

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

Sumário

1. INTRODUCTION	2
2. PURPOSE	2
3. SCOPE AND AREAS INVOLVED	2
4. DEFINITIONS AND ASSUMPTIONS	3
5. RESPONSIBILITIES	3
6. POLICY DESCRIPTION	5
6.1 PRINCIPLES	5
6.2 PROCESSING OF PERSONAL DATA	5
6.3 DATA COLLECTED	6
6.3.1 SENSITIVE DATA	7
6.3.2 MEANS OF COLLECTION AND PURPOSES	7
6.3.2.1 CONTACT DATA	7
6.3.2.2 UNSUBSCRIPTION FROM CONTACT DATA	7
6.3.2.3 DATA RELATED TO EXECUTED CONTRACTS	8
6.3.2.4 DATA RELATED TO THE EXPANSION OF THE PRODUCT DATABASE	8
6.3.2.5 PURPOSE OF PERSONAL DATA PROCESSING	8
6.4 PERSONAL DATA RETENTION PERIOD	9
6.5 SHARING OF PERSONAL DATA	9
6.6 DATA SUBJECT RIGHTS	10
6.7 ROLES AND RESPONSIBILITIES IN PERSONAL DATA PROCESSING	10
6.7.1. DATA CONTROLLER	10
6.7.2 PRIVACY CONTACT	10
6.8 INFORMATION SECURITY	11
6.9 BROWSING DATA (COOKIES)	11
6.9 LEGAL BASIS FOR PERSONAL DATA PROCESSING	13
6.10 APPLICABLE LAW AND JURISDICTION	13
7. POLICY COMMITMENT	13
8. ANEXSES	13
9. REFERENCE	14
10. ACRONYMS	14

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

1. INTRODUCTION

This Privacy Policy contains information regarding how Vega Farm Analytics processes, in whole or in part, whether automated or not, personal data that may be necessary for the services performed or contracted.

The purpose of this Policy is to clarify to interested parties the types of data that are collected, the reasons for collection, and how data subjects may consult, update, or request the deletion of such information.

This Privacy Policy was prepared in compliance with applicable United States privacy and consumer protection laws, including the Texas Data Privacy and Security Act (TDPSA), as applicable, as well as other U.S. state privacy laws and sector-specific federal laws that may apply depending on the services and data processed (“Applicable Laws”).

This Policy applies to personal data processed in the context of Vega Farm Analytics’ operations involving individuals located in the United States, including employees, customers, prospects, suppliers, business partners, and website visitors.

This Privacy Policy may be updated as a result of regulatory changes; therefore, data subjects are encouraged to periodically review this document.

2. PURPOSE

Vega’s Privacy Policy aims to establish clear and transparent guidelines regarding the collection, use, storage, sharing, and protection of users’ personal data, in compliance with Applicable Laws in the United States, including TDPSA when applicable. It seeks to ensure privacy, security, and confidentiality of information, promoting a relationship of trust and respect with all data subjects.

3. SCOPE AND AREAS INVOLVED

This Policy applies to all stakeholders who, directly or indirectly, participate in the processing of personal data, including employees, service providers, business partners, suppliers, and any other entity or individual who accesses, uses, or processes data on behalf of Vega Farm Analytics.

- This Policy covers personal data processed through:
- Vega Farm Analytics websites and digital channels;
- Commercial and contractual relationships;
- Employment and workforce-related operations (where applicable);

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 2 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

- Supplier and vendor management;
- Corporate security and access management (where applicable).

4. DEFINITIONS AND ASSUMPTIONS

- Personal Data: information related to an identified or identifiable natural person;
- Sensitive Personal Data: personal data that may be considered “sensitive” under Applicable Laws, including data revealing racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexual orientation, citizenship or immigration status, genetic or biometric data processed for the purpose of uniquely identifying an individual, personal data collected from a known child, or precise geolocation data.
- Data Subject: natural person to whom the personal data being processed relates;
- Controller: natural or legal person, public or private, who determines the purposes and means of data processing;
- Processor: natural or legal person, public or private, who processes personal data on behalf of the controller;
- Privacy Contact (or Privacy Office): designated contact point responsible for receiving and responding to privacy-related requests and questions under Applicable Laws.
- International Data Transfer (IDT): transfer of personal data to a foreign country or international organization..

