

Privacy and Personal Data Protection Notice - Employees



suzano

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1 - OBJECTIVE

The purpose of this **Privacy and Personal Data Protection Notice** ("Notice" or "Policy") is to explain to you, as an employee, how Suzano processes your Personal Data and to raise awareness about the precautions you must follow when handling Personal Data.

2 - REFERENCE DOCUMENTS

- PC.00.0002 - Suzano Code of Ethics and Conduct;
- PC.00.0024 - Information Security Policy;
- PC.00.0090 - Internal Privacy and Personal Data Protection Governance Policy;
- FOR.37.00.0004 - Responsibility and Confidentiality Agreement;
- Law no. 8.069 - Child and Adolescent Statute ("ECA"); e
- Law no. 13.709/18 - Brazilian General Data Protection Law ("LGPD").

3 - TERMS, DEFINITIONS AND ABBREVIATIONS

For the purposes of this Notice, the following terms shall have the meanings set out below:

- **ANPD:** Brazilian National Data Protection Agency, as defined in the LGPD;
- **Consent:** a freely given, informed and unambiguous indication by which the Data Subject agrees to the Processing of their Personal Data for a specific purpose;
- **Controller:** an individual or a company, whether public or private, who is responsible for decisions regarding Personal Data Processing;
- **Data Protection Laws and Regulations:** all rules relating to Privacy and Personal Data Protection, including the Federal Constitution, Civil Code, Consumer Defense Code, Internet Law and LGPD, as well as decisions issued by competent Supervisory Authorities, applicable to Personal Data Processing carried out in the context of this Notice;
- **Data Protection Officer ("DPO"):** the person or entity appointed by Suzano to act as a communication channel between Data Subjects, the ANPD and the Processing Agents;
- **Data Subject:** the individual to whom Personal Data relates;
- **Employee(s) or You:** any worker, intern, trainee, including subcontractors or outsourced personnel, representatives or agents, whether paid or unpaid, on a full-time or part-time basis, acting on behalf of the Controller and having access to Personal Data;
- **LGPD:** Law No. 13,709 of August 14, 2018 (Brazilian General Data Protection Law), as amended;
- **P&PD Notice:** the Privacy and Personal Data Protection Notice provided by Suzano to ensure transparency to Data Subjects regarding Personal Data Processing activities;
- **Personal Data:** any information relating to an identified or identifiable natural person (e.g., ID number, tax ID, name, as well as geolocation, behavioral profile, IP address and other information that may identify You);

- **Processing of Personal Data:** any operation performed on Personal Data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, storage, deletion, evaluation, control, modification, communication, transfer or extraction;
- **Processor:** an individual or a company, public or private, that processes Personal Data on behalf of the Controller;
- **Security Incident ("Incident"):** any adverse security event or set of events, confirmed or suspected, that affects the availability, integrity, confidentiality or authenticity of an information asset. For the purposes of this Notice, it refers to incidents involving Personal Data;
- **Sensitive Personal Data:** any Personal Data concerning racial or ethnic origin, religious beliefs, political opinions, membership of a trade union or religious, philosophical or political organization, health or sex life data, genetic or biometric data, when linked to an individual;
- **Supervisory Authorities:** any authority, including judicial authorities, competent to supervise, decide upon, and enforce applicable laws, including but not limited to the ANPD; and
- **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.

4 - GUIDELINES

Suzano S.A. ("Suzano" or "Controller") is committed to ensuring the Privacy and Protection of Personal Data of all individuals with whom it interacts, even indirectly. Therefore, Suzano undertakes to carry out Personal Data Processing activities in a responsible manner and in compliance with applicable Data Protection Laws and Regulations.

Data Protection Laws and Regulations establish several requirements and obligations that must be implemented in connection with Personal Data Processing activities. Many of these requirements are aimed to: *(i) ensure that Personal Data is processed appropriately; (ii) protect Personal Data against unauthorized access or processing; and (iii) prevent the risk of Personal Data Incidents.* There are several measures that must be adopted by Processing Agents to demonstrate that processing activities are carried out in accordance with best practices and with a focus on protecting the Data Subject.

For this reason, this P&PD Notice for Employees formalizes our commitment to transparency, so that You can clearly and objectively understand which Personal Data is involved in processing activities and whether such information is shared with third parties.

This P&PD Notice applies to Personal Data Processing activities (as defined below) carried out in connection with the Employment Contract ("Contract") and forms an integral part of it for all legal purposes.

