

PRIVACY POLICY

Updated [month] 2023.

• WHAT IS THIS PRIVACY POLICY FOR?

Our Privacy and Personal Data Protection Policy ("Policy"), was designed to present the personal data processing activities that we carry out to enable the operation of all the functionalities and interactions provided by companies of the **Pirelli group** in Brazil.

• INTRODUCTION:

We also generally refer to companies of the **Pirelli group** in Brazil through the use of the terms "website", "we", "our" and "us". Words such as "you", "your", "user(s)" and similar expressions refer to the holders of the personal data we process.

The purpose of this Policy is to explain how your personal data is treated by companies of the **Pirelli group** in Brazil (referred to in this policy as "**Pirelli**", "**We**", "**Us**"), either through the use of and access to our platforms, in accordance with the laws in force in Brazil.

• DEFINITIONS:

To begin with, it is important to introduce some terms that will be used throughout our Policy. Are they:

- (1) **LGPD**: means the General Data Protection Law (Law No. 13,709, of August 14, 2018);
- (2) **Personal Data** : means all information related to a natural person, which allows their identification;
- (3) **Sensitive Personal Data**: is a special category of personal data, defined as data on racial or ethnic origin, religious conviction, political opinion, membership of a union or organization of a religious, philosophical or political nature, data referring to health or sex life, genetic or biometric data, when linked to a natural person;
- (4) **Holder**: means any natural person to whom the personal data refer;
- (5) **Treatment**: means any operation carried out with personal data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction; It is
- (6) **ANPD**: means the National Data Protection Authority, which corresponds to the body responsible for ensuring, implementing and supervising compliance with the LGPD throughout Brazil.

• CONDITIONS AND NOTICES :

As a condition for accessing and using the exclusive features of our platforms, you declare that you are over 18 (eighteen) years old or over 16 (sixteen) years old if emancipated. In addition, he also declares that he has read the provisions of this Privacy Policy, acknowledging that he is aware of the conditions set forth herein.

We will always treat your personal data respecting this Privacy Policy and the legislation applicable to the protection of personal data. We clarify that your consent will not always be necessary for the treatment to take place. Whenever your authorization is required, **Pirelli** will only carry out the treatment after receiving it properly.

• HOW DO WE TREAT YOUR PERSONAL DATA?

You provide us with most of the data we process. Personal data is collected when you voluntarily enter or submit your information on our website or when accessing and interacting with the functionalities made available on **Pirelli platforms and applications**.

Accordingly, we may collect the following information relating to you: (1) browsing information; (2) registration information; (3) contact information; (4) payment, billing and purchase history data; and (5) details of your vehicle and tires as described in this Policy.

You are already aware that **Pirelli** may request permission to use tools on your devices (such as using the camera) in the context of using our apps and platforms, to allow technological and innovative experiences, always without storing data not supported by the LGPD.

(1) Navigation data:

We collect your personal data when you access our platforms (including the website and/or applications), even if you are not registered or logged in. This data includes, but is not limited to:

- Device information;
- Browser information; and
- *Cookies*.

(2) Registration data:

We may collect personal data that you voluntarily provide us to: register for any promotion or campaign; registration on our website; registration and *login* to our applications; between others. This data includes, but is not limited to:

- Full name;
- CPF;
- RG; and
- Date of birth.

(3) Contact details:

We collect your personal data when you contact us for any reason and through any **Pirelli channel**. This data includes, but is not limited to:

- Email;
- Phone number; and
- Address.

In addition to the aforementioned personal data, when you communicate and/or interact with us, we may request and you may provide additional personal data during the course of our service.

(4) Payment, billing and purchase history data:

We collect your personal data when you purchase our products. We also use this data to allow your snake to be carried out securely. This data includes, but is not limited to:

- Data from credit cards, debit cards and other types of payment; and
- Purchase history.

(5) Vehicle and tire details:

We collect data from your vehicle and tires when necessary for scheduling services or interacting with entertainment, for example at competitions or events. This data includes, but is not limited to:

- Brand;
- Model;
- Mileage;
- Tire DOT.

• **REGISTRATION OF NAVIGATION ACTIVITIES AND TRACKING TECHNOLOGIES:**

As for the process of collecting your browsing data, we use various technologies, both proprietary and third-party, that automatically collect information about you. This data is collected through technologies known as *cookies* and uses technical and profiling cookies that are installed directly by us (so-called “First Party Cookies”) or by our selected partners (so-called “Third Party Cookies”).

For more details, access our cookie policy: <https://www.pirelli.com/tyres/pt-br/saiba/cookie-policy>

Other technologies may be used to obtain your browsing data, respecting the terms and limits established by this Policy and your options regarding collection and storage.

• **WE MAY USE PERSONAL DATA FOR THE FOLLOWING PURPOSES:**

The processing of personal data will only take place for legitimate purposes. Thus, **Pirelli** will not process any personal data if it does not have a specific, legitimate and determined purpose. Pirelli may use your data for the **purposes** below, but not limited to:

1. Allow you to access and register on the website to enjoy the services offered by us;
2. Receive and address your complaints;
3. Respond to your inquiries and respond to your requests for information;
4. Comply with legal or regulatory obligations to which we are subject;
5. Allow you to participate in initiatives, events or competitions organized, promoted or sponsored by us;
6. Enable your interaction and experience with the functionalities of our platforms, products, services and applications;
7. Analyze your profile in order to personalize your experience with the services we provide and, in addition, send you online and offline advertisements that are most suitable for you; and
8. Send you promotional messages, marketing, social media advertising through platforms such as Facebook and Instagram and other information that may be of interest to you based on your preferences.

