



Personal Privacy and Data Protection Policy

Updated on

December/2023

Prepared by

Data Protection Officer

Approved by

Board of Directors

..... PURPOSE

Establish guidelines for the protection of data and personal information, as well as the respective electronic records (“Data”) within Localiza, given that in the execution of its operations, it collects, handles, and stores information that may be related to identified and/or identifiable individuals (“Data Subject”).

These guidelines seek to:

- Comply with applicable laws and regulations regarding the protection of personal data (Federal Constitution, Consumer Protection Code, Civil Code, Internet Civil Rights Framework and its respective Regulatory Decree, General Data Protection Law, and other relevant standards on the subject);
- Protect the rights of customers, suppliers, partners, and employees against the risk of personal data breaches;
- Be transparent in the procedures for handling personal data; and
- Promote company-wide awareness regarding the protection of personal data and privacy issues.

..... TARGET AUDIENCE AND SCOPE

This Policy applies to the managers, employees, and departments of Localiza Rent a Car, its subsidiaries, and controlled entities (“Localiza”), establishing the ways in which information provided and shared by customers, suppliers, partners, and all Data Subjects with whom Localiza interacts in the course of its business activities are handled.

..... PRINCIPLES AND RIGHT TO PRIVACY

The principles that should govern the collection, handling, storage, disclosure, and processing of Data are:

- Legality, Transparency, and Non-discrimination;
- Limitation and Purpose Adequacy;
- Necessity;
- Accuracy (data quality);
- Data retention and limitation of data storage; and

Integrity, availability, and confidentiality (free access, prevention, and security). Localiza respects the privacy rights of individuals and is committed to processing data responsibly and in accordance with applicable privacy and data protection legislation.



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..... DATA SUBJECT AWARENESS

Data Subjects will become aware of this Policy when interacting with Localiza’s systems, in person, via email, over the phone, through text messages on communication apps, or when using Localiza’s websites, systems, and pages (“Pages”).

..... DATA SOURCES

The information that may be provided by the Data Subject includes, but is not limited to:

- name;
- email addresses;
- mailing address;
- phone number;
- banking and/or credit card information;
- information relating to their National Driving License;
- social media account information;
- public profile information;
- identification documents provided;
- and information about third parties, such as relatives, main/additional drivers, partners, legal representatives.

The collection of Data or sensitive data related to the Data Subject (“Sensitive Data”) by Localiza can be carried out in two ways: (a) through the registration of Data provided by the Data Subject and/or (b) through the registration of Data collected automatically from other sources. In this case, the collection of Data may be carried out through cookies and other similar technologies, public databases, or information received during the selection or operation of contracts with suppliers, service providers, and partners, or in the hiring of employees.

In the automatic collection of Data from the Data Subject through the use of cookies and other similar technologies, Localiza’s purpose is:

- to ensure the best user experience and full functionality of websites and applications.
- to carry out statistical analysis of trends;
- to manage web pages and media;



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- to track user behavior in the Localiza Privacy Portal, as well as in managed platforms and similar environments.

to ensure that the Data Subject has control over the use of cookies through browser configuration, being aware that, if deactivated, the use of resources and functions of the Pages may be limited.

In certain circumstances, we may request, based on voluntary disclosure and for specific purposes, some Sensitive Data to fulfill legal or regulatory obligations or other cases permitted by applicable law.

..... DATA PROCESSING

The Data will be used for the exact purpose for which they were collected, including:

- to start, respond to or maintain contact with the Data Subject;
- to enable the execution of contracts by Localiza;
- to provide assistance and support related to Localiza's business activity.
- for advertising purposes;
- to send information about events, company updates, and promotional materials;
- to register and execute contracts with suppliers and partners.

Localiza may process the Data:

- to comply with legal or regulatory obligations;
- when consented by the Data Subject;
- whenever necessary for the execution of a contract or related contract procedures.
- to protect their rights;
- to protect the life or physical safety of the Data Subject or third parties; and
- where necessary to meet their legitimate interests.

