

# PRIVACY AND PERSONAL DATA PROTECTION NOTICE

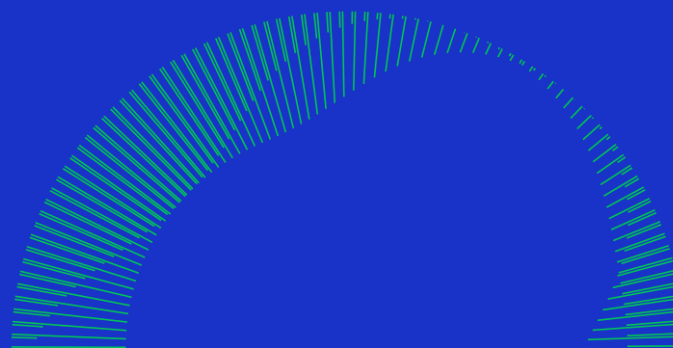
EMPLOYEES

**Issuing area:** 00. Políticas Corporativas

**Date:** July 06, 2022

**Code:** PC.31.0001

**Reviews:** 0



# Contents

(Click on the buttons to browse)

1. Objective of this Notice >

2. Guidelines >

3. Policy Updates >

4. Policy Breaches >

5. Annexes >

6. Documents >

7. Glossary >



In this document we use some technical terms, so if you have a query you can refer to the Glossary.



# 1. Objective of this Notice

This Privacy and Personal Data Protection Notice (P&DP Notice) was created to **establish, update and unify** the guidelines at Suzano for processing employees' personal data.

Based on it we demonstrate our commitment to:



**I.** Protect the personal data and rights of our Employees (Personal Data Subjects);



**II.** Adopt guidelines that ensure compliance with and the adoption of standards and good practices;



**III.** Promote transparency in the way we process personal data;



**IV.** Protect the company and our Employees from security incidents involving personal data.

## Why do we care about this?

To ensure that the processing activities involving employees' personal data are legitimate, lawful and in accordance with good practices and applicable laws, in order to:

### ENSURE



The success of our activities and operations in the domestic and external market; and

### SAFEGUARD



Our image and credibility among employees, suppliers, partners, the National Data Protection Authority (ANPD) and general public.



## 2. Guidelines

Suzano, as a “**Personal Data Controller**”, is committed to ensuring the privacy and protection of personal data of everyone with whom we interact, even if indirectly.

In this regard...

**We use rules and guidelines that:**



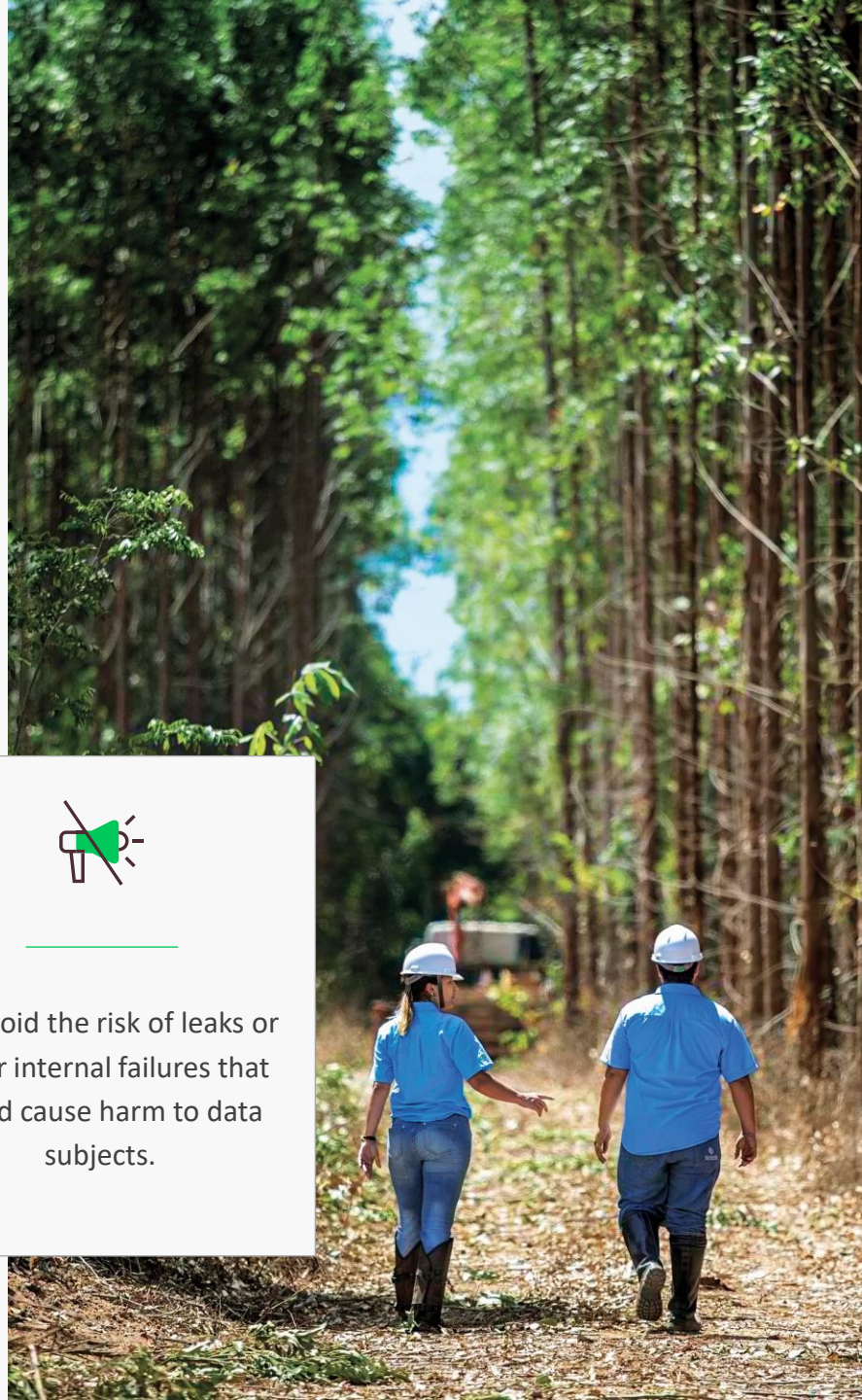
**I. Process personal data appropriately;**