4.1 - PERSONAL DATA PROCESSING AND PURPOSES

Suzano acts as Controller and is therefore responsible for the Processing of Personal Data within the scope of its relationship with its Employees. Depending on the specific purpose, the

Processing of Personal Data may be based on one or more of the legal bases provided for in the LGPD, especially for: (i) *performance of the employment contract*; (ii) *compliance with legal or regulatory obligations*; (iii) *legitimate interest*; (iv) *protection of life*; (v) *exercise of rights*; (vi) *internal policies (e.g., diversity policies)*, always observing the principles of good faith, transparency, non-discrimination and data minimization, as described in **Annex B**.

Personal Data will be retained by Suzano for the period necessary to fulfill the purposes described herein, including compliance with legal or regulatory obligations.

4.2 - DATA SUBJECTS' RIGHTS

Suzano must ensure the possibility of exercising the following rights:

- Confirm of the existence of Personal Data Processing;
- Know what Personal Data is being processed and access such data;
- Correct incomplete or outdated Personal Data;
- Obtain information about the purposes of the Processing of their Personal Data;
- Withdraw consent at any time, upon express request from the Data Subject, where Processing is based on consent;
- In certain cases, object to specific types of Processing; and
- In certain cases, request the anonymization, blocking, or deletion of Personal Data that is excessive, unnecessary, or processed in non-compliance with Data Protection Laws and Regulations.

Requests related to exercise of such rights must be sent to the e-mail LGPD@suzano.com.br.

It is important to note that these rights are not absolute and may not apply in all circumstances. Therefore, each request will be assessed and, following such assessment, Suzano will inform you whether or not it can be fulfilled. Suzano may not always be able to comply with requests for deletion of Personal Data due to legal and/or regulatory obligations requiring data retention for a certain period.

4.3 - PERSONAL DATA OF CHILDREN AND ADOLESCENTS

When applicable, Suzano may process Personal Data of children and adolescents in the context of its activities, particularly in situations involving Employees' dependents (for example, for the granting of benefits, inclusion in health plans or corporate programs), as well as in the hiring of apprentices or participation in training and professional inclusion programs.

In such cases, Processing will be carried out in compliance with applicable laws, especially the LGPD and the ECA, observing the applicable legal requirements and, when necessary, involving the legal representatives.

4.4 - SHARING OF PERSONAL DATA WITH THIRD PARTIES

Suzano shares certain Employees' Personal Data with third parties to the extent necessary for the management of the employment relationship. Sharing may occur, for example, for the purposes of complying with legal obligations (such as sharing data with tax authorities and eSocial), as well as for fulfilling contractual obligations (such as sharing data with financial institutions for payment purposes).

Any third party that processes Personal Data on behalf of Suzano must comply with the guidelines established in the applicable Data Protection Laws and Regulations, especially the LGPD.

4.5 - INTERNATIONAL TRANSFERS

Your Personal Data may be transferred to other countries, either between Suzano's international entities or with international service providers. In such cases, Suzano adopts measures to ensure that your Personal Data remains protected and that such transfers are carried out in accordance with applicable laws.

5 - RESPONSIBILITIES

The proper protection of Personal Data at Suzano depends on the coordinated actions of different areas and individuals, as described below:

5.1 - EMPLOYEES

Employees are responsible for processing Personal Data in compliance with Data Protection Laws and Regulations and Suzano's internal policies. In this context, they must:

- Fully comply with all internal policies, procedures and guidelines applicable to Personal Data Processing;
- Process Personal Data exclusively for legitimate purposes related to their professional activities;
- Not sharing Personal Data with unauthorized third parties;
- Follow the Company's information security guidelines;
- Ensure that Personal Data is retained only for as long as necessary for the purpose of Processing, or as required by law or regulation;
- Follow the guidance of the **DigitalTech** and **P&PD** teams regarding the use of technological tools, data storage and contracting services;
- Complete the required documentation and privacy assessments, including **Privacy by Design** instruments, when developing new processes, products or activities; and
- Immediately report any security incidents involving Personal Data, even if suspected, to the P&PD Team.

5.2 - P&PD TEAM

The P&PD Team is responsible for structuring, implementing and monitoring Suzano's Privacy Program, and must:

- Monitor compliance with applicable Data Protection Laws and Regulations;
- Define guidelines, guide internal areas and support the implementation of privacy best practices;
- Conduct Privacy and Personal Data Protection assessments, including periodic reviews and audits;
- Support the analysis of new projects, products and processes from a Data Protection perspective;
- Act as a support point for Employees regarding questions and demands related to Privacy and Personal Data Protection.

5.3 - DPO

The Data Protection Officer is responsible for:

- Acting as a communication channel between Suzano, Data Subjects and the ANPD;
- Receiving and handling Data Subjects' requests;
- Supervising compliance with Processing activities with the LGPD;
- Approving this P&PD Notice;

- Conducting or coordinating periodic Privacy and Personal Data Protection assessments; and
- Guiding the Company on best practices and applicable legal obligations.

