



**PRIVACY POLICY &
PERSONAL DATA
PROTECTION
MK GROUP**

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Presentation

This Privacy and Personal Data Protection Policy aims to provide guidance and guidelines on the management of activities and operations for the processing of personal data performed by MK GROUP.

This document is part of the MK GROUP's compliance program to the General Data Protection Law (Law No. 13,709/2018 - "LGPD") and is intended for holders of personal data, client companies, partner companies and the general public.

The LGPD is a law that runs across different economic agents in Brazil, from the private, public, and third sectors, providing the rules and conditions so that personal data can be used in the activities of the processing agents.

In conducting its activities, MK GROUP performs operations for the processing of personal data in which it seeks the best interest of the holders, respecting their rights and freedoms, and can be characterized either as a Personal Data Controller or as a Personal Data Operator, according to the definitions of the LGPD, reinforcing, in all positions it occupies, the commitment to compliance with the applicable privacy and personal data protection rules.

MK GROUP's LGPD compliance process is materialized in the documents integrating the Privacy and Data Protection Management System, which include the technical and organizational measures implemented with the objective of managing the life cycle of the personal data object of processing, complying with the requirements of confidentiality, integrity, availability and authenticity of the data subjects' personal data, observing the principles that guide the protection of personal data, the principles of privacy *by design and by default*, mapping the risks to the privacy of personal data, managing the demands of data subjects as well as requests by government authorities, establishing a Data Breach Response Plan, promoting education by raising awareness of the importance of privacy and personal data protection, and assigning accountability to all users involved in the handling processes it performs.

This policy will be subject to permanent monitoring and review, seeking continuous improvement, in order to follow not only the expansion of the MK GROUP's activities, according to its values, mission and purpose, but especially to follow the technological innovations, implementation of new businesses, development of legislation, regulatory measures and technical standards involving the protection of personal data, rights and freedoms of the holders.

Purpose

The purpose of this policy is to meet the legal, regulatory and contractual requirements involving the organization under Law 13,709/2018 (LGPD), observing the rights of the Personal Data (PD) Subjects.

Scope

With respect to scope, this policy applies to the entire internal organization¹, directly to its contracted or outsourced employees and partners, as well as to external parties, such as its contracted or subcontracted PD Operators, business partners (third parties) and other stakeholders, so as to involve directly or indirectly all those who handle PD on behalf of MK GROUP, including, itself, on behalf of other Controllers.

Data Protection Policy

Principle

Personal Data is handled by the organization in several aspects of its life cycle, observing good faith and good governance practices.

Policies, processes and other related controls are applied, aiming at constant compliance with the LGPD, regulations of the National Data Protection Authority (ANPD, for its acronym in Portuguese) and other laws relating to the protection of personal data.

Data Protection Policy Statement

MK GROUP is classified as a **Controlling** Agent and an **Operating** Agent for PD, in the context of the LGPD definitions.

This policy confirms MK GROUP's commitment to protecting the privacy of the personal information of its prospects, clients, employees, contractors, partners, subcontractors and other stakeholders.

MK GROUP has engaged programs for an Information Security and Privacy Management System (SGSI-P, for its acronym in Portuguese) that is aligned with the international standards ISO/IEC 27001:2013 and ISO/IEC 27701:2019, to ensure that the processes of personal information and data are conducted guided by strict Security Risk Management and other good governance, service and data practices.

General Procedures for Handling Personal Data

The document "General Procedure for Personal Data Handling", documents processes for Personal Data Handling in the organization and has specific instructions for the required activities,

¹ Comprising the companies MK Química do Brasil | CNPJ nº 92.315.332/0001-83, MK Cargo Transportes Ltda. | CNPJ nº 14.207.774/0001-00.

based on the applicable ISO/IEC 27701:2019 controls, in line with the Brazilian General Data Protection Law.

Need for Personal Data Processing

MK GROUP has a specific procedure to identify the need for the Handling of Personal Data, in order to carry it out only when it is not possible to achieve its objectives without PD processing, and yet applying to such treatment all the principles of Personal Data Processing provided by the LGPD. This procedure complies with the principle of "subsidiarity", as good practice for assessing the need for processing prior to carrying it out.

Legal Basis for the Processing of PD under the LGPD

Article 7 of the LGPD clearly sets out the legal basis under which PD can be processed. The table below represents the summary of the processing hypotheses.

