

## PRIVACY POLICY

The Privacy Policy of Randon Companies based on the principles of its commitment to transparency and respect in relations with its users.

## DATA SUBJECT PRIVACY

We know that you care about your personal data and we want you to trust the Randon Companies to use your personal data with care. This Privacy Policy will help you understand about the protection and processing of personal data collected by us.

Take a few moments to learn about our privacy practices, and if you need clarification, contact us by e-mail [dpo@empresasrandon.com.br](mailto:dpo@empresasrandon.com.br) or through the data subject's portal.

## PERSONAL DATA COLLECTION

The Randon Companies or partners responsible for the operation handle any personal data provided by you or collected by the Randon Companies through other monitoring technologies.

This Privacy Policy also applies to the marketing content of the Randon Companies, including offers and advertising for products and services of our companies, which we present to you on websites, platforms and third-party applications based on your information on the use of our platforms. These third-party platforms will generally have their own Privacy Policies, read it before using these platforms.

## TYPE PERSONAL DATA COLLECTED FROM THE DATA SUBJECT

It is important to know that 'personal data' means any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

You (data subject) shall have the right to withdraw his or her consent at any time, and the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.



We may collect personal data from a variety of sources. These include:

- Personal data you provide to us;
- Personal data that we collect automatically, and
- Personal data that we collect from other authorized sources.

You may be asked for your personal data when you contact us. The Randon Companies may share their personal data between group companies and use them in accordance with this Privacy Policy. We may also associate this data with other information to improve our products, services, content and advertising.

## TO COLLECT YOUR PERSONAL DATA

Your personal data is processed lawfully, fairly and in a transparent manner:

- Personal data that you provide us. We collect information about your use of our services and products, such as the type of content you view or interact with, or the frequency and duration of your activities. We also collect personal data that you provide to us when you subscribe to an advertising newsletter, fill out a form or register an account to buy our products. In these actions, we may request some of your personal data, such as your name, date of birth, email, address, phone number.
- Personal data that we collect automatically. We also collect and store certain types of personal data whenever you interact with us online. We use cookies and tracking technologies to obtain personal data whenever your internet browser accesses our platforms or advertisements and other content offered by the Randon Companies or on your behalf on other partner platforms. Examples of the types of personal data we collect include IP address, location data, computer information, time zone settings, types and versions of plug-ins used by the browser. During part of your browsing on the platforms of the Randon Companies we may use software tools to measure and collect information about the session, including page response times, download errors, duration of visits to certain pages and information regarding your interaction with its. We may collect technical information to help us identify your device for fraud prevention and diagnostic purposes.
- Personal data that we collect from other authorized sources. We collect personal data from other sources, including third parties with whom we have trusted partnerships and on third party platforms where we operate the Randon Companies accounts. For example, when using the “like” on Facebook. In addition, we receive information about your interaction with our advertising to gauge whether it is relevant and successful.



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## PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation only shall apply if it is in accordance with the law or the interests of the data subject.

## CONDITIONS APPLICABLE TO CHILD'S CONSENT

We understand the importance of taking additional precautions to protect the privacy and safety of children and adolescents who may use the Randon Companies platform.

Most of our platforms are intended for use by adults. The processing of children's personal data will shall only to the extent that consent is given or authorized by the holder of parental responsibility over the child.

The Randon Companies make reasonable efforts to verify if that consent given or authorized by the holder of parental responsibility over the child, taking into consideration available technology.

## PROCESSING OF PERSONAL DATA

We collect process and disclose your personal data only for specific and limited purposes. For example, to process your requests, to develop and improve our products, services, communication methods and the functionality of our platforms, to offer you personalized products and communications, as well as targeted advertising and product recommendations. We can also create profiles by analyzing information about your online browsing, research and shopping habits, and your interactions with our brand communications, by building segments (creating groups that share common characteristics) and placing your personal data in one or more of these segments.

The Randon Companies process your personal data using automated means. An automated decision is a decision made exclusively by automatic means.

We may collect process and disclose your personal data for the following purposes:

- To process and respond to your requests or to contact you to answer your questions and / or requests;
- To develop and improve our products, services, communication methods and the functionality of our websites;



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- To communicate and manage your registration and / or subscription to our newsletter or other communications;
- To authenticate the identity of individuals who contact us by phone, electronic or other means;
- For training and quality assurance purposes;
- To understand and evaluate the changing interests, desires, and needs of consumers, to improve our website, our platforms, our current products and services, and / or to develop new products and services; and
- To provide you with personalized products and communications, as well as targeted advertising and product recommendations.

When applicable, we will ask for your consent to process your personal data, and when you have provided your consent for processing activities, you will have the right to withdraw your consent at any time.

There is a legitimate interest in processing your personal data in many cases. This legal basis used where necessary to achieve a fundamental objective, for example to assist in the execution of a contract or to optimize a service, and does not compromise your rights as an individual. We can assure you that if the legitimate interest used as a reason to process your personal data, we will keep a record of that action and you will have the right to request that information.

We also process your personal data to execute a contract to which you are or will be a party. For example, we need to process your personal data to deliver a product or service that you have purchased.

