

PRIVACY AND DATA PROTECTION POLICY

Summary

Legal bases for processing

Processing of sensitive personal data and data of children and adolescents

Definitions

Rights of data subjects

About the information processed by VIA BRASIL

Example table of data categories and purposes

Collection and processing of personal data of children and adolescents

Duration of the processing of personal data

How to exercise your rights

Your privacy is important to us. The purpose of this Privacy and Data Protection Policy is to demonstrate, with clarity and transparency, how VIA BRASIL COMÉRCIO ATACADISTA DE PRODUTOS DE EXPLORAÇÃO MINERAL LTDA ("VIA BRASIL" or "Company") collects, uses, stores, shares and protects personal data of customers, suppliers, third parties, representatives, financial institutions, foreign buyers and business partners, as well as its employees and other stakeholders with whom it maintains a contractual relationship and commercial.

VIA BRASIL is committed to respecting your privacy in relation to any information that we may collect and process. The data subject is free to refuse our request for personal information, aware that such refusal may prevent or limit the conclusion or performance of contracts, compliance with legal and regulatory obligations, including related to registration processes, "Know Your Customer" (KYC), anti-money laundering (AML), combating the financing of terrorism and compliance with sanctions.

We request personal information only when it is really necessary for compliance with current legislation, for the execution of contracts, for the adoption of pre-contractual measures at the request of the data subject, for compliance with internal integrity, compliance and risk management policies, or based on legitimate interest duly assessed.

Legal bases for processing

VIA BRASIL processes the personal data entrusted to it, by fair and legal means, with the knowledge of the holder, as specified below:

- To comply with a legal or regulatory obligation;
- For the regular exercise of rights in judicial, administrative or arbitration proceedings;
- Upon the provision of consent by the data subject, when the applicable legal basis is consent and there is no other more appropriate basis;
- For the execution of a contract or preliminary procedures related to a contract to which the data subject is a party, at the request of the data subject;

- To comply with legal and regulatory obligations related to the prevention of money laundering, combating the financing of terrorism, combating corruption, compliance with economic and trade sanctions, fraud prevention, "know your customer/supplier" (KYC/KYB) and reporting duties to competent authorities, in Brazil and abroad;
- For the execution of public policies provided for in laws and regulations or supported by contracts, agreements or similar instruments;
- For the protection of the life or physical safety of the holder or third parties;
- When necessary to meet the legitimate interests of VIA BRASIL, as a controller, including for security purposes, fraud prevention, credit protection, counterparty risk analysis, integrity assessment of business partners, internal and external audits, provided that the fundamental rights and freedoms of the holder are respected.

VIA BRASIL assumes as an institutional commitment the periodic evaluation of the purposes of its processing operations, considering the context in which these operations are inserted, the risks and benefits that may be generated for the holder of personal data, and the legitimate interest of the company.

The records of personal data processing operations may be consulted by the data subject, as well as by public authorities competent for the access and retention of data on their behalf, safeguarding the rights of the personal data subject.

Processing of sensitive personal data and data of children and adolescents

VIA BRASIL recognizes that the processing of sensitive personal data represents preponderant risks to the holder and, for this reason, is committed to always safeguarding them, in compliance with the best protection practices, notably through its risk governance and compliance.

Pursuant to article 5 of Law No. 13,709/2018 (LGPD), sensitive data is that which refers to racial or ethnic origin, religious conviction, political opinion, union membership or religious, philosophical, or political organization, data related to health or sex life, genetic or biometric data.

In this line, anchored in the governance policy and good management practices, we understand that personal data of children and adolescents will be treated with the same level of care required and offered to sensitive personal data, since, in addition to adapting to the LGPD, the purpose provided for in Law No. 8,069/1990 (Statute of the Child and Adolescent) is thus fulfilled.

Therefore, the processing of sensitive personal data by VIA BRASIL may only be carried out:

- Upon the provision of specific consent for this purpose by the holder or their legal guardian, when applicable;
- To comply with a legal or regulatory obligation by VIA BRASIL;
- For the protection of the life or physical safety of the holder or third parties;
- For the regular exercise of rights in judicial, administrative or arbitration proceedings;



- For the execution of public policies provided for in laws and regulations or supported by contracts, agreements or similar instruments;
- To comply with legal obligations in labor, social security, health and safety matters, as well as integrity, prevention of discrimination, inclusion and diversity, when applicable.

Definitions

For the purposes of this Policy, the definitions of the LGPD apply, whenever applicable, and, when processing personal data subject to European legislation, also the definitions of Regulation (EU) 2016/679 (General Data Protection Regulation – "GDPR").

General Data Protection Law (Law No. 13,709/2018): regulates the processing of personal data, including in digital media, by an individual or by a legal entity governed by public or private law, with the objective of protecting the fundamental rights of freedom and privacy and the free development of the personality of the natural person.

Processing Agents: are those responsible for the processing of personal data and are separated into two categories: the Controller and the Operator. The Controller is the person or company responsible for decisions regarding the processing of personal data. The Operator, in turn, is the person or company that processes personal data on behalf of the Controller, following its instructions.

