


## Rights Policy of Data Subjects

Any questions regarding any personal data processing operation carried out by the company, as well as any complaints and communications and requests for clarification may be forwarded to our person in charge:

 [dpo@btp.com.br](mailto:dpo@btp.com.br)

We at **BRASIL TERMINAL PORTUÁRIO S.A. - BTP**, a legal entity with its principal place of business at **AV ENGENHEIRO AUGUSTO BARATA, s/n Bairro ALEMOA, zip code 11.095-650 Santos/SP**, duly enrolled with the CNPJ under no. **04.887.625/0001-78** take your privacy and data protection seriously.

This document explains how we process your personal data, what your rights are, and how you can exercise them.

We are committed to ensuring transparency in the information ("Personal Data") that we process and, for this reason, we make this Data Subject Rights Policy ("Rights Policy") available to the data subject ("You"), which should be read in conjunction with our Privacy Policy.

Brazilian personal data protection and privacy laws guarantee You, the Data Subject, a series of guarantees ("Data Subject's Rights" or "Rights"), which put you in control of the information You provide to us.

Please find below the Rights, and we explain how to exercise them:



### How to exercise your Rights?

**BRASIL TERMINAL PORTUÁRIO S.A. - BTP** has trained professionals to answer your questions and requests. To exercise your Rights, you shall complete our **Rights Request Form** ("Form").

It is important to highlight that fathers, mothers or legal guardians may exercise their rights on behalf of children or adolescents, in accordance with applicable legislation.



### Which are your Rights?

- **Confirmation of the existence of processing:** This Right allows You, the data subject, to request and receive confirmation about the existence of collection, storage, sharing, or any type of Processing using your Personal Data.
- **Access to personal data:** This Right allows You to request and receive a free and accessible copy of the Personal Data processed by us.
- **Correction of incomplete, inaccurate or out-of-date data:** If You identify any inaccuracy or inaccuracy in your Personal Data that we have processed, you may request that we rectify it.
- **The anonymization, blocking, or deletion of Personal Data that is unnecessary, excessive, or processed in violation of the law:** This Right allows the anonymization, blocking, or deletion of Personal Data from our database to be requested. All Data collected will be anonymized, blocked or deleted from our servers, when possible and requested by You.
- **Portability:** BRASIL TERMINAL PORTUÁRIO S.A. - BTP allows You or a named third party to obtain access to Personal Data that is processed by us, in a structured and interoperable format.

- **Revoking or not providing consent:** You have the right to revoke your consent or, if applicable, not to provide it to us, being informed of the consequences of such denial. In some cases, it is possible that the refusal may result in the impossibility of providing you with certain products, services or contractual relationships.
- **Reviewing automated decisions:** You have the Right to request a review of decisions made solely based on automated Processing of Personal Data, and to receive clear and adequate information regarding the criteria used in the decision, as long as this information does not violate any commercial secret of **BRASIL TERMINAL PORTUÁRIO S.A. – BTP**.
- **Opposition to processing:** You also have the right to oppose to certain purposes of processing Personal Data, such as, for example, sending advertising, newsletters or new offers.
- **Deletion of Personal Data processed with consent:** If You have provided us with your consent for a Processing purpose, You may request the deletion of the Personal Data that we have stored until then.



## How will your request be analyzed?

When we receive your request, our privacy team will review it and may respond in two ways:

- (I) your request is lawful and legitimate, and must therefore be accepted; or
- (II) your request was denied and, for certain reasons, cannot be accepted.

Do not worry, because even if there is a refusal, we will inform you of the reasons why your request was not approved.

All our responses will always be sent by the same means by which You contacted us, whether email or postal mail.

We may need to request specific information from You, to confirm your identity and ensure that You can exercise your Rights.

This is a security measure to ensure that the Data is not disclosed to any person that is not entitled to receive it.

We clarify that this measure is necessary considering, above all, our concern with information we process that belongs to children and adolescents.

If your request is accepted, we will do our best to contact our vendors, commercial partners, and service providers who may have access to your Personal Data, so that they can also rectify, delete or exercise any other Right that You have requested.

However, unfortunately we cannot guarantee the actual exercise of these Rights by these third parties, who use, disclose and protect Personal Data in accordance with their respective policies.

We may store and maintain, in record form, a history of requests for Rights that You have made, so that we can, if necessary, present it to the competent authorities as proof that we have responded to requests in a timely and appropriate manner, in accordance with applicable legislation.



## How long will it take to respond to your request?

Once your request has been received, our team will respond to You within the following deadlines:

RIGHT OF THE DATA SUBJECT	TERM
Confirmation of the existence of processing	Within 15 calendar days from receipt of the request
Access	Within 15 calendar days from receipt of the request
Adjustment	Within 5 working days from receipt of the request
Anonymization, Blocking or Deletion	Within 15 calendar days from receipt of the request
Portability	Within 15 calendar days from receipt of the request
Revocation or failure to provide consent	Within 15 calendar days from receipt of the request
Reviewing automated decisions	Within 15 calendar days from receipt of the request
Deletion of Data processed with consent	Within 15 calendar days from receipt of the request

If clarification or more information is required about your request, we may send You some questions so that we can respond to your request satisfactorily, so that the deadlines will be suspended from the submittal of our questions until we receive your response.



## In what situations can we deny your Right?

Your Rights are not unlimited and, therefore, we present below some situations that may lead to their total or partial denial:

- preservation of business secrets and intellectual property of BRASIL TERMINAL PORTUÁRIO S.A. - BTP;
- violation of the rights and freedoms of third parties;
- the information is anonymized and, therefore, is not Personal Data;
- obstruction of law and justice;
- the legitimate interests of BRASIL TERMINAL PORTUÁRIO S.A. - BTP overlap with those of the Data subject;
- the data subject made repetitive, repeated or excessive requests;

In any case, we will respond to requests in a timely manner and will inform you clearly about the reasons that led us to reject your request.



## How to speak to BRASIL TERMINAL PORTUÁRIO S.A. - BTP?

If you have questions, comments or suggestions related to this Policy, You can contact the privacy team at **BRASIL TERMINAL PORTUÁRIO S.A. - BTP** by the following means:

**Data Protection Supervisor/DPO:** [btp@dpo.com.br](mailto:btp@dpo.com.br)



## Changes in the Rights Policy

As **BRASIL TERMINAL PORTUÁRIO S.A. - BTP** is always seeking to improve its services, this Rights Policy may undergo updates.

Therefore, we recommend that You periodically visit this document to be aware of any changes.

If material changes are made that require new consent, we will post this update and ask You for new consent.