	Privacy Notice and Personal Data Protection for Customers and Suppliers		
	Type: Institutional Policy		Version: 3
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1. Introduction

As a Data Controller and as responsible for the processing of your personal data, Sencinet respects your privacy and is committed to complying with the requirements of national and international laws on the privacy and protection of personal data that may apply to you, as well as to this document, which describes how we treat your personal data, your rights and the means you have to seek information.

Sencinet undertakes to process information legally classified as Personal Data in compliance with applicable legislation, including, but not limited to, Federal Law 13.709/2018 (Brazil's General Data Protection Law), General Data Protection Regulation (GDPR), Law 1581/2012 (Colombia), Law 25.326 (Argentina), Mexico General Law on Protection of Personal Data Held by Mandated Parties ('the Public Sector Law'), Law 29.733 (Peru), and Law 19.628 (Chile).

1.1. Our responsibility

Whether you are a customer, supplier, Sencinet partner, or just a visitor to our Portal, we will act as the "controller" of your personal data whenever we collect it. And what does that mean? It means that we determine the form and purpose to use your personal data.

In addition, we need to clarify what your rights are and offer you the appropriate means to exercise them. Therefore, below you already find the contact channel with the Data Protection Officer of Sencinet.

As Personal Data Processing Operator, will carry out the Processing of Personal Data solely to achieve the Purposes delimited by the Terms of Use, contracts and/or other documents that regulate the relationship between Sencinet and its customers.

When in the position of Operator, Sencinet has the right to refuse, upon formal and written notification, any operation ordered by a Controller, which implies the Processing of Personal Data in non-compliance with the rules for the protection of Personal Data in force.

1.2. Data Protection Officer


You can contact our Data Protection Officer to request your rights, request information and clarify questions.

Contact Email: dpo@sencinet.com

1.3. Your responsibility

- Read this document, because it is linked to your rights in the face of the activities of processing personal data; and
- If you are our customer, partner or contractor, please also check our contractual instrument, which may contain information and details about how we treat your personal data; and
- In the event that you provide us with personal data from third parties, or in the event that third parties provide us with your personal data, we will only use it for the specific reason why such data was provided. We remind you that you are

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solely responsible for (i) ensuring, prior to the provision of third party data to Sencinet, the legality of the sharing, (ii) for informing the third party of the terms of this Policy and (iii) for holding Sencinet from liability relating to the lack of information and/or consent of the third party;

- By providing your personal information, you authorize us to process it in accordance with this Policy and applicable law.

2. When and how we collect your personal data

Personal data is any information that may identify you or make you identifiable, directly or indirectly. Therefore, Sencinet in the context of providing its services and products, developing business activities and/or complying with legal obligations may perform processing of personal data. Regarding the way in which the collection of your personal data is performed, it stands out, among others:

- **When you interact with us**

We collect personal data when you show interest in our services and/or products, seek information about our company, participate in promotions or other marketing activities, or when you contact us to resolve questions, submit any questions and/or send us your suggestions.

- **When you browse our Portal**

We collect personal data when you browse our Portal to statistically understand the most visited pages and identify possible needs for improvements on our website. To learn about your browsing habits and show you advertising targeted to your profile.

- **When we provide our services or provide products**

When you request any of our services and/or products, we will collect personal data to meet you efficiently and targeted to your needs. If you are our supplier, or service provider, we will sometimes need to process personal data to perform our contract.

- **When you apply to work with us in one of our available vacancies**

We collect data about you when you apply to work with us in one of our available vacancies.

3. Why do we use personal data?

The General Law on the Protection of Personal Data tells us that we can only use your data for certain reasons and, for this, we will always be protected by a legal basis for our activity. Here are the reasons why we process your data:


When you browse our Portal

We collect personal data when you browse our Portal to statistically understand the most visited pages and identify possible needs for improvements on our website. To learn about your browsing habits and show you advertising targeted to your profile.

Legal Base

Legitimate Interest

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To manage our contractual relationship

For the purpose of managing our contractual relationship, Sencinet may process your personal data, always with the purpose of: (i) managing and monitoring our contractual relationship, (ii) meeting our customers' requests with respect to a request, (iii) monitoring deliveries and equipment in perfect condition to our customers, (iv) controlling carrier cargo deliveries.

Legal Base	Contract Execution
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When we request data from our suppliers

Sometimes we need to obtain data from our suppliers to obtain the release of professionals to provide face-to-face service on Customer sites and Sencinet sites. Such data is collected and will always be processed for the purpose of complying with our contract.

