



Header: EXTERNAL PRIVACY NOTICE - GRUPO VAMOS

Document Number and Version: POL0247 - v.0

Phase: In force

Prepared by: COMPLIANCE AREA

Date of creation: 10/20/2021

1. INTRODUCTION

GRUPO VAMOS is recognized for offering solutions of excellence from the rental of trucks, machinery and equipment in various brands to the sale of trucks, buses, machinery and agricultural equipment.

To demonstrate our commitment to always handling your personal data safely, transparently and with respect for your privacy, we have drawn up this Privacy Notice, which applies to the websites and all the products and services offered by **GRUPO VAMOS**. In it you will find information on the data that we process, the purposes for doing so, your rights as a data subject and how to exercise them with us.

We would like to thank you in advance for trusting us when you share your personal data with us, and we stress that we take the security of your information seriously.

If you are an employee, information on how we treat your personal data is available in our Internal Privacy Notice.

2. WHAT DO YOU NEED TO KNOW BEFORE READING THIS NOTICE?

If you have any questions about the terms used in this Notice, we suggest reading the definitions below:

Anonymization: process by which data relating to the Data Subject cannot be identified, considering the use of reasonable technical means available at the time of its processing.

Employee: all employees of the VAMOS GROUP, regardless of their position or role.

Controller: the agent responsible for taking decisions relating to the Processing of Personal Data, such as the form, duration, means and purpose of the Processing.

Consent: free, informed and unequivocal expression by the Data Subject authorizing the Processing of their Personal Data for a specific Purpose.

Personal Data: any information relating to an identified or identifiable natural person. An identifiable individual is one who can be directly or indirectly identified, in particular by reference to an identifier such as a name, an identification number, location data, an electronic identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of such person.

Sensitive Personal Data: special category of Personal Data relating to racial or ethnic origin, religious conviction, political opinion, membership of a trade union or religious, philosophical or political organization, relating to health or sex life, genetic or biometric data relating to a natural person.

Children's Personal Data: Personal Data relating to the Data Subject up to twelve (12) years of age.

Person Responsible for Processing Personal Data: the person appointed by GRUPO VAMOS to be responsible for ensuring that your rights are observed and for clearing any doubts over the Processing of your Personal Data.

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Purpose: the reason why the personal data will be processed, or the aim of the data processing.

LGPD: General Data Protection Law - Federal Law No. 13709/2018.

Operator: Individual or legal entity, whether public or private, who carries out the Processing of Personal Data on behalf of the Controller.

Pseudonymization: is the Processing by which a piece of data loses the possibility of direct or indirect association with an individual, if not for the use of additional information, kept separate by the controller in a controlled and secure environment.

Data Protection Impact Report: a document from the controller that contains a description of the Personal Data Processing processes that may give rise to risks to civil liberties and fundamental rights, as well as measures, safeguards and risk mitigation mechanisms.

Third Party: refers to, but is not limited to, any individual or legal entity with whom GRUPO VAMOS has a relationship or will have a relationship, service provider, supplier, consultant, client, business partner, Third Party contractor or subcontractor, lessee, assignee of commercial location, regardless of the existence of a formal contract, including those who use the Company's name for any purpose or who provide services, supply materials, interact with Public Officials, the Government or other Third Parties on behalf of the Company.

Data Subject: individual to whom the Personal Data refers, such as clients, Employees, contractors and you.

Processing: Any transaction carried out with Personal Data within its life cycle, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

International Transfer: transfer of Personal Data to a foreign country or international agency of which the country is a member.

Shared Use of Data (or Sharing): is any and all sending, communication, dissemination, International Transfer, interconnection of Personal Data between GRUPO VAMOS and Third Parties and/or Companies of the same group, not being considered a Sharing of Personal Data the sending of Data between areas of the same company.

