

INVESTOR RELATIONS PRIVACY POLICY

CVC Brasil Operadora e Agência de Viagens S.A. ("CVC Corp") takes the privacy of individuals very seriously and has, as a priority, ensuring the security and protection of the personal data of all our shareholders and those who relate to the Investor Relations area ("IR") through the Company's communication channels and website <https://www.cvccorp.com.br/> ("Website").

Through this Investor Relations Privacy Policy ("Policy"), we present clear and precise information about our protection and privacy practices for the treatment of personal data that are collected during access to the Website and other interactions with IR or that are used for carrying out corporate activities.

It is recommended that you read this Policy carefully. For questions about the processing of your personal data or additional clarifications, contact us by e-mail: privacy@cvccorp.com.br.

1. Who are we?

The controller of your personal data is CVC Brasil Operadora e Agência de Viagens S.A. ("CVC Corp"), registered under CNPJ 10.760.260/0001-19, headquartered at Rua Catequese, nº 227, 13º andar, sala 132, Bairro Jardim, em Santo André/SP, CEP: 09090-400.

2. To whom this Privacy Policy applies?

This Policy applies to all shareholders, investors, analysts and other people who contact CVC Corp's IR area, register for the mailing list and/or use CVC Corp's IR website, which will be referred to as "You".

3. What personal data we process?

CVC Corp may process the personal data provided directly by You through the Website (for example when registering for "Contact IR", the "Mailing List" or accessing results and events teleconferences), automatically collected when browsing the Website (for example, through cookies) or, even, shared by third parties, when the data is necessary for IR activities (for example, information shared by the Bank that holds the Company's shares about our shareholders).

Personal data that we may collect directly from you: Identification data, such as first name, last name, gender, email address, telephone number, ID number and social security number; professional data, such as company and position; place and date of birth, parentage, bank details; that You share with us by filling out forms or sending us emails. Therefore, we ask you to avoid sharing sensitive personal data (personal data revealing racial or ethnic origin, political opinions and religious or philosophical beliefs; trade union membership; genetic or biometric data; data related to health; data relating to sexual life or sexual orientation) when contacting us.

Personal data that we may automatically collect: When using our Website, we may automatically collect certain information that may be defined as personal data, namely: geolocation, operating systems, navigation services, number of visits to our Website, where You were redirected to our website. Additionally, we use third-party web analytics services in connection with our Website, including Google Analytics, which uses cookies and similar technologies to collect data to measure usage and interaction with our Website.

Personal data that we may collect from third parties: We may collect personal data from third parties if You authorize those third parties to share that personal data with us (for example, if You create a LinkedIn account and access our Website through LinkedIn, LinkedIn may provide us with certain personal data relating to You such as name and e-mail address). Information provided by the third party may be controlled by You in accordance with the third party's privacy notice and the choices it provides to You.

4. For what purposes do we treat your data?

CVC Corp may process your personal data for the following purposes:

- Process and respond to inquiries You make to Us or contact You to respond to Your requests;
- To send communications about CVC Corp from the moment you register on our contact list, such as Material Facts, Notices to the Market, or any other type of information or official notice that CVC Corp deems relevant. We understand that the processing of your data is also beneficial for you insofar as it allows us to help you and respond to your demands. You may at any time request to unsubscribe ('opt-out') from these communications;

- Compliance with legal or regulatory obligations to which CVC Corp is subject and which require the processing of your personal data, with emphasis on the requirements of the Brazilian Securities and Exchange Commission (CVM) and the Brazilian Corporate Law (Federal Law No. 6,404/1976);
- Allow auditing for purposes of corporate operations, such as merger, acquisition or sale of all assets of CVC Corp, its economic group, or part of each of them, and transfer the information to the new owner, if ownership or control of all or a portion of CVC Corp or its assets changes;
- Generate statistical analysis so that CVC Corp can better understand your needs and interests and thereby improve features, performance, support available, as well as to manage our Website, including protecting the security and/or integrity of our Website and our Information Technology infrastructure.

When we process your personal data in pursuit of our own legitimate interests, we will appropriately balance those interests with your fundamental rights and freedoms and implement robust safeguards to ensure that your privacy is protected accordingly.

5. Who We Share Your Information With

CVC Corp relies on third parties, such as vendors and service providers, to perform Website and IR activities, which may involve sharing some of your personal data. Sharing may occur based on the following criteria and for the purposes described below..

Service providers

We may share your data with third parties that provide services to us, such as web hosting companies, mailing providers, analytics providers, event hosting services and information technology providers;

Authorities

To comply with a legal or regulatory obligation, or to protect the rights, property or security of our information and Website, users and/or interested third parties;

Related Parties to a business transaction

We may share your personal data with service providers, consultants, potential transactional partners or other third parties in connection with the consideration, negotiation or completion of a transaction in which we are acquired or merged with another company or sell, liquidate or transfer all or part of our assets, as well as any bankruptcy or corporate reorganization.

