



# Data Privacy Policy

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## DATA PRIVACY POLICY

### 1. GOAL

Demonstrate integrity and compliance with the General Data Protection Law (LGPD) and the European Union's General Data Protection Regulation (GDPR) in the processing of personal data of all audiences with which the Vibra Group relates, having the following premises:

- (i) To inform all audiences and related parties of the Vibra Group about the company's privacy vision and mission;
- (ii) Inform the reasons why the Vibra Group processes personal data;
- (iii) Inform the hypotheses in which the data will be shared with third parties;
- (iv) Inform data subjects about their rights and how their personal information is processed; and
- (v) Inform Vibra Group employees about how the company treats their personal information.

### 2. APPLICATION AND SCOPE

This Privacy Policy applies to the Vibra Group and to all audiences with which the company relates, including, for example, employees, contractors, customers, partners, suppliers, service users and other interested parties.

Approved by the Executive Board through Minutes RDE 3426, item 5.3, of 12.08.2025 - Agenda 133/2025.

### 3. DEFINITIONS

**Processing Agents:** are the controller and the operator.

**Anonymization:** use of reasonable technical means available at the time of processing, through which it does not relate to an identified or identifiable natural person

**National Data Protection Authority (ANPD):** an autarchy of a special nature, endowed with technical and decision-making autonomy, responsible for ensuring, implementing, and supervising compliance with Law No. 13,709, of August 14, 2018, throughout the national territory.

**Competent Data Protection Authority:** an independent public authority established under the laws of a jurisdiction other than Brazil, as applicable, which has the competence, under applicable Data Protection Laws, to monitor and enforce the application of those laws.

**Personal Database:** A structured set of personal data, established in one or several locations, in electronic or physical support.

**Sharing:** is the act of making personal data available to third parties, inside or outside the organization, observing legitimate purposes, applicable legal bases and compatible security measures

**Communication of Security Incident:** act of the controller that communicates to the ANPD, or other Competent Data Protection Authority, and/or to the data subject the occurrence of a security incident, in accordance with the applicable Data Protection Laws.

**Consent:** free, specific, informed and unequivocal manifestation of the will of the data subject, by which he/she, by means of a statement or a clear affirmative action, indicates agreement with the processing of personal data related to him/her.

**Controller:** natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Joint Controllership:** joint, common or convergent determination, by two or more controllers, of the purposes and essential elements for the processing of personal data, by means of an agreement that establishes the respective responsibilities in accordance with the applicable Data Protection Laws.

**Personal Data:** information relating to an identified or identifiable natural person. This includes data such as name, CPF, email, telephone, address, location information, document number, service use history, license plate and any other data that, alone or together, can identify a specific person.

**Sensitive Personal Data:** personal data that reveal racial or ethnic origin, religious conviction, political opinion, membership in a union or organization of a religious, philosophical or political nature, data related to health, sex life or sexual orientation, genetic or biometric data for the purpose of unique identification of a natural person, when linked to a natural person.

**Data Protection Officer (or DPO):** professional appointed by the controller, when required and as provided for in applicable Data Protection Laws.

**Deletion:** is the definitive deletion of personal data from a database, regardless of the means used.

**Group or Conglomerate of Companies:** a group of companies in fact or in law with their own legal personalities, under the direction, control or administration of an individual or legal entity or even a group of people who hold, separately or jointly, power of control over the others, provided that integrated interest, effective communion of interests and joint action of the companies that are part of it are demonstrated.

**Security incident:** any breach of security that results in the destruction, loss, alteration, unauthorized disclosure of, or accidental or unlawful access to, personal data transmitted, stored, or otherwise processed.

**Legitimate Interest:** legal basis established by applicable Data Protection Laws, which authorizes the processing of personal data when necessary to meet the interests of the controller or third parties, provided that they are lawful, necessary to achieve an identified purpose and do not prevail over the fundamental rights and freedoms of the data subject.

**Data Protection Laws:** Law No. 13,709, of August 14, 2018 ("LGPD") of Brazil and Regulation (EU) 2016/679 ("GDPR") of the European Union.

**Operator/Processor:** natural or legal person, under public or private law, who processes personal data on behalf of the controller.