Anonymization: a technique through which a piece of data loses the possibility of direct or indirect association with an individual, so that it is later impossible to re-identify, even by technical solutions.

National Data Protection Authority (ANPD): a federal public administration body with attributions related to the protection of personal data and privacy, including inspection for compliance with the LGPD.

Cookies: small files containing a string of characters, created and sent by websites to your computer or device whenever you visit them. They help you remember your preferences and personalize your access, making your browsing safer, faster, and more enjoyable. You can set your browser not to accept cookies or to warn you when a cookie is being sent, but without them, some features of the website may be compromised and limited. Additional information about the use of cookies may be contained in a specific notice on our website.

Personal Data: information related to an identified or identifiable natural person, such as name, address, identity documents in general, CPF, RG, telephone, e-mail, professional identification data, bank details, geolocation data, among others.

Sensitive Data: personal data on 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 or sex life, genetic or biometric data, when linked to a natural person.

Device: device that can be used by the holder to browse the internet, as well as access the VIA BRASIL website in all available options, such as desktop computers, tablets and smartphones.

VIA BRASIL

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PRODUTOS DE EXTRAÇÃO MINERAL LTDA
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Data Protection Officer (DPO): responsible for ensuring that VIA BRASIL complies with privacy laws and regulations, ensuring the protection of personal data and serving as a communication interface with the ANPD, other data protection authorities and data subjects.

IP address: The number assigned to each device connected to the Internet, known as an Internet Protocol (IP) address.

Geolocation: a feature that, when activated by the holder, allows you to define the precise or approximate position of a device, bringing information such as country, state, city and street where this device is located, as well as the date and time of access.

Data Subject: any identified or identifiable natural person to whom the personal data processed refers. These are, for example, our customers, potential customers, employees, third parties, service providers, job applicants, representatives, contacts at financial institutions, foreign buyers, and business partners.

Processing: any operation carried out with personal data, by automated means or not, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, storage, filing, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

Rights of data subjects

The LGPD confers certain rights on individuals, related to their respective personal data. When applicable, VIA BRASIL will also observe the rights provided for in the GDPR in relation to data subjects located in the European Union or the European Economic Area.

As provided for in the terms of the applicable legislation and unless limited by it, VIA BRASIL respects the rights related to privacy and data protection, which include:

- Right to confirmation of the existence of processing;
- Right of access to data, as long as requested by the holder himself;
- Right to correction of incomplete, inaccurate or outdated data;
- Right to anonymization, blocking or deletion of unnecessary, excessive or processed data in violation of the Law;
- Right to guarantee the availability, authenticity, integrity and confidentiality of data;
- Right to be notified of material changes in data processing;
- Right not to be subjected to automated decisions solely based on automated processing of personal data, including profiling, when such decisions affect your interests;
- Right to restrict/oppose data processing, in cases where the processing is based on legitimate interest or another hypothesis that admits opposition;
- Right to restrict data processing, in the cases provided for by law;
- Right to the deletion of personal data processed based on consent, except in the cases of legal custody and others provided for by law;
- Right to information of public and private entities with which VIA BRASIL has shared data;
- Right to information about the possibility of not providing consent and about the consequences of refusal;

- Right to revoke consent, under the terms of the Law.

The holder of personal data may, at any time, request VIA BRASIL to exercise any of these rights. The interest in exercising such rights must be communicated to the Data Processing Officer of VIA BRASIL, whose contact information is:

Person in charge (DPO): FABIO GUILHERME L MARTINELLI

Email: lawpro@viabrasil1.com

About the information processed by VIA BRASIL

VIA BRASIL is zealous and responsible in the processing of personal data and reiterates its commitment through this Privacy Policy. The data that is collected and processed by VIA BRASIL may be, but is not limited to, those informed below, including in the context of registration, qualification and evaluation processes of customers, suppliers, third parties, representatives, financial institutions, foreign buyers and business partners for KYC, AML, sanctions, integrity and audit purposes:

- Name, CPF, RG, registration number in a class council body, diploma, photo, biometrics, signature, date of birth, place of birth, nationality, affiliation;
- Address, telephone number, e-mail, professional and position/function data, history of business relationship with VIA BRASIL;
- Bank details, financial information, credit and risk data, information on corporate structure and ultimate beneficiary of legal entities, when necessary for KYC, anti-money laundering, sanctions and integrity assessment purposes;
- Data relating to possible sanctions lists, Politically Exposed Persons (PEP) and other restrictive lists, obtained from public sources, third-party databases and specialized providers, always in accordance with applicable legislation.

VIA BRASIL processes sensitive personal data, especially when new employees are hired, whether direct or indirect, in the format established by the CLT or as a legal entity, including, but not limited to: Name, address, telephone, e-mail, CPF, RG, PIS/PASEP, registration number in class council, diploma, photo, bank details, biometrics, signature, health information, union membership, financial information, religious option, sexual orientation/gender, data of minors, date of birth, place of birth, nationality, affiliation, ethnic self-declaration, marital status, voter registration, reservist certificate, political party membership, CNH, criminal record, CTPS, electoral discharge certificate, strictly observing the applicable legal and regulatory requirements and the principle of data minimization.