3. SUMMARY OF INFORMATION

WHO WILL PROCESS YOUR PERSONAL DATA AS CONTROLER OF INFORMATION?	VAMOS LOCAÇÃO DE CAMINHÕES, MÁQUINAS E EQUIPAMENTOS S.A. CNPJ: 23.373.000/0001-32. TRANSRIO CAMINHÕES, ÔNIBUS, MAQUINAS E MOTORES LTDA.
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	<p>CNPJ: 11.726.521/0001-47.</p> <p>BORGATO SERVIÇOS AGRÍCOLAS S.A. CNPJ: 13.280.519/0001-12.</p> <p>VAMOS MAQUINAS E EQUIPAMENTOS S.A. CNPJ: 57.213.191/0001-97.</p> <p>VAMOS SEMINOVOS S.A. CNPJ: 18.163.414/0001-05.</p> <p>VAMOS COMÉRCIO DE MÁQUINAS LINHA AMARELA LTDA. CNPJ: 35.654.688/0001-08.</p> <p>VAMOS COMERCIO DE MAQUINAS AGRÍCOLAS LTDA. CNPJ: 38.364.749/0001-90.</p> <p>MONARCA MÁQUINAS E IMPLEMENTOS AGRÍCOLAS LTDA. CNPJ: 29.297.183/0001-30.</p>
<p>WHAT PERSONAL DATA WILL BE PROCESSED?</p>	<p>The Personal Data we process includes your identification data (such as name, gender, ID, individual taxpayers' register number (CPF) and date of birth), contact details (such as telephone number, cell phone number and e-mail address), financial data (such as bank, branch and account number), professional data (such as occupation and professional address) and some sensitive personal data (biometric data).</p>
<p>FOR HOW LONG WILL WE STORE YOUR DATA?</p>	<p>Your personal data will be deleted by Grupo Vamos when it is no longer useful for the purposes for which they were provided and are no longer necessary to comply with any legal obligation.</p>

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WHAT DOES GRUPO VAMOS WANT BY PROCESSING YOUR DATA?	To perform the contracts signed with our clients, provide support for the services contracted, exercise our rights to protect ourselves in legal proceedings, comply with our legal obligations and enable us to carry out internal processes related to our services and to rendering them.
WITH WHOM WILL GRUPO VAMOS SHARE YOUR PERSONAL DATA?	Service providers and partners essential to our activities; and government authorities/agencies as a result of legal or regulatory obligations or to comply with a specific court order.
WHAT ARE MY RIGHTS AND HOW CAN I EXERCISE THEM?	You have the right to confirmation of processing, access to the personal data we hold, to revoke your consent, among other things. You may exercise your rights by sending an e-mail to: privacidade.dados@grupovamos.com.br
WHAT ARE COOKIES AND HOW DO WE USE THEM?	Cookies are small files that are placed and stored on your computer, smartphone or other internet device when you visit a particular website. Grupo Vamos uses different types of cookies and asks for your consent to use these tools.
HOW DO WE KEEP YOUR DATA SAFE?	In order to ensure that your information is safe, Grupo Vamos uses the best data protection practices, products and services available on the market.
APPLICABLE LAWS	This notice has been prepared for special compliance with Laws No. 13709/2018 (General Personal Data Protection Law "LGPD"); No. 12965/2014 (Civil Rights Framework for the Internet); and No. 8,078/1990 (Consumer Protection Code), without prejudice to compliance with other laws applicable to the activities provided by JSL.
UPDATES TO THIS PRIVACY NOTICE	In the event of any changes to the Processing of your Personal Data, we will update this notice and inform you of any such update.

4. WHAT PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSE?

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Below you will find the main personal data we process about you and the reasons for it.

4.1 Talent acquisition

As well as advertising our job openings on specialized websites, we also receive CVs through our website, from referrals from our employees, and from CVs that are left in person at our physical locations. In these situations, we will process your personal data to proceed with the selection process, check your skills, curriculum information and whether or not you meet the specific requirements of the opening for which you have applied.

For these activities, the following personal data will be processed: Full Name, ID, Individual Taxpayers' Register Number (CPF), Driver's License (CNH), Nationality, Address, E-mail, Telephone Numbers, School/Academic Background, Professional Experience, Languages, Skills and Certifications, Marital Status, Date of Birth, Age, Position Desired and Salary Expectation.

4.2 Commercial relations – Clients

We process your personal data, as a client, so that we can enable the commercial relationship arising from the contract signed with you, your company, or the company you represent.

