

## VOTORANTIM CIMENTOS S/A

### PRIVACY POLICY

This policy illustrates how Votorantim Cimentos, directly or through its affiliates, processes users' personal data (hereinafter "user", or "You") in accordance with Law No. 13.709/18 (General Law for the Protection of Personal Data - "LGPD"), and how that data is used, shared and how they can be accessed, changed or deleted. As proof of its commitment to privacy, Votorantim Cimentos defined this policy within the broadest scope of a privacy management model, to ensure its full compliance as the basis of the company's culture. All personal data provided by you through our Websites is used solely for the purposes described below.

#### **What categories of personal data does Votorantim Cimentos collect about me and how is that data collected?**

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"Personal data" means any information relating to You. Votorantim Cimentos will collect, process and use the following categories and types of personal data about You:

- **identification data**, such as your first name, surname, CPF;
- **personal information**, such as date of birth and gender;
- **contact details**, such as your email address, home address, home phone, mobile phone number, and State of residence;
- **professional data**, such as the company in which You work, department, position, business address, business telephone,
- **data about your preferences**, such as content you are interested in receiving, areas of interest;
- **data about your use of our services or the Website**, such as if You contact us regarding any issues related to our service on the Website, how You interact with our services, logs related to each session, including IP address, date and time of access;
- **data related to your social networking profile**, if You decide to share Content from the Website on these channels through plug-ins (e.g., fb share, etc.), some data posted by you on your social network will be collected by the Website and processed for the corresponding functions. The use of these plug-ins implies the sharing of the corresponding actions and information on the respective social networks; our services, logs related to each session, when You access your account;
- **browsing data**, You browse the Website, Votorantim Cimentos uses certain technologies (cookies, see below for more information) that automatically collect certain information elements related to the way in which the user uses our services, such as IP address or other unique device code (computer, mobile device or other devices) used by the user to navigate the Website, date and time of access; identification as registered or unregistered user;

technical information that may include the user's source URL; information about the browser; language. This information helps us to continuously improve our services, as well as monitor the accuracy of the Website's operations and is not intended to be associated with user identification data. However, browsing data can identify you when compared to your personal identifying information.

Your personal data is collected from the following sources:

- data you provide to us directly, by completing the registration on the Website or contacting us; and
- information obtained through automatic tracking systems when using the Website and its services.

### **For what purposes does Votorantim Cimentos use these personal data?**

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The Votorantim Cimentos may process your personal data for the following purposes:

- allow You to register on the Website;
- provide the services available through the Website (e.g., account registration and account access management, account management);
- manage and respond to budget requests;
- assist the user in his experience on the Website, clarifying doubts and suggesting content;
- technically manage the Website and its operational functions, including technical troubleshooting, statistical analysis, testing and research;
- prevent or discover fraudulent activity or misuse that is harmful to our Website or threatens the security of transactions;
- comply with the legal requirements provided for in Brazilian laws and regulations, as well as court orders or decisions or requests from authorities;
- protect the cybersecurity of users, the Website and services;
- to defend Votorantim Cimentos in court or in administrative proceedings, for example, in case of violation by web users, or to exert and protect Votorantim Cimentos' rights and property ;
- assist user requests (for example, information request management);
- send users operational communications related to the provision of the service or products, sales and after-sales assistance;
- for marketing purposes, in the support and promotion of Votorantim Cimentos' activities, including to send commercial and promotional communications and periodic updates (e.g. by e-mail, telephone, text message, postal service, social network and newsletter) related

to Votorantim Cimentos products, services, institutional materials, initiatives and events organized by and/or in collaboration with Votorantim Cimentos, respecting the user's right to opt out of receiving marketing communications at any time;

