



DATA PRIVACY DECLARATION

ANNEX - BRAZIL

1. INTRODUCTION

This annex complements ANDRITZ's Data Privacy Declaration and applies to the processing of personal data carried out in Brazilian territory or referring to data subjects located in Brazil, as established by the General Law for the Protection of Personal Data (LGPD - Law No. 13,709/2018).

2. LEGAL BASES FOR DATA PROCESSING

In accordance with article 7 of the LGPD, ANDRITZ processes personal data in Brazil based on the following legal bases, applied according to the purpose and necessity of each processing operation:

- **Performance of contract:** Used when data processing is necessary for the performance of a contract or for preliminary procedures related to a contract to which the data subject is a party. Example: processing customer and supplier data for issuing invoices and fulfilling contractual obligations.
- **Compliance with legal or regulatory obligation:** Applies to situations in which ANDRITZ needs to process data to comply with legal or regulatory rules imposed by government authorities, such as tax, labor, and social security obligations.
- **Legitimate interest:** This occurs when ANDRITZ has a legitimate interest in processing the personal data of the data subject, provided that this interest does not prevail over the fundamental rights and freedoms of the data subject. Example: data analysis to improve products and services, system security, fraud prevention, and institutional communications.
- **Consent:** The holder must provide express authorization for the processing of their data in certain situations, such as personalized marketing campaigns. Consent must be obtained clearly and prominently, and can be revoked at any time.

3. PROCESSING OF SENSITIVE PERSONAL DATA

The processing of sensitive personal data, as defined in article 5, II, and article 11 of the LGPD, will be carried out in a restricted and exceptional manner, only when strictly necessary and based on the applicable legal hypotheses.

ANDRITZ will adopt reinforced technical and organizational measures for the processing of this data, including restricted access control, segregation of environments, records of processing operations, and prior assessment of risks to the rights of data subjects.

4. RIGHTS OF DATA SUBJECTS IN BRAZIL

As provided for in **article 18 of the LGPD**, data subjects in Brazil have the following rights, which can be exercised upon formal request to ANDRITZ's Data Protection Officer:

- **Confirmation of the existence of processing:** The data subject has the right to know whether ANDRITZ processes his or her personal data.
- **Access to data:** The data subject may request a copy of their personal data processed by ANDRITZ.





- **Correction of incomplete, inaccurate or outdated data:** If there are errors or outdated data, the holder may request their correction.
- **Anonymization, blocking, or deletion of data:** When the data is processed in non-compliance with the LGPD or becomes unnecessary for the original purpose.
- **Data portability:** The holder may request the transfer of his or her personal data to another service provider, upon express request.
- **Revocation of consent:** When the data processing is based on consent, the data subject may revoke it at any time, being informed of the consequences of this revocation.
- **Information about data sharing:** The data subject can request details about public and private entities with which their data has been shared.
- **Review of automated decisions:** If a data subject is affected by automated decisions, they may request a human review to better understand the criteria applied.

Requests related to the rights of data subjects can be made through ANDRITZ's specific service channel in Brazil, as indicated in the contact section of this document.

5. INTERNATIONAL DATA TRANSFER

When personal data of Brazilian data subjects are transferred outside the country, ANDRITZ will ensure that this transfer occurs exclusively based on valid legal mechanisms, pursuant to article 33 of the General Data Protection Law (LGPD) and Resolution CD/ANPD No. 19, of August 23, 2024. To ensure an adequate level of protection for personal data, ANDRITZ will adopt, as applicable, the following measures and safeguards:

- **ANPD adequacy decision:** Whenever possible, the transfer will be carried out to countries or international organizations recognized by the ANPD as having a level of protection of personal data adequate to that provided for in the LGPD.
- **Standard Contractual Clauses (CCPs):** In the absence of an adequacy decision, **Standard Contractual Clauses approved by the ANPD** will be used, pursuant to Resolution CD/ANPD No. 19/2024, incorporated into contracts signed with controllers or operators located abroad, without prejudice to other applicable data protection clauses.
- **Binding Corporate Rules (BCRs):** For intra-group international transfers, ANDRITZ may adopt global corporate rules duly approved by the ANPD, when applicable, ensuring adequate safeguards and a level of protection compatible with the LGPD.
- **Recognized certifications, codes of conduct, and seals:** Transfer mechanisms based on certifications, codes of conduct, or seals of good practice recognized by the ANPD may be used, provided that they are accompanied by binding commitments that are required by the recipient of the data abroad.
- **Additional safeguards and impact assessment:** Whenever necessary, especially when relevant risks to the rights and freedoms of data subjects are identified, ANDRITZ will carry out **impact assessments on the protection of personal data** and implement complementary technical, organizational, and contractual measures, such as encryption, access controls, data segregation, and periodic audits.
- **Specific hypotheses provided for in the LGPD:** In exceptional situations, the transfer may occur based on the hypotheses provided for in article 33 of the LGPD, such as the specific and detached consent of the data subject, compliance with a legal or regulatory obligation, or the execution of a contract or pre-contractual measures requested by the data subject, subject to the applicable legal requirements.