**II. Protect personal data from undue access or processing;**



**III. Avoid the risk of leaks or other internal failures that could cause harm to data subjects.**



## See what our guidelines are:

2.1. The purposes for processing

2.2. Storage and sharing

2.3. Rules for consent

2.4. Compliance with the principles of the law

2.5. Data subjects' rights

2.6. Security measures

2.7. Employees' obligations

2.8. Queries or requests

## 2.1. The purposes for the processing of personal data

All the activities below will always observe the principles of good faith, transparency, non-discrimination and minimization of personal data.



Performance of the employment contract such as admission and termination;



Protection of the life or physical security of employees;



Contracting physical and mental well-being services (such as gyms);



Ensuring access to the company's environments;

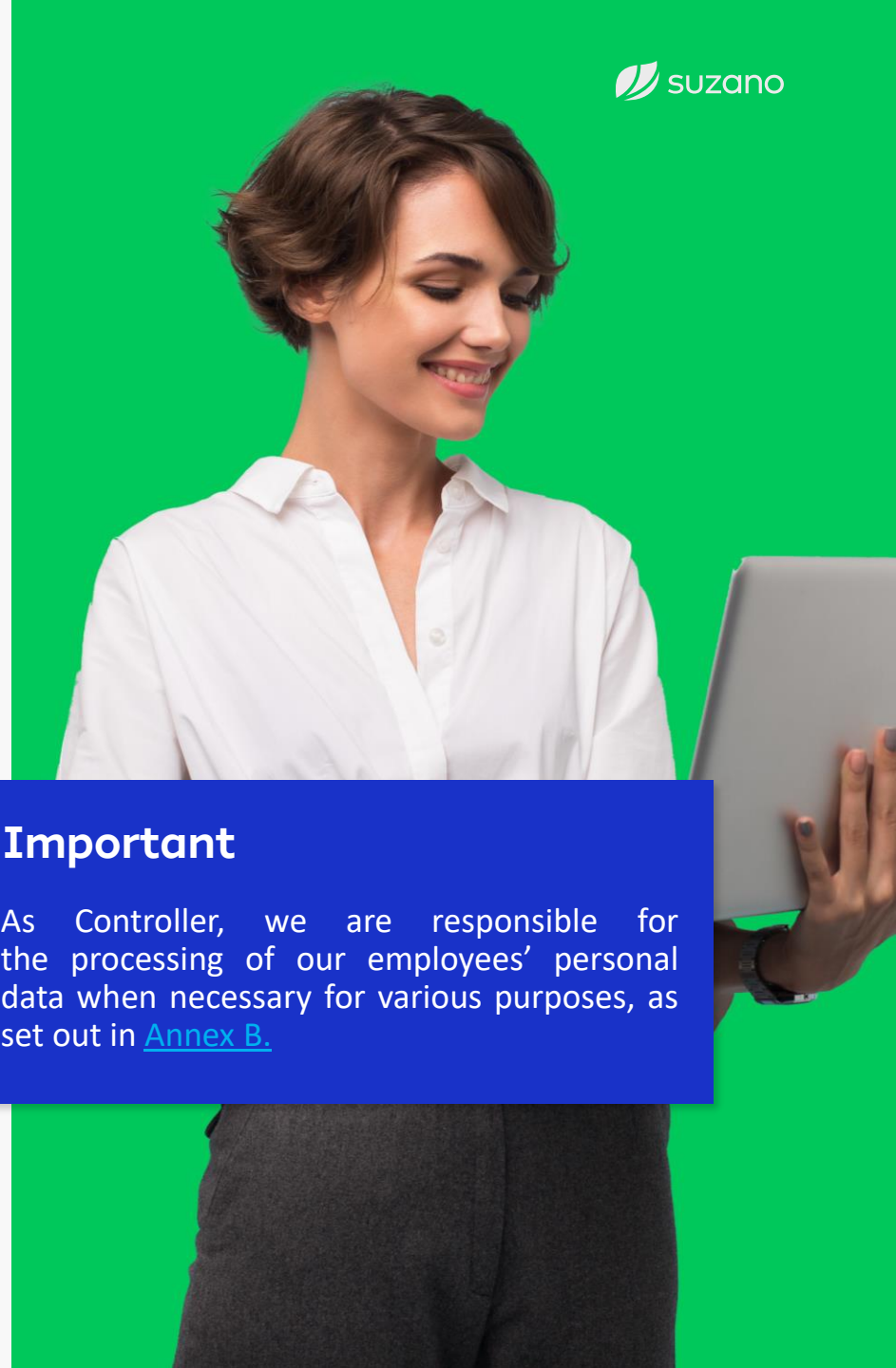


Developing our activities.



### Important

As Controller, we are responsible for the processing of our employees' personal data when necessary for various purposes, as set out in [Annex B](#).





## 2.2. Storage and Sharing of employees' data

How do we carry out these processes?

### Storage:

**Method of storage:** The data will be stored physically and/or electronically, on our own or on contracted third-party servers, in accordance with applicable laws;

**Reason for storage:** To comply with the purpose for processing.

**Period of storage:** For the duration of your employment contract and/or for the period necessary to comply with legal requirements and/or regular exercise of rights.



## Sharing:

Employees' and their dependents' personal data will be shared, if necessary, in order to:

