

PRIVACY POLICY

ROSENBERGER DOMEX TELECOMMUNICATIONS LTDA (Brazil)

Rosenberger Domex Telecommunications (“RDT”) is a Brazilian company with German social capital, with a strong presence in the Brazilian telecommunications market, as well as in the automotive and aeronautical sectors.

The company has products and services that range from fiber optic connectors to antenna installation and reinforcement projects.

Our customers are exclusively **legal entities**, so the activity moves in the B2B modality.

As a way of expressing our respect for people (whether representatives of customers, employees or partners), we present our Privacy Policy to explain how we collect, use, store and protect personal data of our employees, representatives of our customers and suppliers, job applicants and visitors or users of our Sites (“Holders”).

The processing of personal data, such as name, residential address, e-mail address or telephone number of a data subject, must always be in accordance with the General Data Protection Law (LGPD) published by the plateau under no. 13.709/2018.

Reading this document will help you understand the importance given by RDT to the privacy and security of information of all people with whom it relates. If you have any questions after reading it, please contact us through the channels indicated at the end of the document.

1 - DEFINITIONS

Before entering into the conditions for collecting and using the personal data of the Holders, some basic concepts will be presented:

General Data Protection Regulation (GDPR): Law No. 13.709, of August 14, 2018, provides for the treatment of personal data, including in digital media, by a natural person, with the objective of protecting the fundamental rights of freedom and privacy and the free development of the personality of the natural person.

Personal Data: information related to an identified or identifiable natural person.

Personal Data Holder: is any identified or identifiable natural person to whom the Personal Data processed refers.

Treatment: refers to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, storage, archiving, elimination, evaluation or control of information , modification , communication , transfer , dissemination or extraction , among other acts , performed with Personal Data under RDT's custody .

Person in Charge (DPO) for Personal Data Processing: person indicated by RDT to act as a communication channel with any personal data holder and with the competent government authorities.

2- PRIVACY POLICY AND PERSONAL DATA TREATMENT

The Policy applies to cases of personal data treatment by RDT for the development of its ordinary activities.

3 – PERSONAL DATA TREATED BY ROSENBERGER

A table below shows which types of personal data are treated by RDT for which purposes. It is important to emphasize that all data collected and treated are

always and exclusively provided in a consensual way by the holders, there being no collection or treatment of personal data in a veiled way.

| Type of Holder | Data Description | Legal basis | Storage interest |
|------------------------------------|---|---|--|
| Employees | Personal qualification: full name, RG, CPF, electoral title, sex, CTPS, PIS, mother's name, address, date of birth, phone number, salary, benefits, schedules, CNIS, ASOs, medical certificates, vaccination card, SUS card; | Art. 7 th , V e VI, of Law 13.709/18 | Contract execution and possible defense of judicial and administrative process |
| Dependents of employees | Personal qualification for agreements (medical, dental, SESI, Mafersa): full name, RG, CPF, date of birth, sex, SUS card. | Art. 7 th , I, of Law 13.709/20 | Contract execution |
| Candidates | Personal/professional qualification: full name, RG, CPF, sex, address, date of birth, previous work contracts, academic background, phone number and e-mail. | Art. 7 th , I and V, of Law 13.709/21 | Pre-contractual analysis. |
| Self-employed workers | RPA data: Full name, e-mail, cell phone and phone number, CPF and municipal registration. | Art. 7 th , V and VI, of Law 13.709/22 | Contract execution and possible defense of judicial and administrative process |
| Outsourced workers | Personal/professional qualification full name, RG, CPF, sex, address, date of birth. | Art. 7 th , X, of Law 13.709/24 | Execução de contrato e, eventual defesa de processo judicial e administrativo |
| Suppliers/Customers | Credit score of the partners of the suppliers | Art. 7 th , X, da Lei 13.709/24 | Contract execution Credit analysis |
| | Contact information of the representatives of the companies (e.g. salespeople, financial, support): full name, e-mail and cell phone. | Art. 7 th , VII, of Law 13.709/23 | Contract execution |
| Third parties and Visitors | Physical access control: Vehicle plate, full name, RG/CPF and representative company | Art. 7 th , VII, of Law 13.709/18 | Security |
| Employees and Third Parties | Images: in advertising campaigns on social networks there may be images of employees. | Art. 7 th , VII, of Law 13.709/19 | Publicidade |
| Employees** | Corporate devices: backup of device data corporate that is being returned to IT with subsequent formatting. There is a possibility that personal data may be contained in the devices of | Art. 7 th , IX, da Lei 13.709/20 | Dados empresariais relevante para o funcionamento das atividades. |

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| | employees, despite the recommendations not to use the devices for personal purposes. | | |
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*Images always preceded by Term of Authorization for Use of Image.

**Policy for Use of Cell Phones and Corporate Computers implemented since November /2018.

4 – SHARING OF PERSONAL DATA

Eventually, personal data will be shared with third parties, whenever there is express consent or legal authorization for this. All third parties with whom data may be shared have a legal or contractually established commitment to respect Law No. 13.709/2018.

