

# **PERSONAL DATA PROTECTION AND PRIVACY POLICY**

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## 1. GENERAL PROVISIONS

Approved at the 10<sup>th</sup> Ordinary Meeting of the Board of Directors, held on October 19, 2023 (Version 3).

## 2. PURPOSE

The purpose hereof is to establish guidelines for the collection and processing of personal data from individuals who are customers, employees, administrators, suppliers, shareholders, business partners, other stakeholders, and their respective related parties.

## 3. COVERAGE

Personal Data Protection and Privacy Policy covers all processes and procedures that in any way treat personal data, in any medium (physical and digital) of the subjects who relate to the company.

Therefore, it applies to all people who work at Companhia de Saneamento do Paraná – Sanepar, whether Board Members, Members of Committees, Officers, professionals of any nature, interns and apprentices, as well as to any individual or legal entity, governed by Public or Private Law, with whom you relate: business partners, suppliers, service providers, customers, among others.

This Policy is available at the electronic address: <https://ri.sanepar.com.br/governanca-corporativa/estatuto-codigos-e-politicas> and, once approved by the Board of Directors, it must be disclosed to all persons who must fulfill it.

## 4. REFERENCES

- 4.1. Constitution of the Federative Republic of Brazil;
- 4.2. Federal Law No. 12.965/2014 (Civil Rights Framework for Internet Use);
- 4.3. Federal Law No. 13.709/2018 (Brazilian General Personal Data Protection Law);
- 4.4. Federal Law No. 13.853/2019 (Provides for the protection of personal data and creates the National Data Protection Authority; and makes other provisions);
- 4.5. Federal Law No. 12.527/2011 (Access to Information Law);

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- 4.6. State Decree No. 10.285/2014 (Provides for procedures to be observed by the Direct and Indirect Administration, with a view to guaranteeing access to information);
- 4.7. Code of Conduct and Integrity;
- 4.8. CAVOUKIAN, Ann et al. Privacy by design: The 7 foundational principles. Information and privacy commissioner of Ontario, Canada, v. 5, 2009.

This Policy must be read and interpreted together with Code of Conduct and Integrity and other corporate policies.

## **5. DEFINITIONS**

Key terms referenced herein include:

**5.1 – Controller** – individual or legal entity, public or private, who is responsible for decisions regarding the processing of personal data and communication with data subjects and the National Authority and/or competent authorities in relation to the Processing of Personal Data, in accordance with the Brazilian General Personal Data Protection Law - GPDL and good governance practices;

**5.2 – Information Security Committee** – employees designated to deal with relevant matters, based on the need identified by the Data Protection Officer (DPO) or Person in Charge;

**5.3 – Person in charge or DPO – Data Protection Officer** – person in charge, appointed by the controller and operator to act as a communication channel between the controller, data subjects and the National Data Protection Authority;

**5.4 – Personal Data Security and Privacy Leaders** – Coordinators and/or Managers of the different areas that, in some way, have personal data processing in their processes;

**5.5 – Internal Data Processing Agents (Internal Operators)** – are all employees who, in carrying out activities related to the company's processes, have contact with and process personal data;

**5.6 – Data subject** – individual to whom the personal data that are subject to processing refer;

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**5.7 – Processing** – any operation carried out with personal data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction;

**5.8 – Personal Data** – information related to an identified or identifiable individual;

**5.9 – Sensitive Personal Data** – personal data on racial or ethnic origin, religious conviction, political opinion, union membership or organization of a religious, philosophical or political nature, data related to health or sexual life, genetic or biometric data, when linked to an individual;

**5.10 – National Data Protection Authority** (in portuguese ANPD) – Government agency responsible for ensuring, implementing and supervising compliance with the GPDL throughout the national territory.

**5.11 – Cookies** – File stored on the computer to aid navigation on websites. Common practice for customizing the user experience which may modify your browser settings to accept or reject cookies.

**5.12 – Operator** – individual or legal entity, public or private, who processes personal data on behalf of the controller;

## **6. PRINCIPLES**

This Personal Data Protection and Privacy Policy, based on fundamental rights, on the data protection legal microsystem that deals with the subject, as well as on Sanepar's values and Code of Conduct and Integrity. Personal data processing activities must observe good faith and the following principles:

**6.1 – Purpose:** carrying out the processing for legitimate, specific, explicit and informed purposes to the data subject, without the possibility of subsequent processing in a way that is incompatible with those purposes;

**6.2 – Suitability:** compatibility of the processing with the purposes informed to the data subject, according to the processing context;

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**6.3 – Need:** limiting the processing to the minimum necessary for the fulfillment of its purposes, with the scope of relevant data, proportional and not excessive in relation to the purposes of data processing;

**6.4 – Free Access:** guarantee, to subjects, of facilitated and free consultation on the form and duration of processing, as well as on the completeness of their personal data;

**6.5 – Data Quality:** guarantee, to the subjects, of accuracy, clarity, relevance and updating of the data, according to the need and for the fulfillment of the purpose of its processing;

**6.6 – Transparency:** guarantee, to subjects, of clear, precise and easily accessible information about the performance of the processing and the respective processing agents, observing commercial and industrial secrets;

**6.7 – Security:** use of technical and administrative measures capable of protecting personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or dissemination;

**6.8 – Prevention:** adoption of measures to prevent the occurrence of damage due to the processing of personal data;

**6.9 – Non-Discrimination:** Impossibility of carrying out the processing for illicit or abusive discriminatory purposes; and

**6.10 – Accountability and Rendering of Accounts:** demonstration, of the adoption of effective measures capable of proving compliance with and compliance with the rules on the protection of personal data and even the effectiveness of these measures.

## **7. RECITALS**

7.1 – Sanepar values unconditional and unrestricted respect for all applicable national and foreign laws, regulations, policies, norms, standards, procedures and good organizational practices in all activities on behalf of the Company and wherever it operates.

