

Date of preparation: 08/21/2020

Date of Validity: 3 years

Prepared by: Data Protection Specialist

Approved by: Board of Directors

OBJECTIVE

Establish the guidelines for data and personal information protection, as well as the respective electronic registry (“Data”) within the Localiza environment, since, in execution of its data collecting operations, it handles and stores information that can be related to individuals identified and/or identifiable (the “Owner”).

These guidelines seek to:

- Be in compliance with the applicable laws and regulations for the protection of personal data (Federal Constitution, Consumer Protection Code, Civil Code, Civil Internet Regulatory Framework and respective Regulatory Decree, General Data Protection Law and other rules on the subject);
- Protect the rights of customers, suppliers, partners and employees against the risk of personal data breach;
- Be transparent in the procedures for processing personal data; and
- Promote the company's awareness regarding the protection of personal data and privacy issues.

TARGET PUBLIC AND SCOPE

This Policy applies to the managers, employees and areas of Localiza Rent a Car, its subsidiaries and controlled companies (“Localiza”), establishing the manners of information handling made available and shared by customers, suppliers, partners and all the Owners with whom the Localiza interacts in the development of its business activities.

PRINCIPLES AND RIGHT TO PRIVACY

The principles that must govern the collection, handling, storage, dissemination and treatment of Data are:

- Legality, Transparency and Non-Discrimination;
- Limitation and Adequacy of Purpose;
- Need;
- Accuracy (data quality);
- Retention and limitation of data storage; and
- Integrity, availability and confidentiality (free access, prevention and security).

Localiza respects people's right to privacy and is committed to treating Data responsibly and in accordance with applicable legislation on privacy and data protection.

AWARENESS OF THE OWNER

The Owner will be aware of this Policy when interacting with Localiza's systems, personally, by email, by phone, by text messages, by communication applications or when using Localiza's websites, systems and pages (“Pages”)

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DATA SOURCES

The information that can be supplied by the Owner includes, but is not limited to:

- name;
- email address;
- mailing address;
- telephone number;
- banking and/or credit card information;
- driver's license information;
- social media account information;
- public profile information;
- identification documents supplied;
- and information about third parties, such as relatives, primary/additional drivers, partners, legal representatives.

The collection of Data or sensitive data related to the Owner ("Sensitive Data") by Localiza can be carried out in two ways: (a) by registering data provided by the Owner and/or (b) registering data collected automatically by other sources. In this case, data collection can be performed through cookies and other similar technologies, public bases or information received in the selection or operation of contracts with suppliers, service providers and partners, or in the contracting of services.

In automatic Data collection of the Owner by means of use of cookies and other similar Technologies, Localiza's purpose is:

- to ensure the best user experience and integral functionality of sites and applications;
- for statistical trend analysis;
- webpage and media management;
- tracking of user behavior in Localiza's Privacy Portal's environment, platform and Page functions.

The Owner is assured control of the use of cookies by means of configuration settings in the Navigator and is aware that, in case of deactivation, certain use of Page resources and functions may be limited.

In some instances, we may request, based on voluntary release and for specific purposes, some Sensitive Data to fulfill legal or regulatory obligations of other permitted cases allowed by applicable law.

DATA PROCESSING

The Data will be used for the exact purpose for which it was collected, including:

- to enter, respond to or contact the Owner;
- so that contracts can be executed by Localiza;
- to provide assistance and support related to Localiza's business activity;
- for advertising purposes;
- for sending event information, company news and promotional materials;
- for registering and executing contracts with suppliers and partners.

Localiza may perform Data processing:



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- for the fulfilment of legal or regulatory obligations;
- when consented to by the Owner;
- when necessary for the execution of a contract or contract-related procedures;
- to safeguard its rights;
- for the protection of the Owner’s life or physical well-being; and
- when needed to serve its legitimate interests.

The processing of Sensitive Data may occur in the above cases or to ensure the prevention of fraud and the security of the Owner.

Data processing involving children will only occur with the specific consent of at least one parent or legal guardian.

The Owner may request, at any time and free of charge, information on the processing or disposal of his Data, as well as the cancellation of his registration to receive marketing and advertising emails and SMS.

This request must be made by filling in the form available on the Localiza Privacy Portal through the link localiza.com/privacidad.

DATA SHARING

Localiza may share the Owner’s information, in order to meet specific purposes, aiming at the operationalization and development of business activity with third parties, among which:

- Localiza suppliers and service providers, responsible for assisting in the execution of contracts and availability of Localiza products;
- partners involved in commercial relations with Localiza, for the development of activities, as well as for advertising purposes; and
- public authorities, in case of legal or judicial obligation, for protection of rights, fulfillment of duties, guarantee of security for Owners, investigation of fraud and/or answers to questions made by public agents.

The sharing of Data held by Localiza will take place after the implementation of appropriate measures to ensure that the Data is used in a manner consistent with this Policy, including, without limitation, the maintenance of its confidentiality and integrity.

In case of international data transfer, Localiza undertakes to observe, in the transmission, the applicable regulations.

DATA SECURITY

Data security aims to protect against accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate treatment, in addition to discriminatory information processing.

Localiza processes and stores the Data provided by the Owner or collected through the adoption of technical, administrative and organizational security practices and measures, all of which are capable of protecting and maintaining the integrity of the Data, in line with good market practices and the applicable law.

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Localiza undertakes to inform the Owner, the National Personal Data Protection Authority (*Autoridade Nacional de Proteção de Dados Pessoais*) and the relevant regulatory bodies of any security incident that may cause a relevant risk or loss.

..... TRANSPARENCY OF DATA AND OWNERS' RIGHTS

The Data will be processed and retained as long as necessary to fulfill the purpose for which they were collected, to enable the execution of contracts, offer benefits and fulfill obligations, according to the terms and obligations provided for by law or in specific regulations.

At any time, the Owner may request,

- confirmation of the existence of processing;
- access to Data;
- rectification of incomplete, inaccurate or outdated data;
- anonymity, blockage or elimination of unnecessary, excessive or processed Data not in keeping with this Policy;
- Data transmission to a supplier or service provider;
- elimination of processed Data
- information from public and private entities with which his Data was shared;
- information about the possibility of not supplying consent and its consequences; and
- abrogation of consent.

The Owner's requests regarding the Data must be made by filling in the form available on the Localiza Privacy Portal through the link: localiza.com/privacidade.

..... SITES AND THIRD-PARTY SERVICES

The Localiza Privacy Portal and platforms managed by Localiza may contain links to third party websites and applications. In case of use of these by the Owner, the possibility exists of information being collected, processed and shared by third parties not linked to Localiza. In these cases, Localiza is not responsible for the content or privacy practices of third parties.

..... VALIDITY AND POLICY CHANGES

This Policy will come into effect on the date of its approval by the Board of Directors and will remain valid for 3 (three) years or until there is a resolution to the contrary.

Localiza may change this Policy at any time, without prior notice to the Owner.

On the other hand, Localiza may not, without notifying the Owner, change:

- the specific purpose of the Data processing;
- the form and duration of the Data processing;
- the identity of the controller; and/or
- the information about shared Data use by the controller and the finality.

Privacy and Data Protection Policy

Rev.0

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With the exception of the above mentioned changes, it is the responsibility of the Owner to re-read this Policy in case of any change, according to the updated data mentioned at the end of this document

..... CONTACT WITH LOCALIZA

In case of any doubt, suggestion or request that involves this document, contact our Specialist in Charge for Personal Data Processing through the form available in our Privacy Portal (localiza.com/privacidade) or by email: privacidade@localiza.com.