Legal Base	Contract Execution
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Import and export in operations involving Foreign Trade

When we need to update the system for operations involving Foreign Trade, we will collect and process personal data to comply with our legal obligation to keep the information up to date and obtain authorization for the operation.

Legal Base	Legal and/or Regulatory Obligation
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Release of access to Sencinet's points of presence

When you intend to visit our points of presence, we control access for security and prevention reasons and therefore we will need to collect personal data.

Legal Base	Fraud Prevention and Data Subject Safety
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To perform integrity assessment

We will process personal data for analysis of information security, privacy and protection requirements of the company's personal data and integrity with which we relate, as well as its partners.


Legal Base	Legitimate Interest
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Conduct satisfaction survey with our customers

It is in our interest to know how to collect feedback from our customers about our activities. For this, in order to know the opinion of our customers, we conduct satisfaction surveys. We will collect your consent when we want to post your feedback on our Portal.

Legal Base	Legitimate Interest	Consent
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When you apply to work with us in one of our available vacancies

We collect data about you when you apply to work with us in one of our available vacancies, including for the purpose of validating the information you provide us in an eventual interview for our vacancies. We will maintain a base of resumes for any and future vacancies that may be of interest to you.

Legal Base

Contract Execution

3.1. But after all, what are legal bases?

Contract

Data processing is necessary for the performance of a contractual instrument you have with us, such as to deliver our services, products to you or to comply with our contractual obligations, we receive from you services, products and/or other things arising from our contractual relationship, for pre-contractual negotiations as in the event that you are a candidate for one of our available vacancies.

Legitimate Interest

The legitimate interest is valid when the processing of your data is necessary to meet the legitimate interests of Sencinet, such as to support and promote our activities. This legal basis will only be valid when our legitimate interests are not exceeded by your rights.

Legitimate interests may involve the following processing activities:

- Get information about your behavior in our site;
- Develop marketing campaigns tailored to you, according to your expectations;
- Send you news about our activities;
- Measure your satisfaction, through research, with respect to the services provided.

Consent

When we collect the free manifestation by which the data subject agrees to the processing of your personal data for a particular purpose, such as in the case in which case we request your consent to publish your comments with respect to the performance of our services.


Legal and/or Regulatory Obligation and Exercise of Rights

When the data processing activity is necessary to comply with the obligations provided for by law or in standards that regulate our activities.

4. Your choices and rights

You have control over your information, and may oppose the operations with your personal data, including with respect to the data used for marketing purposes, by "opting out" of any distribution list we may use to reach you. We guarantee that your choice will be preserved.

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You can also oppose to the use of your personal information for the purpose of improving our services and products by sending an email to: **dpo@sencinet.com**

With respect to your rights, you can exercise them through our Contact Channel with the Data Protection Officer by sending an email to: **dpo@sencinet.com**

You have the right to confirm whether or not we treat your personal information. If so, you may require access to your personal information, as well as additional information about personal data processing activities, such as:

- categories of personal data processed about you;
- the purposes of the activities of processing personal data;
- retention periods of personal information;
- and other issues that may clarify data processing activities.

We remind you that in the event of your request, you must prove your identity, presenting your identification document or, in the case of a legal representative, accompanied by a representative instrument with a notarized certificate or certified by means of a digital certificate. In addition, your demand will be answered within 15 (fifteen) calendar days, counted from the date of receipt of your application (or if there is a higher term permitted by applicable law within this).

4.1. Brazil's General Data Protection Law (LGPD)

Under the scope of LGPD, you, as a Data Owner, have the right to:

Right to be Informed

The LGDP specifies that data subjects have the right of access to information concerning the data processing of their personal data (Article 9 of the LGPD).

Confirmation and Access

Confirmation of the existence or not of activities of processing personal data related to your personal data and access them.

Rectification

You have the right to request the correction and rectification of any inaccurate, incorrect or outdated personal data about you.

Opposition


You may oppose to the processing of personal data performed, based on one of the hypotheses of dispensation of consent.

You have the right to request the reconsideration of decisions taken solely on the basis of Automated Processing of personal data and that affect your interests; and

oppose the Processing of data that, perchance, has been undertaken in disagreement with the law.

Withdrawal of Consent

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You may revoke consents that may be granted. This will make it impossible for us to continue performing operations with your personal data. However, operations carried out up to the date of revocation will remain valid.