I	Upon provision of consent by the holder
II	For the controller's compliance with legal or regulatory obligations
III	By public administration, ...
IV	For the conduct of studies by research group ...
V	Execution of contract or procedures ...related to a contract to which the holder is a party...
VI	For the regular exercise of rights in judicial, administrative or arbitral proceedings...
VII	For the protection of the life or physical safety of the holder or third party
VIII	For the protection of health...
IX	When necessary to meet the legitimate interests of the controller or third party.
X	For credit protection...

Table 1 - Hypotheses for Personal Data Processing

Only the Controlling Agent makes decisions about the hypothesis of Personal Data Processing. Therefore, as the Operating Agent, there are no decisions to be taken regarding the legal basis. However, such processing will only be carried out by MK GROUP upon prior contract established and signed between the Processing Agents, with specific instructions as provided in this policy.

PD Subject's Consent

For cases where the legal basis for PD Processing is "Consent", the organization collects specified, highlighted and informed consent, providing all necessary clarifications to the personal data subject. The Consent Form is filed together with the related contract.

Personal Data Retention

With regard to "retention", the "PD 02 Data Retention Policy" is observed, in which the retention period for personal data in your business process is indicated, also observing the legal and contractual requirements for such, harmonizing its processes and *compliance* records.

Agreement with Personal Data Operators

MK GROUP observes the Privacy and Data Protection for its clients and other Data Subjects when entering into contracts with PD Operators, which minimally contain:

- I - The name of the processing;
- II - The duration of the processing;
- III - The nature and purpose of the processing;
- IV - The types of personal data involved;
- V - The rights and obligations of the parties involved;
- VI - The contracts also include terms stating that:
 - VII - The Operator shall only act on the documented instructions of the Controller, unless required by law to act without such instructions;
 - VIII - The Operator must ensure that people processing the data are subject to a Non-Disclosure Agreement or similar instrument that guarantees the confidentiality of the personal data being processed;
 - IX - The Operator must take appropriate measures to ensure the security of the PD Processing;
 - X - The Operator must take appropriate measures to assist the Controller to respond to requests from holders to exercise their rights;
 - XI - Taking into account the nature of the Processing and the information available, the Operator shall assist the Controller in fulfilling its obligations under the LGPD in Brazil in relation to the safety of the DP Processing, the notification of Data Breaches and Data Protection Impact Assessments;
 - XII - The Operator must delete or return all personal data to the Controller (at the Controller's option) at the end of the contract, and the Operator must also delete existing personal data, unless the law requires its storage; and

XIII - The Operator shall provide the Controller, and the Controller to the Operator, with information and evidence that both are complying with their obligations to the LGPD, when requested;

Organization as Operating Agent– Contract with Controllers

MK GROUP observes Privacy and Data Protection when acting as a PD Operator, through a contract signed between the parties, containing provisions that ensure that:

I – It will only process PD according to instructions documented by the Controller, unless required by law to act without such instructions;

II – It will inform the client Controller if, in its opinion, a processing instruction violates any regulation and/or law applicable to the intended PD Processing;

III - All those involved in the Handling of PD activities will have a signed Non-Disclosure (Confidentiality) Agreement, by their own term or through contractual clauses, to ensure the confidentiality and reliability of the actions;

IV – It will not use the PD under a contract for marketing and advertising without establishing that a consent has been properly obtained from the PD Subject; such consent shall not, in any circumstances, be a condition for the provision of the service;

V - It specifically observes and complies with Article 6 of the LGPD, which provides for good faith and principles for PD Processing activities;

VI – It will only involve another PD Operator if duly approved and agreed under a contract with its Controller;

VII – It will take appropriate measures to assist the Controller in responding to requests from individuals to exercise their rights;

VIII - Taking into account the nature of the processing and the information available, it will assist the Controller in fulfilling its obligations to the LGPD in Brazil in relation to the safety of the processing, the notification of Personal Data Breaches and Data Protection Impact Assessments;

IX – It will delete or return all PD to the Controller (at the Controller's option) at the end of the contract, keeping no copies, unless the law or any applicable regulatory regulation requires their storage; and

X - It makes itself available to the Controller and the ANPD for any needs of audits and inspections, as well as undertakes to give the Controller any information it needs to ensure that both are complying with their obligations to the LGPD.

Site and Cookies

As a way of respecting the principle of informative self-determination, when entering the sites <https://mkgrupo.com.br/>, <https://www.mkquimica.com.br/>, <https://soluscoureconstituído.com.br/> and <https://mkcarga.com.br/> the user is informed about the collection of cookies and can previously define their preferences, selecting only the cookies they will authorize.

