

PRIVACY POLICY

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1. INTRODUCTION

This Personal Data Privacy Policy defines how Allog Group acts to protect the personal data processed and controlled within the scope of its activities, as well as the privacy of the related data subjects.

This policy applies when we act as a controller of personal data and expresses Allog Group's constant efforts to act in accordance with applicable legislation and the organization's internal regulations related to data privacy as well as developing appropriate technical and organizational measures to protect personal data against unauthorized or unlawful processing, as well as accidental loss, alterations, disclosure, access, destruction, accidental damage, among other situations related to confidentiality, availability and integrity of personal data under its control.

In situations where we act as operators, we act in compliance with applicable legislation, best data privacy practices and in accordance with the instructions provided by the related controller. To this end, we promote training, qualifications, and awareness campaigns to disseminate Allog Group's best data privacy practices to all our employees and promote faithful compliance with applicable legal obligations.

2. DEFINITIONS

Throughout this policy, we adopt the terms listed below with their respective meanings:

National Data Protection Authority (NDPA): It is the body that will supervise and guide the application of the The General Personal Data Protection Law (LGPD), as well as being responsible for applying administrative sanctions in case of violation of the law.

Legal Basis for Processing: The processing of Personal Data is permitted by LGPD in accordance with the legal bases provided, such as the data subject's consent, compliance with legal and/or regulatory obligations by Allog Group, the existence of a contract between Allog Group and the data subject, analysis for credit protection, as well as the legitimate interests of Allog Group or the data subject.

Biometrics: A measurable physical characteristic or personal behavioral trait used to recognize or verify a person's identity. Facial images, fingerprints, and iris samples are examples of biometrics.

Cookie: A cookie is an electronic file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server every time the browser requests a page from that server. Cookies can be "persistent" cookies or "session" cookies. A persistent cookie will be stored by a web browser and will remain valid until the set expiration date unless deleted by the user before the expiration date. A session cookie, on the other hand, will expire at the end of the user session when the web browser is closed.

Privacy and Information Security Committee: It means the Allog Group people committee composed of representatives from the following departments: Commercial, Operation, Product, Quality, Human Resources and Information Technology (IT), which aims to propose improvements, changes and adjustments related to the data privacy policy, security of information and other regulations related to good practices applied by the organization.

Data Protection Officer (DPO): Person appointed by Allog Group to act as a communication channel between the controller, data subjects and ANPD.

Consent: It is the free, informed and unequivocal expression by which the data subject agrees to the processing of their Personal Data for a specific purpose.

Personal Data: Any data related to an identified or identifiable natural person, such as: IP, geolocation, name, ID, SSN (CPF), address, telephone number, bank account, vehicle data, among others.

Sensitive Personal Data: Personal data that presents racial or ethnic origin, religious conviction, political opinion, union membership, data relating to health or sexual life, genetic or biometric data.

Purpose: This is the reason or motivation for processing Personal Data.

Legitimate Interest: Data processing carried out by the Controller, due to its interest, that of other companies or society, without the processing affecting the data subject's individual rights and freedoms.

General Law for the Protection of Personal Data (LGPD): Law No. 13,709, of August 14, 2018.

Free Access: The data subject's right to have access to all information relating to the processing of their Personal Data.

Opposition: It is the data subject's right not to want their data to be processed. This right can be exercised in certain specific situations.

Security: Means the use of technical and administrative measures capable of protecting Personal Data from unauthorized access and accidental or illicit situations of destruction, loss, alteration, communication or dissemination.

Processing: Any operation performed with Personal Data, such as: collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation, information control, communication, transfer, diffusion or extraction.

Data subject: Natural person to whom the Personal Data that is subject to processing refers.

Transparency: It is the guarantee, to the data subject, of clear, precise and easily accessible information on the performance of the processing and respective processing agents, observing commercial and industrial secrets.

3. PRIVACY POLICY SUMMARY

3.1. Scope

This policy applies when we act as a personal data controller. In situations where we or our employees act as operators, we act in accordance with applicable legislation, best data privacy practices and in accordance with the instructions provided by the related controller.

3.2. Data minimization

We only collect personal data necessary for the proper execution of our activities, in accordance with related legal bases.

3.3. Data subjects' Right

Those set out in the LGPD, which we highlight the right to access, rectification, opposition to processing, portability, claim before the competent authorities and withdrawal of consent.

3.4. Retention term

The personal data processed is kept only for as long as necessary according to the applicable legal basis, of which we highlight: the period of existence of the relationship with the data subject, for the period necessary to comply with our legal, contractual obligations and regular exercise of rights, or for as long as the data subject 's consent.