To this end, we will process the following data: (i) Registration Data: Full Name, ID, Individual Taxpayers' Register Number (CPF), Driver's License (CNH), Date of Birth, Age, Sex, Physical and Email Address, Telephone Numbers, Level of Education; (ii) Financial Data: Estimated Income, Credit History, Bank Details (Bank, Branch and Account Number), Tax Return, Bank Statement and Credit Score. (iii) Professional Data: Profession, Professional Contacts, Professional Address and Legal Representative data; and (iv) Vehicle Data: Model, Plate and Document;

This data is used for the following purposes:

- ❖ To process your requests for quotes, proposals and optimize the process of providing services in general;
- ❖ To create a register in our systems with your information, in order to facilitate and speed up our relationship, including for future operations, such as vehicle servicing and technical assistance;
- ❖ To carry out credit analysis to guarantee receipt of sales and services rendered in cash and in installments, with the aim of credit protection;
- ❖ To keep in contact with you, providing advice and support, with continuous quality assessment through surveys;
- ❖ To send the documents required by car manufacturers in the case of sales of new or used vehicles;
- ❖ To carry out the registration process, if requested;

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- ❖ To verify the existence and regularity of the client company, in order to proceed with the sale of products and the provision of the desired services;
- ❖ To evaluate, approve or deny financing and credit lines;
- ❖ To take administrative and regulatory measures when accidents occur within the contractual relationship or otherwise, such as theft, robbery, crashes, etc;
- ❖ To issue promissory notes for payment, e.g. for traffic fines linked to the leased vehicle; and vehicle; and
- ❖ To collect any outstanding (overdue) and unpaid amounts.

4.3 Commercial Relations - Suppliers, Service Providers and Partners

We may process your personal data to enable the commercial relation arising from the contract signed with you, your company, or the company you represent.

To this end, we will process the following data: (i) Registration Data: Full Name, ID, Individual Taxpayers' Register Number (CPF), Driver's License (CNH), Date of Birth, Age, Gender, Physical and Email Address, Telephone Numbers, Level of Education, Profession and Professional Contacts; (ii) Financial Data: Estimated Income, Credit History, Bank Details (Bank, Branch and Account Number), Tax Return, Bank Statement and Credit Score; (iii) Professional Details: Profession, Professional Contacts, Professional Address, details of Legal Representatives, and any registration code of the partner in GRUPO VAMOS.

This data is used for the following purposes:

- ❖ To conduct a thorough assessment of our partners and suppliers;
- ❖ To sign contracts and perform them in their entirety, as well as other contractual amendments;
- ❖ To register partners in our management systems and their main points of contact;
- ❖ To pay for services rendered and products and services purchased/contracted;
- ❖ Monitor the contracted service;
- ❖ Manage current signed contracts; and
- ❖ Maintain an active contact channel with suppliers, service providers and partners.

4.4 Legal or regulatory obligations

In some situations, we are obliged to process some of your personal data to ensure compliance with the law, such as sending invoices and documents to agencies, regulatory bodies and the Public Administration.

To this end, we will process the following data: Full Name, ID, Individual Taxpayers' Register (CPF) Number, Physical and Email Address, Telephone Numbers.

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GRUPO VAMOS companies have various customer service channels, such as the service form on the website, chat, WhatsApp, Instagram, Facebook and telephone. These channels may be used when you require assistance or just to send information, whether you are a client or not. When you enter your data, it is transmitted to us and saved in our database.

In this context, we will send you communications that may be of interest to you, such as information about vehicles, available services and even promotions and offers.

To do this, we will process the following data: Full name, Individual Taxpayers' Register (CPF) Number, email and telephone contact.

4.5 Internal procedures

In order to carry out our regular activities, such as financial and accounting activities, marketing, sales prospecting and the like, we may process some of your Personal Data, such as: Full Name, Signature, ID, Individual Taxpayers' Register (CPF), Internal Registration Number, Nationality, Address, E-mail, Telephone Numbers, Date of Birth, Age, Position, Company/Entity/Organization, Professional E-mail, Professional Address, Social Network Profile, Consumer Habits, Purchasing Trends, Browsing Characteristics, Browsing History, Complaint History, Entertainment Preferences, Geolocation, Geolocation History, Credit History, Credit Score, Bank Details (Bank, Branch and Account Number), Credit Card Details and Payment History.

