

Privacy and **Personal Data** **Protection Policy**



Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

The Privacy and Personal Data Protection Policy
presented aims to guide everyone on the management,
in a broad sense, of the activities and operations of
processing personal data existing at Bom Futuro.

This Privacy and Personal Data Protection Policy
developed by Bom Futuro is in line with the provisions of
the General Data Protection Law (Law No. 13.709/2018)
and other laws that deal with the subject, as well as
indicating Bom Futuro’s guidelines for the protection
and use of personal data that somehow integrate its
activities.

In carrying out some of the activities provided for in its
organizational documents, Bom Futuro needs to carry
out personal data processing operations aligned with
the best interests and rights of the holders of personal
data, and may be characterized as a Personal Data
Controller in accordance with the definitions of the
LGPD.

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Applicability and recipients

This Privacy and Personal Data Protection Policy applies to:

- 1. To the employees of Bom Futuro;
- 2. To all third parties, whether individuals or legal entities, who act for or on behalf of Bom Futuro in operations involving the processing of personal data that are carried out within the scope of activities conducted by Bom Futuro;
- 3. To personal data processing agents external to Bom
- 4. To holders of personal data, whose data is processed by Bom Futuro.

Adherence to this **Policy is mandatory for all recipients** indicated above insofar as they are related to Bom Futuro. All operations involving the processing of personal data that are carried out in the exercise of activities conducted by Bom Futuro are subject to legal standards and those set out herein.

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Objectives

- Defining Bom Futuro guidelines and responsibilities that ensure and reinforce the commitment to compliance with applicable personal data protection legislation;
- Determining the rules to be followed when conducting personal data processing activities and operations carried out by Bom Futuro and by the recipients of this Policy, within the scope of Bom Futuro's activities, which guarantee its compliance with the applicable personal data protection legislation and, in particular, with the LGPD.



Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Privacy Principles and Personal Data Protection

Under the terms of the LGPD, Bom Futuro will
comply with the following principles when processing
personal data:

Purpose: Carrying out the processing of personal data
only for legitimate, specific, explicit purposes and
informed to the holder of the personal data;

Suitability: Carrying out the processing of personal
data in a manner compatible with the purposes
informed to the data subject, and in accordance with
the context of the processing;

Need: Limiting the processing of personal data to the
minimum necessary to achieve its purposes, covering
relevant, proportional and non-excessive data in
relation to the purposes of the processing;

Free Access: Ensuring that holders of personal data
have easy, free and secure access to the form and the
duration of the processing, as well as the completeness
of their data;



Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Privacy Principles and Personal Data Protection

Data quality: Guarantee to the holders of personal data the accuracy, clarity, relevance and updating of the data, according to the need and to fulfill the purpose of its processing;

Transparency: Guarantee holders of personal data clear, precise and easily accessible information about the processing carried out and the respective personal data processing agents, observing commercial and industrial secrets;

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

Prevention: Adopt measures to prevent the occurrence of damages due to the processing of personal data;

Non-discrimination: Prevent the processing of personal data for unlawful or abusive discriminatory purposes.

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Institutional commitment to the processing of personal data

Bom Futuro’s institutional commitment is to periodically evaluate the purposes of its processing operations, considering the context in which these operations are inserted, the risks and benefits that may be generated for the personal data subject, and the legitimate interest of the Institution. In this sense, they must be based on a legal basis and the purpose for all personal data processing operations within the scope of the activities carried out by Bom Futuro must be defined.

Personal data processing operations by Bom Futuro may only be carried out:

- 1 - For compliance with legal or regulatory obligations;
- 2 - When necessary for the execution of a contract or preliminary procedures related to a contract to which the data subject is a party, at the request of the data subject (article 7, V, of the Brazilian LGPD);
- 3 - For the regular exercise of rights in judicial, administrative or arbitration proceedings;
- 4 - For the protection of the life or physical safety of the holder of personal data or third parties;
- 5 - For the protection of health, exclusively, in procedures carried out by health professionals, health services or health authorities;
- 6 - When necessary to meet legitimate interests of Bom Futuro or third parties linked to Bom Futuro, as well as for granting benefits and agreements to its employees;
- 7 - For credit protection
- 8 - For accounting with agricultural partners.

Data Sharing

Bom Futuro operates in partnership with a number of other companies to offer its products and services. This way, Bom Futuro will share the personal data it has access to with partner companies, always seeking to preserve privacy as much as possible, whenever possible, in an anonymous manner.

Here we describe examples of situations in which **Bom Futuro may share personal data and their respective purposes:**

- Our partners and suppliers:** Bom Futuro has a significant number of partners and suppliers that we need to hire to operate our services and products, and some of them may process some of the personal data we collect, such as, but not limited to:
- i. Companies that license the right to use digital platforms that support Bom Futuro’s operations;
 - ii. That provide data hosting services;
 - iii. Market and opinion research companies;
 - iv. Data analysis consultancy companies
 - v. Products transportation companies;
 - vi. Payment processing companies;
 - vii. Holders of technologies for agricultural products and inputs, among others.

We seek to carefully evaluate our suppliers and establish contractual obligations with them regarding information security and personal data protection, with the aim of eliminating/minimizing risks for data subjects.

