

IMPLEMENTATION FORM

PRIVACY POLICY

HORIBA INSTRUMENTS BRASIL LTDA.

TCA/HORIBA SISTEMAS DE TESTES AUTOMOTIVOS LTDA.

1. GOAL

- To demonstrate the commitment and the procedures adopted by **HORIBA INSTRUMENTS BRASIL LTDA.**, aiming at the protection of Personal Data, including on the *online* platform, by the Company, which will also be applicable to the Company member of *Horiba Group* **TCA/HORIBA SISTEMAS DE TESTES AUTOMOTIVOS LTDA.** ("TCA/HORIBA"), once the electronic site is used by both, being TCA/HORIBA responsible for the internal procedures related to the document approval collection.

2. TARGET PUBLIC

- Holders of personal data related to the Companies' activities.

3. APPROVAL

- Members of the Personal Data Protection Executive Committees.

4. REFERENCES

- General Law of Personal Data Protection - LGPD (Federal Law N° 13,709/2018) and
- Good Practices Guide to the General Law of Personal Data Protection (LGPD) made available by the Central Committee of Data Governance of the Federal Government.

5. TRAINING

- Yes
- No

6. PLACE OF AVAILABILITY

- Directory of each Company and in the online portal specified below:

<https://www.horiba.com/bra/>

7. ACCESS

- Full to all users related to **HORIBA** and **TCA/HORIBA** activities.

Jundiaí - SP, July 11th, 2022.

PRIVACY POLICY

HORIBA INSTRUMENTS BRASIL LTDA.

CNPJ/ME nº 01.759.236/0001-79

Rua Presbítero Plínio Alves de Souza, nº 645

Lote Multivias - Jardim Ermida II

Jundiaí - SP

CEP 13.212-181

TCA/HORIBA SISTEMAS DE TESTES AUTOMOTIVOS LTDA.

CNPJ/ME nº 05.018.399/0001-51

Avenida Luigi Papaiz, nº 239, Setor Módulo 5, Galpão F, Campanário

Diadema - SP

CEP 09.931-610

Privacy Policy ("Policy") is the document of HORIBA and TCA/HORIBA that formalizes the observance and commitment of the Companies with the adoption of measures for protection and privacy of personal data treated within the scope of their activities, including online mode, having as basis the Brazilian legislation in force, especially Federal Law N° 13,709/2018 (General Law of Protection of Personal Data - LGPD).

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1. GLOSSARY

- **Personal Data:** All information related to an identified or identifiable natural person, such as, but not limited to, a CPF/RG number, telephone number, license plate number, name, etc.
- **Holder of personal data:** Natural person to whom the personal data processed by **HORIBA** or **TCA/HORIBA** refers to.
- **Treatment:** Any operation performed with personal data, such as those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or information control, modification, communication, transfer, dissemination, or extraction.
- **Foreman:** Person chosen to act as a communication channel between the data holder, HORIBA or TCA/HORIBA and the National Data Protection Authority (ANPD).
- **Anonymization:** Use of reasonable and available technical means at the time of processing personal data, whereby a data loses the possibility of association, directly or indirectly, with an individual, making it impossible for the data to identify a natural person.
- **Cookies:** Storage files of user browsing preferences saved by the websites on the holders' computers.
- **IP Address:** Code assigned to a device that allows its identification, defined according to international parameters (Internet Protocol).
- **LGPD:** Federal Law n° 13.709/2018 (General Law of Personal Data Protection) regulating the processing of personal data.
- **Website:** Portal <https://www.horiba.com/bra/> and its subdomains.

2. IDENTIFICATION OF THE DATA COLLECTED BY HORIBA OR TCA/HORIBA

2.1. Personal data may be collected at the moment of the holder's interaction with the **HORIBA** and **TCA/HORIBA** website, as shown in the following table:

Purpose	Data
Request for information	<ul style="list-style-type: none"> ▪ Name ▪ Surname ▪ Company or Institution ▪ ZIP Code ▪ City ▪ Country ▪ Estate ▪ E-mail ▪ Telephone ▪ Message
Contact us	<ul style="list-style-type: none"> ▪ Surname and Name ▪ E-mail ▪ Telephone ▪ Company ▪ Message
Technical Support	<ul style="list-style-type: none"> ▪ User's name or E-mail ▪ Password
MEDigital - Resources for partners	<ul style="list-style-type: none"> ▪ E-mail, telephone, or Skype
Contact form	<ul style="list-style-type: none"> ▪ Name ▪ Surname ▪ E-mail ▪ Telephone

	<ul style="list-style-type: none"> ▪ Company or Institution ▪ City ▪ ZIP Code ▪ Country ▪ Estate ▪ Message
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2.2. The holder is responsible for the accuracy and updating of his personal data provided to **HORIBA** or **TCA/HORIBA**. **HORIBA** and **TCA/HORIBA** are not obliged to process data if they find that the processing may be contrary to the law or if their website is being used for illegal purposes.

