

PRIVACY AND DATA PROTECTION POLICY SHIPPING PROTECTION SHIP SERVICES

The purpose of this Privacy and Data Protection Policy is to demonstrate and reaffirm Shipping Protection Ship Services' unwavering commitment to privacy and to the lawfulness of processing personal data of clients, suppliers, service providers, and its internal audience.

Access to the services offered by Shipping Protection Ship Services presupposes the data subject's complete and careful reading of this Privacy and Data Protection Policy, expressly granting their free, unequivocal, and informed agreement to the terms set forth herein for the processing of their personal data.

1. GENERAL INFORMATION

The General Data Protection Law (LGPD) establishes rules on how companies must process personal data in physical or digital media, in a secure and transparent manner.

Reinforcing Shipping Protection Ship Services' commitment to the protection of personal data, this Policy presents how information is collected, used, and protected, as well as the rights of data subjects and how they can be exercised.

The directives established herein apply to all employees, service providers, business partners, and, where applicable, to all those who may have access to personal data received, held, or shared by Shipping Protection Ship Services within the context of its ship agency activities.

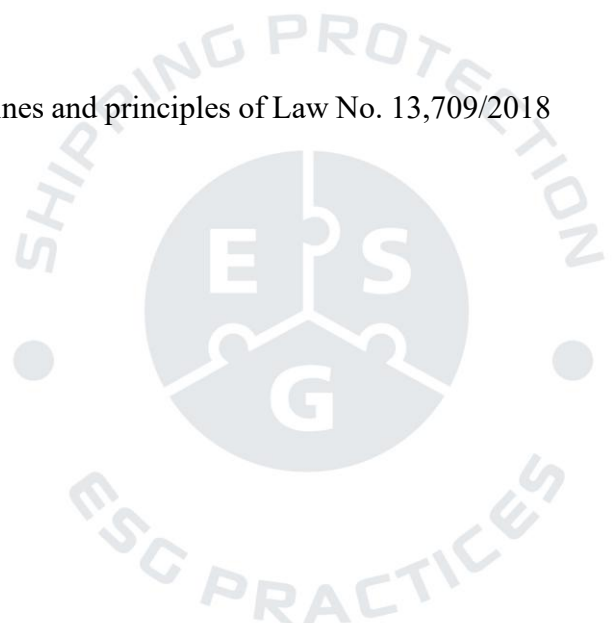
The processing of personal data may occur in situations involving contact with the company, the use of services, access to the website or platform, and the performance of commercial transactions.

Marketing emails are sent only with express authorisation, after prior registration. Such emails may include institutional news, information about new products, and other updates.

2. PRINCIPLES AND GUIDELINES

The use and sharing of personal data follow the guidelines and principles of Law No. 13,709/2018 (LGPD), specifically:

- Principle of Adequacy
- Principle of Necessity
- Principle of Transparency
- Principle of Free Access
- Principle of Data Quality



- Principle of Security
- Principle of Prevention
- Principle of Accountability
- Principle of Non-Discrimination
- Principle of Purpose

Only the data strictly necessary to achieve the intended purpose will be collected, and processing will follow the purposes previously informed by Shipping Protection Ship Services.

Shipping Protection Ship Services does not sell personal data. Sharing may occur with partner companies or those in the same economic group, aimed at improving the data subject's experience and in accordance with the principles set forth in this Policy.