The processing of Sensitive Data may occur in the situations listed above or to ensure the prevention of fraud and the security of the Data Subject.

The processing of data involving children will occur with the specific consent of at least one parent or legal guardian.

The Data Subject may request, at any time and free of charge, information about the processing or deletion of their Data, as well as the cancellation of their registration to receive marketing



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and advertising emails and text messages.

This request should be made by filling out the form available on the Localiza Privacy Portal using the following link: localiza.com/privacy.

..... DATA SHARING

Localiza may share the Data Subject's information with third parties for specific purposes aimed at operationalizing and developing business activities, including:

- Localiza suppliers and service providers, responsible for assisting in the execution of contracts and provision of Localiza products;
- partners involved in commercial relationships with Localiza, for the development of activities, as well as for advertising purposes; and
- government authorities, in case of legal or judicial obligation, to protect rights, fulfill duties, ensure the security of Data Subjects, investigate fraud, and/or respond to inquiries made by public agents.

The sharing of Data held by Localiza will be carried out after implementing appropriate measures to ensure that the Data is used consistently with this Policy, including, but not limited to, maintaining its confidentiality and integrity.

In the event of international transfer of Data, Localiza commits to complying with applicable regulations during transmission.

..... DATA SECURITY

Data security aims to protect against accidental or unlawful situations of destruction, loss, alteration, unauthorized disclosure, or any form of improper processing, as well as discriminatory processing of information.

Localiza processes and stores the Data provided by the Data Subject or collected through the adoption of technical, administrative, and organizational security practices and measures, all aimed at protecting and maintaining the integrity of the Data, aligned with industry best practices and applicable legislation.

Localiza commits to informing the Data Subject, the National Data Protection Authority, and competent regulatory authorities of any security incident that may pose a significant risk or loss.



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..... DATA TRANSPARENCY AND DATA SUBJECT RIGHTS

The Data will be processed and retained for as long as necessary to fulfill the purpose for which they were collected, to enable the execution of contracts, provide benefits, and fulfill obligations, in accordance with deadlines and obligations set forth in law or specific regulations.

The Data Subject may request, at any time:

- confirmation of the existence of processing;
- access to Data;
- the correction of incomplete, inaccurate, or outdated Data;
- the anonymization, blocking, or deletion of unnecessary, excessive, or Data processed in violation of this Policy;
- the transmission of Data to a supplier or service provider;
- the deletion of Data processed with their consent;
- information about the public and private entities with which their Data has been shared;
- information about the possibility of not providing consent and its consequences; and
- the revocation of their consent.

Requests from the Data Subject regarding their Data must be made by filling out the form available on the Localiza Privacy Portal in the following link: localiza.com/privacy.

..... THIRD-PARTY WEBSITES AND SERVICES

The Localiza Privacy Portal and platforms managed by Localiza may contain links to third-party websites and applications. If used by the Data Subject, there is a possibility of third parties not affiliated with Localiza collecting, processing, and sharing information. In these cases, Localiza is not responsible for the content or privacy practices of third parties.

..... DURATION AND AMENDMENTS TO THE POLICY

This Policy will come into force on the date of its approval by the Board of Directors and shall remain valid for three years or until otherwise resolved.

Localiza may change this Policy at any time without prior notice to the Data Subject.



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On the other hand, Localiza cannot, without notifying the Data Subject, change:

- the specific purpose of processing the Data;
- the form and duration of processing the Data;
- the identification of the parent company; and/or
- the information about the shared use of Data by the parent company and the purpose.

With the exception of the changes mentioned above, it is the responsibility of the Data Subject to review this Policy in case of any modification, as per the indicated update date at the end of this document.

..... CONTACT WITH LOCALIZA

If you have any questions, suggestions, or requests regarding this document, please contact our Data Protection Officer through the form available on our Privacy Portal (localiza.com/privacy) or by email at: privacidade@localiza.com.