5. RESPONSIBILITIES

➤ Controller

- Determine the purposes and means of personal data processing within the organization’s activities.
- Ensure that personal data processing complies with applicable legislation under Applicable Laws.
- Ensure personal data is processed securely, lawfully, and transparently.
- Adopt technical and administrative measures to protect data against unauthorized access, leaks, or improper processing.

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 3 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

- Maintain appropriate vendor management practices and contractual safeguards with processors/service providers.
- Where required by Applicable Laws, notify affected individuals and competent authorities in the event of a security incident, in accordance with applicable breach notification requirements.

➤ **Privacy Contact (Privacy Office)**

- Act as the primary communication channel between Vega Farm Analytics and data subjects for privacy-related requests, questions, and complaints.
- Coordinate internal procedures to receive, evaluate, and respond to data subject requests under Applicable Laws (including TDPSA where applicable).
- Support the organization in monitoring compliance and maintaining appropriate documentation of privacy governance.

➤ **Corporate**

Ensure the implementation and maintenance of reasonable administrative, technical, and organizational measures designed to protect personal data against unauthorized access, disclosure, alteration, or destruction.

Manage access controls, authentication mechanisms, encryption where appropriate, incident response procedures, and business continuity planning.

Support the protection of personal data stored, transmitted, or processed within Vega Farm Analytics' systems, consistent with Applicable Laws and industry-recognized information security practices.

➤ **Employees**

- Comply with this Privacy Policy and other internal data protection rules.
- Process personal data only within the scope of their responsibilities and in accordance with legal principles.

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 4 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

- Immediately report to the Privacy Contact or Corporate Security Team any incident, irregularity, or suspected privacy or data security violation.

➤ **Service Providers, Suppliers, and Business Partners**

- Process personal data accessed or handled on behalf of Vega Farm Analytics in accordance with Applicable Laws and contractual obligations.
- Fully comply with this Policy and contractual clauses related to data protection.
- Cooperate with the Privacy Contact and other responsible parties in audits or requests related to personal data processing.

6. POLICY DESCRIPTION

6.1 PRINCIPLES

Vega Farm Analytics, as well as its suppliers, service providers, and third parties involved, are committed to complying with applicable legislation, respecting the following principles:

- ✓ Personal data shall be collected adequately and limited to specific, explicit, and legitimate purposes, and shall not be further processed in a manner incompatible with such purposes (purpose, adequacy, and necessity);
- ✓ Data subjects shall be guaranteed access, updates, and information regarding the processing of their personal data (free access, quality, and transparency);
- ✓ Personal data shall be processed securely, protected against unauthorized or unlawful processing and against accidental loss, destruction, or damage, through appropriate security measures.
- ✓ Vega Farm Analytics also adopts the principles of data minimization and reasonable safeguards, consistent with U.S. privacy and consumer protection expectations.).

6.2 PROCESSING OF PERSONAL DATA

Personal data is processed for the purposes described in this Policy and as permitted by Applicable Laws, including the Texas Data Privacy and Security Act (TDPSA), where applicable.

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 5 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

We process personal data to:

- ✓ Provide and operate Vega Farm Analytics' services and products;
- ✓ Manage commercial and contractual relationships;
- ✓ Manage employment-related activities (where applicable), including access control and security;
- ✓ Comply with legal obligations and respond to lawful requests;
- ✓ Prevent fraud, protect systems, and ensure cybersecurity;
- ✓ Improve products, services, and user experience through operational analytics (non-targeted).

6.3 DATA COLLECTED

In conducting its business, Vega Farm Analytics interacts with shareholders, employees, suppliers, partners, clients, rural landowners, and other data subjects, and may collect and process personal data such as:

- ✓ Name;
- ✓ Date of birth;
- ✓ Government-issued identifiers (only when strictly necessary, such as for employment, contracting, or compliance purposes);
- ✓ Email address;
- ✓ Postal address;
- ✓ Telephone number;
- ✓ Employment-related information (where applicable), such as job title, department, and professional contact details;
- ✓ Company, position/function;
- ✓ Location-related data;
- ✓ Geographic data related to property;

Website technical data (such as IP address and log data) necessary for security and operation;

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 6 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

We do not intentionally collect biometric data or facial recognition data from U.S. consumers through our website. If biometric data is processed for workforce access control (if applicable), it will be handled with appropriate safeguards and transparency.