Here are some examples of possible sharing:

- With the Judiciary and other public bodies, in the representation of the interests of the Holder or the legal entity that integrates;
- With third parties that provide support to RDT, such as consultants, experts, lawyers, technicians, representatives etc.;
- Storage and application providers to support the performance of business activities;

5 – COOKIES

Cookies are small files that websites store in Users' browsers and that collect and store browsing information, such as the pages that the User visited, the search objects, purchase intentions, site that originated the access, Internet protocol (IP), browser version, which ads clicked on, location, among other information of your internet browsing routine.

The most common purposes of cookies are to enable and personalize navigation, marketing targeting, conducting informational and statistical surveys to guide market strategy of companies. Cookies, in general, can be classified as follows:

- Strictly necessary cookies: guarantee the proper and correct functioning of our site, which do not identify the User and cannot be deactivated without this impairing or even making it impossible to operate our site;
- Performance cookies: store anonymous information, such as volume of visits, most accessed places, among other statistical information for management of

operation and improvement of our site. These cookies do not identify the User and can be deactivated; however, their deactivation may affect the proper functioning of our site;

- Functionality cookies: enable the site to offer improved and customized functionalities for the User. The deactivation of these cookies may make some functionalities of our site difficult. These cookies collect information that may identify the User and can be deactivated;

- Advertising cookies: use some information and direct personalized content to the User, according to their own browsing preferences. These cookies collect information that may identify the User and can be deactivated; and

- Third-party cookies: are cookies inserted by partners, such as Facebook and Google , that collect information from the User when he visits our site , so that these partners disclose our advertising materials on their platforms when the User uses them. These cookies collect information that may identify the User and can be deactivated.

Therefore , RDT may analyze anonymous data and information statistically collected , with the aim of increasing data protection and security and ensuring an optimal level of protection for personal data that is processed.

6 – COOKIE MANAGEMENT

The cookies that can be found on the site can be deactivated through the cookie management tool available on the home page or in the settings of internet browser used by the User. To do so, a link to manage cookies is provided.

7 – STORAGE TIME OF PERSONAL DATA

Rosenberger keeps data as long as it is necessary to achieve a specific purpose, to comply with legal or regulatory requirements during the legal prescription period of possible contractual liabilities (including audit) or legal .

In addition, if requested by the Holder, RDT will anonymize or delete data from our servers, except if for some legitimate or mandatory reason, it is necessary to keep it for longer.

8 – SECURITY OF PERSONAL DATA

Rosenberger takes seriously the security of all Personal Data provided to it . Therefore , it follows good practices of information security , constantly investing in implementation and updating of technological resources to ensure that information and personal data collected are not subject to destruction , loss , alteration , communication , leakage or dissemination .

In addition , it is constantly recycled awareness policies for basic precepts of LGPD .

9 – RIGHTS OF THE HOLDER OF PERSONAL DATA

The Holder of Personal Data may contact RDT to exercise their rights, which are

:

- Know which Personal Data are processed by ROSENBERGER.
- Request deletion of your data;
- Request alteration or correction of your data;
- Request information about sharing your data;
- Revoke consent given to RDT for processing your data;
- Request interruption sending any marketing communication;
- Request portability of your Personal Data to another service or product provider upon your express request, subject to trade secrets and industrial secrets, in accordance with future regulation by National Data Protection Authority (ANPD) .

It is possible that your request will not be met, but if this happens, we will explain the reasons with proper legal basis for refusal.

If you contact us to exercise any rights provided above, we may need to take measures to confirm your identity.

10 – SECURITY MEASURES BY HOLDERS

Holders can contribute significantly to security of their personal data by taking some simple measures, such as:

- I. Communicate RDT about any suspicion or finding violation of this Policy, such as misuse of your personal data by third parties;
- II.Consult RDT whenever you receive information or communications about promotions, campaigns and surveys received by e-mail , for verification its veracity ;
- III.Adopt cyber security measures on devices used in interaction with RDT (cell phones , computers etc.) , such as updating antivirus software , firewalls and strong passwords ;

11 – SERVICE CHANNELS

For any matters related to processing personal data , RDT can be contacted in person its Officer (DPO) for Processing Personal Data :

Responsible Name: Carlos Alberto Sepinho

E-mail: carlos.sepinho@rosenberger.com.br

Phone: +55(12)32218501

11 – SERVICE CHANNELS

This Policy was prepared on March 8th 2023 but may undergo periodic updates. So we suggest you follow any changes in our Policy.

This Policy was published on March 8th 2023 in accordance with current legislation especially Law No. 12.965 / 2014 (Civil Internet Framework) and Law No.13.709 / 18 (Personal Data Protection Law or LGPD) .

Any controversial issues arising from this Policy will be submitted jurisdiction competent District Court Caçapava - SP waiving parties any other forum .

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