3. FUNDAMENTAL CONCEPTS

Fundamental concepts relevant to understanding this Policy and the LGPD, as well as for personal data processing:

- **Controller** – The agent responsible for decision-making regarding the processing of personal data; in this case, Shipping Protection Serviços Marítimos Ltda.
- **Sensitive Data** – Personal data regarding racial or ethnic origin, religious belief, political opinion, union membership or membership in a religious, philosophical, or political organisation, data regarding health or sex life, genetic or biometric data, when linked to a natural person.
- **Personal Data** – Information related to an identified or identifiable natural person, such as name, ID, taxpayer number, email, and telephone number.
- **LGPD (General Data Protection Law)** – Law No. 13,709/2018, published on 14 August 2018, which regulates the processing of personal data in order to protect the fundamental rights of freedom, privacy, and the free development of the personality of the natural person. This Policy observes the LGPD and may be adjusted to comply with potential new laws, regulatory decrees, or other binding norms that may be enacted.
- **Operator** – The agent who processes personal data on behalf of the controller.
- **Data Subject** – The natural person to whom the personal data being processed refers.
- **Data Processing** – Any operation carried out with personal data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution,

processing, filing, storage, elimination, evaluation, control of information, modification, communication, transfer, dissemination, or extraction.

4. SCOPE

This Policy applies to all data subjects whose data is processed by Shipping Protection Ship Services, whether through the website, social networks, contracts, business partners, offices, or other forms of interaction. It covers, among others:

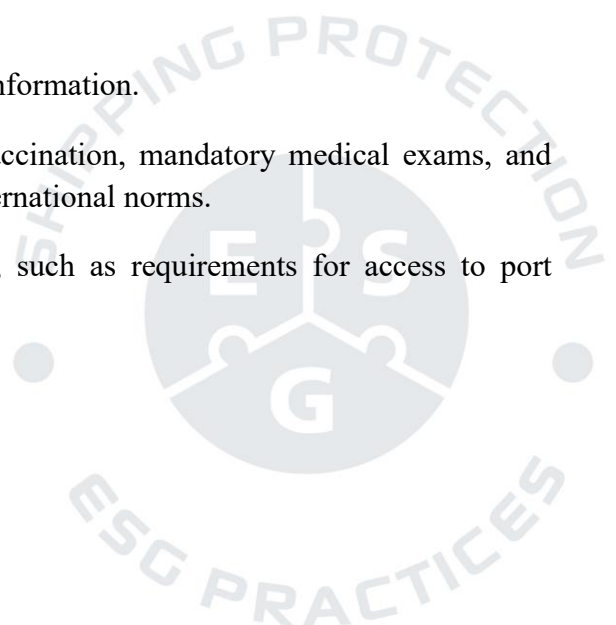
- Representatives of Shipowners, Ship Operators, Ship Managers, Charterers, and Crew Managers, including their employees and crew members.
- Representatives of Shipyards and Naval Maintenance Companies.
- Representatives of Marine Insurers and Salvage Companies.
- Suppliers and Commercial Partners.
- Employees and direct service providers.
- Visitors to physical facilities and digital environments (website, social networks).
- Third parties in general who, in any way, have their data processed by the company.

5. PERSONAL DATA COLLECTED AND PURPOSES

The collection of personal information may occur in different ways, such as through partners, employees, promotional actions, online portals, and social networks. It may also occur through direct contact between the data subject and Shipping Protection Ship Services, via public portals, or through the intermediation of specialised companies.

Types of data collected:

- **Identification and Contact:** full name, identity document (RG), CPF, passport, RNE, date of birth, nationality, parentage, marital status, email, telephone, and residential address.
- **Professional:** position or role, employee ID, company, port and operational credentials, professional history.
- **Financial:** bank details, billing and payment information.
- **Health (Sensitive):** information regarding vaccination, mandatory medical exams, and other data required by health authorities or international norms.
- **Biometric (Sensitive):** in specific situations, such as requirements for access to port facilities or security systems.



- **Browsing and Usage:** IP address, browser type, time on site, device identifiers, cookies, and similar technologies.
- **Operational Records:** information necessary for issuing documents, ship clearance, schedule coordination, provisioning, and agency services.

Purposes of processing:

- Improve service.
- Respond to requests more efficiently.
- Personalise user experiences.
- Enhance products and services based on feedback.
- Conduct promotions, competitions, and surveys.
- Fulfil contractual obligations.
- Comply with requirements of port, customs, and health authorities.
- Fulfil specific purposes communicated in advance.