Data may be obtained through various means, including consultation of data made available on social networks and/or made public by official government agencies.

Occasionally, other types of data not expressly provided for in this Privacy Policy may be collected.

6.3.1 SENSITIVE DATA

Vega Farm Analytics does not intend to collect or process sensitive personal data unless necessary for a specific and legitimate purpose and with appropriate safeguards as required by Applicable Laws.

6.3.2 MEANS OF COLLECTION AND PURPOSES

6.3.2.1 CONTACT DATA

When a client, visitor, or prospect fills out an online form, visits our website or social media channels, or contacts us by email, phone, or messaging, we collect and store the provided data, including:

- ✓ Name and contact information;
- ✓ Company information, if applicable;
- ✓ Nature of the communication;
- ✓ Purpose of the interaction and response actions;
- ✓ Any action taken by the contact (e.g., event registration or document requests).

Note: Data may be supplemented through social media or other digital sources for analysis and prospect database development.

Collected data is used exclusively for interaction with the requester for commercial purposes and promotion of our products and services.

6.3.2.2 UNSUBSCRIPTION FROM CONTACT DATA

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 7 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

- a. Marketing communications include a link allowing recipients to opt out of receiving further content and materials.
- b. General unsubscription from the database may be requested via email at dpo@img.com.br. Active contracts or legal restrictions will be verified. If none exist, full unsubscription will be performed.

6.3.2.3 DATA RELATED TO EXECUTED CONTRACTS

For the fulfillment of employment contracts, supply agreements, or service contracts between Vega Farm Analytics companies and third parties, personal data necessary for execution will be collected and stored.

All parties involved, including employees, commit to full compliance with applicable legislation and this Policy, under penalty of contract termination and applicable legal sanctions.

6.3.2.4 DATA RELATED TO THE EXPANSION OF THE PRODUCT DATABASE

Vega's solution is the GRAIN STATION system, which uses remote sensing and data intelligence to build traceability of origin, perform socio-environmental diagnostics, agroclimatic monitoring, and territorial intelligence. It relies on public and private socio-environmental and agricultural risk layers, adding value and mitigating reputational and negotiation risks.

These solutions connect analytical intelligence and data to clients' core processes, enabling decisions that promote sustainable business development.

For U.S. operations, data used to expand product databases may include information obtained from lawful sources, including publicly available records and authorized third-party data providers, consistent with Applicable Laws and contractual restrictions.

6.3.2.5 PURPOSE OF PERSONAL DATA PROCESSING

Collected personal data will be used exclusively for contract linkage and development of solutions integrated into the Grain Station system, always serving the contractual object and

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 8 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

facilitating, expediting, and fulfilling commitments between the Parties, in compliance with Applicable Laws.

6.4 PERSONAL DATA RETENTION PERIOD

Personal data will be retained according to defined periods, except in cases of mandatory legal retention. Data subjects and controllers may request data deletion before the agreed retention period ends by emailing dpo@img.com.br.

Vega Farm Analytics may retain certain data as necessary to comply with legal obligations, resolve disputes, enforce agreements, maintain security, and prevent fraud.

6.5 SHARING OF PERSONAL DATA

Personal data may be shared with third parties when necessary to fulfill the purposes described in this Policy, observing Applicable Laws.

Sharing may occur, for example:

- for contract execution;
- to comply with legal or regulatory obligations;
- with service providers essential to Vega’s activities;
- with business partners;
- with public authorities;
- for the regular exercise of rights;
- to protect life, physical integrity, or security;
- with consent, when applicable.

In all cases, Vega Farm Analytics ensures that third parties adopt appropriate data security and protection measures.

6.5.1 INTERNATIONAL TRANSFER OF PERSONAL DATA

Vega Farm Analytics may transfer personal data to affiliated companies or service providers located outside the United States, including Brazil, when necessary for technology operations, system development, maintenance, customer support, hosting, and cybersecurity.