7.2 – Sanepar complies with the legislation and internal rules regarding information security, in order to guarantee the integrity, availability and confidentiality of the

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Company's information, promoting an upstanding, ethical and transparent corporate environment.

7.3 – Sanepar fully respects the right to confidentiality and privacy of the personal data of customers and all stakeholders, by virtue of its business processes, creating a long-term relationship of credibility.

## **8. GUIDELINES**

### **8.1 – General Guidelines**

In compliance with what is required by the legislation and the commitments assumed herein, Sanepar will follow, in its processes and procedures, the following guidelines:

I. Identify and monitor business, processes, procedures, areas and critical people, as well as business partners, in order to detect and assess the risks of unauthorized access, preparing action plans to mitigate these risks.

II – Process personal data in accordance with good corporate governance practices and with the Brazilian General Personal Data Protection Law – GDPL (in portuguese LGPD), ensuring protection of data subjects whose data Sanepar has access to due to its business processes, in order to prevent information security incidents.

III – Implement and monitor compliance with physical and logical security measures and requirements for the processing of personal data in the process of managing personal information.

IV – Adopt privacy and data protection from the design stage of products, processes or services to their execution by Sanepar, ensuring compliance with the GDPL.

- a) Adapt internal processes and create procedures for the collection and processing of personal data of individuals so that they are carried out in a sufficient way to fulfill their purpose, in accordance with the legal basis, keeping data permanently updated and classified.
- b) Configure the systems and change the Company's processes with appropriate parameters in accordance with this Personal Data Protection and Privacy Policy as a standard in the processing of personal data and sensitive personal data.

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- c) Apply appropriate technical and organizational measures to ensure a level of security compatible with the risk, taking into account the most advanced and possible techniques at the time, application costs; and the nature, scope, context and purposes of the processing, as well as the risks, of variable probability and impact, to guarantee the rights and freedoms of data subjects.
  - d) During the conception, execution and maintenance of personal data processing operations, adopt appropriate technical measures to ensure the fundamental rights and guarantees of data subjects in the processing of personal data, establish applicable safeguards for the control of the business area, the person in charge and by the subject as to the adequacy to the principles of protection of personal data.

V. Seek to define and keep internal rules, mechanisms and procedures up to date and adapt the processes and tools used for the processing of personal data, aiming to guarantee the rights of data subjects provided for in the GPD, mainly in relation to the protection of sensitive personal data, subject to the Company's rights.

VI. Use technical and administrative measures for the security of personal data in accordance with the best market standards, in accordance with the identified risks, implementation costs and the state of the art applicable to a given measure.

VII. Require the Operator and any subcontractors to maintain security levels for the protection of personal data recommended by the Controller.

VIII. Use mechanisms in the internal control system so that Sanepar's areas monitor, track and identify atypical situations and those considered suspicious of leakage of personal data.

IX. Determine that contracts, agreements and other similar contractual documents involving data processing contain clauses relating to the responsibility of the service provider, regarding the confidentiality and secrecy of the information processed, the possibility of auditing processes and services, as well as sanctions in case of non-compliance with the law or this Policy.



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- a) Establish that the storage of personal data of the data subjects only takes place for the period necessary to achieve the purposes presented to the subject.

X. Make reasonable efforts to ensure that the Operator complies with contractual obligations, carrying out an analysis of compliance with the GPDL.

XI. Keep a record of the processing operations carried out, indicating the purpose, processing time, term, security, secrecy and privacy; and hypotheses provided in the GDPL that authorizes it.

XII. Provide and disclose internally and externally this Policy and other information and guidance necessary for clarification on the protection of personal data, observing the specificities of the communication needs of stakeholders.

- a) Develop an awareness program for employees, third parties and suppliers to disseminate the guidelines established for the processing of personal data.

XIII. Provide communication channels, considering the specificities of the communication needs of stakeholders, so that possible personal data breaches are reported in a complete, adequate and timely manner.

XIV. Consider the voluntary commitments assumed by Sanepar regarding sustainable development, such as the Global Compact and the Sustainable Development Goals – GCSDG (in portuguese ODS).

## **8.2 – Guidelines for Privacy by Design**

All projects and processes to be developed at Sanepar must undergo Privacy analysis, with the purpose of analysis consistent with respect for privacy and the protection of subjects' personal data, represented by the principles listed below.

### **I. Proactive, not reactive; Preventive, not corrective action**

Predict, anticipate, and avoid privacy-invasive events before they happen, preventing, or at least minimizing, the efforts and expenses that are necessary for their subsequent correction. Do not wait for privacy risks to materialize.

### **II. Privacy setting as default**

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Provide the maximum degree of privacy, ensuring that personal data is automatically protected in any project or business process. No action is required on the part of the subject to protect their privacy: it should be built into the project or process by default.

### **III. Privacy built into the design**

Privacy must be incorporated into the design, and architecture of Information Technology systems, and implementations of business rules.

Privacy is not added as an add-on after the fact, it should be an essential component of the core functionality being delivered, becoming an integral part of the project, process, or system without detracting from its functionality.

### **IV. Total Functionality - Positive Sum, not zero-sum**

All legitimate interests and objectives must be reconciled in a “win-win”, positive-sum manner, not through a zero-sum approach where unnecessary trade-offs are made.

The purpose of this process is to meet different interests in the most homogeneous way possible, avoiding the fulfillment of one process at the expense of another. Therefore, the pretense of false dichotomies, such as privacy vs. security, demonstrating that it is possible to have both.

### **V. End-to-end security – complete lifecycle protection**

Ensure secure management in the information lifecycle, from start to finish, end to end, in any project or business process.

Privacy must be incorporated into projects or processes before the first personal data is collected, extending securely throughout the entire lifecycle of the data involved.

Security measures are essential to privacy, from start to finish, ensuring that all data is stored and subsequently safely deleted at the end of the process.

### **VI. Visibility and Transparency**

All interested parties must be assured that whatever business practice or technology involved is in fact operating in accordance with the stated promises and objectives, subject to independent verification.

