clarifications and adopting measures.
- Guide and provide advice to Employees and Brava Energia's areas regarding the legislation and regulations on data protection and the Company's internal regulations.
- To sensitize and train, through educational awareness, communication and training actions, Brava Energia's Employees and third parties, as necessary, on topics related to the protection of personal data.
- Perform the other duties determined by the Company's leadership or established in complementary internal rules.
- Carry out and annually update the Register of Personal Data Processing Operations (ROPA), through official templates, if any.
- Prepare a Data Protection Impact Report (RIPD), with a description of the personal data processing processes that may generate risks to civil liberties and fundamental rights, as well as measures, safeguards and risk mitigation mechanisms.
- Prepare and keep updated the Incident Response and Remediation Plan.

6 DESCRIPTION

Brava Energia may collect and process personal data related to the holders of the above-mentioned personal data, which may be provided by the holder himself or by third parties.

Typically, the personal data we process includes, but is not limited to, the following:

- **Personal Information:** information and various documents about the holder, such as full name, date of birth, telephone, e-mail, address, CPF, RG;
- **Surveillance Video Images:** audio recordings, footage, images on Brava Energia's premises.
- **Data Collected by Cookies on our website:** such as information about your browser, your device, access time and pages viewed.

6.1 For what purposes do we use personal data and the applicable legal bases?

Below, we list the main purposes for which we may process your personal data, without prejudice to other purposes identified in relation to Brava Energia's activities.

6.1.1 For the relationship with investors and shareholders

In accordance with regulatory requirements and good governance practices, publicly traded companies need to ensure the transparency of information related to the composition and structure of shareholders.

In addition, Brava Energia may use personal data of investors and shareholders to provide clarification about any doubts of the holders, inform them about registration in an electronic mail database and about any sending of personal information to comply with CVM and B3 resolutions.

6.1.2 To manage our contractual relationship, register suppliers and prospect partners

For the purpose of managing our contractual relationship, Brava Energia may process personal data of external employees and personal data of legal representatives with whom Brava Energia maintains contractual relations, for registration and qualification of suppliers, in the process of acquiring goods and services, for prospecting and closing deals and international payment of contracted services.

6.1.3 To analyze users' browsing profile

We process personal data collected through cookies to personalize the browsing preferences of users of our website, to provide a personalized user experience in relation to our services and content available virtually. For more information, access the attachment: Brava Energia Portal Cookies (ANX-01- PG-CORP-GRC-010), attached.

6.1.4 To qualify or direct a candidate to our jobs

When the data subject applies for one of our available vacancies, their personal data may be used to feed the recruitment and selection platform hired by Brava Energia. In addition, candidates' resumes may be stored for use in any future vacancies upon providing the consent of the data subject.

In other situations, we may process personal data to conduct research to improve our process of hiring people.

6.1.5 To comply with our legal obligations and defend our rights

To comply with legal or regulatory obligations that may require the processing of personal data. In addition, sometimes in order to defend Brava Energia's interests in administrative, judicial or arbitration proceedings, it will be necessary to process personal data.

6.1.6 To ensure access to Brava Energia's facilities

To eventually allow and record the access of third parties to Brava Energia's premises for various activities, such as maintenance and inspections of the premises of the place where the service will be performed and to ensure the visit of stakeholders to our headquarters, facilities and operations.

6.1.7 For the relationship with users on websites and social networks

When the holder shows interest in Brava Energia's activities, accessing and interacting with our websites and our profiles on social networks, we may use the personal data provided by the holder to send news and updates about our business, by institutional email.

In order to process personal data for the above purposes, Brava Energia needs a legal basis that supports a given situation and authorizes the processing of personal data, in accordance with the applicable legislation. Brava Energia processes your personal data always in accordance with the legal bases provided for in the LGPD, such as:

- Compliance with a legal or regulatory obligation.
- Execution of a contract or preliminary procedures related to a contract to which the holder is a party.
- Regular exercise of rights in judicial, administrative or arbitration proceedings.
- To meet our legitimate interest or those of a third party; or
- Consent, where applicable.

6.2 Sharing data with third parties

We will not share personal data with third parties outside the scope of Brava Energia's activities, the purposes described in this Management Standard or in disagreement with the applicable legislation

We may share personal data in the following cases: (i) to comply with a legal, regulatory, or judicial request; (ii) responding to requests from public authorities and (iii) by contractual force (situations pre-established by mutual agreement between the parties to the contract and in accordance with the applicable legislation).

In some cases, personal data may be shared with our suppliers or partners to make possible a certain service provision or for the development of Brava Energia's activities. Example: companies that process payments for our services, requiring personal data to enable this procedure.

Brava Energia adopts contractual measures to ensure that the partners with whom it shares personal data can guarantee an adequate level of protection for personal data and always in accordance with this Management Standard and the applicable legislation

There are also instances where we may be required by law or regulation to share your personal data with third parties. Example: provision of personal data to public agencies or regulatory agencies, such as the Federal Revenue Service, Bacen, ANP, etc.