In the case of mailing list subscriptions, institutional communications, updates, and related information may be sent. Unsubscribing may be requested via the instructions provided in each message or directly on the company's website.

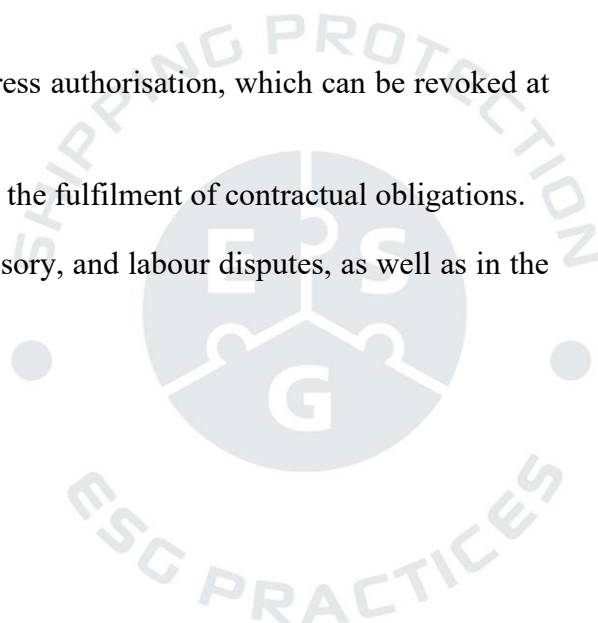
6. DATA OF MINORS AND PERSONS LACKING CAPACITY

The processing of personal data of minors under 18 years of age and persons lacking capacity may occur with the explicit consent of the legal guardian, as established by the LGPD. Typical situations include hiring young apprentices and granting benefits to employees' dependants, always with due authorisation.

7. LEGAL BASES FOR PROCESSING

The processing of personal data carried out by Shipping Protection Ship Services may be based on:

- **Consent:** processing carried out based on express authorisation, which can be revoked at any time.
- **Contract Execution:** processing necessary for the fulfilment of contractual obligations.
- **Regular Exercise of Rights:** use in civil, advisory, and labour disputes, as well as in the defence of rights.



- **Legitimate Interest:** processing necessary for process improvement, risk management, fraud prevention, and operational communication.
- **Legal Obligations:** processing required to comply with laws, regulatory requirements, or judicial and administrative orders.

8. RIGHTS OF DATA SUBJECTS

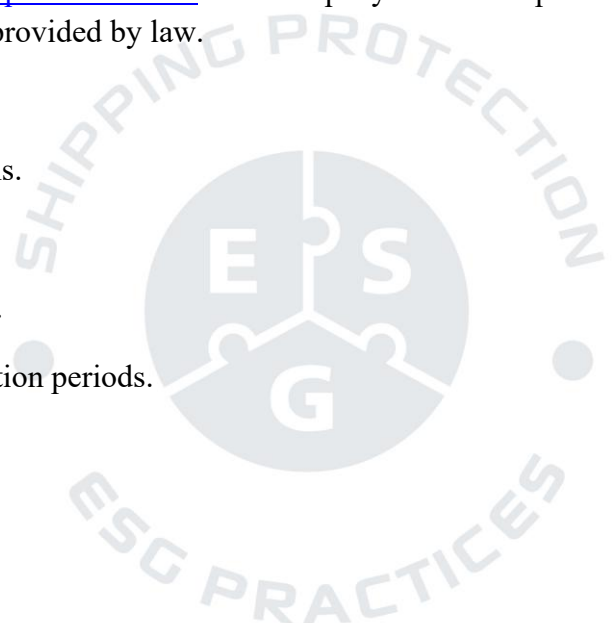
Under the LGPD, data subjects may exercise the following rights with Shipping Protection Ship Services:

- Confirmation of the existence of processing.
- Access to personal data.
- Correction of incomplete, inaccurate, or outdated data.
- Anonymisation, blocking, or deletion of unnecessary, excessive, or non-compliant data.
- Data portability to another service or product provider.
- Deletion of data processed with consent.
- Information about entities with which data has been shared.
- Information about the possibility of not providing consent.
- Review of automated decisions.
- Right to object in cases of irregular processing.
- Revocation of consent.