**Sub-processor/Sub-processor:** another processor engaged by the processor to carry out specific personal data processing activities on behalf of the controller.

**Data Subject:** is the natural person to whom the personal data refers. That is, it is the identified or identifiable individual, such as customers, employees, partners or users of our services.

**Processing:** Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of availability, alignment or combination, restriction, deletion or destruction.

**Web beacons:** small invisible elements used on websites and emails to keep track of whether content has been viewed and how the user has interacted. They record information such as date, time, device, and clicks. They serve to measure results and improve the experience and communication campaigns.

## 4. RESPONSIBILITY

### 4.1. IT IS INCUMBENT UPON THE EXECUTIVE BOARD

- a) Approve the Vibra Group's Privacy Policy.

### 4.2. IT IS INCUMBENT UPON THE PERSON IN CHARGE OF INTEGRITY

- a) Keep the Privacy Policy regularly updated in accordance with:
  - (i) Guidelines determined by the LGPD - General Law for the Protection of Personal Data;
  - (ii) Guidelines determined by the GDPR - General Data Protection Regulation of the European Union;

- (iii) Legislation related to Privacy and the Processing of Personal Data;
- (iv) Complementary rules issued by the ANPD - National Data Protection Authority.
- b) Inform the Board of the Statutory Audit Committee whenever the Privacy Policy is changed/updated.
- c) To deal with complaints and communications from data subjects, provide clarifications and adopt appropriate measures.
- d) Receive communications from the ANPD and take action.
- e) To guide the employees and contractors of the processing agent regarding the practices to be taken in relation to the protection of personal data.
- f) Provide assistance and guidance in the preparation, definition and implementation of privacy measures and controls, communicate to the Statutory Audit Committee and the Ethics Committee on the need to record and communicate security incidents, the registration of personal data processing operations, the preparation of data protection impact reports, the adoption of internal mechanisms for supervision and risk mitigation, the development of policies and contractual instruments related to data processing, the evaluation of international transfers, the implementation of technical and administrative security measures, the promotion of good privacy governance practices and programs, as well as the support for strategic decisions and the design of products and services compatible with the principles of *privacy by design* and *privacy by default*.

## 5. APPLICATION OF THE EUROPEAN UNION'S GENERAL DATA PROTECTION REGULATION

This Privacy Policy applies to personal data processing operations carried out in the context of the Vibra Group's activities in the territory of the European Union, as well as to situations in which the processing involves data subjects located in the European Union, even if the processing takes place outside it, as provided for in Regulation (EU) 2016/679 ("GDPR"), this includes the following types of operations:

- a) That involves processing of personal data of data subjects residing in the territory of the European Union, carried out by any company of the Vibra Group or by a subcontractor designated by it, regardless of whether the company is established in the territory of the European Union, when the activities are related to:
  - i) Offer of goods or services to holders residing in the territory of the European Union, regardless of consideration for payment;

- ii) Monitoring the behavior of data subjects residing in the European Union, including through digital or technological tools, provided that this behavior occurs in the territory of the European Union.

The provisions of the GDPR are applied in a complementary way to the LGPD, as observed in the principle of regulatory compatibility and the need to ensure equivalent levels of protection. When

If there is a divergence between the LGPD and GDPR regimes, the company will observe the most protective standard for the holder, respecting the applicable local laws.

## 5.1. PRINCIPLES AND LEGAL BASES

Processing operations subject to the GDPR must be based on a valid legal basis, such as the consent of the data subject, performance of a contract, compliance with a legal obligation, protection of vital interests, exercise of functions in the public interest, and legitimate interest of the controller, in accordance with Articles 6 and 9 of the GDPR.