This data is used to:

- ❖ Build and maintain a historical purchasing database;
- ❖ Keep records of commercial transactions and payments;
- ❖ Prepare internal reports and analyses as required;
- ❖ Answer questions and queries from the Board of Directors;
- ❖ Generate leads and prospect opportunities;
- ❖ Send mail with information about our products, events and actions;
- ❖ Send newsletters, exclusive offers and discounts;
- ❖ File or receive, register and manage legal cases;
- ❖ Answer internal legal queries from the **VAMOS GROUP** and the SIMPAR Group.

4.6 Regular exercise of rights

We may also process some of your personal data when this is necessary to protect our rights. To this end, we will use registration data, as well as other information we have access to, but within the limits imposed by the General Personal Data Protection Act ("LGPD").

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5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We will share your personal data when necessary to achieve the purpose for which the data was collected or when there is an obligation to do so. Personal data may be shared with:

- ❖ Companies that make up the SIMPAR Business Group to perform the contracted service or offer and supply new products and services;
- ❖ Auditing and compliance companies, to carry out internal audits and analyses;
- ❖ Banking institutions, for payments, reimbursements and granting credit;
- ❖ Insurance brokers, for pricing and taking out insurance, and in the event of a claim involving rented vehicles;
- ❖ Vehicle manufacturers, in the case of vehicle sales;
- ❖ Transportation companies, for delivery of the vehicle or product;
- ❖ Exemption offices, in the case of requests for tax exemption on vehicles for PWDs;
- ❖ Brokers and similar services, for vehicle registration;
- ❖ Government agencies, such as Denatran/Detran and Ciretran for transferring ownership of the vehicle, Finance Departments, the Judiciary and the Federal Revenue Service;
- ❖ Payment and financial institutions, including the Central Bank of Brazil (BACEN);
- ❖ External law firms, to act in extrajudicial, judicial, administrative or arbitration demands or proceedings;
- ❖ Companies that provide services to the Simpar Group, such as technology companies and software suppliers; and
- ❖ Companies providing tracking and supply services, if such services are contracted.

In order to safeguard your privacy, we use contractual instruments to ensure that the third parties who receive your personal data on our behalf make use the same protection as we do.

Occasionally, your personal data may be transferred outside of Brazil to other companies to help us conduct our business, or to suppliers and business partners located abroad.

In such cases, we will make sure that this transfer only takes place to countries that have a degree of security similar to that provided for by Brazilian laws, or when the National Authority for the Protection of Personal Data ("ANPD") so authorizes, when regulating such provision.

For more information on the third parties with whom we share your data, you can use a specific request, as detailed in item 5 below.

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6. WHAT ARE YOUR RIGHTS?

As the data subject, you have the following rights:

- a. To know whether we are processing your personal data and which data we are processing;
- b. Correct or request the correction of incomplete, inaccurate or outdated data;
- c. Request the anonymization, blocking or deletion of data that is unnecessary or excessive in relation to the purpose for which it was collected;
- d. Request the portability of data to another provider of similar products or services;
- e. Obtain information about the public or private entities with which we share your data;
- f. When the Processing activity requires your consent, you may refuse to consent. In this case, we will inform you of the consequences of not carrying out this activity;
- g. When the Processing activity is based on your consent, you may revoke it at any time.

In addition, you may exercise any other rights conferred by law.

To exercise your rights, please contact our Data Protection Officer, Henrique Fabreii Moraes, at privacidade.dados@grupovamos.com.br.

In specific cases, your request may not be granted. In these cases, we will provide you with the reasons for not doing so.

Requests involving the Personal Data and/or documents of other Data Subjects will not be answered, except through instruments such as a power of attorney, parental authority or other circumstance authorizing the exercise of another Data Subject's right by you.

7. AUTOMATED DECISIONS

The **VAMOS GROUP** may use automated decision-making processes, including definitions and profiles, whenever this is necessary to ensure the adequate provision of services and/or the delivery of the appropriate product, in accordance with the interests of the personal data subjects.

Whenever **VAMOS GROUP** makes decisions based solely on the automated processing of personal data, the Data Subject may request a review.

8. COOKIES

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The **VAMOS GROUP** uses cookies for different purposes, such as to generate access statistics, to enable you to browse without complications and in an agile manner and to remember your language preferences, for example.