Companies in the economic group: Bom Futuro will transfer personal data between companies in its corporate group whenever necessary to comply with legal and contractual obligations, accounting confirmations or employee transfers, always respecting the group’s international standards of good practices and conduct, especially with regard to the protection and appropriate use of personal data

Our agricultural partners: In certain situations, Bom Futuro operates in the form of an agricultural partnership, and in these cases, we must account for customers, suppliers and employees. However, these partners must provide the same level of data protection and may not, under any circumstances, use this data except to confirm the results of the agricultural partnership.

Public authorities: Whenever Bom Futuro is subject to any legal or regulatory obligation that determines the provision of personal data to a government agency or organization, it will do so. In addition, if an authority with legal or regulatory competence requires that Bom Futuro shares certain personal data to, for example, conduct an investigation, will also be shared. Bom Futuro will not comply with abusive or excessive orders, and therefore will defend the privacy of personal data subjects.

- Applicability and recipients
- Objectives
- Privacy Principles and Personal Data Protection
- Institutional commitment to the processing of personal data
- Data Sharing
- Institutional commitment to the processing of sensitive data
- Rights of personal data holders
- Duties for the proper use of personal data
- Duties of Bom Futuro employees, personal data processing agents and third parties
- Relationship with third parties
- Data storage period
- Compliance with personal data protection laws
- How to talk about personal data with Bom Futuro
- Privacy Policy

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Institutional commitment to the processing of sensitive personal data

Bom Futuro is committed to safeguarding and taking special care when processing sensitive personal data and recognizes that this data presents higher risks to the personal data subject. Personal data of children and adolescents will be treated with the same level of care offered to sensitive personal data and will be subject to the specific provisions established in Chapter II, Section III, of the LGPD, in addition to other specific applicable standards



Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Rights of personal data holders

Bom Futuro reinforces its commitment to respecting the rights of personal data holders, including the right of the holder to revoke, at any time, consent for the processing of their data, except for data that will be kept to comply with legal, regulatory or contractual duties.

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Duties for the proper use of personal data

In the development of Bom Futuro’s work and activities, all recipients of this Policy are subject to the duties of care, attention and appropriate use of personal data, committing themselves to assist Bom Futuro in fulfilling its obligations in implementing its privacy and personal data protection strategy, paying attention to the confidentiality of information.

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Duties of Bom Futuro employees, personal data processing agents and third parties

All Bom Futuro employees are aware of this policy and have made a commitment to the company to confidentiality and not to process or share data in disagreement with the data protection policy.

Personal data held by Bom Futuro will not be made available or granted access to any unauthorized or competent person, in accordance with Bom Futuro's rules. If necessary, data processing will occur upon authorization, granted after proof of lawfulness.

If there are any doubts about the lawfulness of data processing, these should be resolved with the **Data Protection Committee**.

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Relationship with third parties

The liability established by the LGPD, in the case of equity, moral, individual or collective damages resulting from violations of personal data protection legislation, is joint and several. This means that all agents in the chain involving the processing of personal data can be held liable for any damages caused.

For this reason, Bom Futuro will use its best efforts to verify, evaluate and ensure that such third parties comply with applicable data protection legislation. All contracts with third parties must contain clauses relating to the protection of personal data, establishing duties and obligations, and attesting to the third parties' commitment to applicable personal data protection legislation.

It is also worth noting that these contracts will be reviewed and submitted for approval by Bom Futuro and its technical team, in accordance with the current regulatory framework.



Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Data storage period

A Bom Futuro possui uma política de retenção Bom Futuro has a personal data retention policy in line with applicable law, which is stored only for as long as necessary to fulfill the purposes for which it was collected, except for reasons of compliance with any legal, regulatory, contractual obligations, among others, provided that they are based on a legal basis.



Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Compliance with personal data protection laws

Bom Futuro seeks to comply with the LGPD standards and guidelines in order to guarantee its commitment to **ensuring the appropriate processing of personal data** for legitimate purposes that may be the object of its activities and reinforces its commitment to good privacy and data protection practices with the adoption of advanced and secure technological resources.

The company has a Data Protection Officer (DPO), who, assisted by the Data Protection Committee, will have the responsibility for monitoring compliance with the General Data Protection Law and this Personal Data Protection Policy, in addition to providing clarifications, offering information and present reports on personal data processing operations and their impacts to the competent public authorities, assist with audits, as well as respond to requests and reports from personal data subjects whose data have been processed by Bom Futuro.

Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

How to talk about personal data with Bom Futuro

If you suspect that your personal data has been used in a manner that is incompatible with this Privacy Policy or with your choices as the data subject, or if you have any questions, comments or suggestions related to this Policy, **contact Bom Futuro through the following channels:**

DPO: LEONARDO ROSSATO
E-mail for contact: protecaodedados@bomfuturo.com.br



Applicability and recipients

Objectives

Privacy Principles and
Personal Data Protection

Institutional commitment
to the processing of
personal data

Data Sharing

Institutional commitment to
the processing of sensitive
data

Rights of personal data
holders

Duties for the proper use of
personal data

Duties of Bom Futuro
employees, personal data
processing agents and third
parties

Relationship with third parties

Data storage period

Compliance with personal data
protection laws

How to talk about personal data
with Bom Futuro

Privacy Policy

Privacy Policy Changes

The world is constantly changing and so is agribusiness. Therefore, this Policy may be subject to change.
If relevant changes are made that require new consent from the holders of personal data collected, an update will be published and they will be asked for new consent.



@bomfuturooficial