- **ANPD authorization:** When the international transfer does not fit into the automatic hypotheses provided for in the current legislation or regulations, ANDRITZ may request specific authorization from the ANPD, as provided for in the LGPD and Resolution CD/ANPD No. 19/2024.

ANDRITZ **will periodically review** its international data transfer practices, contracts, and mechanisms in order to ensure their **continued adherence to the LGPD, ANPD resolutions, and best governance practices in data protection**, documenting such reviews and adopting corrective measures whenever necessary.

6. SHARING DATA WITH THIRD PARTIES IN BRAZIL

The sharing of personal data with third parties in Brazil will be carried out only when necessary for the fulfillment of the purposes informed to the holder and based on a valid legal hypothesis.

ANDRITZ will ensure that such third parties are contractually obliged to adopt personal data protection measures compatible with the LGPD, including duties of confidentiality, information security, purpose limitation, and responsibility for the processing carried out.

7. REGISTRATION OF PROCESSING OPERATIONS

ANDRITZ keeps records of personal data processing operations carried out in Brazil, as provided for in article 37 of the LGPD, containing, whenever applicable, information on the purposes of the processing, the categories of personal data processed, the legal basis used, the sharing carried out, the retention period, and the security measures adopted.

These records may be made available to the National Data Protection Authority (ANPD), upon request, under the terms of current legislation.

8. DATA RETENTION AND DISPOSAL PERIOD

Personal data will be stored only for the period necessary to fulfill its purposes and legal obligations, in accordance with article 15 of the LGPD. The criteria for retention and disposal are as follows:

- **Compliance with legal and regulatory obligations:** Data will be stored for the time required by applicable legislation, including tax, labor, and regulatory rules.
- **Contract enforcement and rights enforcement:** Contract-related data will be kept until all contractual obligations have been fulfilled and any disputes have been resolved.
- **Maximum retention period according to current legislation:** If there is no specific legal requirement, the data will be kept for a reasonable period, based on the original purpose of the processing.
- **Secure Erasure Criteria:** When data is no longer needed, it will be securely deleted, ensuring the impossibility of recovery and preventing unauthorized access. This can include the physical destruction of documents or the permanent deletion of electronic records.

ANDRITZ implements internal data retention policies and conducts periodic audits to ensure compliance with applicable regulations.

9. DATA PROTECTION OFFICER (DPO) IN BRAZIL

To meet the requirements of article 41 of the LGPD, ANDRITZ appoints a Data Protection Officer (DPO) for Brazil, responsible for serving data subjects and regulatory bodies.

Contact of the Data Officer in Brazil:

- **Name of DPO:** PHILIPPE GILLEMEN



- Email: LGPD@andritz.com

10. SERVICE CHANNEL FOR CARDHOLDERS IN BRAZIL

ANDRITZ provides an exclusive portal for data subjects to exercise their rights under the LGPD. All requests must be made exclusively through the service portal, available at the following link:

[Data Subject Service Portal \(Privacy Web Form\)](#)

Through this portal, data subjects may request information about the processing of their data, exercise their rights, and obtain additional clarification on the protection of personal data by ANDRITZ.

Requests from data subjects will be analyzed and responded to within the deadlines established by the LGPD and ANPD rules. To ensure the security of the information and prevent unauthorized access, ANDRITZ may adopt procedures for verifying and validating the identity of the requester before the request is fulfilled.

11. INFORMATION SECURITY

ANDRITZ adopts **strict technical and organizational measures** to protect personal data from unauthorized access, leakage, destruction, or improper alteration. Key actions include:

- **Encryption of data** in transit and at rest to ensure confidentiality;
- **Restricted access control**, ensuring that only authorized personnel have access to sensitive data;
- **Continuous monitoring of systems** to detect suspicious activity and prevent incidents;
- **Incident management policy**, with specific protocols for rapid response to security breaches;
- **Regular training for employees** on data protection and good information security practices.

In the event of a security incident that may cause relevant risk or damage to the holders of personal data, ANDRITZ will promptly adopt the necessary measures to contain, mitigate, and remediate the impacts, as well as communicate it to the National Data Protection Authority (ANPD) and, when applicable, to the affected subjects, within the deadlines and terms provided for in article 48 of the LGPD and in the current regulations.

12. CHANGES AND UPDATES

This annex may be updated as necessary to meet new requirements of the LGPD and ANPD regulations. Whenever there is a significant change, data subjects will be informed through ANDRITZ's official communication channels.

13. FINAL PROVISIONS

This appendix is part of the ANDRITZ Privacy Declaration and applies exclusively to the processing of personal data carried out in Brazil. In the event of conflict with other versions of the Declaration, the provisions of this annex shall prevail for situations related to the LGPD.