Requests should be sent to the email esg-br@shipping-protection.com. The company will have up to 15 (fifteen) days to respond, except for exceptions provided by law.

Certain requests may not be fulfilled due to:

- Compliance with legal or regulatory obligations.
- Compliance with contractual obligations.
- Existence of an effective and ongoing contract.
- Legal determination regarding minimum retention periods.



9. SHARING OF PERSONAL DATA WITH THIRD PARTIES

Personal data may be shared with group companies, employees, business partners, and public authorities, including:

- Shipowners, Ship Operators, Ship Managers, Charterers, and Crew Managers.
- Naval maintenance companies.
- Marine insurers and salvage companies.
- The Federal Revenue Service, Federal Police, Brazilian Navy, ANVISA, ANTAQ, and other regulatory bodies.
- Port terminals and logistics operators.
- IT, security, audit, accounting, and related service providers.
- Business partners in joint operations.

Authorised third parties must process data in accordance with this Policy, always under guidance, audit, or legal requirement.

10. RETENTION PERIOD

Personal data is stored for the time strictly necessary to fulfil the purposes that motivated its collection, in a secure and controlled environment, respecting the minimum deadlines set by applicable laws and regulations.

For purposes of auditing, information security, control and fraud prevention, preservation of rights, and compliance with obligations to oversight and control bodies, Shipping Protection Ship Services may retain records and personal data for a period longer than initially envisioned whenever there is a legal or regulatory basis justifying such retention.

Once the legal period and regulatory or contractual necessity have ended, personal data must be eliminated through secure disposal methods. Alternatively, it may be used in anonymised form, exclusively for statistical purposes, studies, and internal analyses, without the possibility of identifying the data subject.

Shipping Protection Ship Services adopts technical, administrative, and organisational security measures to protect personal data against unauthorised access, as well as against accidental or unlawful situations of destruction, loss, alteration, disclosure, or any other form of improper or unlawful processing.

11. COOKIES AND DIGITAL CHANNELS

Shipping Protection Ship Services may collect cookies and similar technologies on its portals, when applicable, to enable essential functionalities, assess and understand the profile and behaviour of data subjects who visit or access our pages, to personalise the browsing experience, and to prevent fraud. The data subject may adjust preferences in the browser, being aware that some functionalities may be affected.

12. DISCLOSURE

Personal information may be disclosed in the event of judicial, administrative, or contractual orders, or upon request by competent authorities, whenever necessary to comply with legal or regulatory obligations.

13. INFORMATION SECURITY

Shipping Protection Ship Services adopts physical, organisational, governance, compliance, and technological measures to protect personal data.

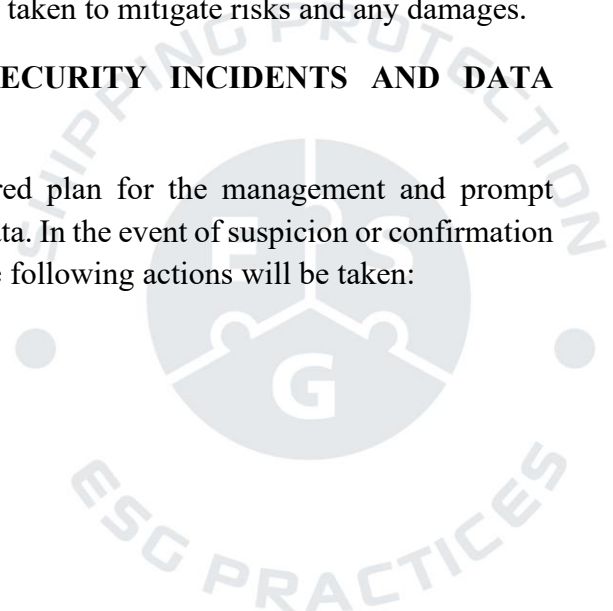
Among the practices adopted are:

- Access controls based on the principle of least privilege.
- Device protection with security software, automatic locking, and encryption.
- Backup routines and continuity plans.
- Security in electronic communications.
- Awareness and training programmes in privacy and security.
- Clean desk and screen practices.