The component parts and operations remain visible and transparent to both users and suppliers.

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## **VII. Respect for user privacy**

The subject must be at the center of everything, with the aim of ensuring respect for their privacy. The interests of the subject must remain at the forefront by offering measures, such as strong privacy standards, appropriate notice, and user-friendly options.

Specific issues for each business area must be formalized in internal regulatory documents, which complement the general guidelines.

## **VIII. Additional protection for the vulnerable**

When any type of processing of personal data of vulnerable groups, such as children and adolescents, the elderly, and people with disabilities, is carried out, the requirements set out in legislation must be observed, with the aim of mitigating the risks that may cause some type of damage to subjects.

## **9. PERSONAL DATA PROCESSING**

Personal data of Customers, Employees, Dependents, Suppliers/Service Providers, Interns and Apprentices, Retired and Former Employees, Third Parties, Governance Bodies, Representatives of Control Bodies, Representatives of the Government, Shareholders, Participants in Public Tenders and Visitors to Sanepar's facilities are collected during the relationship with the data subject to achieve and comply with contractual obligations (e.g. provision of services by Sanepar), business management activities, as well as for compliance with legal or regulatory obligations.

As a result of this relationship, additional personal data may be collected from the data subject, always in compliance with the principles set out in data protection legislation. The processing of personal data occurs in different ways within Sanepar, adopting the division by categories of holders to better elucidate the ways of processing personal data in our processes.

### **9.1 DATA OF CHILDREN AND ADOLESCENTS**

Sanepar only processes the personal data of minors in accordance with the current privacy and personal data protection legislation.

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The processing of personal data of minors under the age of eighteen may be carried out due to activities carried out by the Company, such as hiring them to occupy apprenticeships and interns, as well as for the purpose of registering in the HR system as dependents of employees, as well as for be included in attendance lists, statements by education or recreation entities, with the objective of ensuring security and access control for this public in its facilities.

## **9.2 SENSITIVE PERSONAL DATA**

Depending on its relationship, Sanepar may process sensitive personal data such as, for example, biometric registration for access to its physical facilities; health data or other sensitive personal data involved in the management of people; in cases of relationships with public figures or public agents (e.g. community leaders, councilors, deputies, secretaries of federative entities), especially with regard to political/partisan orientation data; in the case of public policies, programs and social projects and for the creation and management of such projects, such as data related to ethnicity; sensitive personal data that may be included in lawsuits, agreements or investigations of complaints to the ethics channel, among other purposes. Sanepar may process sensitive personal data:

- I. upon consent, and for specific purposes, in accordance with current legislation. If the processing of personal data takes place at the request of the user, it is considered that consent has been given.
- II. without the user's consent if they are indispensable, according to current legislation, for:
  - a) Compliance with a legal or regulatory obligation by the Controller;
  - b) Shared processing of data necessary for the execution of public policies provided for in laws or regulations;
  - c) Conducting studies by a research body, ensuring their anonymity whenever possible;
  - d) Regular exercise of rights, including in agreement and in judicial, administrative and arbitration proceedings;
  - e) Protect the life or the physical safety of the user or third parties;

- f) Health protection, exclusively, in a procedure performed by health professionals, health services or health authority;
- g) Guarantee of fraud prevention and user safety, in the processes of identification and authentication of registration in electronic systems, except in the case of prevailing fundamental rights and freedoms that require the protection of personal data.

### **9.3. USE OF COLLECTED DATA**

The personal data collected by Sanepar are only used to achieve the purposes that originated their collection, being treated in accordance with the applicable laws and the GDPL according to the purposes and categories contained in Tables 1 to 13, below:

Table 1 – Employees

| CATEGORY: EMPLOYEES   | PURPOSE   |
|---|---|
| <p><b>Personal Characteristics:</b> Full name, Date of Birth, Place of Birth, Date of Marriage, Birth Certificate, Marriage, Declaration of Stable Union or Death, Marital Status, Gender, Nationality, Place of Birth, Filiation; Ethnic Group;</p> <p><b>Identification generated by official agencies:</b> CPF, RG, CNH (number, date of issue and issuing agency), CTPS, PIS/PASEP, voter registration card, with number, zone and section, reservist certificate and other public identification documents</p> <p><b>Contract data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone; In case of emergency: name and telephone number of the person appointed;</p> <p><b>Education:</b> School diplomas and certificates, School Records (primary, secondary education);</p> <p><b>Professional Information:</b> Class Counsel, Performance Appraisal, Employer Identification Number. E.g.: Enrollment, Admission date, Area, Workplace, Manager name, Manager CPF, Performance evaluation, Capacity, Licenses;</p> <p><b>Financial information:</b> Bank details (bank, branch and account), Salary, Bonus and other income, FGTS balance and deposits, Paycheck, Income Report, Income Tax;</p> <p><b>Legal Information:</b> Data from progress /concluded processes involving employees, Politically Exposed Person (PEP) records;</p> <p><b>Information on dependents and related parties:</b> Name, Date of Birth, Age, Gender, CPF, CNPJ, degree and type of relationship, Name of Parents;</p> <p><b>Personal health information:</b> Admission medical examination, Occupational Health certificate, Periodic medical examination, Dismissal medical examination, Health plan beneficiary registration, Medical history, Medical treatment, Medical diagnosis, Medical reimbursement, International Classification of Diseases – ICD (in Portuguese CID);</p> <p><b>Sensitive general information:</b> Health Data, Union Affiliation, Ethnicity (quotas), Vaccinations, Driver History, Clearance Certificate of Criminal Background, if permitted by law, biometric registration.</p> | <p>During the employment relationship with Sanepar, personal data will be used to:</p> <ol style="list-style-type: none"> <li>I. enter into and manage the employment agreement, pay compensation and provide benefits to the employee and perform withholdings/payment of corresponding taxes;</li> <li>II. create and manage users in the systems used by Sanepar;</li> <li>III. conduct mandatory training and plan elective training;</li> <li>IV. attendance control and managing absence or absences due to illness and others;</li> <li>V. compliance with labor, social security, medicine and occupational safety obligations;</li> <li>VI. ensure the use of vacation periods;</li> <li>VII. management of those on leave from the National Social Security Institute (in portuguese INSS), as well as analyzing the maintenance of benefits;</li> <li>VIII. managing Sanepar's businesses, as well as carrying out accounting and auditing;</li> <li>IX. make decisions about your employment or continued commitment;</li> <li>X. analyze performance and make decisions about salaries, promotions and benefits;</li> <li>XI. investigate issues related to non-compliance with regulations and standards, especially Sanepar's Integrity Policies and Procedures;</li> <li>XII. defend Sanepar's interests in judicial, administrative or arbitration proceedings involving employees, service providers, suppliers, etc.;</li> <li>XIII. monitor the use of Sanepar's information and communication systems to ensure compliance with our Governance and IT policies;</li> <li>XIV. ensure network and information security, including preventing unauthorized access to Sanepar's computers and electronic communications systems and the distribution of malicious or similar software;</li> <li>XV. process the termination of the employment agreement;</li> <li>XVI. <b>Compliance with a legal or regulatory obligation</b>, pursuant to Article 7, II of the GPDL;</li> </ol> |