3.5. Personal data collection

In general, personal data is collected directly from the data subjects themselves. In some situations, we may obtain it from other sources, always paying attention to the legal basis required for processing this data and applicable legislation.

4. YOUR PERSONAL DATA AND HOW WE USE IT

4.1. Collection

In general, personal data processed by Allog Group is collected directly from the data subjects themselves, who have a contractual relationship or have demonstrated an interest in developing a relationship with us. With the exception of information required by law or applicable Allog Group internal policies, the data subject's decision to provide us with their personal data is voluntary. However, it is important to highlight that if the data subject chooses not to provide certain information, we will eventually be unable to carry out some of the actions that require the use of this data to be carried out, given the nature of the related activities.

In some other situations, personal data can be sought from other sources, such as publicly available data or provided by public authorities, suppliers, contracted parties, other business partners and related sources, always paying attention to the legal basis required for processing this data and the respective applicable legislation.

Data collection can occur directly and indirectly. Directly, when registering to receive information, commercial contacts, filling out forms, sending job CVs, participating in recruitment and selection processes, drafting and signing contracts, among other actions related to the execution of our activities. Indirectly, when collected through existing technology on our website and applications, to provide a more positive user experience.

If you provide personal data of third parties to Allog Group, in accordance with the relationship between the parties, but also in various cases such as vacancy indications and CV deposit, you are responsible for ensuring that the data subject is aware of the information contained in this Data Privacy Policy and must have the respective person's consent to share information with us.

4.2. Children and Teenagers

Data collection from children and adolescents, that is, individuals under the age of 18, will only be carried out with the explicit authorization of the parent(s) and/or legal guardian(s) through a specific instrument, in person and informing the legitimate purposes for this. We do not deliberately collect personal data from children and teenagers in any other way.

If the user is under 18 years of age, they must not register on our relationship platforms or provide us with any personal data. If we become aware that we have collected personal data from a child or young person, we will take reasonable steps to delete the personal data in question.

4.3. Processing

Regarding personal data processed within the scope of our activities, we highlight:

4.3.1. Registration data: Registrations may include name, e-mail address, address, CPF (SSN), telephone number, image, photo, audio, among other data related to the purpose of the registration in question and any legal or contractual obligations linked (Employee Form, Supplier Registration, Customer Portfolio, Hiring Process Participants, Visitor Registration, among others).

4.3.2. Contact information: Information obtained through questions, requests and interactions carried out through our contact forms and means of communication, commercial and relationship activities, among others.

4.3.3. Financial transaction data: Referente a transações realizadas a partir de nossos serviços, inclusive para aquisição de produtos e/ou serviços. Transaction data may include your address, CPF (SSN), financial and banking information and credit card number, among others.

4.3.4. Data relating to and through the use of our websites, products, cloud services and applications (“Computing Data”): The use of Data may include your IP address, cookies, geographic location, browser type and version, operating system, time of visit to our websites, number of uses of the Services, date of visit, among others.

The collection of sensitive data occurs for clear purposes and with a legal basis for this, such as compliance with legal obligations, of which we highlight the Employee File, and legitimate interest for the operationalization of our activities, of which we highlight periodic exams and biometric registration, and In this case, specific consent will be requested. Other purposes may be applied, as long as a specific term is applied for your knowledge and/or acceptance of the processing in question.

Nº	PURPOSES	LEGAL BASIS
01	Trigger Insurance	Contract execution
02	AD (assets directory)	Contract execution
03	Job changes and salary adjustments	Contract execution
04	Authentications/signature recognition (notary office)	Legal Obligation
05	Building Access Registration (concierge)	Consent
06	Marketing activities Registration	Consent
07	Gift registration (shipments)	Consent
08	Customer base	Consent
09	Employee registration (inclusion and maintenance of information)	Legal Obligation
10	Driver Registration	Legal Obligation
11	Registration of CVs (candidates for vacancies)	Consent
12	Supplier and partner registration	Contract execution
13	Fleet Registration (vehicles)	Contract execution
14	Registration Customer platform (customer portal)	Consent
15	User Registration (Software)	Contract execution
16	Digital certification	Legal Obligation
17	Accounts Payable/receivable	Contract execution
18	Contracts	Contract execution

19	Publication access data (website/blog and social networks)	Consent
20	Customs clearance	Contract execution
21	Sending documentation/orders (physical media)	Contract execution
22	Deeds of assets/legal representatives	Legal Obligation
23	Psychological testing writings and profile analysis	Contract execution
24	Training management (internal/external training carried out through Allog)	Contract execution
25	Collection order (driver data)	Contract execution
26	Satisfaction survey (internal and external)	Contract execution
27	Powers of attorney	Contract execution
28	Receiving and sending quotations	Contract execution
29	Disclaimer	Contract execution

Personal data is processed for the purposes and in accordance with the bases mentioned above, which are not limited to as long as a specific term is applied for knowledge and/or acceptance of the processing in question by the data subject.