5.4 - CIBERSECURITY AREA

The Cybersecurity area, in accordance with the **Information Security Policy (PC.00.0024)**, is responsible for ensuring the technical protection of Suzano's data and systems, and must:

- Implement and manage information security and cybersecurity controls;
- Monitor vulnerabilities and ensure their remediation;
- Act in the prevention, detection and response to security incidents; and
- Ensure confidentiality, integrity, availability, authenticity and legality of information, in accordance with internal policies and applicable regulations.

6 - QUERIES OR REQUESTS

Any questions regarding this P&PD Notice must be sent by email to P&PD@suzano.com.br.

7 - POLICY APPROVAL

This Policy enters into force, for an indefinite period, on the date of its approval by the Data Protection Officer or the Legal Director, who has exclusive authority to amend this P&PD Notice at any time.

Note: if necessary, copies of decisions regarding amendments or revisions to this Policy may be provided to interested parties.

8 - POLICY VIOLATION

Violations of this Policy are subject to disciplinary measures as provided for in Suzano's internal rules and in the applicable legislation in Brazil and in the countries where Suzano operates.

9 - FINAL CONSIDERATIONS

This Policy must be communicated to all Employees, regardless of their hierarchical level within Suzano. All individuals are responsible for keeping up to date with this document, and lack of knowledge cannot be claimed.

10 - ANEXES

ANNEX A - CATEGORIES & TYPES OF PERSONAL DATA

ANNEX B - PURPOSES FOR PROCESSING PERSONAL DATA

ANNEX A - CATEGORIES & TYPES OF PERSONAL DATA

The following are examples of Personal Data processed by Suzano:

Personal Data

- **Identification:** Name, Social Name, Tax ID (CPF), ID (RG), Driver's License, PIS, Passport, Employment Record Book (CTPS), Employee Number
- **Family Relationships:** Mother's Name, Father's Name, Spouse's Name, Children's Names
- **Demographic Data:** Date of Birth, Age, Gender/Sex, Marital Status, Nationality, Place of Birth, Education Level
- **Contact Information:** Business Email, Personal Email, Business Phone Number, Personal Phone Number
- **Location Data:** Residential Address, Business Address, Geolocation
- **Financial Data:** Salary, Bank Details, Credit/Debit Card Information
- **Benefits:** Benefits Data and Entitlements, Health Plan Number, Dental Plan Number
- **Professional Data:** Job Title/Position, Job Description, Qualifications/Certifications, Resume/CV, Professional Registration or Membership, Supplier/Service Provider ID
- **Performance Data:** Performance Evaluations, Employee Performance Information
- **Digital Access Data:** Network Login, SAP Login, IP Address, Browser History/Cookies, Outsourced Resource ID
- **Image and Vehicle Data:** Images and/or Videos, Vehicle Information
- **Background and Due Diligence Data:** References or Background Check Information, Non-criminal Sanctions Results
- **Other:** Social Media Information, Data Obtained from Public Sources

Sensitive Personal Data

- Health Data
- Genetic or Biometric Data
- Racial or Ethnic Origin
- Religious, Philosophical or Political Beliefs
- Trade Union Membership or Membership in Religious/Philosophical/Political Organizations
- Political Opinions
- Sexual Orientation

The examples listed above are illustrative and do not constitute an exhaustive list. Not all Personal Data mentioned will necessarily be collected or processed in all cases or for all Employees.

ANNEX B - PURPOSES FOR PROCESSING PERSONAL DATA

PURPOSE	SUMMARY DESCRIPTION
Employment Contract	Procedures related to hiring, performance and termination of the employment contract
Identification and Contact	Identify and contact the Employee in connection with the employment relationship
Legal Obligations	Compliance with obligations under labor and social security legislation
Contract Performance	Performance of contracts related to the employment relationship
Exercise of Rights	Defense of rights in judicial, administrative or arbitral proceedings
Life Protection	Protection of the life or physical integrity of the Employee or third parties
Whistleblowing Channel	Investigation of reports and potential application of disciplinary measures
Well-being	Provision of physical and mental well-being services (e.g., gyms)
Financial Services	Payments, representation before financial institutions and creation of banking profiles
Access and Integration	Physical/system access control, badge issuance and employee onboarding
Diversity and Inclusion	Promotion of diversity and inclusion initiatives
Remuneration and Mobility	Salary calculation, immigration processes, relocation and tax regularization
Digital Authentication	Identity authentication in corporate environments and individualized service
Benefits	Provision of life insurance, health plans, dental plans and other benefits
Other Purposes	Other purposes that may arise and are compatible with the context of the Employment Contract

