



Personal data protection
policy

Introduction

Brazilian Law No. 13.709, of August 14, 2018, usually known as General Personal Data Protection Law (“LGPD”) was enacted in order to regulate the treatment of personal data and the need for their protection, so as to ensure the fundamental freedom and privacy rights of individuals.

Purpose

To set forth the general principles and guidelines to be complied by Omega Energia S.A. and affiliates thereof (“Omega”) in activities involving personal data treatment, so as to standardize and establish processes within the data privacy and protection parameters that are legally required.

Applicability

The principles and guidelines provided herein are applicable to all individuals or legal entities having a relationship with Omega, whether they are directors, officers, employees, trainees, apprentices, suppliers, service providers, clients, inter alia, involved with the treatment of individuals’ data required for Omega activities.

Concepts and Definitions

Without prejudice of the concepts and definitions set forth in article 5 of LGPD, which are hereby adopted in their entirety, it is worth defining other important terms provided herein:

- Personal Data: Information relative to a certain individual that may identify them or lead to their identification;
- Data Protection Officer: Data Protection Officer (“DPO”), an individual appointed by the controller and operator, who acts as a channel of communication between the controller and the data subjects and the supervisory authority (ANPD);
- Safety Incident: Breach in the safety protocol that leads or may lead to the leak of personal data to unauthorized persons;

- Setor de Cyber Segurança: Omega's area responsible for safety measures related to all kind of information;
- Data Owner: Individual having personal data treated by Omega;
- Data Treatment: Use strictly necessary of personal data for the regular exercise of Omega activities

Principles and Guidelines for Personal Data Treatment

Personal data treatment activities shall comply with the following principles and guidelines:

- Purpose and Adequacy: Personal Data will be obtained for legitimate, specific and explicit purposes, upon the knowledge of their owner, being treated appropriately and within the purpose informed.
- Necessity: The treatment of personal data is restricted to the minimum required. Only data that are strictly necessary for performing activities will be requested or maintained.
- Free access and Transparency: The owner of personal data may, at any time and free of charge, request information on the form and duration of treatment and integrity of their personal data.
- Data Quality: Treated data shall be updated as necessary so as to achieve the purpose of their treatment.
- Security: Personal data shall be protected from unauthorized accesses, losses, inappropriate destruction, modification and transmission.
- Monitoring and Prevention: Measures shall be adopted so as to prevent the occurrence of damages, data leaks or external attacks;
- Security Incident Communication: We have procedures for incident communication to inform public authorities and the Data Owner.
- Nondiscrimination: We do not use treated personal data for discriminatory, illegal and/or abusive purposes.

- Confidentiality: Personal data are confidential, and only those persons that are strictly necessary for the regular performance of the activities are granted access to the content of information.

Responsibility for the Treatment and Processing of Personal Data

In general, all those indicated in “Applicability” that have access and/or need to deal with data of individuals are responsible for the due treatment of personal data pursuant hereof and hereby foster and undertake to proceed with data treatment and processing in conformity with the LGPD and the principles and guidelines specified herein.

As responsible and focus point in matters related to the treatment of personal data, Omega hereby appoints its DPO, to whom any and all request and demand shall be addressed:

Contact: Daniel Biaggio

E-mail: dpo@omegaenergia.com.br

Telephone: (11) 999553833

Address: Rua Elvira Ferraz, 68, Suites 123 and 124, 12th floor, Vila Olímpia, SãoPaulo/SP, Brazil, CEP 04552-040

Due to explained above, the DPO shall receive complaints and notices from data owners, provide explanations, adopt measures with public authorities, provide guidance to data controllers, as well as to inspect compliance with the LGPD and with this Policy. It is worth mentioning, in addition, that the primary guidance for the employees of Omega whenever they identify some event in connection with the LGPD is to contact and immediately report it to the DPO, informing them on potential risks or a situation of leak, insecurity or unauthorized use of personal data which are, directly or indirectly, related to Omega. The DPO shall, further, update and define on a constant basis the strategies and orientations about LGPD, so as to ensure the regular compliance with the law and with this Policy.

The DPO shall also be responsible for maintaining the Policy public and updated, making it easily accessible to the public authorities, as well as to all those contemplated in item Applicability of this Policy.

Rights of the Data Owner

The rights of the Data Owner are, without limitation:

- Confirmation of the existence of treatment;
- Access to data; • Correction of incomplete, inaccurate or outdated data;
- Anonymization, blocking or elimination of unnecessary data;
- Submit consistent challenge to data processing; • Request clarifications and information from Omega;
- Withdraw or deny consent for the use of their personal data;
- File complaints with Omega or any competent authority.

The Data Owner's rights will be assured whenever they act in compliance with the LGPD.

Final Provisions

Any questions, clarifications, requests or requirements in connection with the LGPD shall be addressed to the DPO by e-mail.

This Policy shall be updated whenever necessary. This Policy was approved by the Board of Directors on November 11, 2022.