Manage the employment relationship of the employees:

Perform the employment contract

Comply with legal and/or regulatory obligations;

Carry out work activities, among other activities performed by Suzano.

## 2.3. Rules for Consent

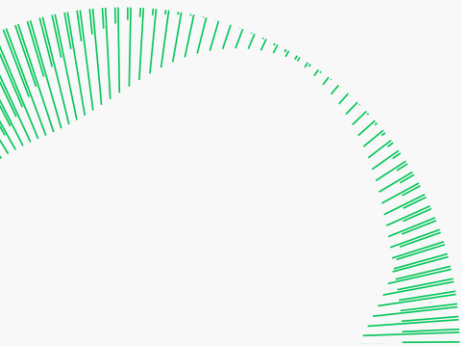
We may request Employees' consent to process necessary personal data in various ways, such as for:



**Initiatives and/or actions  
such as surveys, events  
and training.**



**Implementation of a  
diversity and inclusion  
policy.**



## 2.4. Compliance with the principles of the law

In all our activities, we must always be based on the following **PRINCIPLES**:

### Good faith

All processing operations must be guided by good intentions.

### Transparency

Data subjects will be ensured clear, accurate and accessible information.

### Need

The collection and use of personal data must be limited to the minimum necessary to comply with the purposes.

### Non-discrimination

Processing can never be intended for discriminatory, unlawful or abusive purposes.

### Security and prevention

We must ensure the security and confidentiality of personal data through technical and organizational measures to prevent security incidents.

### Purpose and appropriateness

The processing of personal data must be limited to purposes that are legitimate, specific and informed to the Data Subject.

