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## **Privacy and Personal Data Protection Policy**

Grupo Madero, through its business processes, understands, respects and protects Privacy and Personal Data, whether it be data from its Customers, Employees, Suppliers, Service Providers, Third Parties or other Related Parties, regardless of the format and means of treatment ( physical documents and digital documents).

In this context, this Privacy and Personal Data Protection Policy aims to clearly indicate the guidelines and main rules for Processing Personal Data by Grupo Madero, pursuant to Law 13.709/18 and other applicable legislation.

This Policy may be updated at any moment, without prior notice.

### **1. To whom is the Policy applicable?**

This Policy is applicable to Personal Data collected and processed in Brazil, regardless of whether it is processed in national territory or abroad.

This Policy is applicable to all Grupo Madero Companies, as well as to all Customers, Employees, Partners and Third Parties of Grupo Madero and/or any individual or legal entity that may play the role of Holder and/or Operator of Personal Data, in which Grupo Madero has the role of Controller and/or Operator.

This Policy is an integral part of the Terms of Use and Conditions available on all platforms of Grupo Madero, and all Personal Data Processing activities are under the responsibility of Grupo Madero.

Whenever necessary, complementary corporate rules may be edited to support compliance to the Privacy and Personal Data Protection rules by Grupo Madero.

### **2. Definitions.**

- Any reference made in this Policy to a clause, item or annex shall be that specific clause, item or annex of this Policy, unless expressly provided otherwise.
  - The meaning attributed to each term herein defined must be equally applicable in the singular and plural forms of that term, and the words indicating gender must include both genders; and
  - Whenever the words "include", "includes", "inclusive" or "including" are used in this Policy, they shall be interpreted as being followed by the words "not limited to".
  - Any reference to laws presupposes the text of the law in force and any complementary legislation related to that law.
- For the purposes of this Policy, unless otherwise expressed herein, the words and expressions written in capital letters and listed below, in alphabetical order, shall have the following meanings:

**Anonymization:** use of reasonable technical means available at the time of processing, whereby data loses the possibility being associated, directly or indirectly, to a person, making that person no longer identified or identifiable;

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**Database:** a structured set of Personal Data, in electronic or physical format, established in one or more places.

**Blocking:** temporary suspension of any processing operation, by guarding personal data or the database;

**Client:** individual or legal entity that has a relationship with Grupo Madero through a relationship of consumption of products produced and marketed by Grupo Madero, in its restaurants, internet pages and/or electronic applications and/or arising from a relationship of consumption with the Group through its Partners;

**Employee:** an individual who has an employment relationship with Grupo Madero under a labor or statutory regime;

**Consent:** a free, informed and unequivocal manifestation by which the Holder agrees to having their personal data processed for a specific purpose;

**Controller:** entity responsible for decisions regarding Personal Data Processing; therefore, in this Policy, all Grupo Madero companies;

**Anonymized data:** data relating to a holder that cannot be identified, after using reasonable technical means available at the time of Processing;

**Personal Data:** information related to an identified or identifiable individual, including: their name, General ID (RG) number, National Registry of Individual Taxpayers (CPF) number, age, surname, e-mail, address, etc.;

**Sensitive Personal Data:** personal data on racial or ethnic origin, religious conviction, political opinion, trade union membership or organization of a religious, philosophical or political nature, data on health or sexual life, genetic or biometric data, when linked to an individual;

**Supervisor/DPO:** person appointed by the Controller, who acts as a communication channel between the Controller and the Holders and between the Controller and the National Data Protection Authority (“ANPD”). At Grupo Madero, the Supervisor is also called DPO (*Data Protection Officer*);

**Grupo Madero or Group:** the company MADERO INDÚSTRIA E COMÉRCIO SA, registered with the CNPJ / ME under nº. 13.783.221/0004-78, its branches, affiliates, subsidiaries and franchisees;

**LGPD:** General Personal Data Protection Law, Law no. 13.709/2018;

**Operator:** individual or legal entity, under public or private law, who processes personal data on behalf of the Controller, therefore, Partners of Grupo Madero;

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**Partner:** the individual or legal entity that appears as a supplier, service provider, partner and/or any third party that maintains a business and legal relationship with Grupo Madero;

**Platform:** all websites and applications belonging to Grupo Madero, including, but not exclusively, <MADERO><JERONIMO> and<GRUPO MADERO> ;

**Policy:** Grupo Madero's Privacy and Personal Data Protection Policy;

**International data transfer:** transfer of personal data to third parties located in a foreign country or international organization of which the country is a member;

**Third Party:** Individual or legal entity that does not have a relationship with Grupo Madero;

**Term of Use:** Term elaborated by Grupo Madero Group, available on each Platform, which Clients must expressly agree and acknowledge in order for Clients to access and use the products, services, promotions and be privy to news launched by the Group.

