



# Data Protection Policy

## **Introduction**

*The purpose of this protection policy is to demonstrate the commitment of Mantova Indústria de Tubos Plásticos Ltda. to the privacy and protection of personal data collected, establishing rules on the collection, storage, use, disclosure, enrichment and deletion of the collected data, in accordance with current legislation.*

## **Scope**

*Mantova applies strict policy of protection of the data collected, for all dimensions and activities, in all regions and countries where it operates, directly or indirectly, including, but not limited to, current, future or potential jobseekers, employees, customers, suppliers, contractors, subcontractors, shareholders or any third parties.*

## **Compliance with legislation**

*Mantova is committed to complying with all applicable laws to personal data and ensuring that they are collected and processed in accordance with the provisions of the general data protection law or similar laws.*

## Data collection

As a rule, the company does not collect, or process personal data, without legal provision. For example, we may need to collect and process personal data for the execution of registration, or contract, which the person is a party, or when it is necessary to comply with a legal obligation to which we are subjected. Also, we may collect and process personal data for the legitimate interests of the company, considering business and business relationships, except where those interests are voided by your interests, or fundamental rights and freedoms.

## Purpose of data collection

Personal data are collected for specific, explicit, and legitimate purposes, and are not processed in a manner incompatible with those purposes. When Mantova acts for its own purposes, personal data are processed, mainly for the following purposes: human resources management, accounting and financial management, treasury and tax management, risk management, personnel security management, provision of IT tools, or internal websites, and any other digital solutions, or collaborative platforms, security and health management, information security management, customer relationship management, bids, sales and marketing management, supply management, internal and external communication, compliance with obligations against money laundering, or any other legal requirements, data analysis operations and corporate legal management. We will ensure that the personal data processed is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

## Data storage

Mantova maintains personal data processed accurately, updating it only when necessary. Mantova maintains only personal data for the time necessary for the purposes for which it is processed. It acts in accordance with the instructions indicated to fulfilling this obligation.

## Data security

Mantova implements and uses the most modern technical and administrative measures of the market, appropriate to protect the data against cyberattacks, accidental or illegal alteration or loss, or unauthorized use, disclosure, or access, identifying where they reside, what their flow is, classifying their level, managing its use and life cycle, protecting possible leaks or improper deletions and monitoring its use. It also provides additional security protections for data that is considered sensitive.

## Disclosure of your data

Mantova may share the data provided, in Brazil, or abroad, always respecting the purposes restricted sharing. The company maintains strict internal control over access to data, limited to a group of people, whose access is limited to what is strictly necessary for the execution of the planned activities, linked by individual commitment of confidentiality. Still, Mantova implements mechanisms to ensure that data is not misused. If there is a suspected of any irregularity, the person should contact Mantova through service channels. The exception to the rule of unavailability of data is the request by the Brazilian Judicial Authority, when constitutionally required, there is no legal possibility of resisting the court order. However, the company does not deliver excessively, or when the requesting use is not invested in competence for the act. If there is no judicial gag order, the company will immediately communicate the handover of the data to the Judicial Authority.

## Rights

Mantova is imbued with the commitment to guarantee and protect the rights of persons.

### Right of access

The concerned party has access to their data and, if there is any adjustment to make, request that it be corrected.

### Right to be forgotten

The concerned party has the right to delete his/her personal data in cases where:

- the data is no longer needed,

- choose to withdraw your consent,
- decline the processing of your personal data by automated means using technical specifications,
- your personal data has been processed illegally,
- there is a legal obligation to erase your personal data,
- disposal is necessary to ensure compliance with applicable legislation.

### **Processing restriction right**

The concerned party may request that the processing of his/her personal data be restricted in cases where:

- disputes the accuracy of personal data,
- Mantova no longer needs personal data for the purposes of processing,
- to be processed for legitimate reasons.

### **Right to opposition to processing for direct marketing purposes**

Choosing not to participate in the processing of personal data, particularly in relation to profiling, or marketing communications, is the right of the person. When data is processed based on a consent, the person can withdraw that consent at any time. Any request to make, with respect to personal data (information, request for changes, cancellation, more information, and others), contact Mantova.

## **Legislation**

This policy is the result of Mantova's applied legislation and ethical standards, always aiming at the well-being and viability of the company's business. If interested, consult the legislation:

- Marco Civil da Internet: [http://www.planalto.gov.br/ccivil\\_03/\\_ato2011-2014/2014/lei/l12965.htm](http://www.planalto.gov.br/ccivil_03/_ato2011-2014/2014/lei/l12965.htm);
- General Law for the Protection of Personal Data: [http://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2018/lei/L13709.htm](http://www.planalto.gov.br/ccivil_03/_ato2015-2018/2018/lei/L13709.htm);
- Consumer Protection Code: [http://www.planalto.gov.br/ccivil\\_03/leis/l8078compilado.htm](http://www.planalto.gov.br/ccivil_03/leis/l8078compilado.htm);
- Civil Code: [http://www.planalto.gov.br/ccivil\\_03/leis/2002/L10406compilada.htm](http://www.planalto.gov.br/ccivil_03/leis/2002/L10406compilada.htm).

## **Update**

Mantova can update its data protection policy when there are changes in business, or in legal requirements, or even to adapt to users' expectations. Therefore, it is important to consult the company's policy on a regular basis.

## **Contact us**

In preparing this policy, Mantova intended to communicate simply and objectively. In case any information is not clear, or needs further clarification, send your questions or complaints to the e-mail: [mantova@mantova.ind.br](mailto:mantova@mantova.ind.br)