Table 2 – Retired / Disconnected

| CATEGORY: RETIRED/DISMISSED  | PURPOSE  |
|--|--|
| <p><b>Personal Characteristics:</b> Full name, Date of Birth, Place of Birth, Date of Marriage, Birth Certificate, Marriage, Declaration of Stable Union or Death, Marital Status, Gender, Nationality, Place of Birth, Filiation; Ethnic Group;</p> <p><b>Identification generated by official agencies:</b> CPF, RG, CNH (number, date of issue and issuing agency), CTPS, PIS/PASEP, voter registration card, with number, zone and section, reservist certificate and other public identification documents</p> <p><b>Contract data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone;</p> <p>In case of emergency: name and telephone number of the person appointed;</p> <p><b>Education:</b> School diplomas and certificates, School Records (primary, secondary education);</p> <p><b>Professional Information:</b> Class Counsel, Performance Assessment, Employer Identification Number. E.g.: Enrollment, Admission date, Area, Workplace, Manager name, Manager CPF, Performance evaluation, Lotation, Licenses;</p> <p><b>Financial information:</b> Bank details (bank, branch and account), Salary, Bonus and other income, FGTS balance and deposits, Paycheck, Income Report, Income Tax;</p> <p><b>Legal Information:</b> Data from progress/concluded processes involving employees, Politically Exposed Person (PEP) records;</p> <p><b>Information on dependents and related parties:</b> Name, Date of Birth, Age, Gender, CPF, CNPJ, degree and type of relationship, Name of Parents;</p> <p><b>Personal health information:</b> Admission medical examination, Occupational Health certificate, Periodic medical examination, Dismissal medical examination, Health plan beneficiary registration, Medical history, Medical treatment, Medical diagnosis, Medical reimbursement, International Classification of Diseases – ICD (in Portuguese CID);</p> <p><b>Sensitive general information:</b> Health Data, Union Affiliation, Ethnicity (quotas), Vaccinations, Driver History, Clearance Certificate of Criminal Background, if permitted by law, biometric registration.</p> | <p>After the employment relationship with Sanepar, personal data will be used to:</p> <ol style="list-style-type: none"> <li>I. compliance with labor, social security, medicine and occupational safety obligations;</li> <li>II. defend Sanepar's interests in legal proceedings, involving employees, retirees, service providers, suppliers, etc.;</li> <li>III. eliminate users in the systems used by Sanepar;</li> <li>IV. <b>Compliance with a legal or regulatory obligation</b>, pursuant to Article 7, II of the GDPL;</li> <li>V. <b>Sharing with public agencies:</b> For the purposes of audits and investigations or public policies.</li> <li>VI. <b>Sharing with research bodies:</b> For the purpose of studies and research.</li> </ol> |

Table 3 – Dependents and Related Parties

| CATEGORY: DEPENDENTS AND RELATED PARTIES  | PURPOSE  |
|---|--|
| <p><b>Personal Characteristics:</b> Full name, Date of Birth, Place of Birth, Date of Marriage, Birth Certificate, Marriage or Death, Marital Status, Gender, Nationality, Place of Birth, Filiation;</p> <p><b>Contract data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone Number;</p> <p><b>Identification generated by official agencies:</b> CPF, RG, CNH (number, date of issue and issuing agency) and other public identification documents;</p> <p><b>Sensitive general information:</b> Health Data (number in the health plan, medical report, certificates and accompanying statements with ICD number).</p> | <ol style="list-style-type: none"> <li>I. provide employee benefits on account of their dependents;</li> <li>II. frequency control and manage the absence or absences due to illness of dependents;</li> <li>III. compliance with legal obligations;</li> <li>IV. compliance with legal provisions (payment of meal ticket with payroll deduction);</li> <li>V. <b>Related Parties:</b> information required for verification purposes of close or immediate family members of the individual who are believed to be able to influence the individual's dealings with the entity.</li> </ol> |