6. How we use *cookies*?

For You to know: cookies are small text files sent and stored on your electronic device, which serve to recognize, monitor and store your navigation on the Website.

When you access our Website, a cookie is inserted in your browser, which automatically collects certain personal data to guarantee the security and improve the performance of our Website, as well as to proceed with any translation of its content.

We may use cookies that allow us to authenticate users, prevent fraudulent use of access credentials, protect your data from unauthorized third parties, identify you after a new access, the number of visitors and which pages of the Website were accessed or to translate certain content and even for advertising purposes in the delivery of advertisements and advertising campaigns according to a certain audience.

Some technology service providers may use their own cookies on the Website, such as Google Analytics and Facebook, with our authorization, to provide services to CVC Corp.

For more information on how to remove cookies from your device, please consult the settings of the browser you use. By accessing the respective websites, you will be subject to the privacy policies of other companies, which may not be consistent or similar to the terms of this Policy.

7. International transfer of personal data




If it becomes necessary to transfer your personal data outside of Brazil by CVC Corp, such as to service providers abroad, including cloud services, CVC Corp will take appropriate measures to ensure adequate protection of your personal data, in accordance with the requirements of the applicable data protection legislation

8. How long will your data be stored?

CVC Corp strives to ensure that personal data is kept up-to-date and that unnecessary or excessive data is deleted or anonymized.

In general, your personal data will be retained for as long as necessary to satisfy the purpose for which it was collected.

The end of the processing of personal data will occur when it is verified:

-  That the purpose for which the personal data was collected was achieved or that the personal data collected is no longer necessary or relevant to achieve the specific purpose desired;
-  A statement from you in this regard, especially for cases in which CVC Corp has received your consent for a certain processing of personal data, if any; or
-  A legal determination.

In these cases, subject to the assumptions established by the applicable legislation or by this Policy, personal data will be eliminated or anonymized by CVC Corp in such a way that they completely lose the ability to identify the data subject.

9. What are your rights?

You have rights in relation to your personal data, as required by Brazilian legislation applicable to the processing of personal data. Such rights include, but are not limited to:

Confirmation of the existence of processing of personal data and access to personal data. You may request confirmation of the existence of personal data processing and/or access to your personal data collected and stored by CVC Corp;

Deletion of personal data. You may request the deletion of personal data that has been collected by CVC Corp with your consent. The deletion of personal data can only be complete for personal data that is not necessary for CVC Corp.

Automated decision review. You have the right to request a review of any decisions affecting your interests made solely by a computer or other automated process.

Correction of incomplete, inaccurate or outdated data. CVC Corp is interested in keeping the personal data it handles accurate and up-to-date, so we will update and correct data at your request, after duly validating your identity.

Data portability. This right depends on regulation by the national authority. Where possible, the format must not compromise our trade secrets.

Deletion, opposition, anonymization or blocking of personal data. In cases where You do not agree with the treatment and understand that CVC Corp may be processing some data that is not necessary or that otherwise does not meet the requirements of the applicable legislation, You will have the right to object to

the treatment or request anonymization , deletion or blocking of your personal data.

Withdrawal of consent. You may revoke any consent you have given to CVC Corp for the processing of your personal data. It is important to inform that the treatments carried out prior to the revocation of consent are ratified and that the request for revocation will not imply the elimination of personal data previously processed and that are maintained by CVC Corp based on other legal grounds;

Information about shared data usage. Information about the sharing of personal data can be found in this Policy. CVC Corp makes itself available for further clarifications;



For more information about your rights as a holder of personal data or to exercise any of these rights, please contact CVC Corp's Data Protection Management at privacy@cvccorp.com.br

10. Protection of information and personal data

CVC Corp treats the information and personal data of shareholders, investors, market analysts and Website users with a high level of protection, confidentiality and care, using appropriate technical and organizational measures to protect personal data against unauthorized or illegal treatment, against accidental loss, destruction or damage, acting in a responsible and ethical manner, respecting the terms of applicable data privacy laws and regulations.

11. Changes to this Privacy Policy

This Policy is a dynamic tool and may be updated periodically to ensure that the information provided is in accordance with personal data protection laws. CVC Corp reserves the right to change this Policy at any time by posting the updated version on our website address. In case of material changes in the Policy, You may receive a notice in this regard or be communicated through the official communication channels of CVC Corp.

12. General Information

Matters related to this Policy or other matters relating to the protection of personal data should be addressed to the Data Protection Management, through the email privacy@cvccorp.com.br