## 2.5. Personal data subjects' rights

We must ensure compliance with the following **RIGHTS OF EMPLOYEES** (Data Subjects):

Confirm the existence of the processing;

Understand the reasons for the processing;

Know what the data is and have access to it;

Be informed about the source of the personal data;

Correct incomplete or outdated data;

Be informed about the parties responsible for the processing;

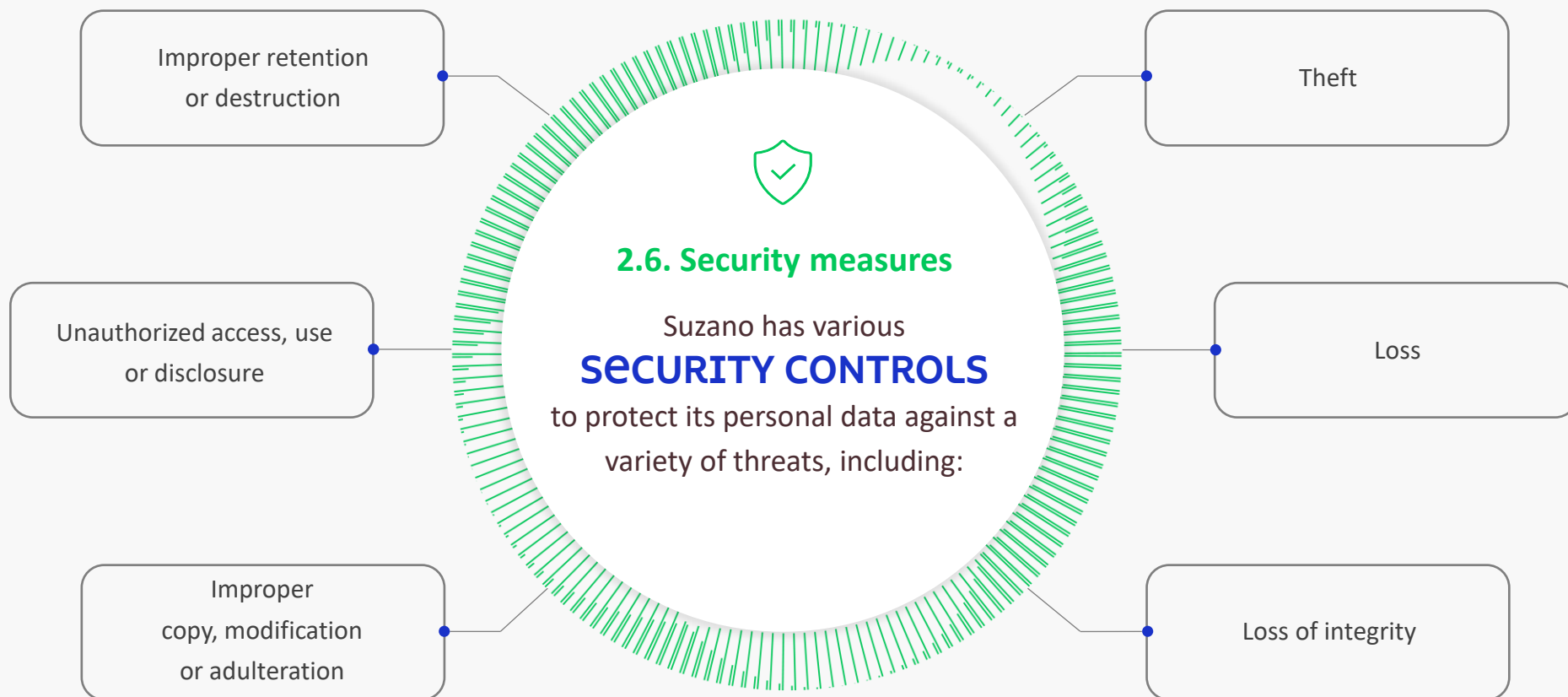
Revoke consents at any time;

In some cases, oppose certain types of processing;

In some cases, request anonymization, blocking or deletion of personal data.

Do you want to make a request related to your rights ? [Click here](#)





**Do you want to know more about this?**

Request information via the e-mail [ciberseguranca@suzano.com.br](mailto:ciberseguranca@suzano.com.br) or access our [Information Security Policy](#).



## 2.7. Employees' Obligations

Various activities performed by our Employees involve the processing of other Data Subjects' personal data such as: suppliers and clients.



Each Employee is responsible for complying with the obligations related to the personal data that they process in their activities.