## 6. RIGHTS OF PERSONAL DATA SUBJECTS

In the context of operations subject to the LGPD and GDPR, the data subject has the right to request the following in relation to his or her personal data:

- a) Confirmation of the existence of processing: obtain confirmation as to whether your personal data is being processed by the Vibra Group.
- b) Access to data: obtain a copy of the personal data and the following information:
  - (i) purposes of the processing;
  - (ii) categories of personal data processed;
  - (iii) recipients or categories of recipients;
  - (iv) where possible, the period provided for retention or, if this is not possible, the criteria used to determine that period;
  - (v) the existence of the rights to request rectification, deletion of personal data, restriction or opposition to processing;
  - (vi) the right to lodge a complaint with the competent Data Protection Authority,
  - (vii) when personal data is not collected directly from the holder, any available information about its origin;

- (viii) the existence of automated decision-making, including profiling;
- (ix) where there is an international transfer of personal data, the appropriate safeguards related to the transfer.
- c) Correction of incomplete, inaccurate or outdated data: request updating or rectification.
- d) Deletion: require that the data be anonymized, blocked or deleted when the personal data is no longer needed, the data subject withdraws his/her consent or opposes the processing in certain circumstances, or when the data has been processed in a timely manner.

unlawful under the LGPD or GDPR, subject to certain exceptions.

- e) Data portability: request the receipt and transfer of your personal data to another controller, in a structured, commonly used and machine-readable format, in accordance with ANPD and GDPR regulations.
- f) Information about the possibility of not providing consent: being informed about the consequences of denying consent when requested.
- g) Revocation of consent: withdraw the consent previously granted, at any time, simply and free of charge.
- h) Objection to processing, including for direct marketing purposes.
- i) Restriction of processing: temporarily restricting or blocking the processing of personal data in certain circumstances.
- j) Rights related to automated decisions: where there are automated decisions, including profiling, under the GDPR, request: (i) human intervention in the process, (ii) express their point of view on the decision, and (iii) challenge the decision.
- k) Right to lodge a complaint with the competent Data Protection Authority.

These rights can be exercised by direct request to the Data Protection Officer (DPO), through the Vibra Group Privacy Portal.

## 7. DESCRIPTION

### 7.1. PERSONAL DATA WE MAY COLLECT

Personal data	Category & Description
User Registration Data	<p>These are the personal data necessary for registration on our business websites, loyalty programs, applications and service channels: We may collect the following data: full name, CPF, gender, email address, telephone number, address, date of birth.</p> <p>The necessary personal data that we may collect varies depending on the type of operation you will carry out in our systems and, if they are not indicated in this field, they will be informed in the specific privacy notices.</p> <p>In addition to this necessary personal data, you may provide additional personal data, such as your consumption preferences, to make your registration more personalized.</p>
Usage Data	<p>We collect related data whenever you interact with our websites and app or when you purchase products and/or services.</p> <p>As for internet behavior, we may collect the history of the pages accessed, the content of the areas and services available on our platforms and programs, your preferred language, and so on.</p> <p>We collect personal data relating to the devices used, mainly: IP address, operating system version, device type, device ID, system and performance information, and browser type.</p> <p>If you're on a mobile device, we'll also collect your UUID from it.</p>

Personal data	Category & Description
Usage Data	<p>We use third-party tracking services that use cookies and page tags (also known as web beacons) to collect data about visitors to our websites. This data includes usage and user statistics. The emails sent may include page tags to allow the sender to collect information about who opened such emails and clicked on the links contained in them. We provide more information in item 9 which details about cookies.</p> <p>For the location of service stations or convenience stores in our applications, we may collect the location for the provision of the service.</p> <p>Register</p> <p>Like most websites today, our servers maintain log files that record data whenever a device accesses the servers. The log files contain data about the nature of each access, including the originating IP address, internet service providers, files viewed on our website (such as HTML pages, graphics, etc.), operating system versions, and timestamps.</p>
Participation data in Surveys, Sweepstakes, promotions, offers or any other promotional action	We will collect the personal data that you authorize when you complete any survey or event forms, sweepstakes, and promotions.
Payment and purchase details	We may collect the following personal data when you carry out a purchase transaction for one of our products or services: name, date of birth, debit or credit card details, mobile phone number, location, and purchase and payment history.

Personal data	Category & Description
Authentication Partner Data	We will collect your personal data (social networks and related applications and/or business partners, etc.) through a legitimate legal basis that authorizes the collection/sharing, such as express provision in the contract, legitimate interest, prior consent of the holder of the personal data, among others.