**Holder:** the individual whose personal data is undergoing processing;

**Processing:** any operation involving personal data, such as those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, destruction, evaluation or control of information, change, communication, transfer, dissemination or extraction;

### **3. How does Grupo Madero collect Personal Data?**

The collection of Personal Data by Grupo Madero Group can take place in different ways, directly or indirectly, for example, but not exclusively, through:

- (i) Registration data filled in by the Client on Grupo Madero's Platforms;
- (ii) Registration data filled in by the Client made available at Grupo Madero's restaurants;
- (iii) Receipt of electronic or printed curriculums, delivered or sent by the Holder to Grupo Madero;
- (iv) The receipt of Personal Data from the Employee and, if applicable, from their dependents, at the time of hiring;
- (v) Registration data from Third Parties and Partners at Grupo Madero areas;
- (vi) Registration data from participation in events and social programs promoted by Grupo Madero, when, with the express consent of the legal guardian, data on children and adolescents may be collected.

### **4. What Personal Data is normally handled by Grupo Madero?**

The Personal Data processed by Grupo Madero are adequate, relevant and not excessive in relation to the respective Processing purposes and are obtained in a fair and legal manner, if necessary, with the express consent of the Holder.

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The Personal Data processed by Grupo Madero Group are described in the registration forms available on the Platforms and will be used by Grupo Madero transparently, under the terms of this Policy.

**The Grupo Madero's Platforms are intended for persons over 18 (eighteen) years of age, therefore, we do not intentionally collect or carry out any type of Personal Data Processing of minors. If the Client does not have the minimum required age, they may not have access Grupo Madero's Platforms, without being represented by their parents, tutors or guardians, in accordance to the law.**

The Personal Data collected by Grupo Madero is also available in registration forms for Third Parties and Partners, as well as in registration files requested by the Department of Human Resources and Marketing to our Collaborators and Clients.

### **5. For what purposes is Personal Data collected and processed?**

Personal Data must only be collected for specific, explicit and legitimate purposes and may not be treated in a way that is incompatible with those purposes.

The Personal Data of Customers and Third Parties may be processed for the following purposes:

- (i) Identify and authenticate Customers, manage and process orders, promotions and registration transactions, in order to fulfill the obligations arising from the use of our services and purchase of our products;
- (ii) Inform Customers about news, products, services, features, content, promotions, news and other events promoted by Grupo Madero, its Partners and/or relevant Third Parties;
- (iii) Develop Customer profiles according to provided data and operations carried out, to customize offered services, products and benefits, including their communication and dissemination to Customers;
- (iv) Customize Customer internet browsing by capturing cookies from their devices, when authorized;
- (v) Comply with legal or regulatory obligations and/or exercise rights in judicial, administrative or arbitration claims;
- (vi) Combat fraud;
- (vii) To better adapt the products and/or services provided by Grupo Madero;
- (viii) Maintain and operate the Platforms and preserve continuity in the delivery of products and services, as well as the availability of services, products and benefits of Partners in which the Client has, in some way, expressed interest; and,
- (ix) External and internal communication of Grupo Madero.

The Personal Data of Employees (and, if applicable, their dependents), Partners and Third Parties may be processed for the following purposes:

- (i) Reorganization and/or corporate succession in order to maintain the continuity of our platforms, products and services;
- (ii) Hire service providers or suppliers;

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- (iii) Recruitment and selection of Madero Employees, as well as the formalization of their employment contracts and obligations arising therefrom, including hiring benefits and compliance with legal obligations;
- (iv) Customize Employee internet browsing by capturing cookies from their devices, when authorized;
- (v) Comply with legal or regulatory obligations and/or exercise rights in judicial, administrative or arbitration claims;
- (vi) To better adapt the products and/or services made available by Grupo Madero;
- (vii) The Group's external and internal communication;
- (viii) Maintain and operate the Platforms and preserve continuity in the delivery of products and services, as well as the availability of services, products and benefits of Partners in which the Client has, in some way, expressed an interest.

In addition to these situations, Anonymized Data may also be used (in which Holders would be unidentifiable).

The purposes for Processing, whenever possible, must be informed to the Holder at the time in which their Personal Data is collected.

In order to fulfill the purposes of Processing, Grupo Madero may share, under the terms of law, Personal Data between all its companies and with third-party Operators, or even co-Controllers, as well as Personal Data received from other controllers or operators.