Table 4 – Interns and Apprentices

| CATEGORIES: INTERNS AND APPRENTICES  | PURPOSE  |
|--|--|
| <p><b>Personal Characteristics:</b> Full name, Date of Birth, Place of Birth, Date of Marriage, Birth Certificate, Marital Status, Gender, Age, Nationality, Place of Birth, Filiation;</p> <p><b>Identification generated by official agencies:</b> CPF, RG, CNH (number, date of issue and issuing agency), CTPS, PIS/PASEP and other public identification documents;</p> <p><b>Contract data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone Number;</p> <p><b>Education:</b> Schooling, Academic Transcript, Declaration of Relationship with Educational Institutions;</p> <p><b>Professional Information:</b> Performance Assessment, Employer Identification Number. E.g.: Registration, Area, Workplace, Supervisor Name, Supervisor CPF;</p> <p><b>Financial information:</b> Bank details (bank, branch and account);</p> <p><b>Sensitive general information:</b> Health Data (medical report, certificates and declarations of attendance with ICD Number).</p> | <p>During the employment relationship with Sanepar, personal data will be used to:</p> <ol style="list-style-type: none"> <li>I. create and manage users in the systems used by Sanepar;</li> <li>II. conduct mandatory training and plan elective training;</li> <li>III. attendance control;</li> <li>IV. compliance with legal obligations;</li> <li>V. managing Sanepar's businesses, as well as carrying out accounting and auditing;</li> <li>VI. analyze performance and make decisions about your learning/internship;</li> <li>VII. investigate issues related to non-compliance with regulations and standards, especially Sanepar's Integrity Policies and Procedures;</li> <li>VIII. defend Sanepar's interests in judicial, administrative or arbitration proceedings involving employees, service providers, suppliers, etc.;</li> </ol> |

*Continued*



Table 4 – Interns and Trainees

(continued)

| CATEGORIES: INTERNS AND APPRENTICES | PURPOSE   |
|-------------------------------------|---|
|                                     | <p>IX. monitor the use of Sanepar's information and communication systems to ensure compliance with internal governance and IT policies;</p> <p>X. ensure network and information security, including preventing unauthorized access to Sanepar's computers and electronic communications systems and the distribution of malicious and similar software.</p> |

Table 5 – Governance Agents

| CATEGORY: GOVERNANCE AGENTS   | PURPOSE   |
|---|---|
| <p><b>Personal Characteristics:</b> Full name, Date of Birth, Place of Birth, Marriage Regime, Birth Certificate, Marital Status, Gender, Age, Nationality, Place of Birth, Filiation;</p> <p><b>Identification generated by official agencies:</b> CPF, RG, CNH (number, date of issue and issuing agency), passport and DNI and other public identification documents;</p> <p><b>Contract data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone;</p> <p><b>Education:</b> Diplomas, Certificates, Education, Academic background;</p> <p><b>Professional Information:</b> Employer Identification Number. E.g.: Enrollment, Admission date, Area, Workplace, Manager name, Manager CPF, Performance evaluation; Capacity, Curriculum, class council (number, date of issue and issuing agency), Certificate of Technical Capacity, evaluation of governance bodies and agents, Professional experience;</p> <p><b>Financial information:</b> Bank details (bank, branch and account); Salary, Bonus and other income, FGTS balance, Income Tax, Income Report;</p> | <p>During the employment relationship with Sanepar, personal data will be used to:</p> <ol style="list-style-type: none"> <li>I. enter into and manage the employment agreement, pay compensation and provide benefits to the employee and perform withholdings/payment of corresponding taxes;</li> <li>II. create and manage users in the systems used by Sanepar;</li> <li>III. conduct mandatory training and plan elective training;</li> <li>IV. frequency control and manage the absence or absences due to illness;</li> <li>V. compliance with labor, social security, medicine and occupational safety obligations;</li> <li>VI. managing Sanepar's businesses, as well as carrying out accounting and auditing;</li> <li>VII. make decisions about your employment or continued commitment;</li> <li>VIII. investigate issues related to non-compliance with regulations and standards, especially Sanepar's Integrity Policies and Procedures;</li> <li>IX. defend Sanepar's interests in judicial, administrative or arbitration proceedings involving employees, service providers, suppliers, etc.;</li> </ol> |

Continued

Table 5 – Governance Agents

(continued)

| CATEGORY: GOVERNANCE AGENTS   | PURPOSE  |
|---|--|
| <p><b>Legal Information:</b> Data from progress/concluded processes involving employees, Politically Exposed Person (PEP) records;</p> <p><b>Personal health information:</b> Admission medical examination, Occupational Health certificate, Periodic medical examination, Dismissal medical examination, Beneficiary number in the health plan, Medical history, Medical treatment, medical diagnosis, Medical reimbursement;</p> <p><b>Sensitive general information:</b> Health Data, Union Affiliation, Ethnicity (quotas), Vaccinations, Driver History, Clearance Certificate of Criminal Background, if permitted by law.</p> | <p>X. monitor the use of Sanepar's information and communication systems to ensure compliance with our Governance and IT policies;</p> <p>XI. ensure network and information security, including preventing unauthorized access to Sanepar's computers and electronic communications systems and the distribution of malicious or similar software;</p> <p>XII. process the termination of the employment agreement.</p> |

Table 6 – Shareholders/Investors

| CATEGORIES: SHAREHOLDERS/INVESTORS   | PURPOSE  |
|--|--|
| <p><b>Identification:</b> Full name, Date of Birth, Place of Birth, Date of Marriage, Birth Certificate, Civil Registry, Enrollment, Marriage Certificate, Marriage Certificate with Civil Registry and Enrollment Entries, Enrollment Copy of Steady Union, Marital Status (declared), Gender, Age, Nationality, Place of Birth, Parents;</p> <p><b>Documents:</b> CPF/CNPJ No.;</p> <p><b>Contact information:</b> address;</p> <p><b>Bank Details:</b> bank, branch and account;</p> <p><b>Financial information:</b> amounts related to dividends and Interest On Equity – IoE (in portuguese JCP), Income Tax amounts related to the distribution of IoE, place of custody of the shares;</p> <p><b>Professional Information:</b> profession, activity.</p> | <p><b>Control:</b> The Shareholder was registered in Sanepar's systems to control compliance with legal and regulatory obligations and to enable payment of Dividends.</p> <p><b>Shareholder Service:</b> When the data subject contacts Sanepar's IR area by any available means.</p> |