## 7.2. HOW WE USE THE INFORMATION WE COLLECT

In each of the cases where we describe how we use your data in this Privacy Policy, we identify which of these processing grounds we rely on, as listed below:

Purpose
To conduct business and provide services offered by the Vibra Group;
For registration and general updates of your registration.
To send you information about services, products, and marketing. To send questionnaires, forms and registrations (questions and answers) within the contractual or legally permitted limits.
To create and suggest the use of other features, services, and content, for example, by making recommendations on how to optimize their use.
To evaluate the performance of our communication campaigns and messages and to tailor marketing campaigns according to the inferred profile of our users.
Conduct market analysis and research to understand trends, identify opportunities, and continuously improve the shopping experience for customers.

Purpose
Combine information we have about you in an aggregated and/or anonymized form to create a profile to identify and understand trends in different interactions with our services, helping us to make our sales and marketing actions more relevant to you and to personalize and improve your experience.
To correct and troubleshoot technical issues related to the functionality of our services, products, and systems.
To improve your browsing experience on the specific device/browser by optimizing the appearance of the website and how screen brightness affects your experience, as well as to ensure the optimal functioning of the service on different devices and browsers.
We will use information from third parties and integration partners to ensure that you can sign up for our services from an external integration, such as Facebook, LinkedIn, Microsoft, Google, or similar.
We use referral information to track the success of our integrations and our referral processes.
Process your payment or redemption of benefits
To meet a legal, regulatory or subpoena obligation from a Public or Judicial Authority.
To bring or defend against a judicial or administrative claim
To mitigate the risks of abuse, unknown/unauthorized access to the user's account and for the prevention and detection of fraud. For example, we have automated systems that scan content for <i>phishing</i> and <i>spam activity</i> .
For reporting and business strategy development.
For the protection of the life or safety of the user or others.

### 7.3. PURPOSES OF PROCESSING AND SECONDARY USE OF PERSONAL DATA

The Vibra Group processes personal data for specific, explicit and legitimate purposes. The relevant purposes are communicated to the data subjects through privacy policies/notices or by any other appropriate means.

The Vibra Group processes personal data in a restricted manner for the purposes previously informed and legitimately linked to its activities. Any secondary use understood as the processing of data for purposes other than those originally informed to the holder will only be carried out upon verification of compatibility with the initial purpose, existence of an adequate legal basis and, when necessary, updating of the information provided to the holder.

Before any further use, factors such as the relationship between the new and old purpose, the nature of the data involved, the potential impact on the subject and the applicable security measures will be evaluated. The company will not process personal data for incompatible or non-legitimate purposes, except when authorized by law, by regulatory obligation or with the express consent of the holder.

### 8. PROCESSING OF EMPLOYEES' PERSONAL DATA

The Vibra Group processes the personal data of its employees, former employees, interns, apprentices and job applicants, exclusively for purposes related to the management of the employment relationship, compliance with legal and contractual obligations, execution of internal policies and preservation of the ethical, safe and compliant environment.

The processing covers, by way of example, the following purposes:

Recruitment and selection management, resume analysis, interviews, tests and profile evaluations;
Personnel administration, such as employment contracts, payroll, benefits, working hours, vacations, occupational exams and labor obligations, etc.;
Compliance with legal, regulatory and tax obligations, including communication with public agencies and class entities;
Management of performance, climate and organizational development, including training, certifications, career plans and development of goals for the company and its employees;
Execution of internal policies for integrity, information security, investigations and internal audits, which may involve access and analysis of information stored or trafficked on devices, corporate accounts and systems made available by the company;

Physical and digital security management, access control, use of networks, logs, and incident monitoring;
Institutional communication and use of image, always with consent when applicable

Employees are informed about their responsibilities in the processing of personal data through internal policies, training and confidentiality terms, reinforcing the Vibra Group's privacy vision/mission.

## 9. COOKIES

Cookies are small data files that are stored on the device you use to access our services, so that we can recognize repeat users. Each cookie expires after a certain period of time, depending on the purpose for which it is used.

To learn more about how we use cookies on our websites, apps and business tools, please visit our cookie policy available on the Vibra Group Privacy Portal.

## 10. WHO WE SHARE THE DATA WE COLLECT WITH

The data may be shared with third parties in accordance with the rules of this policy and applicable legislation. These third parties are subject to contractual obligations of confidentiality and security.

