

PERSONAL DATA PROCESSING NOTICE – SEATRUM**Last reviewed on: 28/08/2026**

This Personal Data Processing Notice aims to clarify and inform data subjects who relate to Seatrium how their personal data is treated, especially with regard to collection, use, storage, sharing and termination operations. And in order to achieve this goal, Seatrium may improve this Personal Data Processing Notice, when it will make any new versions available for the Data Subjects' knowledge.

Seatrium has been operating in Brazil since 2000, nowadays with three shipyards: Estaleiro BrasFELS Ltda. (BrasFELS), located in Angra dos Reis, Rio de Janeiro, in operation since 2000; Estaleiro Jurong Aracruz Ltda. (EJA), located in Aracruz, Espírito Santo, in operation since 2014; and Seatrium Singmarine Brasil Ltda. (SSMB), located in Navegantes, Santa Catarina, in operation since 2010. Together, Seatrium is the controller of the personal data processed for the purposes of this Personal Data Processing Notice, although each shipyard is a business unit.

Seatrium respects the privacy and personal data of all employees, customers, suppliers and stakeholders. And, through this Personal Data Processing Notice, it seeks to demonstrate that the processing of personal data by Seatrium, is carried out under the terms of the applicable privacy and data protection legislation, including the General Law for the Protection of Personal Data of Brazil (LGPD – Law No. 13,709/2018), as well as the Federal Constitution, and the regulations, guidelines and technical guidelines of Regulatory Agencies or the Data Protection Authority (ANPD) that impact on applicable rights and duties regarding privacy and data protection.

It is suggested that you (Data subject) carefully read this Personal Data Processing Notice, remaining Seatrium available, through its Data Protection Officer (at the end identified), to clarify any doubts and answer questions. This Personal Data Processing Notice is also available for consultation in digital format, in the "Personal Data Processing Notice" section at the www.seatrium.com/brazil-pt.php website.

1. Data that may be collected and the purpose for doing so:

In your interaction with Seatrium, various types of personal data¹ data provided directly by you (vg.: filling up forms or contracts) may be collected, such as name, date of birth, address, telephone number, e-mail address, identification documents. There is also data collected automatically when you access Seatrium's facilities, such as CCTV (Closed Circuit Television – Security Cameras) images (which are confidential and accessible only under the terms of specific law). Eventually, other types of personal data not exemplified above may be collected and processed, ensuring that such collection must be preceded by the consent of the Data Subject, or a substantiated legal basis that authorizes such collection in another way.

¹ L. 13.709/18 (LGPD), art. 5, items I and II: Personal data is information related to an identified or identifiable natural person and may or may not be sensitive. Sensitive personal data are personal data about racial or ethnic origin, religious belief, political opinion, membership in a union or organization of a religious, philosophical or political nature, data related to health or sex life, genetic or biometric data, when linked to a natural person;

The collection of your personal data enables your interaction with Seatrium. You are not required to provide your personal data, however, if you do not do so, Seatrium will not necessarily be able to engage in contracts of any nature with you and those you represent. Therefore, it is clarified that your personal data will be processed for the purpose of enabling the following interactions:

- 1.1. Due compliance with Brazilian legislation and any decisions of the competent authorities, as well as to respond to requests for information by data subjects;
- 1.2. To job applicants and employees, in order to enable the management of the employment contract, professional and administrative activities related to the employment relationship sought or maintained;
 - 1.2.1. The processing of sensitive personal data or data related to underage personal data subjects will be carried out only for the proper management of administrative issues of the employment contracts related to them, such as health insurance for family members and dependents of employees. In such cases, Seatrium will take the necessary measures to ensure that the processing is carried out in accordance with the applicable legislation and in the best interests of the child or young person, whilst ensuring, where required by the LGPD, that at least one parent or legal guardian is informed; such acknowledgement may be provided on the forms or documents used to collect the data.
- 1.3. Enable contractual execution, commercial interaction or any other interaction with partners, suppliers, service providers, customers and other interested parties;
- 1.4. To safeguard the life, physical and mental safety of stakeholders who relate in any way to Seatrium, and to provide for the physical and property security of Seatrium units, including access, transit and parking of motor vehicles inside Seatrium units;
- 1.5. The regular exercise of Seatrium's rights and its legitimate interests;
- 1.6. To comply with the consent of the holder of the personal data; and
- 1.7. Other applicable hypotheses, under the terms of the LGPD.

2. Legal bases for processing and personal data:

The legal basis for the processing of personal data is the legal basis for doing so, under the terms and limits of the provisions of articles 7, 10 and 11 of the LGPD, and specified in the specific documents. In the case of Seatrium, the hypotheses for processing the personal data of the interested parties processed by Seatrium are as follows:

- 2.1. the consent of the interested parties;
- 2.2. For the fulfillment of a legal or regulatory obligation by Seatrium, or when legally necessary for the public administration;
- 2.3. The regular exercise of rights in judicial, administrative or arbitration proceedings;
- 2.4. Protection of life or physical safety, protection of health, and the rights of the holder or third party;

- 2.5. Execution of the contract and respective preliminary procedures, of which the holders are directly or indirectly interested parties, at their request;
- 2.6. Guarantee of the security of the holder and the prevention of fraud, in the identification and authentication processes, respecting the legal limits; and
- 2.7. Where necessary to meet the legitimate interests of the Controller;

3. **Cookies:**

The Seatrium website uses cookies to monitor browsing preferences and help us analyse data about web page traffic to make website improvements based on customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

A cookie does not give us access to your computer or any information about you, other than the data you choose to share with us. Most Internet browsers automatically accept cookies, but you can usually modify your browser settings according to your preference. If you choose not to accept cookies, you may not be able to experience all the features of our website.