We also process your personal data when necessary to comply with a legal obligation.

The Randon Companies can also use your personal data to build profiles. We create profiles through the analysis of information about your online browsing, research and service acquisition habits, and your interactions with the communications of our brands, through the construction of segments (creation of groups that share common characteristics) and placement of your personal data in one or more segments. These segments are used by the Randon Companies to personalize the platforms, the website and our communications to your needs (such as showing you relevant content when you visit our site, or in a newsletter addressed to you), and to show you offers and relevant advertising for our brands on the Randon Companies' platforms, and on third party websites. The segments can be used for third party campaigns on our platforms. The Randon Companies create profiles with your data as long as you have given us your consent to do so, for example, by accepting the placement of cookies in your internet browser or by subscribing to newsletters from one of our brands in your email.



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You can at any time withdraw your consent to prevent the use of your personal data in this way, using the manage cookies section of our Cookies Policy or canceling the subscription to use your email address if you registered with one of the websites or subscribed to an advertising newsletter.

The Randon Companies may collect personal data with your consent:

- On our platforms according to what you see and how you interact with our content;
- In our digital advertising that we present on social platforms and other websites; and
- In the forms, you fill out online and send us with your interests.

We also monitor the products you click on in our advertisements and move on to ordering or purchasing a product or service. Also, if you have requested our contact by email, SMS, WhatsApp or other means of communication, a registration is made when you open, read, or click on their content to see what interests you, so that we can offer you more content that we think you like.

Sometimes, with your consent, we may use your current location to offer you advertising regarding local promotions or events that we think may be of interest to you.

## DATA SHARING BETWEEN RANDON COMPANIES

Please be advised that we may share your data between Randon Companies. Therefore, know that all our companies follow the same standard of personal data protection and comply with the same purposes for using your data described in this policy as:

- For the development of new products and services;
- To offer products and services that best meet your interests; and
- To generate statistical and aggregated data about the use of our products and services and user profiles.

To learn more about the corporate structure of Randon Companies, access our investor relations website (<https://ri.randon.com.br/>).



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## TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANISATION

The Randon Companies may share personal data within the group or with third parties for the purposes described in this Privacy Policy. If the company make an international transfer of personal data, we will ensure that it have an adequate level of protection.

## PERSONAL DATA PROTECTION

For the Randon Companies, privacy and the protection of their personal data are important. We make every effort to protect your personal data from misuse, interference, loss, unauthorized access, modification or disclosure.

We keep your personal data for as long as necessary for processing. We keep personal data for as little time as possible, after which we will take steps permanently delete it.

## RIGHTS OF THE DATA SUBJECT

The Randon Companies facilitate the exercise of data subject rights. You can exercise these rights at any time.

For your knowledge, we describe below some of your rights, but we emphasize that we comply with all your rights in accordance with current personal data protection act:

- The right to information. You data holder has the right to be given concise, transparent, understandable and easily accessible information, using clear and simple language, on how we use your personal data and on your rights. For this reason, we present this Privacy Policy.
- The right of access and rectification. You data holder has the right to access your personal data, as well as to rectify your inaccurate personal data, or to complete them if they are incomplete.
- The right to data portability. The personal data you provided us with may be portable. This means that can transferred, copied or transmitted electronically in certain circumstances, when requested.
- The right to delete personal data. Under certain conditions, you, the data owner, have the right to obtain from the controller the deletion of your personal data. If you wish to delete your personal data, please inform us and we will take reasonable steps to respond to your request in accordance with legal requirements. If the personal data we collect is no longer necessary for any purpose and we not required by law to maintain it, we will use our best efforts to permanently delete, destroy or anonymize it.



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- The right to restriction of processing. Under certain conditions, you have the right to limit the processing of your personal data.
- The right to erasure ('right to be forgotten'). You have the right to object at any time, for reasons related to your particular situation, to the processing of personal data concerning you. In particular, when personal data processed for direct marketing, the data subject has the right to object at any time to the processing of personal data concerning him for the purposes of said marketing (receiving e-mails from notification).
- The right to revoke consent. If you have given your consent to our use of your personal data, you have the right to withdraw your consent at any time by communicating your intention to us through the contacts provided.
- The right related to automated individual decision-making, including profiling. You have the right not to be subject to decisions solely based on automated processes that produce legal effects or other significant effects. In general, it has the right to obtain human intervention, to obtain a justification for the decision obtained after an evaluation and to challenge the decision.

Any supplementary information or advice on your rights can be obtained through the regulatory authority in accordance with current data protection act.

## CONTACT OF RANDON COMPANIES – DPO

The Data Protection Officer (DPO), responsible for the protection of personal data, appointed by the Randon Companies can be contacted at e-mail [dpo@empresasrandon.com.br](mailto:dpo@empresasrandon.com.br) or through the data subject's portal on our platforms.

### DATA SUBJECT'S PORTAL

Link: [portaldotitular.empresasrandon.com.br](http://portaldotitular.empresasrandon.com.br)

If you have any questions about this Privacy Policy or the processing of personal data, please contact us. We inform you that we have a dedicated team to answer your request or question.