Cookies are small text files that are stored in a user's computer when they access websites. MK GROUP's websites collect essential, analytical and marketing cookies. The settings for each type of cookie collected can be accessed via the "configuration" button in the cookies banner on the site's home page.

It is important to mention that the cookies called "essential" are necessary for the site to work properly (performance) and cannot be disabled, not collecting information that can identify the user.

"Analytical" cookies allow visitor behavior patterns to be analyzed and this information is used to improve the overall experience or identify areas of the website that need maintenance. The information is anonymous (it cannot identify the user and does not collect personal information).

"Marketing" cookies are used to track advertising effectiveness, provide a more relevant service and better advertisements to match the interests of site users, through the Google Ads tool.

To better evaluate the decision about consent to cookies, MK GROUP recommends the user to access the site <https://www.allaboutcookies.org/>, where there are detailed explanations on each type of cookie, as well as information on how to disable them.

In addition, the organization recommends that the visitor access the link below which explains how to access the cookie settings in several different browsers and how to disable them if desired: <https://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html>.

To disable *Google Analytics* on all sites, the user can access the link <https://tools.google.com/dlpage/gaoptout?hl=pt-BR> and make the necessary settings. All these links can be accessed in the Portuguese language at the user's option.

Cross-Border Data Transfer

The LGPD, in its Art. 33, determines the conditions for a Cross-Border Data Transfer to take place, as follows:

I – to countries or international organizations that provide a degree of protection of personal data adequate to that provided for in this Law;

II - when the controller offers and proves guarantees of compliance with the principles, the rights of the holder and the data protection regime provided for in this Law, in the form of:

- a) specific contractual clauses for a given transfer;
- b) standard contractual clauses;
- c) global corporate standards;
- d) regularly issued seals, certificates and codes of conduct;

III - when the transfer is necessary for international legal cooperation between public intelligence, investigation, and prosecution agencies, in accordance with the instruments of international law;

IV - when the transfer is necessary for the protection of the life or physical safety of the holder or of a third party;

V - when the national authority authorizes the transfer;

VI - when the transfer results from a commitment undertaken in an international cooperation agreement;

VII - when the transfer is necessary for the execution of public policy or legal attribution of the public service, with publicity being given under the terms of item I of the caput of art. 23 of this Law;

VIII - when the holder has provided his/her specific and highlighted consent for the transfer, with prior information on the international nature of the operation, clearly distinguishing it from other purposes; or

IX - when necessary to meet the hypotheses provided for in items II, V and VI, of art. 7, of this Law.

Important Note:

The conditions for a lawful cross-border data transfer still require regulation by the ANPD, which is why this policy does not determine which guideline will be observed for this purpose.

However, MK GROUP undertakes to, minimally, observe its relationship with PD Operators in extraterritorial scope, in order to give preference to hiring only those that demonstrate greater controls in relation to the discipline of Privacy and Data Protection.

It also undertakes to review this policy as soon as the ANPD regulates the legal provisions for Cross-Border Data Transfers.

Principles of Data Protection

MK GROUP is committed to handling PD in accordance with its responsibilities under the LGPD. Article 6 of the LGPD requires good faith in the handling of PD and establishes the observation of the following principles:

Purpose

Processing is carried out for legitimate, specific, explicit and informed purposes, without the possibility of further processing in a manner incompatible with these purposes;

MK GROUP only processes data for the purposes collected and communicated and not for other reasons without the agreement and knowledge of the Data Subject.

Adequacy

Compatibility of the processing with the purposes informed to the data subject, according to the context of the processing;

MK GROUP reviews and documents the data being processed, both as operator and as controller. In the latter case, the legal basis for processing is defined.

Need

Limitation of the processing to the minimum necessary to achieve its purposes, with a scope of data that is relevant, proportionate and not excessive in relation to the purposes of the data processing;

MK GROUP ensures that the data collected is not excessive and is adequate to the purpose for which it was collected.

Free access

Guarantee that data subjects are able to consult easily and free of charge the form and duration of the processing, as well as about the completeness of their personal data being processed.

MK GROUP guarantees Data Subjects the exercise of their rights and freedoms, free of charge, providing channels of communication with the organization, through the Data Officer via the e-mail lgpd@mkquimica.com.br.

Data quality

Guarantee, to the holders, of the accuracy, clarity, relevance and update of the data, according to the need and for the fulfillment of the purpose of its processing;

The handling performed by MK GROUP follows the principle of minimization, which requires that the data collected be minimal and only necessary for the proposed processing, with guarantees of their quality and accuracy, as well as their integrity, tuned to the purpose of the processing.