- for sending technical information about civil construction, works, projects, management of stores, products and applications, construction Website, works and innovation, and other content associated with the institutional and promotional communication of Votorantim Cimentos;
- interact with you on the Website to suggest products, clarify questions or facilitate your use of the Website or your product acquisition;
- conduct, by mail, telephone or e-mail, statistical analysis, studies and market research related to Votorantim Cimentos products and services;
- participate and manage promotions and contests available on the Website, if any;
- When the user is not yet a Votorantim Cimentos customer, if he registers and indicates his/her contact, to send commercial and promotional communications and periodic updates (e.g. by e-mail, telephone and newsletter) related to Votorantim Cimentos products, services, initiatives and events organized by and/or in collaboration with Votorantim Cimentos, and to conduct, by mail, telephone or e-mail, statistical analysis, studies and market research related to Votorantim Cimentos products and services. The user may, at any time, choose to stop receiving marketing communications.

### **Why does Votorantim Cimentos need to collect, process and use my personal data?**

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We will process your personal data in strict compliance with applicable law, especially Law No. 13.709/18 (General Law for the Protection of Personal Data or "LGPD"). Our personal data processing activities are based on one of the legal bases provided for in the LGPD, and that is what we will explain to You below.

When you request an action or contact us in relation to Votorantim Cimentos products, we will process your personal data to perform a contract or preliminary procedure relating to a contract between You and Votorantim Cimentos pursuant to Article 7,V of the LGPD.

We will also process your personal data based on our legitimate interest under Article 7,IX of the LGPD. Our legitimate interest is to support and promote our sales activities, and to ensure the provision of complete information to users about products and Votorantim Cimentos.

Finally, Votorantim Cimentos may process your personal data to comply with the law and exercise rights of Votorantim Cimentos or third parties, pursuant to Article 7, II and VI, if necessary.

### **With whom will Votorantim Cimentos be able to share my personal data?**

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To achieve the purposes described in this Privacy Policy, some companies may be involved in the processing activities, both as controllers and responsible for the data processing , as well as processors, and for this purpose Votorantim Cimentos may share their personal data with third parties, as indicated below. However, under our internal policies, we limit third parties who have access to personal data to what is necessary. For the purposes described herein, we may share your personal data with:

- consultants and technology and IT companies authorized to manage the Website and provide Website-related services, hosting providers, and database service providers;
- if necessary, with regulators, authorities and other third parties to comply with a legal obligation or for Votorantim Cimentos or third parties exert of rights ;
- with acquiring companies, in the context of an acquisition or other operation of sale of assets or corporate transaction involving Votorantim Cimentos;
- with processors. To the extent necessary for the purposes of processing indicated in this Privacy Policy, Votorantim Cimentos may share your personal data with third parties, either from Votorantim Cimentos' the economic group or independent third parties, to process personal data in accordance with our specific instructions, on behalf of Votorantim Cimentos ("Processors"). Processors may process data to manage of our database, support it systems and support the organizational activities of Votorantim Cimentos, and will be subject to contractual obligations to implement technical and organizational security measures to protect personal data and to process data solely in accordance with Votorantim Cimentos instructions.

Some third parties who have access to personal data may be located in other countries or may process data outside Brazil. The level of data protection in the other country may not be equivalent to the level of protection in Brazil. Therefore, we will only transfer your personal data to countries that the Brazilian National Data Protection Authority ("ANPD") decides to have an adequate level of protection, or we will take effective measures to ensure that all recipients of personal data implement an appropriate level of data protection. We do this, for example, by contractual means, entering into international personal data transfer agreements in accordance with the standard clauses, in compliance with the provisions of the LGPD.

## **Personal Data Management**

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The provision of the user's personal registration data is voluntary and optional. Users may freely decide not to provide information for contractual purposes, as well as subsequently delete their registration. In addition, at any time the user may opt out of receiving marketing communications or other institutional communications from Votorantim Cimentos by clicking to stop receiving marketing communications, in a link present in all communications. If the user does not provide registration data, or if you refuse to receive marketing communications, the user will not have access to part of the functionalities and content available on the Website, but the management will be the responsibility of the user, and we will respect their choices.