Table 7 – Customers:

| CATEGORIES: CUSTOMERS  | PURPOSE  |
|--|--|
| <p><b>Personal Characteristics:</b> Full name, preferred name Date of Birth, Parentage, Marital Status;</p> <p><b>Identification generated by official agencies:</b> CPF, RG, CNH (number, date of issue and issuing agency), passport and DNI and other public identification documents;</p> <p><b>Contact data:</b> Personal Email, Contact Address, Personal Mobile Number, Home Phone Number;</p> <p><b>Enrollment Information:</b> Property Address, Customer Category, Hydrometer Number, Number of water savings, Number of sewage savings, Number of inhabitants, Real Estate Registration, Water connection situation, Sewage connection situation, Water Connection Date, Sewage Connection Date, Water Interruption Date, Water Interruption Reason, Water Reconnection Date, Water Disposal Date, Water Disposal Reason, Sewage Disposal Reason, Sewage Disposal Date, support material</p> <p>Supply source, Supply reservoir, Easel Seal, Hydrometer Protector Indication, Special Tariff Class, Bill Delivery Method, Water Connection Condition, Sewage Connection Condition, Invoice Exemption Indicator, Contact Name of the Property, Alternative Address, Geographical Coordinates;</p> <p><b>Financial information:</b> Bank details (bank, branch and account);</p> <p><b>Other Information:</b> power of attorney (when represented or assisted), Differential Income Tariff, Single Registry</p> | <p><b>Service provision:</b> The necessary entries are made in Sanepar's systems to provide the service, maintenance, customer service, by any means available.</p> <p><b>Customer Service:</b> When the subject contacts Sanepar through the official service channels, for example: 0800, self-service, Relationship Centers and Contact Us.</p> <p><b>Compliance with legal and regulatory obligations</b> related to Sanepar.</p> <p><b>Whistleblowing Investigation:</b> Involving employees and people who act on behalf of Sanepar, in accordance with internal policies.</p> <p><b>Defend Sanepar's interests</b> in judicial, administrative or arbitration proceedings involving employees, service providers, suppliers, etc.</p> <p><b>Fraud Investigation:</b> Inspection carried out in the field at homes and companies to investigate and analyze possible fraud in water distribution.</p> <p><b>Differentiated tariff:</b> Eligibility for social tariff and monitoring of water supply and sewage collection.</p> <p><b>Billing:</b> Notification to the defaulting customer and on amounts invoiced and not paid by the customer. In cases where the debt is not remedied, the default is communicated and financial guarantees activated.</p> <p><b>Deactivation</b> of equipment, deregistration of Sanepar customers and termination of the agreement.</p> <p><b>Sharing with public agencies:</b> For public policy purposes or compliance with a legal or regulatory obligation.</p> <p><b>Identify user needs:</b> For the purpose of improving its products and services.</p> |

Table 8 – Suppliers / Service Providers / Business Partners

| CATEGORIES: SUPPLIERS/ SERVICE PROVIDERS/ BUSINESS PARTNERS  | PURPOSE  |
|--|--|
| <p><b>Personal Characteristics:</b> Full name, Date of Birth, Marriage Regime, Marital Status, Gender, Nationality, Number of dependents and additional data of dependents;</p> <p><b>Identification generated by official agencies:</b> CPF, ID, CNH, CNPJ number (number, date of issue and issuing agency), PIS/PASEP number, NIT and other public identification documents;</p> <p><b>Contact data:</b> Professional email, Professional Address, Professional mobile number, Business phone number;</p> <p><b>Education:</b> Diplomas, certificates and education;</p> <p><b>Professional Information:</b> Agreement number with the supplier, Licenses and Class Council, Certificate of Technical Capacity, Legal proceedings related to tax exemption, Municipal and State Registration, CBO (Brazilian Occupation Code) number, Indication of company Opting for Simple Taxation System (in portuguese SIMEI);</p> <p><b>Criminal record:</b> where permitted by law.</p> | <p><b>Agreement Execution:</b> The processing of the data will occur to enable the provision of services, for example, to create a user register in the systems used, sharing the data for release of entry, as well as for the inspection of the services in accordance with the quality parameters established by Sanepar.</p> <p><b>Compliance with legal</b> and regulatory obligations related to Sanepar.</p> <p><b>Agreement control and monitoring audits:</b> investigate issues related to non-compliance with regulations and standards, especially Sanepar's Integrity Policies and Procedures;</p> <p><b>Network Security:</b> Monitor use of Sanepar's information and communication systems to ensure compliance with its governance and IT policies and network and information security, including preventing unauthorized access to Sanepar's computers and electronic communications systems and the distribution of malicious or similar software.</p> |

Table 9 – Representatives - Inspection and Control Agencies

| CATEGORIES: INSPECTION AND CONTROL AGENCIES  | PURPOSE  |
|--|--|
| <p><b>Identification:</b> Full name;</p> <p><b>Documents:</b> ID card, CPF, CNH (number, date of issue and issuing agency);</p> <p><b>Contact information:</b> Business Email, Business Address, Business Mobile Number.</p> | <p><b>Surveillance actions to prevent and combat corruption:</b> For verification purposes, corrections and sanctions, in case of irregularities in the Company's acts.</p> <p><b>Service provision:</b> For the execution of public policies.</p> |

Table 10 – Representatives - Government

| CATEGORIES: REPRESENTATIVES   | GOVERNMENT  | PURPOSE |
|---|---|---------|
| <p><b>Identification:</b> Full name, photo;</p> <p><b>Documents:</b> ID card, CPF, CNH (number, date of issue and issuing agency);</p> <p><b>Contact information:</b> Business Email, Business Address, Business Mobile Number.</p> | <p><b>Granting/ Program Agreements:</b> preparation and signing of the agreement to enable the granting of public services.</p> <p><b>Compliance with Legal Obligations:</b> Rendering of accounts to entities that regulate Sanepar's activities.</p> <p><b>Management of the granting/Program agreement</b> for monitoring and maintaining the granting of public services.</p> <p><b>Agreement control and monitoring audits:</b> investigate issues related to non-compliance with regulations and standards, especially Sanepar's Integrity Policies and Procedures;</p> <p><b>Compliance with the Government:</b> When the representative of the Government contacts Sanepar by any means available.</p> <p><b>Rendering Service:</b> For the execution of public policies.</p> |         |