Transparency

Guarantee, to the data subjects, clear, accurate and easily accessible information about the performance of the processing and the respective handling agents, observing commercial and industrial secrets;

MK GROUP guarantees to the Data Subject the provision of clear information about their personal data and associated processing, through the Data Subject Service Flow, in a documented procedure, carried out through the e-mail lgpd@mkquimica.com.br.

Security

Use of technical and administrative measures capable of protecting personal data from unauthorized access and accidental or unlawful destruction, loss, alteration, communication or disclosure;

The Organization, through the Information Security and Privacy Management System, based on ISO/IEC 27001:2013, observes the additional controls to data privacy suggested by ISO/IEC 27701:2019, in order to properly conduct the PD Processing and also observing the security of all assets related to this process, reducing all associated risks to a level acceptable to the organization.

Prevention

Adoption of measures to prevent damage as a result of the Processing of Personal Data;

MK GROUP assures the Data Subjects that, by conducting the Security and Privacy Risk Management, it establishes preventive measures and necessary assessments so that their PD is not subject to Violations.

Non-discrimination

Impossibility of carrying out the processing for unlawful or abusive discriminatory purposes;

MK GROUP assures the Data Subjects that their PD will not be treated in a discriminatory and/or unlawful manner, nor will abuses be committed, so that only the proposed processing will be performed. To this end, it is at the disposal of the Data Subjects and the ANPD, as well as the Controllers for any clarifications that may be necessary.

Accountability

Demonstration, by the agent, of the adoption of effective measures capable of proving the observance of and compliance with the rules for the protection of personal data, including the effectiveness of such measures;

The organization, through its Privacy and Data Protection Program, allows good practices and governance to be properly applied, as provided for in the LGPD and able to provide evidence of compliance.

Storage of personal information

The storage of personal information complies with the Information Classification and Handling Policy, Backup Policy and Data Retention Schedule defined internally by MK GROUP.

Data Breach

In the event of a breach of the principles set forth in the LGPD, taking as a premise the preservation of confidentiality, integrity and availability of PD of Holders, MK GROUP will use the incident management process.

Data Breaches will be assessed and, when appropriate and required, the Data Subjects and the ANPD, as well as other authorities and entities provided for in the Data Breach Response Plan, such as other PD Controllers, are duly notified and activated, according to the deadlines provided for in the Law and detailed in the Plan.

The Rights of Data Subjects – art. 18 of the LGPD

I – Confirmation of Existence of Processing

PD Subjects have the right to be informed, upon request to the Controller, about the existence of Processing of their PD. Confirmation must be made immediately, if in a simple format, or within 15 days, if in a detailed format.

II – The right to access

Data Subjects have the right to access their Personal Data. Individuals may request access as provided by law, by formal request, through the e-mail lgpd@mkquimica.com.br.

III – The right to rectification

The LGPD includes the right for individuals to have inaccurate personal data corrected or completed if it is incomplete. Individuals may request access as provided by Law, by formal request through the e-mail lgpd@mkquimica.com.br.

In certain circumstances, MK GROUP reserves the right to refuse a request for rectification when the inaccuracy cannot be documented by the holder.

IV – Anonymization, blocking or deletion of unnecessary data

Data Subjects have the right to request the restriction or deletion of their PD. This is not an absolute right and only applies in certain circumstances. In some situations, for example, data cannot be deleted, anonymized or blocked because it is being used in a judicial, regulatory or administrative claim involving public authorities.

When processing is restricted, MK GROUP may store personal data but not use it. Individuals may request access as provided by law, by formal request, through the e-mail lgpd@mkquimica.com.br.

V – The right to data portability

The right to data portability allows Data Subjects to obtain and reuse their personal data for their own purposes in different services.

It enables them to easily move, copy, or transfer personal data from one IT environment to another in a safe and secure manner without affecting their usability.

Important note:

This right depends on regulation by the Brazilian Data Authority and does not apply to certain activities, such as those carried out by MK GROUP. In addition, it only applies to information that a Data Subject has effectively provided to a controller.

VI – The right to delete

The LGPD introduces the right for individuals to have PD deleted. Individuals may request access as provided by Law, by formal request at the link indicated in this policy. The right is not absolute and only applies in certain circumstances.

VII – Information on data sharing

The LGPD introduces the right for individuals to have information about who can access their PD. This information can be found in MK GROUP's internal Processing Activities Log and will be provided to the holder upon request at the e-mail lgpd@mkquimica.com.br.