2.3. The personal data considered by **HORIBA** or by **TCA/HORIBA** are property and responsibility of the Company that considered the personal data, whereas the use, storage, eventual sharing, and elimination are made in accordance with the Brazilian law of protection of personal data, never being monetized the personal data considered.

2.4. To conduct its business activity, **HORIBA** and **TCA/HORIBA** may also process:

- Personal data such as gender and age;
- Job title and position within your own company or department;
- Career history;
- Work details;
- Data derived from IT systems, such as IP addresses and location information;
- Information required for contract execution;
- Sensitive data.

2.5. **HORIBA** and **TCA/HORIBA** may obtain, use, and process data relating to various individuals, such as employees, business partners, claimants, relatives and associates of the individual concerned, advisors, consultants and other current, former and prospective professionals and team members, on condition that they have a specific purpose and that the processing is in accordance with Brazilian law.

3. WAYS OF SHARING PERSONAL DATA

3.1. Personal data collected by **HORIBA** or **TCA/HORIBA** and recorded activities (logs) may be shared with:

- i) emergency services, educational and training institutions, examining bodies, and research and analysis organizations;
- ii) judicial, administrative, and governmental authorities when there is a legal determination or request;
- iii) data processors working on behalf of **HORIBA** or **TCA/HORIBA**, as well as the headquarters organization and its subsidiaries/affiliates;
- iv) suppliers and partner and potential companies, to enable their activity and the Company's performance;
- v) employees and consultants, whether internal or external, current, former or future;
- vi) automatically, in the occurrence of corporate movements, such as mergers, acquisitions, or incorporations.

3.2. **HORIBA** and **TCA/HORIBA** declare that the treatment of personal data performed in their business activities will always have a purpose and will observe the justifying legal bases indicated in the applicable

legislation.

3.3. As part of an organization with global reach, there may be sharing of personal data within the **HORIBA Group** abroad, where countries have an adequate level of data protection. In any case, all transfers are subject to the **contractual framework regarding the transfer of data within the HORIBA group**, which includes standard contractual clauses published by the European Union.

4. WEBSITE NAVIGATION INFORMATION

4.1. The website, like most websites, collects information that is not capable of identifying the website visitor, such as, but not limited to, browser type, language preference, date, and time of the visitor's request, in order to understand the need of each user.

4.2. **HORIBA** and **TCA/HORIBA** inform that they use tracking tools on their website, such as *Google Analytics* to analyze their website and improve functionality according to the needs of the user. These platforms set the cookie to store anonymous information about how the visitor has arrived at the website, what has he visited, how long he has stayed on the site and what his interests are. There is no identification of the visitor. The storage and treatment may occur outside Brazil by **HORIBA** subsidiaries. Other information related to cookies can be found in the site's *Cookies Policy*.

4.3. When browsing **HORIBA/TCA HORIBA** social networks or blog, cookies may be stored in your browser. The privacy of this information derives from the preferences of the social networks and knowledge of the privacy policies of these portals is the responsibility of the user, as they are not part of the domain or responsibility of **HORIBA/TCA/HORIBA**.

5. CONTENT EMBEDDED ON THE WEBSITE

5.1. Content of the **HORIBA/TCA/HORIBA** website may contain embedded media, such as, for example, videos, images, articles, among others. This content behaves identically to that observed in the user's visit to its origin site, and may collect data, use cookies, incorporate additional tracking, and monitor interaction, including interaction with the embedded content, if there is an account connected to the site. Therefore, the user must read the Privacy Policy of the sites of origin of the contents and know their privacy policies, since they are not the responsibility of **HORIBA/TCA/HORIBA**.

6. RIGHTS OF THE WEBSITE VISITOR (USER WHO IS THE HOLDER OF PERSONAL DATA)

6.1. The rights of personal data subjects listed in the LGPD are as follows:

- (i) **Access:** right to request a copy of all data that **HORIBA** or **TCA/HORIBA** holds about the user.
- (ii) **Confirmation of treatment:** right to check whether **HORIBA** or **TCA/HORIBA** handles any personal data of the user.
- (iii) **Correction:** right to ask **HORIBA** or **TCA/HORIBA** to correct outdated, incomplete, and incorrect data. It can be done on the "Registration Update" tab.
- (iv) **Anonymization, blocking or elimination:** right to (a) request to have data anonymized; (b) request blocking which temporarily suspends processing; (c) request deletion of data from the **HORIBA** or **TCA/HORIBA** database, except in cases where the law requires that they be kept.
- (v) **Get informed about sharing:** The user's right to know with whom their data is being shared.
- (vi) **Opposition:** right not to agree with the processing activities that do not depend on consent, being able to request the interruption, unless there is a legal basis for it to be maintained by **HORIBA** or

TCA/HORIBA, which must be informed to the user holder.

