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BRC BERCO REVEST CAR INDÚSTRIA E COMÉRCIO DE INTERIORES DE CAMINHÕES LTDA BRC PERSONAL DATA AND PRIVACY PROTECTION POLICY – LGPD



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BRC Personal Data and Privacy Protection Policy

BRC is committed to transparency, privacy and data security of all interested parties throughout the process of interaction with the organization's website. This commitment extends to the way data is collected, used, stored, controlled or deleted.

This Policy is in accordance with the LGPD – Lei Geral de Proteção de Dados Pessoais (General Personal Data Protection Law), Lei No. 13,709, of August 14, 2018.

BRC emphasizes that customer registration data are not disclosed to third parties, except for legal requirements, or when necessary for the delivery process (shipment and others) or for credit collection from defaulters.

Basic considerations

By expressing their acceptance, the website user gives their free and express consent for BRC to collect and use the information for the purposes described in this BRC Personal Data Protection and Privacy Policy.

LGPD gives the customer and other interested parties the right to request BRC, at any time, upon formal request, for information regarding their data processed.

The points covered by the BRC Personal Data Protection and Privacy Policy are stated below.

In accordance with relevant legislation, BRC identifies itself as: Predominantly controller.

In resume, the purpose of using the personal data is to meet the needs of the organization with a focus on maintaining its own development and performing well in the market in which it operates. More details can be seen in item 3.

The points of interaction and the types of personal information of interested parties collected by BRC are detailed in item 2.

In order for the Privacy Policy to be well understood, it is essential to clarify some important concepts:

Data processing agent or controller	BRC
Stakeholders	Customers, Employees, Community, Suppliers, Government and Shareholders.
Personal data	Any information related to a person that identifies him or her, or that, used in combination with other processed information, identifies an individual. Also, any information through which it is possible to identify a person or contact him/her
Treatment of personal data	The processing of personal data is the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, communication, transfer, dissemination or extraction of data from individuals.
Data holder	Any natural person who has their personal data handled by BRC
Purpose	What you want to achieve with the processing of personal data.
Necessity	The processing of personal data must be limited to the minimum necessary for the intended purpose. In other words, it must be relevant, proportional and not excessive.
Consent	Clear and objective authorization that the holder gives for the treatment of his/her personal data with a previously stipulated purpose. After giving consent, you can revoke it at any time. Revocation does not cancel previously performed processing.
DPO – Data Protection Officer	The data protection officer is the person in charge chosen by BRC to act as a communication channel between the controller, data subjects and the ANPD – Autoridade Nacional de Proteção de Dados (National Data Protection Authority), when necessary.

BRC Personal Data and Privacy Protection Policy – Details

1 Who does this privacy policy apply to?

It applies to all interested parties that interact with BRC and that in somehow have personal data processed by the organization.

2 What personal information is collected and used?

The information collected and used is miscellaneous information, generally being:

- Customer, supplier, community, government and shareholder information:

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- Response to form sent via e-mail by BRC;
- Updating the contact register in the ERP;
- Data collection via website, e-mail marketing, blog, Skype, whatsapp, facebook, linkedin, youtube, vimeo, Instagram and other social networks that BRC may interact with;
- Updating company data;
- Satisfaction survey
- Disclosure or participation in commercial or technical events in person or virtually;
- Contacts that interact with the website (catalog, folders, forms);
- Collection of cookies via the website, advertisements, blogs and any possible electronic interaction;
- Public sources (e.g.: demographics);
- Data providers (e.g.: data related to online advertisements and stakeholder interests).
- Of Employees:
 - Through specific registration forms for the purpose of complying with legal obligations;
 - Receiving resumes;
 - Through data collected on admission in order to broadcast in the corporate media, institutional information with the purpose of integrating, interacting and motivating with congratulations on commemorative dates, outstanding work achievements as well as solidarity actions in the Institutional Newspaper and the company's mural, in addition to from institutional videos, technical, commercial and marketing promotional actions with the purpose of instructing, encouraging and publicizing actions for customers.

3 Why are personal data requested and used?

The data is needed for:

- inform the Customer about offers and publicize services;
- deliver purchased products or contracted services;
- carry out the process of exchanging or returning products, after analyzing and identifying the quality sector;
- send you order status updates and service communications;
- coordinate with partners the delivery or availability of services; verify that [and own fleet];
- provide services tailored to the Customer's needs;
- improve customers' shopping experience at BRC;
- perform market analysis and research;
- keep the customer informed about products, services, commercial and technical actions;
- run targeted online advertising;
- prevent, detect and investigate activities that do not comply with our Code of Conduct, or that are prohibited or illegal;
- improve the website, social networks and modes of communication;
- optimize the interaction of all stakeholders with BRC and BRC with them;
- ensure the security of the data we process;
- comply with legal obligations;
- administrative and management purposes.