4. **Sharing personal data with third parties and international data transfer:**

Seatrium shares personal data with third parties, committing to observe the applicable laws and rules when doing so, seeking to ensure the security of Seatrium's stakeholders' data.

4.1. For example, Seatrium may share personal data with:

- 4.1.1. **Companies that are part of the Seatrium Group:** The companies in the group may share with each other the personal data processed for the same purposes as previously presented;
- 4.1.2. **Third-party service providers and Business Partners:** When Seatrium shares data with third-party service providers or business partners, the processing of personal data is required under the terms of this Personal Data Processing Notice, or with the express consent of the Personal Data Subject, when applicable;
- 4.1.3. **Regulatory bodies, judicial or administrative authorities:** personal data may be shared with public authorities to provide the competent authorities with all the information requested in relation to the Data Subject, within the limits provided for in the legislation. In addition, such sharing may be carried out with private entities to combat fraud, non-compliance with policies and procedures, and abuse of the contractual relationship (of any nature) maintained with Seatrium, within the limits of the provisions of the legislation.
- 4.1.4. **With the authorization of the Holder:** for other cases, Seatrium will submit the possibility to the Holder of personal data, to obtain consent, under the terms of the legislation.

It should be noted that the personal data processed by Seatrium may be transferred to other countries, especially when using third-party services that operate outside the national territory (e.g., technology providers, cloud data storage, etc.). These transfers are carried out in accordance with the legislation, ensuring that third parties are located in countries that offer a level of personal data protection that is similar to or better than the legal standard adopted in Brazil.

4.2. This is done by:

- 4.2.1. Adoption of standard contractual clauses aligned with the ANPD's guidelines;
- 4.2.2. Implementation and monitoring of compliance with global corporate standards (when applicable);
- 4.2.3. Provision of clear information to the holder about the purpose of the transfer and the protection mechanisms adopted.

5. Termination of the processing of personal data:

The termination of the processing of personal data is defined by the scope or extinction of the purpose/legal basis for which the data was collected by Seatrium and is provided for in arts. 15 and 16 of the LGPD. After the purpose or legal basis for the processing of personal data has been achieved or extinguished, it will be properly anonymized or eliminated, and the data processing will be terminated from this moment on, except for the exceptions and extensions provided for in the legislation, such as legal requirement, determination of a competent authority, or legal pendency that requires extension of the processing. In these cases, the information will be properly maintained until the pendency and/or legal determination or the competent authority ends.

The revocation of consent or the request for deletion of personal data can be made at any time, with the processing of data based on other legal bases remaining. However, you are advised that certain information may be retained (within the limits of the law) for the regular exercise of rights, the protection of legitimate interests and the prevention of fraud. After the end of the period of need, and except for the cases provided for by law or in this notice, the personal data will be duly deleted.

6. Rights of the Holder:

The rights of Data Subjects are provided for in article 17 et seq. of the LGPD, highlighting the right to obtain detailed information from the Controller on:

- 6.1. Confirmation of the existence of processing and access to data;
- 6.2. Correction of incomplete, inaccurate or outdated data;
- 6.3. Anonymization, blocking or elimination of unnecessary, excessive or processed data in legal non-compliance;
- 6.4. Revocation of consent and/or deletion of personal data processed only with the consent of the holder, under the terms of item 5 and the legislation;
- 6.5. Information from the entities with which Seatrium has shared data;
- 6.6. Information about the possibility of not providing consent and the consequences of refusal; and
- 6.7. Request for the review of decisions taken solely on the basis of automated processing of personal data that affect your interests.

The Holders of personal data processed by Seatrium may interact with Seatrium to exercise their rights by sending a detailed message to the Personal Data Protection Officer (at the end identified).

7. Security measures in the processing of personal data.

Seatrium ensures that it continuously improves its information security and data governance program, with the aim of maintaining physical, technical and organizational measures appropriate and reasonable to its structure, operations and sensitivity of the data processed, and protects personal data against "security incidents".

It should be noted that, in the event of a data security incident², Seatrium will promptly act to remedy relevant risks or damages to the Personal Data Subjects and Seatrium itself, seeking: (i) to carry out internal investigations; (ii) to identify the nature of the personal data affected, the subjects exposed, and the risks related to the incident; (iii) communicate with the competent authorities and data subjects; (iv) adopt measures to mitigate the effects of the damage; and (v) enhance the data governance program to prevent future similar occurrences.

8. Data Protection Officer:

If you have any questions about this Personal Data Processing Notice, or about the data processing carried out by Seatrium, please contact the Data Protection Officer designated by Seatrium:

Personal Data Protection – Seatrium Brazil

Data Protection Officer (DPO)

Dr. Mayra Braga

dpo.br@seatrium.com

² "Security incident" is defined as any situation or threat related to unauthorized or accidental access, loss, alteration, disclosure, destruction or any other form of access, leakage or illegal processing of Personal Data transmitted, stored or otherwise processed, including through fraud or *hacker attack*.