VIII – Information on the possibility of not providing consent and on the consequences

Data Subjects have the right to be informed about the possibility of not providing consent to the Data Processing to which they are subject. Data Subjects must also be equally informed of the impossibility of exercising this right in the event that the Handling is not based on consent.

IX – Revocation of consent

The LGPD gives Data Subjects the right to revoke consent previously provided for a particular Processing of Personal Data. In the event consent is revoked, it may not be possible for the organization to continue to provide certain services. Should this be the case, the Data Subject will be duly informed, subject to the prior procedures for contract termination established by the company, when applicable.

X – Complaints to the ANPD

The LGPD gives Data Subjects the right to file complaints with the National Data Protection Authority, ANPD. This right is exercised directly with the ANPD and MK GROUP, if requested by the Data Subject, it undertakes to advise the Data Subject through its Data Officer.

Observations on the Rights of Data Subjects

In order to meet the legal requirements imposed by the LGPD, Data Subjects may exercise their rights by formal request through the communication channel made available by the organization: e-mail lgpd@mkquimica.com.br.

The document "General Procedure for Handling Personal Data", contemplates the process of "PD Holder Service" and describes in detail how and when to attend the PD Subjects.

Definitions

To ensure that the company understands its obligations to protect Personal Information, the following definitions apply and are based on the current understanding of these terms as established by the LGPD, in its Article 5:

Personal Data

Any information relating to an identified or identifiable natural person (Data Subject), directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, an online identifier, or to one or more factors specific to that natural person's physical, physiological, genetic, mental, economic, cultural, or social identity.

Sensitive Personal Data

Personal Data that are by their nature particularly sensitive, as defined in the context of the LGPD, deserve specific protection because the context of their processing could create significant risks to fundamental rights and freedoms. Sensitive Personal Data includes Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

Data Controller

The natural or legal person, public authority, agency, or any other body, which alone or jointly with others, determines the purposes and means of processing Personal Data.

Data Operator

A natural or legal person, public authority, agency, or any other body that processes Personal Data on behalf of a Data Controller.

Processing

An operation or set of operations which is performed on Personal Data or in sets of Personal Data, whether by automated means, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmission,

disseminating or otherwise making available, aligning or combining, restricting, deleting or destroying the data.

Anonymization

Irreversibly de-identify personal data in such a way that the individual cannot be identified using reasonable time, cost and technology, either by the controller or by anyone else to identify that individual. The Personal Data processing principles do not apply to anonymized data as it is no longer Personal Data.

DPIA – Data Protection Impact Assessment

Defined by the LGPD, it is also called the **RIPD** (acronym in Portuguese), or Data Protection Impact Report. It is a documentation from the controller that contains a description of the Personal Data Handling processes that may generate risks to civil liberties and fundamental rights, as well as measures, safeguards and risk mitigation mechanisms.

Consent

Free, informed and unequivocal manifestation by which the data subject agrees with the processing of his or her personal data for a specific purpose;

Policy compliance

Compliance Measurement

The information security management team will verify compliance with this policy through various methods including, but not limited to, analysis, business tool reports, and internal audits.

Exceptions

Any exceptions to the policy must be approved and recorded by the Managing Partner and Data Officer.

Final considerations

Statement of Commitment to Continuous Improvement

MK GROUP reinforces its commitment to good privacy and data protection practices, committing to keep its Information Security and Privacy Management System - SGSIP updated with the legislation in force, regulations and recommendations issued by the National Data Protection Authority - ANPD.

It also undertakes to revisit this Policy periodically and, at its discretion, promote changes that update its provisions in order to improve the organization's culture and commitment to the privacy and protection of the personal data of the holders.

Any modifications that may imply changes in the purposes of the data processing or which involve the sharing or communication of data to third parties that are not previously foreseen will be regularly communicated to the data subjects in accordance with the provisions of the General Data Protection Law and, when appropriate, their consent will be required for processing for this other purpose or for the communication or sharing of data.

The latest version will be indicated at the bottom of the Table of Contents of this document with the date of its most recent update, which will be the Privacy Policy in force.

We recommend that holders visit MK GROUP's website periodically to update themselves of any changes in the Privacy and Data Protection Policy.

After reading this Privacy Policy, in case of any questions or requests for the fulfillment of your rights, further details about the collection or processing of personal data can be requested to MK GROUP at any time. Contact us through the e-mail lgpd@mkquimica.com.br.

This Policy must be interpreted according to the Brazilian legislation.

Portão, November 25, 2022.

Milton Kogler
CEO

Luciano dos Santos Hans
Data Officer