## **Safety**

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Votorantim Cimentos will adopt technical and organizational security measures to protect users' information from unauthorized access or use.

For data accessible from a specific user account, Votorantim Cimentos informs that the password is one of the account protection mechanisms, so users are asked to use a password sufficiently secure and stored in a secure location, limiting access to it on their own computers and browsers, disconnecting it after you have visited the Website.

## **How long will Votorantim Cimentos Keep my Personal data?**

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Votorantim Cimentos treats your personal data only for the purposes described in this Privacy Policy. Personal data are kept and deleted in accordance with Votorantim Cimentos retention policy, to the extent necessary for the purposes of processing, and should be excluded: (i) as soon as the reason for its use is finalized; or (ii) if the deadline is determined by law. Votorantim Cimentos will also process the data up to the prescribed period provided for in the applicable legislation for possible actions related to the data. User information is processed at Votorantim Cimentos facilities, its affiliates and the locations where the servers are located. For more information, please contact Votorantim Cimentos through the channels indicated below.

## **Cookies**

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- **Cookies:**

To improve navigation on the Website, Votorantim Cimentos uses "cookies". A cookie is a small file, usually composed of letters and numbers, that is downloaded to a computer when the user logs on to specific Websites. Cookies allow a webWebsite to recognize the user's computer, track their browsing on multiple pages of a particular Website, and identify users who return to the Website. Cookies do not contain information that personally identifies the user, but the personal information that Votorantim Cimentos records from the user may be linked to information kept in the cookies and extracted from them.

- **Web beacons:**

This Votorantim Cimentos webWebsite may have digital images recognized as web beacons (sometimes also defined as GIF or pixel tag), also linked to the use of cookies, in order to collect information about how the Website is used. Web beacons can provide some types of information found on the user's computer, such as the time and date the page was visited, the description of the page where the bacon web is found, or the same cookies. These web beacons can also be found in promotional email messages and internal newsletters for the purpose of confirming that the message has been opened and read. Votorantim Cimentos may use third-party web

beacons to facilitate the collection of grouped statistics on the effectiveness of its advertising campaigns or on other aspects related to the execution of its Websites.

- Types and Purposes of cookies:

Cookies can be technical, analytical and profiling:

A) Technical cookies are used to perform and facilitate their navigation, to provide and allow the use of the services of the Website. These cookies allow you to not have to re-enter data, such as the username for the login, for a second access, for example.

B) Analytical cookies are used to analyze and monitor the way in which the Website is used (for example, number of accesses and pages viewed) in order to allow Votorantim Cimentos to make constructive changes to the Website related its operation and navigation.

C) Profiling cookies are used to track your browsing on the Website and create profiles about your likes, habits, choices, etc. These "cookies" can be used to send advertising messages according to the preferences that have already been shown in online browsing.

Votorantim Cimentos uses the following "cookies":

Cookie	Cookies functions on theWebsite
Website Security and Performance Cookies	This type of cookie is used to maintain the Website operation and security of. Within this category, we also have cookies that guarantee its performance, both for maintaining logins, maintaining users configuration, performing translation functions, among others. They might be strictly necessary for the operation of the Website or not.
Analytical Cookies	They are used to understand the profile of visitors in order to verify how they interact with the Website, collecting and reporting information in an anonymized way.
Profiling Cookies	These cookies have the function of identifying advertising that is relevant to the user.

- **Enabling or disabling cookies and web beacons**

Users may authorize Votorantim Cimentos to use cookies and web beacons. If users do not agree, they must configure the browser to refuse the acceptance of cookies. Please note that refusing/disabling cookies may limit the usability and easy browsing of the Website.

- **Support**

If you have any questions about the use of Cookies, please contact us as indicated in the item below (**Who shall I contact regarding this matter?**).

### **Underage Users Data**

This Website is not intended for children under the age of 18 and Votorantim Cimentos does not knowingly collect your personal information.

If any information about minors is involuntarily stored, Votorantim Cimentos will arrange for timely disposal at the request of users.