We will share information with our partners, service providers and companies in our Economic Group aiming at the maintenance and operability of our products and services on our platforms, here are some examples:

- a) Providers of administrative support services necessary for the operationalization of our services;
- b) Service providers technology infrastructure necessary for the operationalization of our services;
- c) Marketing and advertising service providers;
- d) Payment Processors;
- e) To judicial and police authorities upon formal request or for compliance with legal or regulatory obligations.

## 11. INTERNATIONAL DATA TRANSFER

Following the requirements of the LGPD and GDPR, the Vibra Group may carry out international transfers of personal data when necessary for the fulfillment of its purposes, strictly observing the applicable legal provisions and ensuring the adequate protection of the data transferred, adopting the appropriate safeguards provided for in the LGPD and/or the GDPR:

- a) Countries with an adequate level of protection: The transfer will preferably occur to countries or international organizations that have a level of protection of personal data equivalent to that provided for in Brazilian or European Union legislation and applicable international standards, recognized as adequate by the ANPD and/or the European Commission;
- b) Appropriate safeguards: In the absence of recognition of suitability, appropriate safeguards should be adopted, such as:
  - (i) Standard Contractual Clauses (SCCs), including those adopted by the European Commission;
  - (ii) Codes of conduct/self-certification mechanisms;
  - (iii) Specific contractual clauses;
  - (iv) International contracts;
  - (v) Binding Corporate Rules (BCRs); and
  - (vi) Derogations provided for in the LGPD and/or the GDPR.

The processing agent disclosing personal data ("data exporter") must ensure that any onward transfer is compatible with the original purposes and that the recipient complies with the safeguards provided for and, where applicable, the SCCs.

The processing agent that receives personal data ("data importer") may only carry out subsequent transfers with the express authorization of the exporter and for legitimate purposes, respecting the defined retention periods and, where applicable, in accordance with the SCCs.

Appropriate technical and organizational measures will be implemented to protect personal data from unauthorized access, loss, alteration, or any form of inappropriate processing during and after the transfer.

## 12. STORAGE OF PERSONAL DATA

The Vibra Group adopts strict practices to ensure that personal data is stored securely, and we are concerned with storing your data only as long as necessary to achieve the purposes informed in this Privacy Policy.

We may store data for the preservation of information necessary for the fulfillment of contractual, legal and regulatory obligations or for the exercise of legitimate commercial interests, such as the exercise of the right of defense in judicial and administrative proceedings.

- **Retention Period:** The retention periods will follow the Vibra Group's Document Temporality Table, as well as the Digital Information Backup Policy.
- **Disposal Criteria:** After the end of the purposes or the applicable legal term, the data will be securely eliminated, through disposal techniques that prevent recovery or improper access, except when there is a legal or regulatory obligation to retain it for a longer period.

### 13. SECURITY OF PERSONAL DATA

The Vibra Group is committed to providing adequate security for your data. We are regularly updating our technical, organizational and information security measures in order to protect the privacy of data subjects.

Digital data will be stored exclusively in secure corporate environments, such as internal systems, authorized servers, and certified cloud solutions, ensuring encryption, access control, and continuous backup. Digital data will be stored exclusively in authorized corporate environments (e.g., approved servers, certified cloud solutions), in accordance with IT standards.

### 14. PERSONAL DATA OF CHILDREN AND ADOLESCENTS

The Vibra Group recognizes that the personal data of children and adolescents deserve special protection, being treated with the same rigor applied to sensitive personal data, as provided for in the applicable legislation. Our services are not intended for anyone under the age of eighteen (18).

If the holder of the personal data is not of the minimum age required, he or she should not access and use our services.

We do not knowingly collect personal data from children and adolescents or allow them to be registered. If we discover that we have inadvertently collected personal data from a child or teenager, that information will be deleted.

## 15. UPDATING OUR PRIVACY POLICY

From time to time, we may make updates to this Privacy Policy. We will identify the changes made to this page.

## 16. CONTACT CHANNEL

If you have questions about the content of this Privacy Policy, information about your personal data or your rights, we advise you to contact us through the Personal Data Subject Request Form available at the end of the Vibra Group Privacy Portal (<https://www.vibraenergia.com.br/portal-da-privacidade>) or through the direct contact of the Vibra Group Data Officer, by e-mail [lgpd@vibraenergia.com.br](mailto:lgpd@vibraenergia.com.br).