Table 11 – Participants in Public Tenders - selection process for hiring staff

| CATEGORIES: PARTICIPANTS IN PUBLIC CONSULTATIONS  | PURPOSE   |
|---|---|
| <p><b>Personal Characteristics:</b> Full name, Date of Birth, Place of Birth, Date of Marriage, Birth Certificate, Marital Status, Gender, Age, Nationality, Place of Birth, Filiation;</p> <p><b>Identification generated by official agencies:</b> CPF, RG (number, date of issue and issuing body), CNH (number, date of issue and issuing agency), CTPS, PIS/PASEP;</p> <p><b>Contact data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone number;</p> <p><b>Personal health information:</b> Only applicable to vacancies for PCD - Medical report, International Classification of Diseases – ICD (in Portuguese CID), ethnicity.</p> | <p><b>Application:</b> Identification of the candidate for the public tender and issuance of the slip for payment of the respective fee.</p> <p><b>Registration:</b> In Sanepar's systems, the candidates approved in the contest for future calls, respecting the quotas defined by law.</p> <p><b>Special Attendance:</b> Health data is used to guarantee the necessary conditions for the PWD candidate to take the exam (e.g., proof printed in Braille, adapted furniture, etc.).</p> |

Table 12 – Visitors to Sanepar's facilities

| CATEGORIES: VISITORS   | PURPOSE  |
|--|--|
| <p><b>Personal Characteristics:</b> Full name of the person responsible for the visit;</p> <p><b>Identification generated by official agencies:</b> ID card, CPF, CNH (number, date of issue and issuing agency);</p> <p><b>Contact data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone Number;</p> <p><b>Professional Data:</b> Company, functional RG, Capacity; Name of the institution, Address of the institution, Phone number of the institution and email of the institution.</p> | <p><b>Access Control:</b> In order to provide you with certain facilities such as access to buildings and conference rooms or Wi-Fi and to control access to Sanepar's buildings.</p> <p><b>Property Security:</b> to protect offices, personnel, property and confidential information, for example using closed-circuit television - CCTV.</p> |

Table 13 – Third parties (anyone who does not fit into any of the other categories)

| CATEGORIES: THIRD PARTIES  | PURPOSE  |
|--|--|
| <p><b>Personal Characteristics:</b> Full name</p> <p><b>Identification generated by official agencies:</b> CPF, ID card, CNH (number).</p> <p><b>Contract data:</b> Personal Email, Home Address, Personal Mobile Number, Home Phone Number;</p> | <p><b>Applicant service:</b> The necessary entries are made in Sanepar's systems to provide information (academic papers, requests for access to information, information about personal data), by any means available.</p> <p><b>Compliance with legal and regulatory obligations</b> related to Sanepar.</p> <p><b>Sharing with public agencies:</b> For research or public policy purposes.</p> |

## 9.4 – CHANGE IN PURPOSE

- I. The personal data of the data subjects will only be used for the purposes for which they were collected, unless it is reasonably necessary to use them for another reason and this reason is compatible with the original purpose. If it is necessary to use personal information for unrelated purposes, it will always be in accordance with the provisions of the GDPR, through a legal basis that allows the processing.
- II. Sanepar may process the personal data of data subjects without their consent, in accordance with the rules above, when this is required or permitted by law.

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## 9.5 – DATA SHARING

- I. In some cases, Sanepar may share personal data which it controls when required by law, necessary to administer its contractual and/or work relationship or when it has a legitimate purpose in doing so.
- II. Such data may be shared with third parties, including service providers, who will treat the data according to the purposes for which it was collected.
- III. For more information about the sharing of their data, data subjects may use the request form and/or contact us by email [lgpd@sanepar.com.br](mailto:lgpd@sanepar.com.br)

## 10. INTERNATIONAL TRANSFER

Sanepar fully respects the protection of personal data, only carrying out the international transfer of personal data when permitted by law, always in accordance with the requirements established in article 33 of the GPD, for the fulfillment of its legal or regulatory obligations or for the execution of an agreement.

## 11. DATA SUBJECTS' RIGHTS

11.1 - The data subject has rights related to privacy and protection of their data, and SANEPAR, in addition to being concerned about the security of these data, is also concerned that the data subject has access and knowledge of all their rights.

11.2 – Specific information may be requested from the data subject to help Sanepar confirm its identity, for its own protection. In addition, Sanepar may reject requests always indicating the reasons of fact or right that prevent the immediate realization of the request.

Thus, the rights that data subjects have are listed below in Table 14:

Table 14 - Data Subjects' Rights

| <b>RIGHT</b>  | <b>DESCRIPTION</b>   |
|---|--|
| <b>Processing confirmation</b>  | The data subject may request Sanepar to confirm the processing of their personal data.   |
| <b>Access to data</b>   | The data subject may request Sanepar to access their personal data that it has.  |
| <b>Correction of personal data</b>  | The data subject may request Sanepar to correct data that are incomplete, inaccurate or out of date, and may correct or supplement them. In order to carry out the correction, Sanepar may require the data subject to present a document proving the veracity of the new data informed.   |
| <b>Anonymization, blocking or deletion</b>  | If your data is being processed unnecessarily, excessively for the purpose of the processing or in breach of the provisions of the GPDL, the data subject may request that Sanepar carry out the anonymization, blocking or deletion of the data within available and possible techniques. For this, it must be proven in fact that there was excess, lack of need or non-compliance with the GPDL in Sanepar's processing activities. The elimination of essential data for the use of the platform will result in the termination of your registration with Sanepar. |
| <b>Deletion of data processed with consent</b>  | The data subject may request the deletion of data processed based on his/her consent, and these will be deleted as long as they are not necessary for the provision of Sanepar services or for compliance with legal or regulatory obligations.  |
| <b>Information about sharing</b>  | The data subject may ask Sanepar for information on the public and private entities with which their data has been shared.   |
| <b>Information about the possibility of not giving consent and the consequences thereof</b> | If consent is essential to access a certain Sanepar product or service, the data subject may ask Sanepar for information about the possibility of not providing consent and the consequences of this action.   |
| <b>Revocation of consent</b>  | If the data subject has provided his consent for the processing of data, he/she may revoke it at any time. It should be noted that this does not mean that Sanepar can no longer process his/her data, these may be treated anonymously or based on another authoritative legal hypothesis that supports the processing.   |
| <b>Automated decisions</b>  | The data subject may request the review of decisions taken solely on the basis of automated data processing and the indication of the criteria used in these decisions, always observing Sanepar's commercial and industrial secrets.  |
| <b>Data Portability</b>   | After regulation of this right by the competent authority under the GPDL, the data subject may request the portability of his personal data to another service or product provider.  |



