

PRIVACY POLICY FOR APPLICANTS

WORK AT TRAMONTINA



What is LGPD?

It is the Brazilian General Data Protection Act (*in Portuguese, Lei Geral de Proteção de Dados n. 13.709/2018*), which **regulates the processing of individuals' data**, with the aim of protecting their fundamental rights of freedom and privacy.



What is the purpose of the POLICY?

TRAMONTINA has drafted this POLICY to demonstrate how we use, process and protect your data, with respect for your privacy and in compliance with the legal rules of Brazilian legislation.



Which of its APPLICANTS' data does TRAMONTINA process?

DATA	USAGE PURPOSES	LEGAL BASES
<i>full name</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>date of birth</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>nationality</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>gender (male or female) or prefer not to answer</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>cpf</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>

	<i>process</i>	
<i>e-mail</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>cell phone, secondary contact</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>disabled person (yes or no) / type</i>	<i>Requirement under specific legislation</i>	<i>compliance with a legal obligation</i>
<i>picture of applicant</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>address (country, postal code, state, city, district, street, number, additional info)</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>level of education, undergraduate degree (institution, period), other academic background</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>supplementary courses (type, description, institution, period), other courses</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>languages, proficiency level</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>first job (yes or no)</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>professional experience (number of companies, company, position, period)</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>work shift preference</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>mode (young apprentice or intern)</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>areas of interest</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>

	<i>process</i>	
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Similarly, throughout the applicant selection process, the following information may be collected:

DATA	USAGE PURPOSES	LEGAL BASES
<i>Applicant interview/statement</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>Behavioral tests</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>contract execution</i>
<i>Psychological tests</i>	<i>Identify the user and proceed with the recruitment and selection process</i>	<i>regular exercise of rights</i>
<i>Videos recorded by the applicant</i>	<i>Get to know the applicant's profile and skills in order to check whether he/she is suitable for the position</i>	<i>regular exercise of rights</i>

The content of this Policy may be changed at any time according to Tramontina's needs, such as to adapt to and comply with a law or regulation with equivalent legal force, without the need for any prior notice by Tramontina, and it is the applicant's responsibility to check it whenever he/she visits the website.



With whom do we share your data?

Your data will be shared solely in the following circumstances:

- With other Tramontina units;
- With companies contracted by Tramontina to handle the recruitment and selection process;
- With the data subject, by means of formal request through the channels indicated in this "Policy", subject to validation of authenticity in order to prevent fraud, breach of confidentiality and protection thereof;
- Database management companies, for information storage purposes;
- With companies that provide AI resources, for the purpose of analyzing compatibility of applicants with job openings;
- Due to a legal obligation and/or request from Government Authorities and/or Oversight Entities;

TRAMONTINA requires that all third parties with which it engages maintain the **confidentiality of information shared or accessed by them in the course of their business**, and that they use **such information solely for the expressly permitted purposes**.

TRAMONTINA does not sell, disclose or share the data it collects for any purposes other **than those described in the Data Protection Policy**.



For how long do we use your data?

The data will be used **during the recruitment and selection process** and thereafter for a **period of sixty-one (61) months, subject to your consent**.

After the period of **sixty (60) months** has elapsed, you will receive a notice to your registered e-mail address giving you the option to update your registration and grant your consent to keep the data for the same period. If you do not update the data, they will be deleted from the Tramontina database.



Does Tramontina use AI in its recruitment process?

Yes. Tramontina may use automated artificial intelligence tools to organize the database of resumés, matching them with available job openings in order to give better opportunities to the people most compatible with vacancies.

Artificial Intelligence does not delete any analyzed resumé, nor does it make decisions to approve or reject them. Every decision during the Selection Process is made directly by the recruiter and/or by the manager responsible for the vacancy.

AI does not analyze sensitive data and/or information on gender, sexual orientation, age, race, ethnicity, pictures or videos, precisely to ensure that no discriminatory rule is applied.

Tramontina is responsible for decisions related to this phase of the selection process and it benefits from the informational support provided by AI, remaining free to disregard AI suggestions and apply its own criteria. The final decision about which applicants will progress to the next steps, interviewing and hiring is the recruiter's prerogative.

AI does not send automatic messages related to the result of the selection process. Feedback on the processes is provided by Tramontina.

The applicant is entitled to request deletion of his/her account at any time, resulting in removal and anonymization of his/her data. In case of inactive accounts, defined as no

access or log in for a period longer than 5 years, the data and the account will be permanently deleted.

Even after requesting deletion of an account, some information may be retained to comply with legal or regulatory obligations under other Brazilian laws, or to safeguard data subject or third-party rights, including in potential judicial disputes. In addition, if the applicant is hired, Tramontina will keep the information stored to enable compliance with labor obligations and for the regular exercise of rights in eventual judicial disputes. In these circumstances, data deletion will only be possible with express authorization from Tramontina as the hiring party.

You may **request the deletion of your data** at any time by simply clicking on the “I want to delete my data” option on the website <https://www.tramontina.net/trabalhe-na-tramontina/>.



Where do we store your data?

Collected data will be stored at our own **physical data centers** located in Brazil and abroad.



Is there international transfer of your data?

Yes, there will be an international transfer of data to store information in the cloud. Tramontina manages the providers of these services, evaluating whether they **have an adequate level of Personal Data protection**.

Tramontina also establishes mechanisms to ensure the legality of the international transfer of Personal Data, following the guidelines of Art. 33 of the LGPD and regulations issued by the ANPD.



Which rights are granted to APPLICANTS by the LGPD?

- To confirm the existence of your data;
- To have access to your data;

- To request the correction of incomplete, inaccurate or outdated data;
- To request anonymization, blocking or deletion of unnecessary data;
- To request portability of your data to another provider;
- To request the deletion of your data after use;
- To be informed about shared data use;
- To be informed about the consequences of not providing your data;
- To request revocation of your consent.

To exercise these rights, you can visit the Platform: <https://www.tramontina.net/trabalhe-na-tramontina/> or the channel provided in this “Policy”.



How do we ensure the Security of APPLICANTS’ data?

Tramontina adopts information security management methods and strict information protection controls, following the recommendations of national and international Information Security standards such as NBR ISO/IEC 27000, among other market standards and good practices, and requires its suppliers to guarantee the same or a higher level of security for the data stored in their databases.



Which law is applicable?


This Policy will be interpreted according to Brazilian law, in Portuguese language, and **your domicile** will be the jurisdiction for settling any dispute involving this document.



What is the channel for requests or complaints regarding APPLICANTS’ personal data?

Applicants may ask any question related to this “Policy” or request any of their rights through the contact channels below:

Controller information:	
Company name:	Tramontina Central de Administração Ltda.
CNPJ (corporate)	90.114.299/0001-06

taxpayer ID):	
Address:	Av. Ivo Tramontina, 1024, Bairro Triângulo CEP: 95185-000, Carlos Barbosa RS
Request/complaint channel:	
Contact us:	Click here to access;
Tramontina Data Subject Assistance Portal	 https:// globaltramontina.zendesk.com/hc/pt-br/p/ atendimento-titular
E-mail for contact:	dpo@tramontina.com
Data Protection Officer	
Name:	Isaac R. Sartori Junior
Alternate Data Protection Officer	
Name:	Paulo Roberto Tramontina

Last updated on May 20, 2025.

Version: Brazil

Applicability: Brazilian Users.