A cookie is a small file added to your device or computer to provide you with a personalized access experience, enabling us to analyze internet traffic and know when you have visited a specific website. But rest assured, a cookie does not give access to your computer or reveal information other than that which you choose to share.

Below you will find the categories of cookies we use in our applications and their respective purposes:

Types of cookies	What do they do?
Necessary	These are essential cookies that enable the proper functioning of our website and allow you to make use of all the features available.
Performance	These are cookies that help us understand those interacting with our website, providing information on the areas visited, the time spent on the site and any problems they might have faced.
Functional	These cookies allow our website to remember your previous choices, such as browsing language. They are responsible for providing a personalized experience.
Marketing	These cookies are used to provide you with more content that is relevant and specific to your interests. They can also be used to display more targeted advertising or to limit the number of ads that are shown. They also make it possible to measure the effectiveness of a campaign.

In general, the cookies we use collect the following information: which browser you use, information about your IP address, along with the date, time and duration of your visit, the pages viewed and the links you click on.

You can disable cookies in your browser settings. But remember that the necessary cookies are essential for our website to function properly, so objecting to their use may result in your experience being rendered unusable or your access being suspended.

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9. FOR HOW LONG DO WE PROCESS YOUR PERSONAL DATA?

We will retain your personal data for as long as necessary to fulfill the purpose for which it was collected, unless a longer retention period is necessary to comply with legal obligations, safeguard our rights or comply with judicial/extrajudicial settlements.

To determine the retention period of your personal data, we take into account the following criteria:

- ❖ Whether we have a legal, contractual or other obligation to retain personal data, or whether it is necessary for investigation or litigation purposes; and
- ❖ Whether it is necessary to keep accurate business and financial records

10. HOW DO WE KEEP YOUR PERSONAL DATA SAFE?

Any information provided by the User will be collected and stored in accordance with the strictest security standards.

To this end, the **VAMOS GROUP** adopts several precautions, in compliance with the guidelines on security standards established in the applicable laws and regulations, such as:

- i. The **VAMOS GROUP** uses the latest methods and equipment available on the market to encrypt and anonymize your personal data when necessary. Encryption allows us to protect your data before it is transmitted over the Internet. Advanced encryption techniques make this information unreadable and prevent others from viewing it before it reaches our server;
- ii. The **VAMOS GROUP** has protections in place against any unauthorized access to its systems and records all accesses to personal data, guaranteeing the traceability of these accesses;
- iii. The **VAMOS GROUP** only authorizes specific people to access the location where your personal information is stored, provided that this access is essential to the development of the intended activity;
- iv. The **VAMOS GROUP** guarantees that those agents, internal employees or external partners who process personal data undertake to maintain the absolute confidentiality of the information accessed, as well as to adopt the best practices for handling this information, as established in the external policies and procedures;
- v. The **VAMOS GROUP** performs regular backups. Checks are made consistently to protect the information you provide. Sophisticated protection systems are used and activities are monitored.

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In addition to technical efforts, the **VAMOS GROUP** also has institutional measures in place to protect personal data, and as such, it has a privacy governance program applied to its activities and governance structure, which is constantly updated.

Access to the information collected is restricted to employees and authorized persons and is monitored through access logs. Anyone who makes improper use of this information, in violation of the internal policies adopted, will be subject to administrative, disciplinary and legal sanctions.

Although the **VAMOS GROUP** makes every effort to preserve your privacy and to protect your personal data, no transmission of information is completely secure, so the **VAMOS GROUP** is unable to fully guarantee that all the information it receives and/or sends will not be subject to unauthorized access perpetrated by methods designed to obtain information by improper means, such as technical failures, viruses or database intrusions.

In any case, in the unlikely event of incidents of this nature, the **VAMOS GROUP** guarantees its full efforts to remedy the consequences of the event.

The **VAMOS GROUP** is not responsible for any other websites that may be accessed from our website, as long as there is no business relationship between the **VAMOS GROUP** and the other company.

11. UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice may be changed at any time to guarantee our commitment to maximum transparency with you.

But rest assured that you will be notified when there are changes and/or updates.

12. QUESTIONS?

If you have any questions or would like to make a suggestion, you can contact our Data Controller at privacidade.dados@grupovamos.com.br.

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