

PRIVACY GOVERNANCE

Privacy and Personal Data Protection Policy

Transparency, purpose limitation, security, and respect for data subjects' rights.

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PRIVACY CHANNEL

privacidade@tectril.com.br

TECTRIL SOLUÇÕES EM LOGÍSTICA E COMÉRCIO LTDA.

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Introduction

Tectril Soluções em Logística e Comércio Ltda. (“Tectril”) recognizes the importance of privacy and personal data protection. This Policy transparently explains how Tectril may collect, use, share, store, protect, and delete personal data in its institutional, commercial, operational, and digital relationships.

Personal data will be processed in accordance with Brazilian Law No. 13,709/2018 — the Brazilian General Data Protection Law (“LGPD”) — and other applicable rules. This Policy should be read together with the Cookie Policy, Terms of Use, specific privacy notices, and applicable agreements, where available.

1. Purpose

This Policy is intended to clearly inform data subjects, in accessible language, about:

- the categories of personal data Tectril may process;
- how and why such data may be used;
- with whom the data may be shared;
- how long the data may be retained;
- the security and governance measures adopted;
- data subjects’ rights and how to exercise them.

2. Scope

This Policy applies to personal data processing related to Tectril websites, institutional pages, forms, communications, service channels, business relationships, and activities that refer to this document.

It may cover data relating to website visitors, representatives of clients and prospective clients, suppliers, partners, service providers, applicants, professionals, authorities, event participants, and other individuals who interact with Tectril.

Operations, platforms, or channels involving specific risks, purposes, or audiences may have their own privacy notices. In such cases, the specific notice supplements this Policy and prevails with respect to the processing it describes.

3. Who Processes Personal Data

Tectril Soluções em Logística e Comércio Ltda. will act as controller when it decides the purposes and essential means of personal data processing.

For certain client services, Tectril may act as a processor, processing personal data on behalf of and under the lawful instructions of the relevant client. In that case, the client is responsible for decisions inherent to the controller, without prejudice to Tectril’s legal and contractual obligations.

For privacy and personal data protection matters, data subjects may contact: privacidade@tectril.com.br.

4. Personal Data We May Process

Depending on the relationship and applicable purpose, Tectril may process the following categories of data:

Identification and contact data: name, position, company, email, telephone number, business address, and other information required for the relationship.

Communication data: content of messages, requests, submitted documents, and service history.

Professional and business data: role, field of activity, business interests, proposal, contract and meeting information, and relationship with the represented organization.

Operational and documentary data: information related to foreign trade, logistics, supply chain and compliance operations, customs, tax and commercial documents, and operational evidence, when required to provide services.

Technical and browsing data: IP address, access date and time, pages visited, browser type, device, security logs, and technical identifiers, according to website and cookie settings.

Financial and registration data: information required for registration, billing, payments, fraud prevention, risk analysis, and compliance with legal obligations.

Applicant and professional data: résumé, education, experience, contact details, and other information voluntarily submitted in a recruitment process, if and when such a channel is made available.

4.1. Sensitive Personal Data

Tectril does not intend to collect sensitive personal data through its general contact form. If such data is required for a specific relationship, processing will be restricted, proportionate, secure, and supported by an applicable legal basis.

Data subjects should not enter sensitive information or third-party personal data that is unnecessary for the requested service in the free-text message field.

4.2. Children's and Adolescents' Data

Tectril's institutional and business channels are not directed at children. Tectril does not intentionally seek to collect children's or adolescents' personal data through the website. If incompatible processing is identified, Tectril will take appropriate measures, observing the data subject's best interests and applicable law.

5. How Personal Data May Be Collected

Personal data may be obtained:

- directly from the data subject through a form, email, telephone, WhatsApp, meeting, proposal, contract, or other contact;
- from the organization represented by the data subject, such as a client, supplier, partner, or employer;
- from legitimate third parties involved in an operation, subject to applicable responsibilities;

- from public sources and official databases, where necessary and permitted;
- automatically through technical logs, cookies, and similar technologies, according to current website settings;
- from documents and systems used to perform and control contracted services.

6. Purposes and Legal Bases

Tectril will process personal data only for legitimate, specific purposes compatible with the relevant context. The legal basis will be determined for each activity and may include performance of a contract or preliminary procedures, compliance with a legal or regulatory obligation, regular exercise of rights, legitimate interests, credit protection, and consent, where applicable.

