



**MAUSER**  
Packaging Solutions

PERSONAL DATA PROCESSING POLICY  
FOR SUPPLIERS, CUSTOMERS AND  
PARTNERS



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## 1. Introduction

Law 13.709/2018, better known as the General Personal Data Protection Law (LGPD), established rules for the processing of Personal Data carried out by companies of any type, including yours. The new law is extremely important for companies to be more careful with a type of asset that has become increasingly valuable: Personal Data.

We created this policy in order to clarify to our suppliers, customers and partners the implications of said law, as well as create basic rules to be followed by any company that wants or comes to contract with Mauser.

In the following pages, you will have access to the most important definitions of the law, you will understand how Mauser expects you to act and you will know how to protect yourself from breaking the law. It is worth remembering that violations of the LGPD can result in administrative fines of up to 50 million reais, in addition to impacting your service provision, sale of materials or partnership agreement. In this way, Mauser expects from you the commitment necessary to comply with this Policy, which aims to protect the rights not only of our companies (contractor and contractor/partner), but also the rights of the holders of Personal Data.

## 2. LGPD Definitions

First, it is important that you understand the definitions created by the LGPD and reproduced in this Policy:

<b>Natural Person</b>	Also known as a physical person, that is, every human being as an individual, from birth to death. It is the individual as a subject with rights and duties.
<b>Personal Data</b>	Information relating to an identified or identifiable natural person;
<b>Sensitive Personal Data</b>	Personal data on racial or ethnic origin, religious conviction, political opinion, membership of a union or organization of a religious, philosophical or political nature, data relating to health or sex life, genetic or biometric data, when linked to a natural person;
<b>Anonymized Data</b>	Data relating to the data subject that cannot be identified, considering the use of reasonable technical means available at the time of its treatment;
<b>Data Holder</b>	Natural person to whom the Personal Data that are processed;
<b>Controller</b>	Natural or legal person, of public or private law, who are responsible for decisions regarding the processing of Personal Data;
<b>Operator</b>	Natural or legal person, governed by public or private law, who processes Personal Data on behalf of the controller;
<b>Data Protection Officer</b>	Person appointed by the controller and operator to act as a communication channel between the controller, data subjects and the National Data Protection Authority (ANPD)

<b>Treatment</b>	Any operation carried out with Personal Data, such as those referring to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction;
<b>Anonymization</b>	Use of reasonable technical means available at the time of processing, through which a data loses the possibility of association, directly or indirectly, with an individual;
<b>International Data Transfer</b>	Transfer of Personal Data to a foreign country or international organization of which the country is a member;
<b>National Data Protection Authority - ANPD</b>	Public administration body responsible for overseeing, implementing and monitoring compliance with this Law throughout the national territory.



### 3. Application of the Policy

This Policy is applicable to any contract signed with Mauser that, directly or indirectly, causes the processing, by the Supplier, Customer and/or Partner, of Personal Data held by Mauser, including, but not limited to, database, lists, relations, qualifications of Natural Persons, etc.

In other words, whenever you have access to one or more Personal Data held by Mauser or as a result of a contract between the parties, you must comply with this Policy.

**ATTENTION: The definition of Treatment includes the most basic actions with Personal Data, such as mere access or storage.**

### 4. The role of the Supplier, Customer and Partner as a treatment agent

The Supplier and Customer of products or services or the Partner are classified, under the terms of the LGPD, as Operators in the processing of Personal Data, that is, they can only process Personal Data in accordance with the provisions of the contract.

In case of doubt or omission in the contract, you must formally question Mauser so that there is an official pronouncement. As Mauser is the Controller of the data processing delegated to you, only it can decide on the processing of Personal Data related, directly or indirectly, to the contract, and the Supplier, Customer or Partner must strictly observe its guidelines.

### 5. Procedures in the event of contract termination

When your contract with Mauser ends <sup>1</sup>, you must take the following steps:

- a) If you have access to Personal Data directly from the Mauser system structure, without making any copies for yourself, you **MUST** stop accessing immediately. If access is required even after the end of the contract, you must inform Mauser of your need, so that the company can comment.
- b) If you have in your possession<sup>2</sup> Personal Data that you have obtained from Mauser, you **MUST** collect and return it, or follow Mauser's guidelines for its elimination or Anonymization. If the maintenance of Personal Data is necessary even after the end of the contract, you must inform Mauser of this need, in order for the company to comment.

**ATTENTION: The processing of Personal Data after the termination of the contract with Mauser, even if merely copying or storing, will be considered a breach of contract, unless there is a pronouncement by Mauser to the contrary or the processing of data takes place by express legal or regulatory provision.**

*1 - A contract can be terminated for several reasons: expiration of the term, rescission, rescission, non-renewal, etc.*

*2 - For example, copying database, spreadsheets, relations, etc.*



## 6. Ownership of the Personal Data processed

Personal Data will always be the property of the Owner, never of the processing agents, which includes you and Mauser. Therefore, under no circumstances will you be able to understand or claim that the Personal Data arising from your relationship with Mauser is your property or that you have any right over them, unless the LGPD expressly provides otherwise.

## 7. Occurrences relating to Personal Data

You must immediately inform Mauser of any occurrence with the Personal Data you are processing as a result of the contract entered between the parties, such as, but not limited to, leakage, destruction, loss, alteration or improper communication.

You must also immediately notify Mauser of any subpoena or authority request that affects the processing of Personal Data.

## 8. Appointment of a Person in Charge

As defined by law, as of August 16, 2020, you must inform Mauser who your Person in Charge is or make such information available on your company's website, unless there is an ANPD regulation that exempts you from this obligation.

## 9. Sharing or transmitting Personal Data with third parties

You must not share or transmit the Personal Data to which you have access, directly or indirectly, as a result of the contract entered into between the parties to third parties without prior authorization from Mauser.

When contracting with third parties that have access to said Personal Data, such as systems, storage, software, among others, you must verify that the supplier/partner is committed to complying with the LGPD. When contracting, you are fully assuming, together with Mauser, the responsibility for the processing of Personal Data that the third party will carry out.

## 10. Specific processing of Personal Data by express order of Mauser

When Personal Data is in your possession, you must be prepared to comply with specific Mauser guidelines regarding processing, such as, for example, deleting or anonymizing certain data.



## 11. Safety and prevention

You must keep the Personal Data to which you have access safe and complete, by adopting practices, systems and tools commonly used by companies of similar size and activities.

Mauser may audit the level of security applied by you to the Personal Data to which it has access, and if the level of security is inadequate or, after approval, degrades, the contract for the provision of services, products and/or partnership may be harmed, being terminated with good reason in the most extreme cases.

## 12. Technical inspection

Mauser reserves the right to carry out a technical inspection of the headquarters and branches of its company, by scheduling and monitoring, to verify that the processing of Personal Data carried out is in accordance with the contract signed.

## 13. Compliance with LGPD

You declare to Mauser that you know and comply with the LGPD in relation to your business, as well as in the aspects in which the law affects the service provision or product supply contract.

## 14. Doubts

Your queries may be forwarded to the Data Protection Officer, via e-mail: [dataprotection.bra@mauserpackaging.com](mailto:dataprotection.bra@mauserpackaging.com).

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