

PRIVACY AND DATA PROTECTION POLICY SHIPPING PROTECTION SHIP SERVICES

This Privacy and Data Protection Policy is intended to demonstrate and reaffirm Shipping Protection Ship Services' unrestricted commitment to privacy and to the lawful processing of the personal data of clients, suppliers, service providers, and its internal personnel.

This Policy should be read fully and carefully by data subjects. Personal data processing by Shipping Protection Ship Services will be carried out in accordance with the purposes communicated and the applicable legal bases provided under Brazil's General Data Protection Law (LGPD), including independently of consent whenever another legal basis authorizes the processing.

1. GENERAL INFORMATION

Brazil's General Data Protection Law (LGPD) establishes rules on how companies must process personal data in physical or digital media, securely and transparently.

Reinforcing Shipping Protection Ship Services' commitment to personal data protection, this Policy explains how information is collected, used, and protected, as well as the rights of data subjects and how those rights may be exercised.

The guidelines established herein apply to all employees, service providers, business partners and, as applicable, all persons who may have access to personal data received, held, or shared by Shipping Protection Ship Services in connection with its ship agency activities.

Personal data processing may occur in situations involving contact with the company, use of services, access to the website or platform, and commercial transactions.

Marketing emails are sent only with express authorization following prior registration. These emails may include institutional news, information about new products, and other updates.

2. PRINCIPLES AND GUIDELINES

The use and sharing of personal data follow the guidelines and principles of Law No. 13,709/2018 (LGPD), specifically:

- Adequacy Principle
- Necessity Principle
- Transparency Principle
- Free Access Principle
- Data Quality Principle
- Security Principle

- Prevention Principle
- Accountability Principle
- Non-Discrimination Principle
- Purpose Principle

Only data strictly necessary to achieve the purpose for which they are intended will be collected, and processing will follow the purposes previously communicated by Shipping Protection Ship Services.

Shipping Protection Ship Services does not sell personal data. Sharing will occur only when necessary to fulfill the purposes communicated, comply with legal, regulatory, or contractual obligations, provide services, or in other legally authorized circumstances, always in accordance with the principles and protective measures set forth in this Policy.

3. FUNDAMENTAL CONCEPTS

Fundamental concepts relevant to understanding this Policy and the LGPD, as well as personal data processing:

- **Controller** – The agent responsible for making decisions regarding the processing of personal data; in this case, Shipping Protection Serviços Marítimos Ltda.
- **Sensitive Personal Data** – Personal data concerning racial or ethnic origin, religious belief, political opinion, trade union membership or membership in a religious, philosophical, or political organization, data concerning health or sex life, genetic or biometric data, when linked to a natural person.
- **Personal Data** – Information related to an identified or identifiable natural person, such as name, RG, CPF, email address, and telephone number.
- **LGPD (Brazilian General Data Protection Law)** – Law No. 13,709/2018, which governs the processing of personal data and protects the fundamental rights of freedom, privacy, and the free development of a natural person's personality. This Policy may be adjusted to reflect legal or regulatory changes or binding guidance applicable to personal data protection.
- **Processor** – The agent that processes personal data on behalf of the Controller.
- **Data Subject** – The natural person to whom the personal data being processed relate.
- **Data Processing** – Any operation performed on personal data, such as collection, production, receipt, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation, information control, modification, communication, transfer, dissemination, or extraction.

4. SCOPE

This Policy applies to all data subjects whose data are processed by Shipping Protection Ship Services, whether through the website, social media, contracts, business partners, offices, or other forms of interaction. It includes, among others:

- Representatives of Shipowners, Vessel Operators, Ship Managers, Charterers, and Crew Managers, including their employees and crew members.
- Representatives of Shipyards and Marine Maintenance Companies.
- Representatives of Marine Insurers and Salvage Companies.
- Suppliers and Business Partners.
- Employees and direct service providers.
- Visitors to physical facilities and digital environments (website, social media).
- Third parties in general whose data are processed by the company in any manner.

5. PERSONAL DATA COLLECTED AND PURPOSES

Personal information may be collected in different ways, such as through partners, employees, promotional activities, online portals, and social media. It may also be collected through direct contact between the data subject and Shipping Protection Ship Services, through public portals, or through specialized companies.

Types of data collected:

- **Identification and Contact:** full name, RG, CPF, passport, RNE, date of birth, nationality, parentage, marital status, email address, telephone number, and residential address.
- **Professional:** position or function, employee ID, company, port and operational credentials, and professional history.
- **Financial:** banking data, billing information, and payment information.
- **Health (Sensitive):** vaccination information, mandatory medical examinations, and other data required by health authorities or international standards.
- **Biometric (Sensitive):** in specific situations, such as requirements for access to port facilities or security systems.
- **Browsing and Usage:** IP address, browser type, time spent, device identifiers, cookies, and similar technologies.
- **Operational Records:** information necessary for issuing documents, vessel clearance, port call coordination, provisions, and agency services.