Upon electronic or physical acceptance of privacy terms, we consider that permission has been given by the data subject for the proper processing of their personal data, in compliance with legal and internal requirements related to data privacy.

Personal data under the control of Allog Group will not be used for purposes not compatible with those informed to its data subjects, except those that are required or authorized by law, as well as those of vital interest to the data subject. If other personal data is collected and processed, this document will be updated and disclosed according to any legal requirements.

5. DATA TRANSFER TO THIRD PARTIES

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our controllers and all their subsidiaries), to the extent reasonably necessary for the stated purposes and in accordance with applicable legislation, as well as subject to the bases legal processing informed in this policy.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the initiation, exercise or defense of administrative, arbitration and/or legal claims. Furthermore, we may disclose your data to our suppliers and service providers to the extent reasonably necessary to provide you with our products and/or services and ensure the security of their use and the use of your personal data, such as suppliers, software companies, marketing and customer service services, network and cloud service providers. These third parties may be located in other countries or have servers in different regions.

Financial transactions relating to our services and the purchase of our products and/or services are handled by our financial service providers, and we share transaction data with our payment service providers only to the extent necessary for the purposes of processing payments, refunding amounts and dealing with complaints and queries related to these issues.

In addition to the specific disclosures of personal data set out in this item, we may disclose your personal data whenever such disclosure is necessary to comply with a legal and/or regulatory obligation to which Allog Group is subject, as well as to protect your vital interests or the vital interests of another Data Subject. Before sharing, we will take the necessary precautions to ensure that the related personal data will have adequate protection as required by applicable law.

Allog Group has offices and facilities in Itajaí, Porto Alegre, Campinas, Curitiba, São Paulo, Manaus and Santos, as well as having suppliers in other countries (website hosting, cloud services, payment gateways, technical support, development, modeling, customization, among others). Therefore, we can transmit your data outside Brazil for the purposes indicated above. Allog Group adopts all appropriate measures and enters into the necessary contracts with its suppliers and offices to ensure that the processing of personal data outside Brazil is carried out in accordance with the LGPD and in compliance with Allog Group's policies.

You acknowledge that the personal data you provide to Allog Group through the existing relationship, services provided or our products and/or services may be transferred or accessible by operators internationally.

6. STORAGE AND DELETION OF PERSONAL DATA

6.1. We keep personal data only for as long as necessary, according to specific procedures for retention and management of records in accordance with the existing legal basis, of which we highlight:

a) During the relationship with the Data Subject.

b) During the period necessary to comply with our legal and contractual obligations and regular exercise of rights, among other applicable legal bases.

c) As long as the Data Subject's consent lasts, in cases where this is the legal basis.

6.2. We will retain your personal data in accordance with the available legal bases, given that due to the nature of the business, in some cases it is not possible to specify in advance the periods for which your personal data will be retained in accordance with the relationship between the parties. In such cases, we will determine the retention period based on the following criteria, without prejudice to others:

a) Existence of a specific law or regulation requiring a specific period of time for data retention.

b) Allog Group's internal policies.

c) Existence of legal, administrative or arbitration proceedings.

d) Information requests from government authorities.

7. YOUR RIGHTS

Allog Group respects the rights of data subjects set out in the LGPD. Among these, we highlight:

- a) right to access.
- b) right to rectification.
- c) right to object to processing.
- d) right to data portability.
- e) right to sue before the competent authorities.
- f) right to withdraw consent.
- g) right not to be subjected to automated decision-making and profiling.

You have the right to confirm whether or not we process your personal data and where we do so, and you have the right to access such personal data. If the rights and freedoms of third parties are not affected, we will provide you with a copy of your personal data.

In some circumstances, you have the right to erase your personal data without undue delay. These circumstances include:

- a) The personal data is no longer necessary in relation to the purposes for which it was collected or processed.
- b) You withdraw consent to consent-based processing.
- c) The processing is for marketing purposes.
- d) Personal data was processed illegally.