Purpose	Examples of Use	Potential Legal Bases
Service and relationship	Receive, review, route, and respond to contacts.	Preliminary procedures; contract; legitimate interests.
Proposals and services	Prepare proposals and contract, perform, control, and close services.	Preliminary procedures; contract; legal obligation.
Governance and compliance	Perform controls, audits, due diligence, investigations, and risk management.	Legal obligation; legitimate interests; regular exercise of rights.
Operations and documentation	Manage logistics, customs, tax, financial, and documentary flows.	Contract; legal or regulatory obligation; regular exercise of rights.
Security and prevention	Protect environments, accounts, records, and assets and prevent fraud or incidents.	Legitimate interests; legal obligation; regular exercise of rights.
Institutional communication	Send responses, information related to an existing relationship, and compatible communications.	Contract; legitimate interests; consent, where necessary.
Legal compliance	Respond to authorities, retain records, and comply with orders.	Legal or regulatory obligation; regular exercise of rights.

6.1. Consent

Where consent is the applicable legal basis, it will be requested freely, knowingly, and unambiguously for a specified purpose. Consent may be withdrawn through the indicated means, without affecting the lawfulness of prior processing or processing supported by another legal basis.

6.2. Legitimate Interests

When relying on legitimate interests, Tectril will assess the purpose, necessity, the data subject's legitimate expectations, and appropriate safeguards. Processing will not rely on legitimate interests where incompatible fundamental rights and freedoms prevail.

7. Contact Form and Channels

The contact form may request a name, company, business email, telephone or WhatsApp number, area of interest, and message. This data will be used to review and route the request, respond to the

contact, assess a potential business or institutional relationship, and maintain necessary service records.

Submitting the form does not automatically authorize unrelated promotional communications. If Tectril implements a newsletter or consent-based campaigns, subscription will be presented separately, on an optional basis, with an unsubscribe mechanism.

Service may also be provided by email, telephone, WhatsApp, or LinkedIn. When using third-party platforms, data subjects should review the relevant privacy policies because those providers conduct their own processing.

8. Cookies and Similar Technologies

Cookies are small files or identifiers used to enable functionality, enhance security, remember preferences, and, when configured, understand website usage.

Tectril may use strictly necessary cookies and, subject to appropriate configuration and legal basis, functional, analytics, or third-party cookies. Details concerning categories, duration, providers, and user choices will be maintained in the Cookie Policy and the preference mechanism available on the website.

Until a particular tool has actually been implemented, this Policy should not be construed as stating that it is in use. Tectril will update applicable notices when new technologies affecting personal data are enabled.

9. Sharing Personal Data

Tectril may share personal data, to the extent necessary, with:

- hosting, technology, security, communication, service, and support providers;
- consultants, advisers, auditors, law firms, and specialist service providers;
- clients, operating partners, carriers, agents, customs brokers, and other authorized participants in an operation;
- financial institutions, insurers, and payment providers, where applicable;
- administrative, tax, customs, regulatory, law-enforcement, or judicial authorities, where required or legitimately necessary;
- potential successors in a corporate reorganization, subject to data subjects' rights and applicable safeguards.

Tectril does not sell personal data. Recipients should receive only the data required for the relevant purpose and will be subject to applicable legal, contractual, and security obligations.

10. Processors, Suppliers, and Third Parties

Suppliers processing personal data on Tectril's behalf must act under lawful instructions, defined purposes, confidentiality duties, security requirements, and contractual obligations consistent with applicable law.

Tectril may assess suppliers in proportion to risk, require evidence of compliance, control relevant subcontracting, and take corrective action where noncompliance is identified.

11. International Transfers

Some suppliers, partners, clients, or systems involved in international operations may be located outside Brazil or use foreign infrastructure. In such situations, Tectril will adopt mechanisms and safeguards permitted by the LGPD and regulations issued by the Brazilian National Data Protection Authority, as applicable.

International transfers will be limited to what is required for the legitimate purpose and may rely, as appropriate, on an adequacy decision, contractual clauses, standard contractual clauses, global corporate rules, specific consent, or another valid legal mechanism.

12. Retention and Deletion

Personal data will be retained for the period required to fulfill the stated purposes and meet legal, regulatory, contractual, audit, security, fraud prevention, and regular exercise-of-rights requirements.