Purposes of processing:

- Improve service.
- Respond to requests more efficiently.
- Personalize user experiences.
- Improve products and services based on feedback.
- Conduct promotions, contests, and surveys.
- Perform contractual obligations.
- Meet requirements of port, customs, and health authorities.
- Fulfill specific purposes previously communicated.

When registering for mailing lists, institutional communications, updates, and related information may be sent. Unsubscription may be requested through the instructions provided in each message or directly through the company's website.

6. PERSONAL DATA OF MINORS AND LEGALLY INCAPACITATED PERSONS

The processing of personal data of children and adolescents will always be carried out in their best interests and may be based on the legal grounds provided under the LGPD, as applicable to the specific case. When the processing of children's data is based on consent, such consent must be specific and prominent and provided by at least one parent or legal guardian, subject to the other legal requirements. Typical situations may include the hiring of young apprentices and the granting of benefits to employees' dependents.

7. LEGAL BASES FOR PROCESSING

Personal data processing carried out by Shipping Protection Ship Services will be based on the applicable legal bases provided under the LGPD, according to the nature of the data, the purpose, and the context of the processing, including, where applicable:

- **Consent:** processing carried out on the basis of a free, informed, and unambiguous indication of the data subject's wishes, when this is the applicable legal basis, and which may be withdrawn under the terms of the LGPD.
- **Performance of a contract or preliminary procedures:** processing necessary for the performance of a contract or procedures related to a contract to which the data subject is a party.

- **Regular exercise of rights:** processing necessary for the regular exercise of rights in judicial, administrative, or arbitration proceedings and in other legally permitted circumstances.
- **Legitimate interest:** processing necessary for the legitimate purposes of the Controller or third parties, where applicable and subject to the fundamental rights and freedoms of the data subject, including process improvement, risk management, fraud prevention, and operational communication.
- **Compliance with a legal or regulatory obligation and other applicable legal bases:** processing necessary to comply with laws, regulations, orders from competent authorities and, where applicable, to protect life, physical safety, or health. The processing of sensitive personal data will comply with the specific legal bases provided under the LGPD.

8. DATA SUBJECT RIGHTS

Under the LGPD, data subjects may exercise the following rights with Shipping Protection Ship Services:

- Confirmation of the existence of processing.
- Access to personal data.
- Correction of incomplete, inaccurate, or outdated data.
- Anonymization, blocking, or deletion of unnecessary or excessive data or data processed in violation of the LGPD.
- Portability of data to another service or product provider.
- Deletion of data processed on the basis of consent.
- Information about entities with which data have been shared.
- Information about the possibility of not providing consent.
- Review of automated decisions.
- Right to object in cases of unlawful processing.
- Withdrawal of consent.

Requests must be sent to esg-br@shipping-protection.com and will be addressed within the timeframes established by applicable laws and regulations. For confirmation of the existence of processing and access to data, a simplified response may be provided immediately or, when a clear and complete statement is requested, within the applicable legal timeframe, currently up to 15 (fifteen) days.

The handling of certain requests may be limited or denied when there is a legal, regulatory, or contractual basis that justifies maintaining the processing, including:

- Compliance with a legal or regulatory obligation.
- Need to preserve data for the performance or defense of rights relating to an active or terminated contractual relationship.
- Need to retain records for the regular exercise of rights, audits, fraud prevention, or other legally permitted purposes.
- Legal requirements concerning minimum retention periods.

9. SHARING PERSONAL DATA WITH THIRD PARTIES

Personal data may be shared with group companies, employees, business partners, and public authorities, including:

- Shipowners, Vessel Operators, Ship Managers, Charterers, and Crew Managers.
- Marine maintenance companies.
- Marine insurers and salvage companies.
- Brazilian Federal Revenue Service, Federal Police, Brazilian Navy, ANVISA, ANTAQ, and other regulatory authorities.
- Port terminals and logistics operators.
- IT, security, audit, accounting, and related service providers.
- Business partners in joint operations.

Authorized third parties must process personal data only for purposes compatible with the established relationship, observing this Policy, applicable instructions from Shipping Protection Ship Services, and legal and contractual obligations regarding privacy, security, and confidentiality.

10. RETENTION PERIOD

Personal data are stored only for as long as strictly necessary to fulfill the purposes that motivated their collection, in a secure and controlled environment, in compliance with the minimum periods required by applicable laws and regulations.