### Therefore, pay attention to:

- **COMPLYING** with Suzano's policies when collecting, accessing, using, managing, disclosing, storing, transferring and otherwise processing personal data;
- **NOT SHARING** personal data with unauthorized third parties;



- **REPORTING** any actual or potential personal data breaches to the Personal Data Protection Officer.

- **FOLLOWING THE GUIDELINES** of the areas of Information Technology, Information Security, Data Governance and Privacy & Personal Data Protection on the acquisition or supply of technology services, as well as the storage of documents and information on external servers (cloud storage services, pendrives, etc).

**KEEPING** personal data only for as long as necessary for the specific purpose or as required by law or regulations;

- **COMPLETING THE DOCUMENT** Privacy by Design upon developing a new product/process/activity;

## 2.8. Queries and requests

Contact our **Service Channel** directly by clicking [here](#).



## 3. Policy Updates

We advise that this document always be revisited if there is a need for understanding, as it can be changed at any time and without prior notice.

## 4. Policy Breaches

We advise that this document always be revisited if there is a need for understanding, as it can be changed at any time and without prior notice.

## 5. Annexes



Annex A: Categories and types of personal data



Annex B: Purposes for the processing of personal data

## 6. Documents

Access the documents mentioned by this policy on page [xxx].



Access the documents here

## 7. Glossary

### What do these terms mean?

**ANPD** **ANPD:** Is the abbreviation for the National Data Protection Authority in Brazil.



**Controller:** An individual or company, public or private, that takes decisions on processing.



**Controller's Personal Data:** Any Personal Data shared by Employees for processing by Suzano or our Processors, including Sensitive Personal Data (racial or ethnic origin, religious conviction, political opinion, membership of a union or religious, philosophical or political organization, data relating to health or sex life, or genetic or biometric data), in the context of the Contract.



**Data Protection Laws and Regulations:** All rules related to Privacy and Personal Data Protection, such as: the Federal Constitution of 1988, Civil Code of 2002, Consumer Defense Code, Internet Law, General Personal Data Protection Law, and any decision published by any competent Supervisory Authority, applicable to the Processing of Personal Data that occurs in the context of the Contract.



**Employee:** Any worker, including subcontractors or outsourced workers, representatives or agents, whether paid or unpaid, on a full or part-time basis, who acts on behalf of the Controller and has access to Personal Data.



**LGPD:** Is the abbreviation for the General Data Protection Law, Law no. 13,709, of August 14, 2018.



**Personal Data:** Any information that makes it possible to identify, directly or indirectly, a person.



**Processing of Personal Data:** Any operation carried out on Personal Data, such as: collection, production, reception, classification, use, access, reproduction, transmission, distribution, handling, filing, storage, deletion, information evaluation or control, modification, communication, transfer, broadcast or extraction, among others.

**Processor:** Individual or company, whether public or private, that processes on behalf of the controller.



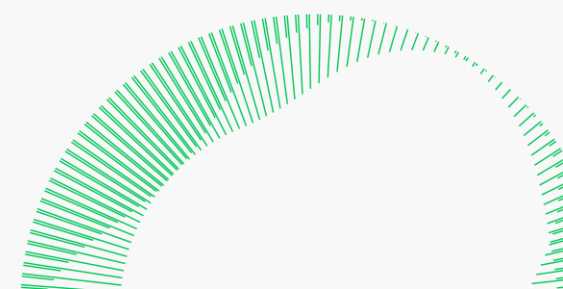
**Security Incident:** Any adverse security event, confirmed or suspected, that impacts the availability, integrity, confidentiality or authenticity of information. In the case of this Policy, we refer to incidents involving personal data.



**Supervisory Authorities:** Any authority, including judicial, that supervises, judges and applies the relevant legislation.



**Suzano or Company:** Suzano S.A., its subsidiaries and controlled companies (jointly “Suzano” or “Company”, controlled (or control) being considered the company in which the controller, directly or through other subsidiaries, holds partner rights that assure it, in a permanent position, majority in corporate deliberations and the power to elect the majority of administrators. For the purposes of this Policy, “subsidiaries” are entities in which the company has direct or indirect interest greater than the equivalent of 50% (fifty percent) of the capital stock.





# Annex A

## Categories & types of personal data

The personal data below are examples of data obtained by physical and/or electronic means, either when supplied by the Employee(s) at the time of application, or after being hired.