- (vii) **Portability:** right to require that **HORIBA** or **TCA/HORIBA** transfer the data they have to other companies in the same industry.
- (viii) **Withdrawal of consent:** right to cancel the consent granted or not to grant it, being informed of the consequences of the choice, which may impede the activity of **HORIBA** or **TCA/HORIBA** with regards to that user.

6.2. Requests and doubts about the rights of the users must be sent via e-mail to gregory.azevedo@horiba.com. In order for **HORIBA** or **TCA/HORIBA** to clarify all doubts in a complete manner, the user must identify himself and inform the right he wants to exercise, as well as direct the request to **HORIBA** or **TCA/HORIBA**, and the Company undertakes to respond in the best time it can and according to the Brazilian law.

7. PERSONAL DATA STORAGE AND ACTIVITY LOGGING

7.1. The personal data received by **HORIBA** or by **TCA/HORIBA** and the activities of the users are stored in a safe and controlled place, in servers located in Brazil or in the cloud computing, and there may be transfer of data outside Brazil, provided that to companies and branches that demonstrate compliance with legal standards, maintaining a level of compliance compatible or more stringent than that provided for in Brazilian law.

7.2. This data is stored only for as long as necessary to fulfill the defined purposes, unless there is another reason for keeping it, such as for complying with legal or regulatory obligations, contractual obligations, preservation of rights and legitimate interest, on the basis of the legislation in force and for the period justified by the legal basis.

8. FORMS OF PROTECTION OF USERS' PERSONAL DATA

8.1. To preserve the privacy of personal data handled by **HORIBA** or **TCA/HORIBA**, the Companies are implementing internal programs that establish governance practices, standard procedures, training, and mechanisms to reduce the risks of incidents involving personal data.

8.2. Access to personal data collected in the internal environment of **HORIBA** or **TCA/HORIBA** is restricted to properly authorized employees of each Company, always obeying the principles of **proportionality, necessity, and relevance** to the purposes of the business activity, as well as the commitment to safeguard the privacy of the user, according to this Policy.

8.3. The **user** is also responsible for the confidentiality of his personal data and should be aware that the sharing of access data and passwords violates this **Policy** and can compromise the security of the data and the site. If the user comes to know of occurrences involving the violation of the security of his personal data, he must contact the **HORIBA/TCA/HORIBA** Administrator through the service channels informed at the end of this **Policy**.

8.4. **HORIBA** and **TCA/HORIBA** carefully analyze their **partners and service providers** and establish confidentiality, information security and personal data protection agreements, aiming at protecting the rights of the user holder.

9. ADDITIONAL INFORMATION

9.1. **HORIBA** or **TCA/HORIBA** may change the content of this **Policy** at any time, if they verify the need and purpose, without any notice, being the user responsible for verifying the **Policy** each time he/she

accesses the website.

9.2. In the event this **Policy** is modified, the modifications will apply solely to personal data collected after the revised document or privacy statement is posted on the website.

9.3. If any point of this **Policy** is deemed unenforceable by a judicial or data authority, this will not mean that the entire document is null and void, and the other applicable provisions will remain in effect.

9.4. This document must be read and interpreted according to Brazilian law, in the Portuguese language, in conjunction with the rules and procedures applicable to **HORIBA** and **TCA/HORIBA**, electing the domicile forum of the data subject to process any controversies resulting from this **Policy**, unless there is a specific determination of the legislation regarding personal, territorial, and functional competence.

10. CONTACT

10.1. If any questions arise regarding this **Policy**, the user must direct them to the **HORIBA and TCA/HORIBA Manager, Mr. Gregory Alan Azevedo**, through the e-mail gregory.azevedo@horiba.com. Mailing address **HORIBA**: Rua Presbítero Plínio Alves de Souza, nº 645, Lote Multivias, Jardim Ermida II, CEP 13.212-181. Mailing address **TCA/HORIBA**: Avenida Luigi Papaiz, nº 239, Setor Módulo 5, Galpão F, Campanário Diadema - SP, CEP 09.931-610.

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