### **In the activities described here, does Votorantim Cimentos make decisions solely based on automated processing of personal data?**

No, Votorantim Cimentos does not make decisions solely based on the automated processing of your personal data in the activities described in this Policy.

### **What rights do I have related to my personal data?**

Every data subject has rights related to its personal data, and Votorantim Cimentos respects their rights under the LGPD. Under the applicable law, the rights of the user must be exerted in such a way to protect Votorantim Cimentos and third parties' trade secrets, as well as third parties fundamental rights. .

You have the following rights related to your personal data:

**(i) Right of processing confirmation and right of access**

You have the right to confirm the existence of the processing activity of your personal data. If Votorantim Cimentos processes your personal data, you have the right of access, i.e. to obtain a simplified or complete statement about the categories of personal data processed, the origin of the data and the purposes of the processing. If your personal data is processed based on your consent, or the performance of a contract between You

and Votorantim Cimentos, you also have the right to obtain a full copy of the personal data that is processed based on consent or the contract.

**(ii) Right to rectification**

You have the right to request the rectification of incomplete, inaccurate or outdated data about You.

**(iii) Right of anonymization, blocking or erasure**

In certain cases, when your personal data is unnecessary, excessive or processed in non-compliance with the LGPD, you have the right to request anonymization, blocking or erasure of such data.

**(iv) Right to data portability**

In certain cases, as defined and to the extent required by the ANPD, and always respecting Votorantim Cimentos' trade and industrial secrets , You have the right of portability of your personal data to another company.

**(v) Right to erasure**

In cases where your data is processed based on your consent, You have the right to request the erasure of such personal data, subject to the assumptions in which Votorantim Cimentos has the right to retain the data under the LGPD.

**(vi) Right of information on shared usage of data**

You have the right to obtain information about the public and private entities with which Votorantim Cimentos has shared usage of your personal data.

**(vii) Right of refusal and withdrawal of consent**

Every time we request your consent to process your personal data, you have the right of refusal your consent. We will always inform you this right, and the consequences if you prefer not to consent to a processing activity. In addition, whenever You consent to the processing of your personal data for a specific purpose, You may withdraw your consent at any time, and all processing activities carried out up to the date of withdrawal are validated.

**(viii) Right to petition before ANPD**

You have the right to petition against Votorantim Cimentos before the National Data Protection Authority (ANPD) regarding your personal data.

**(ix) Right to object**

You have the right to object any processing activity of your personal data that might violate the LGPD provisions..

**(x) Right to review decisions solely based on automated processing**

You have the right to request a review of decisions made solely based on automated processing of personal data affecting your interests, including decisions of profiling, intended to define your personal, professional, consumer and credit profile or aspects of your personality.

To exert any of these rights, please contact us as indicated in the item below (**Who shall I contact regarding this matter?**).

**Who shall I contact regarding this matter?**

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If You have any doubts, questions or concerns regarding this Privacy Policy, You may contact Votorantim Cimentos' Data Protection Officer at [LGPD@vcimentos.com](mailto:LGPD@vcimentos.com).

If You wish to exert your rights as a data subject, You can submit your request through our [Data Subject Rights Form](#) (in Portuguese). All rights in the form are related to the Brazilian Law No. 13.709/18 (General Law for the Protection of Personal Data - "LGPD").

**Privacy Policy Updates**

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For legal and/or organizational reasons, this Privacy Policy may be updated. Therefore We suggest checking this Privacy Policy regularly, referencing its latest version. If Votorantim Cimentos believes that the updates are important, users will be notified through the Website.

**Third Party Website Links**

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During browsing, content that refers to third-party Websites might be seen. Votorantim Cimentos cannot access or control cookies or other functions used by thirdparty Websites and the procedures of these external webWebsites are not covered by our Privacy Policy. Consequently, it is necessary to contact and/or consult these third parties directly for additional information about their privacy protection procedures.

Date of last update: July 2022