NOTE:

BRC uses legal bases, which may vary according to the purpose of collection, to process customer personal data. The storage period may change depending on the legal basis applicable to each situation and the purpose.

4 Marketing services

The data may be used for marketing services.

Marketing services are offered through marketing communications about offers, services and products addressed to the Customer, related to their profile and purchases made.

This service covers e-mails, SMS, WhatsApp and electronic communication triggering services.

The customer may cancel the service at any time by submitting an e-mail request to the DPO.

5 With whom personal data is shared?

The information collected will only be shared with those necessary in specific cases, such as:

- for the adequate provision of the services object of its activities with partner companies;
- protection in the event of conflict;
- upon court decision or request from a competent authority;
- companies providing technological and operational infrastructure, such as payment intermediary companies and information storage service providers.

6 International data transfer

As the internet is a global environment, certain services offered by BRC may require the transfer of your data to other countries. In these cases, the data is processed in accordance with the LGPD and other protection legislation.

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Security measures follow defined policies and standard clauses are adopted in contracts with suppliers and service providers. By browsing the organization's website or communicating with the organization, you agree to the treatment of your information, including the international transfer of data, when necessary.

BRC takes appropriate measures to ensure that any information collected is handled securely, in accordance with data protection standards and in accordance with the BRC Privacy and Personal Data Protection Policy.

7 How long is personal information stored?

Stakeholder information is stored for the relevant time, in accordance with the statute of limitations of Brazilian law. BRC ensures and guarantees the destruction of data according to articles 15 and 16 of Law 13,709/18 - LGPD.

8 What are the rights of the data holders?

From the beginning of the term of the LGPD, the holder of personal data has the right to obtain from BRC, at any time, upon formal request, information regarding their data.

BRC will have 15 days to respond to holders' requests.

Requests will be analyzed as provided for in current legislation and, for legal reasons, some requests may not be met.

Data subjects, according to the text of the LGPD, can exercise their rights through:

- i. confirmation of the existence of treatment;
- ii. access to data;
- iii. correction of incomplete, inaccurate or outdated data;
- iv. anonymization, blocking or elimination of unnecessary, excessive or treated data in violation of the provisions of this Law;
- v. portability of data to another service or product provider, upon express request, in accordance with the regulation of the national authority, observing commercial and industrial secrets;
- vi. elimination of personal data processed with the consent of the holder;
- vii. information on public and private entities with which the controller made shared use of data;
- viii. information on the possibility of not providing consent and on the consequences of denial;
- ix. revocation of consent.

9 How can the data holder exercise their rights?

The interested party can exercise their rights by accessing the "Privacy" section, available on the organization's website, and contacting them explaining what they want through an e-mail request to the DPO.

Through this path, you can change your preferences regarding notifications (including marketing communications) at any time,

If you do not wish to receive marketing communications, it is also possible to unsubscribe by clicking on the link sent along with the marketing e-mail, or by sending an e-mail to the DPO writing your full name and clearly which service you wish to unsubscribe from.

10 Cookies and Similar Technologies

Cookies are small data files that are placed on computers or other devices (such as 'smartphones' or 'tablets') while browsing websites in general.

BRC does not use cookies as it is a merely informative platform and, therefore, it is not necessary to collect this data.

11 Other important information about data protection information

BRC Privacy and Personal Data Protection Policy is always available in its most recent version on the organization's website.

Since the user has the right to request cancellation at any time in relation to acceptance of the BRC Data Privacy Policy, acceptance of previous, current or future versions does not need to be renewed at any time, that is, even when the policy is updated.

12 How to proceed in case of doubt or complaint?

The data protection officer is the person in charge chosen by BRC to act as a communication channel between the controller, data subjects and the ANPD, when necessary.

The data protection officer is available to clarify any doubts regarding BRC's Personal Data Protection and Privacy Policy, just contact us by e-mail.

- DPO – Data Protection Officer: Mr. William França
- e-mail address: privacidade@brc-brasil.com
- Organization website: www.brc-brasil.com

The ANPD – Autoridade Nacional de Proteção de Dados (National Data Protection Authority) is the government agency that deals with all issues related to data protection in Brazil, and is therefore a broad channel for seeking information and reporting.

- ANPD website: <https://www.gov.br/anpd/pt-br>