However, there are exclusions to your right to object to processing, such as when it is necessary to exercise the right to freedom of expression and information, to comply with legal and/or regulatory obligations, to exercise rights in proceedings, or even for Allog Group's legitimate interests.

If you make such an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which could override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of administrative, legal or arbitration claims.

If you consider that the processing of your personal information violates data protection legislation, you have the right to lodge a complaint with the competent authority and request that Allog Group immediately cease the processing in question.

To the extent that the legal basis for processing your personal data is consent, you have the right to revoke this consent at any time. Withdrawal will not affect the lawfulness of the processing prior to such withdrawal.

You can exercise any of your rights in relation to your personal data by means of written notification to the address of Allog Group, addressed to the Data Protection Officer "DPO " or by means of an electronic procedure available on the website or via the following email address privacidade@allog.com.br.

8. COOKIES, IDENTIFIERS, TRACKERS AND THIRD-PARTY INFORMATION

We use cookies on our website. To the extent that these cookies are not strictly necessary for browsing our website and/or providing our services, we will ask you to consent to the use of cookies when you visit our website.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to information stored in and obtained from cookies. We use cookies for the following purposes:

a) Authentication - identify you when you use our portals and electronic applications.

b) Status - helping us determine whether you are logged into our portals and electronic applications.

c) Personalization - storing information about your preferences and personalizing services for you.

d) Security - as an element of security measures used to protect user accounts, including the prevention of fraudulent use of login credentials and to protect our portals, electronic applications and services in general.

e) Advertising - helping us display advertisements that will be relevant to you.

f) Analysis - helping us analyze the use and performance of our website and services.

g) Cookie consent - storing your preferences regarding the use of cookies more generally.

Our service providers use cookies, and these cookies may be stored on your computer when you use our portals and electronic applications. Most browsers allow you to refuse to accept cookies and allow you to delete cookies. The methods for doing this vary from browser to browser and their versions. Blocking all cookies will negatively impact the usability of many websites. If you block cookies, some of the features available on our portals and electronic applications may have their functionality compromised.

In addition to identifiers, we also use Web Beacons that help us better manage the content on our websites by letting us know which content is effective. Web Beacons are embedded in or associated with certain emails or other communications you receive from us or our offices. Web Beacons help us track your responses and interests and deliver relevant content and services to you. For example, they may tell us when you take actions based on emails we send.

We may use third-party services, such as open search tools and social networks, to obtain information about you (such as your name or company) and enrich your personal data by obtaining publicly available information about you, such as your title, employment history and contact information.

9. INCIDENTS

Allog Group promptly evaluates and responds to incidents that may compromise your Personal Data. If Allog Group becomes aware of any incident involving the Personal Data of data subjects for which it acts as controller, Allog Group will notify you and the proper authorities.

10. DATA SECURITY AND BEST PRACTICES

We take organizational security precautions, whether physical or technical, to promote better governance of personal data controlled by the organization. Related protocols, controls and policies were developed, as well as procedures and guidelines to maintain these measures based on the risk mapping carried out.

Training, capacity-building actions and specific publicity campaigns on Data Privacy topics were included in our preventive actions, aiming to disseminate best practices and train our employees.

The Information Security and Privacy Committee constantly works to propose improvements, changes and adjustments related to the personal data privacy policy, information security and other regulations related to good practices applied by the organization.

11. DATA PROCESSING OFFICER ("DPO")

Allog Group has a Data Protection Officer "DPO" duly appointed to act as a communication channel between the controller, data subjects and the National Data Protection Authority (ANPD). Identity and contact information are displayed on our website available at www.allog.com.br.

If you have any questions, queries or need any clarifications regarding this Privacy Policy, please contact us by email privacidade@allog.com.br (Graciele Milan).

12. AMENDMENTS TO DATA PRIVACY POLICY

Allog Group may amend this policy at any time, and such updates are published on our website and other related platforms and can be checked at any time. We recommend that you periodically check our communication tools to see any amendments to this Privacy Policy.

In the event of significant amendments to this privacy policy, we may communicate such changes to you by email or through specific messages on our communication platforms.

13. About us

Allog Group is headquartered in the City of Itajaí, State of Santa Catarina, Brazil, at 333, Dr. Pedro Ferreira Street, downtown, zip code: 88301-030. In addition to units in the City of Campinas/ State of Sao Paulo, Curitiba/ State of Parana, Manaus / State of Amazonas, Porto Alegre/ State of Rio Grande Do Sul, Santos/ State of Sao Paulo and São Paulo/ State of Sao Paulo.