Portability

You can also request the portability of your personal data to another organization. In this case, we will send a copy in CSV so that you can provide them to those rightful. If you request it from us, and it is technically possible, we will transfer your personal information to you. However, we will not do so if portability involves personal data of third parties other than you, being the exclusive request of the data subject.

Exclusion

You have the right to request the deletion of your personal data held by Sencinet, where your data is no longer needed or if it is too data for the established purposes.

Petition

You can file a complaint with the National Personal Data Protection Authority or consumer protection agencies. However, we ask you to contact us in advance in an attempt to resolve your demand.

4.2. GDPR and UK GDPR

Under the scope of the GDPR and UK GDPR, you, as a Data Owner, have the right to:

Right to be Informed

The Act provides adaptations and restrictions regarding the provision of information in Schedules 2 (Parts 1-2, 4-5) and Schedule 3 of the Act.

Confirmation and Access

Confirmation of the existence or not of activities of processing personal data related to your personal data and access them.

Rectification

You have the right to rectify incorrect Personal Data, or complement incomplete data, according to the Purpose of Processing.

Opposition

You have the right to object to the Processing of your Personal Data, since Sencinet does not have a legitimate interest that overlaps. If You oppose the Processing of data for direct marketing purposes, your Personal Data will no longer be processed for this Purpose.


If your Personal Data is subject to solely automated decisions that affect your interests, you may object to this Processing, unless it is necessary to fulfill a contract with you, comply with legal obligations or based on your consent.

Withdrawal of Consent

If the process is based on your consent, you can revoke it.

Portability

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You have the right to request the portability of your Personal Data.

Exclusion

You have the right to request deletion of your Personal Data, in cases where: (i) they are no longer necessary for the Purpose that justifies their Processing; (ii) the Processing is based on your consent, and you revoke it; (iii) you object to the Processing, as long as Sencinet does not have an overlapping legitimate interest; (iv) the Processing is contrary to law; or (v) the exclusion is necessary to fulfill a legal obligation.

Petition

You have the right of petition to your country's data protection authority (or the Information Commissioner's Office in the UK's case) if you have concerns about how we handle your Personal Data.

4.3. Law 1581/2012 (Colombia)

Under the scope of the Law 1581/2012, you, as a Data Owner, have the right to:

Right to be Informed

Article 8 of the Data Protection Law provides for the data subject's right to be informed by data controllers or data processors about the use of their personal data.

Right to Access

Article 8 of the Data Protection Law provides for the data subjects have the right to freely access their personal data that has been processed. For queries whose frequency is greater than one per calendar month, the data controller may charge only the shipping costs, reproduction and, where applicable, certification of documents. Reproduction costs may not be higher than the recovery costs.

Right to Rectification

Article 8 of the Data Protection Law provides for the data subject's right to know, update, and amend their personal data held by the data controller or data processor. The situations where this right may be exercised include when there is partial, inaccurate, incomplete, or misleading data, or data whose processing is expressly prohibited or has not been authorized.


Right to Erasure

Article 8 of the Data Protection Law provides for the data subject's right to revoke authorization and/or request the deletion of data when processing is not compliant with principles, rights, and constitutional guarantees. The revocation and/or deletion shall proceed when the SIC determines that the processing by the data controller or data processor was contrary to the law and the Constitution.

Right to Object/Opt-Out

The data protection and privacy laws in Colombia provide data subjects with the right to object to the processing of their personal data. However, the right to opt-out is not applicable since blanket consents or opt-out mechanisms are not considered valid as the Courts have considered that these methods do not reflect an express decision that can

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evidence the data subject's intention and choice. In theory, data subjects do not have the right to opt-out because opt-out consents should not be used.

Right to Data Portability

The legal rights of a data subject do not impose on the data controller (or its processors) an express obligation to provide the data on a specific format although the data must be easily accessible and comprehensible to the user. Data portability in Colombia is understood as access rights.

Other Rights

Article 8 of the Data Protection Law provides for the data subject's right to:

To request evidence of the consent granted to the data controller, except when consent is not required for the processing.

Petition

You have the right to submit to the SIC claims for violations of the provisions contained in the Data Protection Law and other rules that modify, amend, or complement it.

4.4. Law 25.326 (Argentina)

Under the scope of the Law 25.326, you, as a Data Owner, have the right to:

Right to be Informed

According to Section 6 of the Act, data subjects must be informed in an express and clear manner about the purposes for which data will be processed, the possibility to access, update, correct, and delete their data, and the mechanism to do so.

Right to Access

Section 14 of the Act provides that data subjects have the right to request and obtain information about their personal data held in databases. According to Section 4(6) of the Act, data must be stored in a way that enables data subjects to exercise their right of access.