Depending on your interaction and the reason for it, we may process different personal data, always respecting the principles of necessity and adequacy in relation to the purposes of treatment.

• **WHERE DO WE STORE THE DATA?**

We store your personal data in our IT systems, based in the European Union, observing all the rules of the applicable legislation.

• **HOW LONG IS YOUR PERSONAL DATA STORED?**

In accordance with current legislation, **Pirelli** will use personal data for as long as necessary to satisfy the purposes described in this Policy, or to comply with applicable legal requirements.

In any case, we adopt technical, administrative and operational measures to guarantee the security of personal data while they are stored with us, observing the current state of the art, thus avoiding any change in the availability, integrity and confidentiality of personal information.

• WITH WHOM DO WE SHARE DATA?

Pirelli employee community , we may share personal data with:

1. Business partner companies, potential business partners, companies from the same economic group and suppliers;
2. Navigation data analysis partners, to develop improvements on our websites, portals, applications and other platforms, including the development of our products and services, as well as a more personalized service;
3. Outsourced service providers and product suppliers, when necessary for the provision of our service and/or product, or improvement of any item on the platform, products, services and applications;
4. Judicial, police or government authorities or other third parties with whom we are required to share the data, by law, regulatory rule or court order; It is
5. To enforce the terms of any agreement or terms of our websites, portals, applications, platforms, products and services, in accordance with current legislation.

Pirelli Group companies and third-party service providers are subject to data protection obligations aimed at ensuring an adequate level of protection for your personal data.

We may also disclose your personal data to law enforcement and government authorities or authorized third parties, if and to the extent that we are required or authorized to do so by law or court order.

Furthermore, in case of sale or transfer of part or all of the business, operation or services provided by us to a third party, we reserve the right to disclose your personal data to the potential buyer before or after the sale. If the sale is not consummated, we will ask the potential buyer not to use or disclose their personal data in any way or form and to delete them completely.

• INTERNATIONAL TRANSFER:

If personal data is transferred to another country during treatment by **Pirelli**, we will adopt the measures required by law to ensure that personal data remains protected, and that this transfer is carried out in accordance with one of the transfer mechanisms provided for in the LGPD and in accordance with regulations. and guidelines defined by the ANPD.

• HOW DOES PERSONAL DATA SECURITY WORK?

We have a security protocol in place to protect your personal data from unauthorized access, improper use or disclosure, unauthorized modification, illegal destruction and accidental loss. We only allow access to our databases when necessary, and this access is carried out under strict guidelines on the use that can be made of such data.

However, it is your responsibility to secure your *login information*. We recommend that you use a unique password for each of our websites, portals, applications and platforms.

• YOU HAVE THE RIGHT TO REQUEST US:

Holders of personal data have rights and guarantees provided for in current data protection legislation. Pirelli provides mechanisms, detailed below, so that the holder has clarity and transparency in the exercise of his rights.

1. Obtain confirmation that we have processed your personal data;
2. Access your personal data that is processed by us;
3. Request correction of personal data that is incomplete, inaccurate or out of date;
4. Request the anonymization, blocking or deletion of unnecessary, excessive or processed personal data in breach of the provisions of the LGPD;
5. Request the portability of your personal data to another service or product provider, subject to our commercial and industrial secrets;
6. Request the deletion of personal data processed based on your consent, except in the cases of conservation of personal data provided for in the LGPD;
7. Request information about the possibility of not providing your consent and the consequences;
8. Revoke your consent for the processing of your personal data, in the event that there is treatment based on your consent; and
9. Express opposition to treatment that violates the provisions of the LGPD.

Before we respond to any request to exercise the rights mentioned above, we may ask you to provide us with certain information to confirm your identity. We will respond to your request after validating your identity.

We note that these rights are not absolute and may not apply in certain circumstances. For example, we may continue to process and maintain personal data regardless of your request for deletion, opposition, blocking or anonymization, to comply with legal, contractual and/or regulatory obligations, as well as to safeguard and exercise rights, including in legal proceedings, judicial, administrative and arbitral proceedings and in other cases provided for by law.

• **CHANGES TO THE PRIVACY POLICY:**

This Policy may change at any time, according to our practices and in compliance with the applicable legislation.

The most current version will always be the one available on the Pirelli website and significant changes may be sent to you by e-mail, but we recommend that you access it frequently or whenever you have questions to follow up on any updates.

• **GENERAL PROVISIONS:**

If any provision of this Privacy Policy is considered illegal or invalid by the competent authority, the remaining conditions will remain in full force and effect.

• **HOW TO CONTACT US?**

In case of any questions, suggestions and/or complaints regarding the provisions contained in this Privacy Policy or if you want to submit any request regarding your personal data, you can contact us through the email indicated below: privacy.latam@pirelli.com.