6.3 Third-Party Links

Our website may contain some third-party links, plug-ins, and applications. By clicking on these links, the user allows third parties to collect or share their personal data

These links will direct the user to third-party websites that have their own privacy policies, remembering that Brava Energia does not exercise any type of control in external environments. Therefore, we have no liability towards these third parties. We recommend that the user, before accessing a link, verify that it is not a malicious link and that, when accessing the respective website, read its privacy policy and terms of use.

6.4 International transfers

If Brava Energia needs to carry out international transfers of personal data to achieve the purposes described in this Management Standard, the transfer to third parties located outside the country must be supported on a valid legal basis. In the absence of instructions from the ANPD regarding the legal bases for international transfers, especially about the standard clause models, Brava Energia may adopt the standards used in the European Union or in another country.

In some cases, international transfer may take place for the storage of information in cloud services hosted on servers located abroad. As a security measure, Brava Energia makes reasonable

efforts to only store the personal data necessary to achieve the purposes mentioned in this Privacy and Data Protection Management Standard.

6.5 Rights of data subjects

Brava Energia guarantees the exercise of the fundamental rights of freedom, intimacy and privacy to data subjects. The rights that may be exercised at any time and upon request to be made to the Data Officer are: 1) confirmation of the existence of processing; 2) access to data; 3) correction of incomplete, inaccurate or outdated data; 4) anonymization, blocking, or deletion of unnecessary, excessive, or processed data in non-compliance with the provisions of the LGPD; 5) portability of data to another service or product provider, upon express request, in accordance with the regulations of the national authority, observing commercial and industrial secrets; 6) deletion of personal data processed with the consent of the data subject, except if the storage is provided for in the LGPD; 7) information on the public and private entities with which the controller has shared data; 8) information on the possibility of not providing consent and on the consequences of refusal; 9) review of decisions made solely on the basis of automated processing of personal data that affect the interests of the data subject, including decisions aimed at defining their personal, professional, consumer and credit profile or aspects of their personality; and 10) opposition to the processing carried out based on one of the hypotheses of waiver of consent, in case of non-compliance with the provisions of the LGPD.

The holder also has the right to petition before the competent authorities and consumer protection agencies.

6.6 Contact of the personal data protection officer (DPO)

For the exercise of the rights of the data subjects mentioned in item 7, the request must be sent to the Data Officer (DPO), by e-mail: dpo@bravaenergia.com.

For the demand of the holders to be met, we need complete and up-to-date information. If the data provided is incomplete or outdated, Brava Energia does not guarantee that it will be able to follow up on the request.

6.7 Security

The security of personal data is important to the Company and, therefore, we have implemented technical and administrative measures capable of protecting personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate or unlawful processing.

Among the measures adopted are the inventory of devices, systems and facilities according to the risk represented by such technological assets, in addition to a web content filter and traffic analysis (firewall), antivirus, penetration tests and regular audits to ensure the validation of the internal security controls adopted, aiming at a continuous process of improvement in the environment.

In addition, we use anonymization and pseudo-anonymization techniques to encrypt personal data where possible. We also monitor our systems for potential vulnerabilities and attacks. If there is an incident with the data, we will always proceed in accordance with the provisions of the LGPD.

We inform you that our main websites have the SSL (Secure Socket Layer) Certificate, in order to guarantee security in the transmission of data between the browser and the website.

6.8 Retention and Termination of Personal Data Processing

We only store personal data to the extent that we need it to achieve the purpose for which it was collected.

In this way, we will keep the personal data of the holders for the period in which there is a contractual or commercial relationship with the holder.

When we collect personal data through cookies to better understand the user's experience and habits on our websites, as well as to personalize some services, the personal data will be kept for the necessary time, as long as the user does not exercise their right to revoke consent and have the data deleted from our database, according to the Cookies annex of the Brava Energia Portals.

When it is necessary to obtain consent for the processing of data, the holder may or may not provide consent. We emphasize that consent may be revoked at any time by the data subject and, upon request, Brava Energia will delete your personal data processed based on your consent within 15 days, unless there is a legal basis that authorizes the retention of the data. In the event of non-provision of consent or its revocation, it is expected that Brava Energia will not be able to meet certain demands, such as providing information or service.

In any case, at the end of the processing, the personal data will be deleted or anonymized within the scope and technical limits of the activities, and their storage will be authorized in the situations provided for in current legislation.

6.9 Modification of this Management Standard

Brava Energia reserves the right, at any time and at its sole discretion, to modify or update any part of the terms of this Privacy and Data Protection Management Standard to adapt it to future laws, applicable regulations or for technical, operational, commercial and corporate reasons. Thus, in case of updates or modifications to this Management Standard, Brava Energia will publish the new version.

Any updated version of this document fully replaces the versions previously disclosed at the time of its publication, so that the previous version will not be effective or effective, unless expressly stated.

7 REGISTRATION OF DOCUMENTATION

Not Applicable