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## **12. PRIVACY INCIDENT RESPONSE**

In the event of incidents of personal data, under the terms of the law, internal procedures and strategic people of the Company will be called upon to ensure that the necessary measures are taken to mitigate the risks.

## **13. ACCESS AND USE RULES**

13.1 – Accessing Sanepar's websites or using the resources available therein characterizes the users' adherence to the terms hereof.

13.2 – The user undertakes to use the Sanepar website only for the purposes for which it is intended.

13.3 – The user may not disable or damage Sanepar's website or interfere with the use of other users. Illicit attitudes will be treated in accordance with the provisions of the legislation in force.

13.4 – The user assumes any and all administrative and legal responsibility for the improper use of information, texts, graphics, brands, works, in short, any and all intellectual or industrial property rights on this website.

## **14. REPONSIBILITIES**

### **14.1 Board of Directors**

- I. Approve the Personal Data Protection and Privacy Policy;
- II. Deliberate on topics related to its attributions.

### **14.2 Executive Board**

- I. Promoting the process of complying with the approved guidelines and ensuring that they are in line with good management practices, including the Company's strategic planning;
- II. Decide on the procedures that are forwarded by the Person in Charge in case of occurrences;
- III. Forward to the Board of Directors, for approval, specific cases that imply strategic decisions;

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- IV. Ensure the alignment of planning actions, promoting the necessary adaptations through standardized operating standards in their respective boards;
  - V. Support personal data security and privacy leaders in complying with relevant legislation.

### **14.3 Controller**

- I. Decide on the processing of personal data;
- II. Delegate the necessary actions to operationalize the Personal Data Protection and Privacy Policy within the company's structure;
- III. Demand from individuals and legal entities, public or private, with whom it relates, compliance with this policy when they are processing personal data originating from Sanepar.

### **14.4 Information Security Committee**

- I. Present, discuss and propose improvements to the Personal Data Protection and Privacy Policy;
- II. Suggest, monitor and reassess the implementation of the Privacy Governance Program; and
- III. Support the person in charge in carrying out actions related to the Privacy Governance Policy and Program.

### **14.5 Person in charge (DPO or Data Protection Officer)**

- I. Receive communications from data subjects, provide clarifications and adopt measures;
- II. Receive reports from the National Data Protection Authority and adopting arrangements;
- III. Guide employees, contractors and other persons with whom Sanepar has a contractual relationship regarding the practices to be adopted in relation to the protection of personal data;
- IV. Perform other attributions determined by the controller or established in supplementary rules; and
- V. Coordinate actions aimed at implementing the Personal Data Protection and Privacy Policy and the execution of the Privacy Governance Program.

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Such actions must be carried out with the participation of Security and Privacy Leaders and their teams allocated in the various areas of the company that handle personal data in their processes and procedures.

#### **14.6 Security and Personal Data and Privacy Leaders**

- I. Identify the processes that have personal data processing;
- II. Disseminate the Personal Data Protection and Privacy Policy of the Privacy Governance Program and the actions arising therefrom;
- III. Notify the Person in Charge (DPO) of situations that do not comply with this Policy.

#### **14.7 Internal Data Processing Agents (Internal Operators)**

- I. Carry out data processing in accordance with the instructions provided by the Controller – formalized through legislation, policies and regulations on this matter;
- II. Identify and report problem situations to the Leader and Person in Charge that may put at risk information security and privacy.

### **15. REVIEW**

It is recommended the periodic review hereof, when there are legislative changes or relevant fact to be addressed for this action.

### **16. FINAL PROVISIONS**

16.1 – Violations of this Policy will be examined by the Data Officer, with subsequent referral to the Coordination of Compliance of GGRC - Sanepar, which after analysis will forward the appropriate measures, subjecting those responsible to disciplinary measures and other consequences provided for in the Disciplinary Regulation of the Sanepar and current legislation.

16.2 – Doubts about the provisions of this Policy may be forwarded to the Data Controller at the email: [lgpd@sanepar.com.br](mailto:lgpd@sanepar.com.br)

16.3 – Requests for corrections of personal data must be sent through the Company's service channels.

16.4 – Complaints must be forwarded via Sanepar's Complaint Channel, preferably in a complete, adequate and timely manner.

This policy is effective on the date it is approved by the Board of Directors.

## 17.HISTORY

| Personal Data Protection and Privacy Policy |            | Version   |                       | 1  |
|---|------------|---|-----------------------|--|
|   |            | Management Area   |                       | GGRC   |
|   |            | Secrecy   |                       | External Public                                      |
| Version                                     | Date       | Person in charge  | Approver              | Description of the Change                            |
| 1   | 09/17/2019 | Working Group<br>Resolution 759/2019                            | Board of<br>Directors | Initial issuance                                     |
| 2   | 12/22/2022 | Information Security<br>Committee Joint<br>Resolution 0337/2022 | Board of<br>Directors | Review   |
| 3   | 10/19/2023 | Information Security<br>Committee Joint<br>Resolution 0351/2023 | Board of<br>Directors | Review with the<br>inclusion of privacy by<br>design |