Right to Rectification


On the other hand, Section 16(1) of the Act establishes that data subjects have the right to require the rectification, update, and, where applicable, the suppression or confidentiality of their data stored in databases.

Right not to be subject to automated decision-making

According to Resolution 4/2019, in the event that the data controller makes decisions based solely on the automated processing of data that produce pernicious legal effects to the data subject or negatively affect him/her, the data subject will have the right to request an explanation of the logic applied in that decision, in accordance with section 15, paragraph 1 of the Act.

Petition

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If the above requests are not duly fulfilled, the data subject is entitled to file a special judicial claim for the protection of personal data or habeas data, as set forth under Sections 33 to 43 of the Act.

4.5. The General Law on Protection of Personal Data Held by Mandated Parties ('the Public Sector Law') (Mexico)

Under the scope of the General Law on Protection of Personal Data Held by Mandated Parties ('the Public Sector Law'), you, as a Data Owner, have the right to:

Right to be Informed

Data controllers must inform data subjects, prior to collecting their personal data, of the characteristics of the processing. The document must include, at a minimum, the following information:

- The identity and address of the data controller;
- The purposes of the processing; the options and means offered by the data controller to the data subject to limit the use or disclosure of his/her data;
- The means for exercising the rights of access, rectification, cancellation, and objection ('ARCO rights');
- The means for exercising the right to revoke consent to the processing;
- The transfers of data that the data controller intends to make, if any; and
- The procedure and means by which the data controller will notify the data subject of any changes to the privacy notice.

Right to Access

Data subjects have the right to request access to their personal data from data controllers.

Right to Rectification

Data subjects have the right to request that their personal data be rectified where it is either out of date or inaccurate.

Right to Erasure

Data subjects have the right to request the deletion of personal data where the purposes of the processing have been fulfilled.

Right to Object/Opt-out


Data subjects have the right to object, on legitimate grounds, to the processing of their personal data.

Other Rights

Data subjects have the following rights:

- To limit the use and disclosure of their personal data; and
- To revoke their consent.

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4.6. Law 29.733 (Peru)

Under the scope of the Law 29.733, you, as a Data Owner, have the right to:

Right to be Informed

Data subjects are entitled to be informed in detail, in a simple, express and unequivocal manner, prior to the collection of their personal data, of all the relevant aspects of the processing according to the consent requirements.

Right to Access

Data subjects have the right to access information about themselves that is processed in private or public administration databanks, the manner in which their personal data was collected, the reasons for its collection and at whose request it was collected, as well as transfers made or planned to be made.

Right to Rectification

Data subjects have the right to rectify information about themselves that is processed, when:

- It is partially or totally incomplete or inaccurate;
- An error or omission has been noticed;
- It is no longer necessary or relevant to the purpose for which it has been collected; or
- Its term established for processing has expired.

Right to Erasure

Data subjects have the right to erase information about themselves that is processed, when:

- It is partially or totally incomplete or inaccurate;
- An error or omission has been noticed;
- It is no longer necessary or relevant to the purpose for which it has been collected; or
- Its term established for processing has expired.

Right to Object/Opt-out


Under the Law and its Regulation, data subject have the right of object when:

- There is no law that forces to carry out the act of data processing objected;
- There is no consent, or it has been revoked;
- There are legitimate and grounded reasons, due to a specific personal situation; or
- The personal data was obtained from public sources and data subject did not consent such collection.

Right to data portability

Regulation establishes the right of portability implicitly. It states that, no matter the format used to provide data subjects with the information requested, it must be clear, readable

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and intelligible, without using passwords or codes that require other mechanisms to access the information.

Other Rights

If data controllers reject or fail to comply with an individual rights' request, data subjects have the right to file a claim against them before the APDP (as a second instance).

4.7. Law 19.628 (Chile)

Under the scope of the Law 19.628, you, as a Data Owner, have the right to:

Right to be Informed

The right to be informed is not considered as a data subject right in the Bill, but only as a requirement for the consent as a basis to adequately process personal data.

Right to Access

This is defined as the right to request and obtain from the controller, confirmation as to whether a data subject's personal data is being processed, to access such data where appropriate, and information about the purpose of processing, and type and categories of the data which is being processed.

Right to Rectification

This is defined as the right to request and obtain from the controller, the modification or completion of personal data, when it is being processed, and is inaccurate, outdated, or incomplete.