For audit, information security, control and fraud prevention, preservation of rights, and compliance with obligations before supervisory and oversight authorities, Shipping Protection Ship Services may retain record histories and personal data for a period longer than initially expected whenever there is a legal or regulatory basis justifying such retention.

Once the legal period and the regulatory or contractual need have ended, personal data must be deleted using secure disposal methods. Alternatively, they may be used in anonymized form exclusively for statistical purposes, studies, and internal analyses, without the possibility of identifying the data subject.

The retention and disposal of personal data will follow criteria of necessity, security, traceability, and compliance with applicable legal, regulatory, and contractual obligations.

11. COOKIES AND DIGITAL CHANNELS

Shipping Protection Ship Services may collect cookies and similar technologies on its portals, when applicable, to enable essential functionalities, assess and understand the profile and behavior of **data subjects** who visit or access our pages, personalize the browsing experience, and prevent fraud. Data subjects may adjust their browser preferences, with the understanding that some functionalities may be affected.

12. DISCLOSURE

Personal information may be disclosed or shared when necessary to comply with a legal or regulatory obligation, a judicial or administrative order, a request from a competent authority, the regular exercise of rights, or the performance of contractual obligations, always on an applicable legal basis and in accordance with the principles of the LGPD.

13. INFORMATION SECURITY

Shipping Protection Ship Services adopts physical, organizational, governance, compliance, and technological measures to protect personal data.

Practices adopted include:

- Access controls based on the principle of least privilege.
- Device protection using security software, automatic locking, and encryption.
- Backup routines and business continuity plans.
- Security in electronic communications.
- Privacy and security awareness and training programs.
- Clean desk and clean screen practices.

In the event of incidents, all possible measures will be taken to mitigate risks and potential harm.

14. MANAGEMENT AND RESPONSE TO SECURITY INCIDENTS AND DATA BREACHES

Shipping Protection Ship Services adopts a structured plan for the management of and rapid response to any security incident involving personal data. In the event of a suspected or confirmed data breach, unauthorized access, or other incident, the following actions will be taken:

- Immediate assessment of the occurrence to identify its scope, the nature of the affected data, and the impacted data subjects.
- Notification to the Brazilian National Data Protection Authority (ANPD) and the affected data subjects when the incident may result in relevant risk or harm, within the timeframe and under the conditions provided in the applicable ANPD regulation, currently up to 3 (three) business days, except where a specific deadline is established by law.
- Adoption of corrective measures to mitigate the risks and harm resulting from the incident.
- Detailed record of all steps taken, including technical reports and future preventive actions.

Ongoing training and guidance for the teams involved, with the aim of maintaining preparedness and effectiveness in incident response.

15. INTERNATIONAL DATA TRANSFERS

If personal data are transferred to other countries or international organizations, Shipping Protection Ship Services will adopt legally recognized mechanisms and appropriate safeguards in accordance with the LGPD and ANPD regulations applicable to international data transfers.

16. USE OF EMERGING TECHNOLOGIES

Whenever emerging technologies, including artificial intelligence systems, are used in the processing of personal data, the company will adopt measures to ensure compliance with the principles and legal bases of the LGPD, transparency, security, and data subject rights, taking into account the risks associated with the context of use.

17. CONTACT

Questions or requests related to this Policy, including correction or deletion of personal data, should be sent to esg-br@shipping-protection.com.

18. CONSEQUENCES OF NONCOMPLIANCE

Failure to comply with this Policy and applicable legal obligations may result in disciplinary, administrative, contractual, or legal measures, as appropriate. For employees, measures provided under internal rules and labor law may be applied; for suppliers and partners, contractual measures may be adopted, including suspension or termination of the business relationship, without prejudice to any applicable liability.

19. POLICY UPDATE

This Policy will remain in effect for an indefinite period and may be reviewed or updated whenever necessary, at the discretion of Shipping Protection Ship Services, particularly due to legal, regulatory, technological, operational, or organizational changes, changes in personal data processing activities, or developments in privacy and data protection best practices.

When there is a material change in personal data processing practices, Shipping Protection Ship Services will take appropriate measures to inform data subjects, highlighting the modified content where applicable.

If an update requires new consent or another specific action by the data subject, Shipping Protection Ship Services will provide the necessary notice and obtain any required consent through available contact channels, in accordance with applicable law.

DOCUMENT HISTORY

Revision	Date	Description of Change	Responsible Party
00	October 3, 2025	Initial issuance of the document	Management
01	October 1, 2026	Update of the institutional letterhead and content revision to ensure compliance with applicable laws and regulations.	Management

Management Approval:

Approval Date: October 1, 2026

Name of Responsible Person: Kledilton Cutrim Pinto

Position: Executive Director

Signature: **KLEDILTON CUTRIM**
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