In the event of incidents, all possible measures will be taken to mitigate risks and any damages.

14. MANAGEMENT AND RESPONSE TO SECURITY INCIDENTS AND DATA BREACHES

Shipping Protection Ship Services adopts a structured plan for the management and prompt response to any security incident involving personal data. In the event of suspicion or confirmation of a breach, unauthorised access, or other incident, the following actions will be taken:



- Immediate assessment of the occurrence to identify the extent, nature of the data affected, and impacted data subjects.
- Communication to the National Data Protection Authority (ANPD) and to the affected data subjects, as legally required.
- Adoption of corrective measures to mitigate risks and damages arising from the incident.
- Detailed record of all steps taken, including technical reports and future preventive actions.
- Ongoing team training to ensure readiness in incident response.

15. INTERNATIONAL DATA TRANSFERS

If personal data is transferred to countries or international organisations, Shipping Protection Ship Services will ensure that such transfers occur in compliance with the LGPD, guaranteeing an adequate level of data protection through contractual clauses, certifications, or other recognised legal mechanisms.

16. USE OF EMERGING TECHNOLOGIES

Whenever using emerging technologies, such as artificial intelligence, for personal data processing, the company ensures that such technologies respect the principles of the LGPD, guaranteeing transparency, security, and protection of data subjects' rights.

17. CONTACT

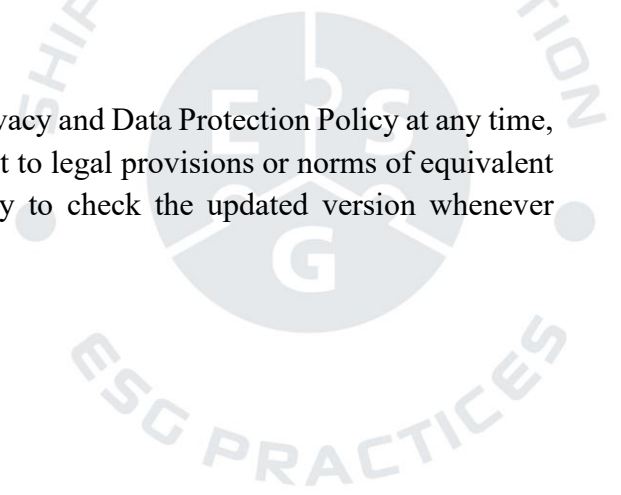
Questions or requests related to this Policy, including rectification or deletion of personal data, should be sent to the email esg-br@shipping-protection.com.

18. CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with this Privacy Policy and with applicable legal obligations may result in disciplinary measures for employees and suppliers, including warnings, suspension, termination, and legal liability, ensuring commitment to the protection of personal data and the organisation's integrity.

19. POLICY UPDATES

Shipping Protection Ship Services may amend this Privacy and Data Protection Policy at any time, as required by purpose or necessity, as well as to adapt to legal provisions or norms of equivalent legal force, and it is the data subject's responsibility to check the updated version whenever accessing the company's systems.



If relevant aspects of data processing are modified, Shipping Protection Ship Services will inform data subjects, specifically highlighting the content of the changes.

If updates to this document require new consent collection, Shipping Protection Ship Services will notify data subjects through previously provided contact channels.

Approval by Management:

Approval Date: 07/11/2025

Name of Responsible Person: Kledilton Cutrim Pinto

Position: Executive Director

Signature: _____

