



## G-Inter Data Protection and Privacy Policy

GInter respects individual privacy and values trust of its customers, employees, suppliers, business partners and others. GInter strives to collect, store, process and distribute Personal Information in a manner consistent with the laws of the countries in which it does business and has a tradition of maintaining the highest ethical standards in its business practices. This Privacy Policy (the "Policy") sets forth the privacy principles that G-Inter follows regarding the Information transferred to its customers, employees, suppliers, business partners from anywhere in the world, including the European Economic Area (EEA).

The purpose of this policy is to inform data owners (customers, employees, suppliers, business partners) and provide us with information about the management of your personal data. G-Inter, in the scope of providing its services, needs to collect some personal data from its Customers.

This Data Protection Policy aims to help customers, employees, suppliers and business partners understand what personal information we collect, how and why we use it, who we disclose it to and how we protect your privacy when using our services or visiting our Platforms.

For the purposes of this Policy, the following definitions shall apply:

"Personal information" means any information or set of information that identifies or could be used by or on behalf of G-Inter to identify an individual. Personal Information does not include coded, anonymous or publicly available information that was not combined with nonpublic Personal Information. "Sensitive personal information" means personal information that reveals race, ethnicity, trade union membership, political opinions, or religious or philosophical beliefs, which relate to health or sex life, or which contain criminal records. In addition, G-Inter will treat as sensitive personal information any personal information received from a partner where that partner treats and identifies such personal information as sensitive.



## 1 USE OF PERSONAL DATA

The intention is that all customers, employees, suppliers and business partners become aware of the general privacy rules and the terms of processing personal data that we collect, in strict deference to and compliance with applicable legislation in this regard.

Personal data means any information of any nature and regardless of its support, including sound and image, relating to an identified or identifiable natural person (data subject). Any person who can be identified directly or indirectly, namely by reference to an identification number or to more specific elements of his/her physical, physiological, psychic, economic, cultural or social identity, shall be considered identifiable.

G-Inter seeks to respect best practices in security and personal data protection, promoting actions and improving systems in order to protect the data that is provided to us by our customers, employees, suppliers and business partners. G-Inter will not sell or share such information with third parties in ways other than those disclosed in this Policy

G-Inter collects, stores and processes Personal Information of current and past employees and job seekers, such as name, contact information, government identifier, financial account information, and family information. G-Inter collects Personal Information for employment-related purposes and legitimate business reasons for human resources, such as personnel and employee management and evaluation, recruitment, and staff; payroll management; absence monitoring; training and development; management planning; evaluation and promotion; trade union negotiations; production and publication of company address books and telephone and e-mail directories; e-mail management and other communication systems; production of employee identity cards; monitoring the use of company resources; information for contacting close relatives in an emergency; filling job positions; management and operations of its benefits and compensation programs; meeting government reporting requirements; health, safety and security management. G-Inter does not requests or collect information about political opinions, religion, philosophy or sexual preference. To the extent that G-Inter maintains information about trade union membership, health status, race or ethnicity, G-Inter will protect and process such information in a manner consistent with this Policy and the applicable law.

G-Inter also collects, stores and processes Personal Information of potential customers, consumers, suppliers, consultants and professional advisors, distributors, resellers, business partner suppliers and others. G-Inter collects this Personal Information for, among other things, legitimate business reasons, such as processing and fulfillment of orders. All Personal



Information collected by G-Inter will be used for legitimate business purposes consistent with this Policy. G-Inter may process and disclose Personal Information.

## 2. PRIVACY PRINCIPLES

G-Inter undertakes to submit the Personal Information covered by this policy to the following principles:

(1) NOTICE: Where G-Inter collects Personal Information directly from individuals, it will inform you of the purposes for which G-Inter collects, stores and processes Personal Information about them, the types of partners to whom G-Inter discloses such information and the options and means, if any, that G-Inter offers individuals to limit the use and disclosure of their Personal Information. The notice will be provided in clear language when individuals are requested to provide Personal Information to G-Inter, or as soon as possible, and in any event, before G-Inter uses the information for a purpose other than that for which it was originally collected.