VIA BRASIL also processes personal data of outsourced employees, interns and apprentice minors, in accordance with the agreements and service contracts, under the terms of the legislation.

VIA BRASIL also processes personal data and so-called special data, such as the geolocation of institutional vehicles referring to drivers:

- Name, address, telephone, e-mail, CPF, RG, PIS/PASEP, CNH, photo, signature, geolocation, health information, date of birth, place of birth, nationality, affiliation.

The verification and confirmation of personal data may, at VIA BRASIL's discretion, be done by third-party companies, which will respect the same security and privacy criteria set forth herein, and this obligation is safeguarded by a mandatory contractual clause established between the parties.

The data subject will be solely and exclusively responsible for the quality and veracity of the personal data provided or collected by VIA BRASIL. The company has no responsibility for the veracity of the data provided, as well as for any damages resulting from the inaccuracy and/or outdated information, and the holder is exclusively responsible for the veracity of the information that is passed on, under penalty of incurring the sanctions provided for in article 299 of the Brazilian Penal Code.

Example table of data categories and purposes

Without prejudice to the purposes set out above, the table below informs, in an illustrative and non-exhaustive way, some of the personal data we process and the purpose of its processing:

Category: Employees, service providers and representatives (direct or indirect hiring / CLT or legal entity)	Examples of data: Name, address, telephone, e-mail, CPF, RG, class council registration number, diploma, photo, bank details, signature, financial information, date of birth, place of birth, sexual orientation or gender, nationality, filiation, marital status, voter registration, reservist certificate, CNH, CTPS, articles of association, access logs.	Purposes: • Compliance with legal requirement / CLT, LGPD; • Execution of employment contracts or provision of services; • Management of benefits, payroll, occupational health and safety; • Access controls, physical and logical security, fraud prevention, internal investigations and audits.
Category: Indoor and outdoor audiences / any visitor to the facility	Examples of data: Images captured by CCTV system, name, RG, CPF, vehicle license plate, entry and exit records.	Purpose: • Legitimate interest of the controller/VIA BRASIL for property security, incident prevention, protection of people and property.
Category: Customers, Suppliers, Third Parties, Representatives, Financial Institutions, Foreign Buyers, and Business Partners	Examples of data: Name, CPF, RG, bank details, e-mail, telephone, signature, address, financial information, photo, date of birth, registration number in class council, place of birth,	Purposes: • Contract execution and adoption of pre-contractual measures; • Registration, qualification, due diligence and continuous monitoring (KYC/KYB);

	nationality, articles of association, data of legal representatives and attorneys-in-fact, information on corporate structure and final beneficiaries, contact data in financial institutions, information obtained from sanctions lists, PEP, negative media databases and other providers of information from risk.	• Compliance with legal and regulatory obligations to prevent money laundering, combating the financing of terrorism, anti-corruption and sanctions; • Audit / Compliance; • Management of commercial relationship, billing, collection, credit and counterparty risk management; • Responding to requests from authorities, including those from other countries, when applicable.
Category: Undergraduate students, interns and minor apprentices	Examples of data: Name, address, telephone, e-mail, CPF, RG, school/graduation statement, photo, bank details, signature, financial information, date of birth, place of birth, nationality, affiliation, marital status, voter registration, reservist certificate, driver's license, data related to academic and professional performance, when necessary.	Purposes: • By means of a consent form, when required; • Compliance with legal requirement / CLT, LGPD; • Contract execution; • Management of internship and apprenticeship programs, control of working hours and benefits.

Collection and processing of personal data of children and adolescents

In the event that it is necessary to process personal data of children and/or adolescents, for any purpose, we will request the specific and prominent consent of at least one of the parents or legal guardian of the data subject, when required by law.

VIA BRASIL has internal procedures and technologies (example: two-step confirmation) to assist in verifying the powers of the legal guardian, thus seeking to ensure the validity of the consent.

After valid consent, when required, the collection and processing of personal data of children and/or adolescents is done following the rules detailed in this Policy, respecting the provisions of article 14 of the LGPD.

Duration of the processing of personal data

The period of processing of your personal data by VIA BRASIL will vary according to the purposes of the processing and the applicable contractual and legal provisions. Some personal data are kept permanently or for long term, under the terms of current legislation, notably labor, tax, corporate and prevention of money laundering and sanctions.

Thus, personal data will be deleted or anonymized by VIA BRASIL, except if its storage must be done due to legal or regulatory obligation, when the purpose for which the information was collected is achieved or when the personal data are no longer necessary or relevant for the achievement of this purpose, when there is revocation of consent, or upon determination of a competent authority.

How to exercise your rights

You may exercise your rights under the LGPD (and, where applicable, the GDPR) by contacting the Data Protection Officer:

Person in charge (DPO): FABIO GUILHERME L MARTINELLI
Email: lawpro@viabrasil1.com

You will receive a response within a maximum of 2 (two) business days from the date of your request.

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