## **6. What are the legal bases that authorize Personal Data Processing?**

Depending on the Personal Data processed by Grupo Madero and its respective purposes, the Processing may be authorized by one of the following legal bases: (i) consent of the Holder; (ii) legal or regulatory obligation; (iii) contractual obligation or pre-contractual procedures involving the Holder; (iv) regular exercise of rights by Grupo Madero, in judicial, administrative and arbitration proceedings; (v) legitimate interest of Grupo Madero; (vi) protection of the life or physical safety of the Holder; (vii) credit protection.

Depending on the Sensitive Personal Data processed by Grupo Madero and its respective purposes, the Processing may be authorized by one of the following legal bases: (i) consent of the Holder; (ii) legal or regulatory obligation; (iii) regular exercise of Grupo Madero rights, in judicial, administrative and arbitration proceedings; (iv) protection of the life or physical safety of the Holder; (v) guarantees for fraud prevention and security of the holder.

## **7. How long is Personal Data stored?**

Personal Data will be stored for as long as required by law or for as long as is necessary for the effective fulfillment of the purpose of processing, under the terms of the LGPD.

## **8. What are the Rights of the Holders?**

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Holders, whenever possible, should receive information about how their Personal Data will be processed at the time of collection, including: purpose, name of Controller, types of data collected, data recipients and information about their rights.

Holders may exercise their rights to confirm the existence of Processing, access to data, correction of incomplete or outdated data; anonymization, blocking or deletion and revocation of consent through the email address at the end of this Policy.

Grupo Madero will implement procedures to guarantee responses to the Holders within the legally established deadlines.

Grupo Madero reserves, under the terms of the LGPD, the right to evaluate the requests made to Holders and fulfill them when technically feasible and effectively required by law. Notwithstanding, the evaluation response will be informed to the Holder.

The Holder must be aware that the exercise of some of their rights may prevent the continuity of their relationship with Grupo Madero, impacting them with the impossibility of Grupo Madero being able to provide their services and products.

### **9. What are the Holders' Obligations?**

The Holder is responsible for the veracity, accuracy and confirmation of Personal Data they provided at the time of registration, whether on the Platforms or by other means. It is strongly recommended that the Holder does not share with third parties, including family and friends, any logins, passwords or any type of credential, so that Grupo Madero will not be held responsible for any violations of the Privacy and Protection of the Holder's Personal Data in such cases.

The Holder is responsible for adopting in their devices, used to access Grupo Madero Platforms, all the necessary security measures, so that Grupo Madero will not be held responsible for any violations of the Holder's Privacy and Personal Data Protection due the lack of diligence of the Holder.

### **10. What are the obligations of Grupo Madero's Personal Data Operators?**

Grupo Madero will always look for Operators committed to Privacy and Personal Data Protection.

Grupo Madero's Personal Data Operators must comply with Grupo Madero's Privacy and Personal Data Protection Policy, as well as with the relevant legislation. In case of non-compliance with one or the other, Grupo Madero reserves the right to immediately cancel the contract, without any onus to Grupo Madero, as well as apply the appropriate legal and contractual sanctions.

Madero Group reserves the right to verify that Operators follow the processes, operating instructions and procedures defined by Grupo Madero, through ordinary or extraordinary audits.

### **11. What are the Security Measures adopted by Grupo Madero?**

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Except for the protection of its intellectual property, including trade secrets and industrial property, Grupo Madero informs that it adopts organizational and technical controls and procedures to ensure the security of the Personal Data under its Processing and prevent unauthorized access or disclosure, which could potentially result in alteration, accidental or illegal destruction, or loss of data and against all other illegal forms of Processing. Considering the legal obligations and good market practices, security measures are adopted to ensure a level of security appropriate to the risks represented by the Processing and nature of the Personal Data to be protected.

Among the organizational measures, Grupo Madero conducts constant training with its Employees, Service Providers and Suppliers on Privacy and Personal Data Protection.

When established by law, the companies of Grupo Madero will conduct the structuring of a Personal Data Protection Impact Report (“RIPD”).

## **12. Cooperation with ANPD.**

Grupo Madero will cooperate with the National Data Protection Authority – ANPD in any matter related to the Protection of Personal Data, within the limits provided for in the LGPD and without renouncing any right of defense and resources that are guaranteed.

The DPO must act as the primary coordinator between the companies of the Madero Group and ANPD, having as support the Collaborators and/or Service Providers and/or Suppliers, potentially involved in the questioned Process or procedure.

## **13. Communication Channel:**

Grupo Madero makes available to Holders, Operators and any other person (individual or legal) free of charge, an exclusive communication and service channel for issues related to Privacy and Personal Data Protection.

All questions related to the topic of Privacy and Protection of Personal Data should be directed to the DPO, Mr. Luciano Johnson, through the e-mail: [privacidade@grupomadero.com.br](mailto:privacidade@grupomadero.com.br)