Retention periods may vary according to the data category, relationship, document, service, and associated risks. Once the need ends, data will be deleted, anonymized, or retained on a restricted basis where a legal ground supports retention.

13. Information Security and Data Protection

Tectril adopts technical, administrative, and organizational measures appropriate to the nature of the data, processing context, and reasonably identified risks. These measures may include:

- access control and the principle of least privilege;
- credential and authentication management;
- protection of devices, systems, networks, and backups;
- logging, monitoring, and vulnerability management;
- confidentiality and contractual obligations;
- training, awareness, and internal procedures;
- incident management, continuity, and recovery;
- proportionate assessment of suppliers and operations.

No environment is completely immune to risk. Tectril will review its safeguards in proportion to evolving threats, services, and legal requirements.

14. Security Incidents

Upon identifying an incident that may affect personal data, Tectril will take steps to contain, investigate, mitigate, document, and prevent recurrence. Where legal requirements are met, Tectril will notify the Brazilian National Data Protection Authority and affected data subjects within the applicable regulatory periods and conditions.

Suppliers and partners must notify Tectril without undue delay of events or suspicions involving personal data processed within the relevant relationship, in accordance with contract and law.

15. Data Subject Rights

Under the LGPD, and as applicable to the specific case, a data subject may request:

- confirmation that processing exists;
- access to personal data;
- correction of incomplete, inaccurate, or outdated data;
- anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- portability, subject to regulations and trade and industrial secrets;
- information about sharing;
- information on the option not to provide consent and the consequences;
- withdrawal of consent;
- deletion of data processed on the basis of consent, subject to lawful retention exceptions;
- objection to unlawful processing;
- review of decisions made solely through automated processing, where applicable;
- petitioning the Brazilian National Data Protection Authority and other competent bodies.

16. How to Exercise Your Rights

Personal-data requests should be sent to privacidade@tectril.com.br, preferably with the subject line “Privacy — Data Subject Request.”

To protect the data subject and prevent improper disclosure, Tectril may request reasonable information to confirm identity and the legitimacy of the request. Only the elements required for verification will be collected.

Tectril will review and respond to the request within applicable time limits. Certain requests may be restricted or denied where there is a legal retention obligation, a need to protect third-party rights, trade or industrial secrets, the regular exercise of rights, or another lawful justification. Where possible, the response will state the applicable grounds.

17. Automated Decisions

Tectril does not currently report using, in its institutional contact channels, decisions made solely through automated processing that produce legal effects or significantly affect a data subject. If such a practice is implemented, this Policy or a specific notice will be updated, and rights under the LGPD will be respected.

18. Third-Party Links and Services

The website may contain links to WhatsApp, LinkedIn, and other external environments. Tectril does not fully control these third parties' privacy practices. When accessing such services, users are subject to the relevant provider's terms and policies.

External resources, such as fonts, images, videos, maps, security tools, or analytics tools, should be enabled in the production environment only after technical and privacy assessment appropriate to their purpose.

19. Data Subject Responsibilities

Data subjects should provide accurate, current, and necessary data, protect their credentials where applicable, and avoid submitting excessive, unlawful, confidential, or third-party information without authorization or an appropriate basis.

If a data subject provides another person's data, the data subject represents that there is a legitimate basis to do so and must inform that person of the processing when required.

20. Changes to This Policy

This Policy may be updated to reflect legal, regulatory, technological, operational, or service changes. The current version will indicate its issue or update date and will be made available through the appropriate institutional channel.

Material changes may be communicated through a prominent website notice or by another means appropriate to the relationship with the data subject.

21. Applicable Law

This Policy will be interpreted under Brazilian law, particularly the LGPD, the Brazilian Internet Civil Framework, and regulations issued by the Brazilian National Data Protection Authority, without prejudice to other rules applicable to the activity or specific relationship.

22. Privacy Channel

Questions, requests, and communications concerning privacy and personal data protection may be sent to:

ORGANIZATION

Tectril Soluções em Logística e Comércio Ltda.

EMAIL

privacidade@tectril.com.br

Primary Legal References

- Brazilian Law No. 13,709/2018 — Brazilian General Data Protection Law (LGPD), as amended.
- Brazilian Law No. 12,965/2014 — Brazilian Internet Civil Framework and applicable regulations.
- Current regulations and guidance issued by the Brazilian National Data Protection Authority regarding processing agents, the data protection officer, data subject rights, security incidents, and international transfers.

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