Right to Erasure

This is defined as the right to request and obtain from the controller, the deletion or removal of personal data, according to the conditions provided by law, especially when:


- The data is not necessary in relation to the purposes of the processing for which it was collected;
- The data subject has revoked their consent and the processing has no other legal basis;
- The data has been illegally obtained or processed by the controller;
- The data is outdated;
- The data must be deleted in order to comply with a court judgment or a legal obligation; and
- The data subject has exercised their right to object and there is no other legal basis for the data processing.

Right to Object/Opt-out

This is defined as the right to request and obtain from the controller, that a specific and determined processing of data is not carried out, in the following cases:

- If the processing affects any fundamental rights and freedoms;

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- If the processing is carried out exclusively for the purpose of marketing or direct marketing of goods, products, or services; and

- If the processing is carried out with respect to data obtained from a publicly accessible source and there is no other legal basis for the processing.

Right to data portability

This is defined as the right to request and obtain from the controller a copy of their personal data in a structured, generic, and common electronic format, which allows it to be operated by different systems, and to communicate or transfer it to another controller.

Right not to be subject to automated decision-making

This is defined as the right to object to decisions concerning the data subject made by the controller based solely on the fact that they are made through automated processing of the data subject's personal data, including profiling. If exercised, the controller must take all necessary measures to ensure the rights of the data subject, in particular the right to obtain human intervention by the controller, to express their point of view, and to request a review of the decision.

5. How secure is your data?

We have a team specialized in Information Security, as well as Privacy and Data Protection.

The security of your information is important to us and therefore we have implemented security, technical and administrative measures able to protect personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or any form of improper or unlawful processing.

In this perspective, we developed the Privacy and Protection program of Personal Data that considers data governance and offers the necessary comfort to the holders of personal data, through the adoption of Policies, Procedures and Processes adhering to market requirements, taking into account the risks, structure, scale, volume of operations and the particularities of personal data processed by Sencinet.

Among the measures adopted are the inventory of devices, systems and installations according to the risk represented by such technology assets, in addition to a web content filter and traffic analysis (firewall), antivirus and regular audits to ensure the validation of the internal security controls adopted, aiming at a continuous process of improvement in the environment.


And remember:

- You provide personal data at your own risk: unfortunately, no data transmission is 100% secure;
- If you believe that your privacy or data has been breached or leaked, please contact the **dpo@sencinet.com**

6. Where do we store your data?

The personal data we collect and all our data processing activities are carried out in our offices, on our own servers, as well as on external servers, i.e. third parties who provide service to Sencinet for data storage purposes.

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7. How long do we retain your data?

The retention of your personal data, including your records, will comply with the necessary measure to perform the purposes listed above, as well as to fulfill our obligations, such as: when it is necessary to retain your data for matters relating to inspections and legal and/or regulatory obligations, to resolve legal disputes and/or execute our contracts.

8. Sharing data and third parties who process your personal information

We will share personal information when: (i) there is a legal, regulatory or judicial obligation; (ii) request from our customers, always based on a legal basis for this; (iii) respond to requests from public authorities; (iii) by contractual force and (iv) between the companies of the Sencinet Group, provided that they have a legitimate interest in processing your information, always respecting your rights and offering you mechanisms to opposed the processing of your data, in order to ensure the legality of the operation.

Sencinet has service providers who carry out personal data processing activities on our behalf to assist us in the development of our activities, always as instructed by us.

Our partnerships are signed with companies that undergo a prior assessment of compliance with data protection rules and that we believe are among the best in the market in their respective activities.

We guarantee that your personal information will only be shared by contractual agreement and always in accordance with this Privacy Policy.

9. Cookies

We use cookies as long as you do not choose to disable cookies in your browser settings. Cookies will be issued, collected and archived from your interaction with our website and help us to measure usage metrics of our Portal, as well as observe, statistically, your browsing, in order to improve the browsing experience of users.

We also use cookies to approach you according to your browsing habits, in order to show you advertising adherent to your profile.

To learn more, please visit our Cookie Policy.


10. Making this policy useful to you

Congratulations on reaching the end of our Privacy and Personal Data Protection Policy. We design it to ensure maximum transparency with you, seeking to bring clear and useful language to your understanding.

Feel free to contact us and clarify any questions that may persist, through the following email: **dpo@sencinet.com**

Be sure to read this Policy as we will post any changes to this page - of course significant changes will be notified by email.

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11. Review History

Version	Date	Revised Content
1	27/09/2021	Document Creation
2	21/09/2022	Document Revision
3	17/05/2023	Version Revision and approver changed to Norberto David