(2) CHOICE: G-Inter will offer individuals the opportunity to choose (disable) if their Personal Information is (a) to be disclosed to partners, or (b) to be used for a purpose other than that for which they were originally collected or subsequently authorized by the individual. For Sensitive Personal Information, G-Inter will give individuals the opportunity for affirmative and explicit consent (enable) for the disclosure of information to a Partner or the use of the information for a purpose other than that for which it was originally collected or subsequently authorized by the individual. G-Inter will provide individuals with reasonable mechanisms to opt-in or out should the necessary circumstances arise.

(3) DATA INTEGRITY AND LIMITATION OF PURPOSE: G-Inter will use Personal Information only in a manner in compliance with the purposes for which it was collected or subsequently authorized by the individual. G-Inter will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete and current.

(4) LIABILITY FOR SUBSEQUENT TRANSFER: G-Inter uses partners to assist us in accomplishing the purposes described in this Policy, for example, to support our customers, perform technical operations, and store and transmit data. G-Inter will confirm that any partner - to whom it discloses Personal Information - will adequately protect the privacy of such Personal Information. Examples of appropriate privacy safeguards include: an agreement that requires the partner to provide at least the same level of protection as required by the relevant privacy principles, and the third party is subject to applicable data protection laws. If G-Inter becomes



aware that a partner is using or disclosing Personal Information in breach of this Policy, G-Inter will take reasonable actions to prevent or discontinue the use or disclosure. G-Inter holds partners - to whom it discloses Personal Information - accountable for maintaining our employees and customers trust in the company.

(5) ACCESS AND CORRECTION: Upon request, G-Inter will grant individuals reasonable access to their Personal Information. In addition, G-Inter shall take reasonable steps to allow individuals to correct, change or delete information that is shown to be inaccurate or incomplete. Any employee who wishes to review or update their Personal Information may do so by contacting the local Human Resources department.

(6) SECURITY: G-Inter will take reasonable precautions to protect Personal Information under its control against loss, misuse and unauthorized access, disclosure, change and destruction. G-Inter protects your data in a number of ways. Physical security is designed to prevent unauthorized access to the database equipment and hard copies of Confidential Personal Information. Electronic security measures continuously monitor access to our servers and provide protection against hackers or other unauthorized access from remote locations. This protection includes the use of firewalls. G-Inter limits access to Personal Information and data to such persons in the G-Inter organization, or as G-Inter Agents, who have a specific business purpose to maintain and process such information and personal data. Individuals who have been granted access to Personal Information are aware of their responsibilities to protect the security, confidentiality and integrity of such information and have received training and instruction on how to do so.

(7) APPEAL, EXECUTION AND RESPONSIBILITY: G-Inter will conduct compliance audits of its relevant privacy practices to verify compliance with this Policy and the relevant privacy principles. Any employee determined by G-Inter to be in violation of this Policy will be subject to penalties up to and including termination of employment.

### 3. INTERNET PRIVACY

G-Inter sees the Internet, intranets and the use of other technologies as valuable tools for communication and interaction with consumers, employees, suppliers, business partners and others. G-Inter recognizes the relevance of maintaining the privacy of Personal Information collected through its websites. G-Inter's sole purpose in operating its sites is to provide information about products and services to the public. Overall, visitors can reach G-Inter through the web without disclosing any Personal Information. Web visitors may voluntarily choose to



provide Personal Information through G-Inter's websites, but are not required to do so. G-Inter collects information from site visitors that voluntarily provide Personal Information by filling out and submitting online questionnaires on comments on the site, requesting information about products or services or seeking employment. Personal Information voluntarily provided by users of the site relates to contact information limited to user name, home and/or business address, phone numbers and email address. G-Inter collects this information so that it can answer questions and forward requested information. G-Inter does not sell this information.

#### 4. ESCALATION AND MONITORING

Ginter has an Ethics and Compliance Committee whose objectives are to disclose this and other company policies, monitor and provide guidance on compliance. The Ethics and Compliance Committee also has the authority to process and adjudicate cases of violation of the Data Privacy and other company policies and to impose disciplinary sanctions and penalties.

The Contributor or Representative who becomes aware of any violation of the principles, guidelines or standards of this policy shall report the fact through the reporting channel or the Compliance Sector. Complaints regarding violations of the Code of Conduct will be forwarded to the Ethics and Compliance Committee.

#### 5. CHANGES TO THIS POLICY

G-Inter reserves the right to, at any time, make changes or updates to this Policy, and these changes are duly updated in our Platforms. We suggest that you check them from time to time to be aware of any changes.