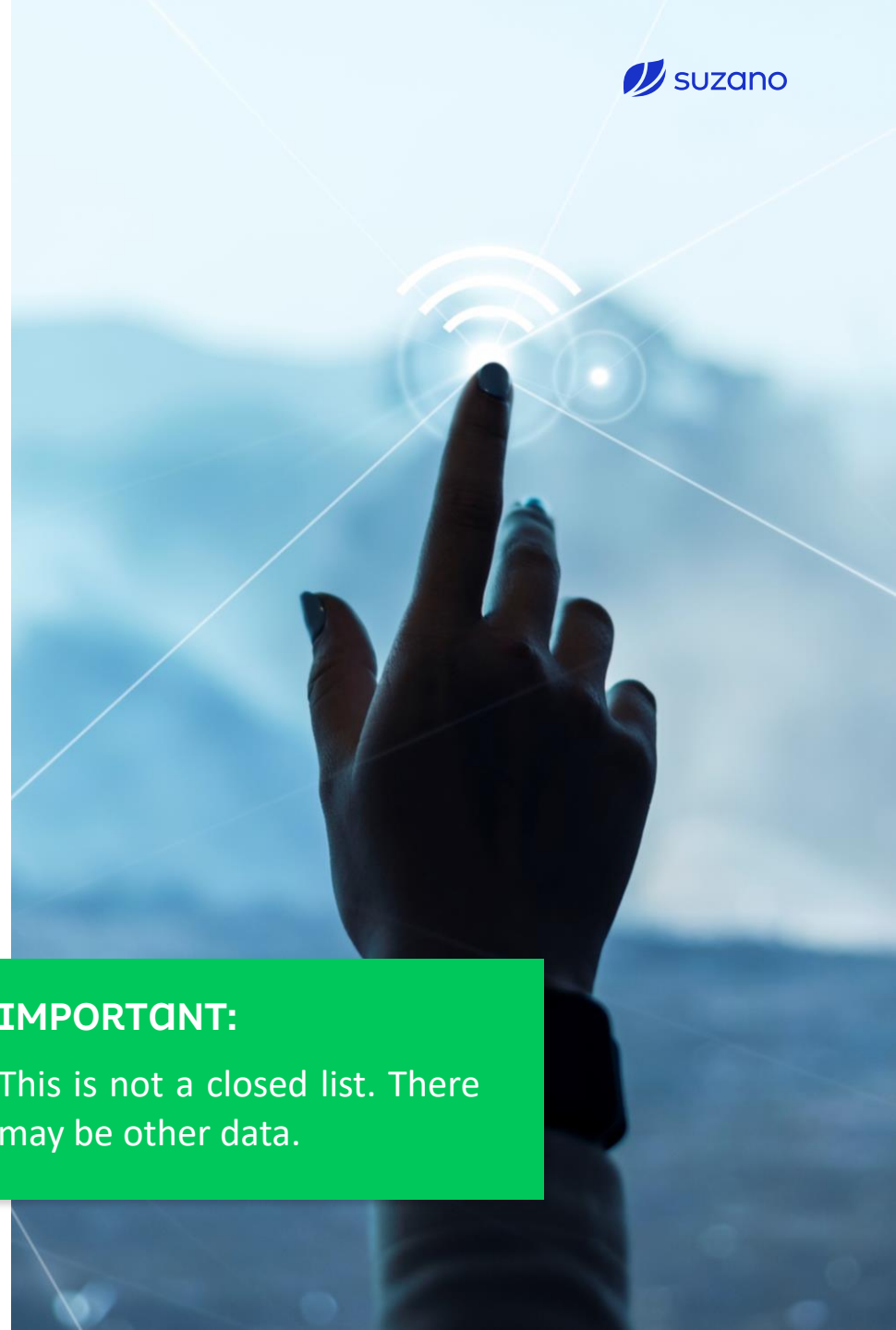
There are two categories of data: **PERSONAL DATA** and **SENSITIVE PERSONAL DATA**.

ethnicity  
gender  
Bank data  
Personal Number (PN)  
CPF  
name  
e-mail  
cargo  
politics  
biometric data  
health data  
sexual orientation  
Address  
race  
membership  
Union



### IMPORTANT:

This is not a closed list. There may be other data.



# Annex B

## Purposes for processing personal data

Here is a list of some of the purposes for which we use our employees' personal data:



Procedures related to hiring;



Compliance with legal obligations;



Use in judicial, administrative and arbitral proceedings;



**Protection of the life or physical security** of employees;



Assessment of **complaints made**;



Contracting corporate benefits;



Evaluation, calculation and payment of remuneration;



Dealing with access to the company's physical and virtual environments;

Among others that may arise in the context of the Employment Contract.