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 9 / 14
---	----------------------------	---------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

International transfers are conducted with reasonable safeguards designed to protect personal data, including confidentiality obligations, access controls, and contractual commitments with vendors and affiliates.

6.6 DATA SUBJECT RIGHTS

Depending on your state of residence, you may have certain rights under Applicable Laws, including TDPSA for Texas residents, such as the right to request access, correction, deletion, and portability (when applicable).

Texas residents may also have the right to opt out of:

- targeted advertising;
- the sale of personal data; and
- profiling in furtherance of decisions that produce legal or similarly significant effects (when applicable).

To exercise your privacy rights or submit a privacy-related request, you may contact us at dpo@img.com.br.

6.7 ROLES AND RESPONSIBILITIES IN PERSONAL DATA PROCESSING

6.7.1. DATA CONTROLLER

The controller (Vega Farm Analytics) determines purposes and mechanisms and assumes final responsibility for personal data processed. In certain cases, Vega Farm Analytics acts as a processor, handling data provided by clients or government agencies.

6.7.2 PRIVACY CONTACT

Vega Farm Analytics designates the following Privacy Contact for requests and inquiries related to this Policy:

Name: Ivone Mariko Masago, and in her absence, Luanda Bessa Ferreira
Email: dpo@img.com.br

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 10 / 14
---	----------------------------	----------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

6.8 INFORMATION SECURITY

Vega Farm Analytics maintains reasonable administrative, technical, and organizational measures designed to protect personal data against unauthorized access, disclosure, alteration, or destruction.

Such measures include access controls, authentication mechanisms, encryption where appropriate, monitoring, incident response procedures, and business continuity planning.

These measures are designed to align with industry-recognized information security practices and are periodically reviewed and updated to address evolving risks..

6.9 BROWSING DATA (COOKIES)

Cookies are used to improve usability and functionality of Vega Farm Analytics’s digital platforms and to understand visitor behavior.

Types of cookies used include:

- **Session cookies:** temporary cookies that are deleted when you close your browser. When you restart your browser and return to the website that created the cookie, that website will treat you as a new visitor.
- **Persistent cookies:** remain stored in the browser until they are manually deleted or automatically removed according to the expiration period defined by the cookie. These cookies recognize your return as a visitor to a previously accessed website or service.
- **Necessary cookies:** strictly necessary for the operation of Vega Farm Analytics’s website or compatible services. They enable website navigation and the use of available features.
- **Analytical cookies:** allow the analysis of website usage patterns. Such information makes it possible to identify links and pages that require improvement, thereby providing a better experience for visitors. The information collected by these cookies is anonymous (does not contain personal data) and is used solely for statistical purposes.
- **Messaging cookies:** installed on Vega Farm Analytics’s websites or compatible services and can only be read by our own compatible websites and services.
- **Advertising cookies:** displayed in advertisements and ads on third-party compatible websites and services. Information is collected when users click on or interact with

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 11 / 14
---	----------------------------	----------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

advertisements. Vega Farm Analytics may use the collected data to deliver relevant or interest-based advertising based on prior behavior.

- **Third-party cookies:** cookies from partner companies installed on Vega Farm Analytics’s websites, such as online advertising services, which may use the collected data to anonymously deliver targeted advertisements.

Vega Farm Analytics’s websites and services may also use other similar tracking technologies (see details below) to improve its websites and compatible services:

- **IP addresses:** An IP address is a number used on the internet or a network to identify a computer. Each time a user connects to the internet, the computer receives an IP address assigned by the internet service provider. IP addresses may be recorded for the following purposes:
 - Troubleshooting technical issues;
 - Maintaining the protection and security of our websites and other online services;
 - Gaining a better understanding of how our websites and online services are used;
 - Adapting our content to user needs, depending on geographic location.
- **Log files:** Information is collected in the form of log files that detail website activities and gather statistics on user browsing behavior. These logs are typically generated anonymously and help us understand details such as:
 - The type of browser and system used by users of our websites or online services;
 - Details of user sessions, including the referring URL, date, time, pages visited on our websites and compatible services, and the duration of use;
 - Other navigation or click-count details, including website traffic reports, unique visitor counts, and similar data.
- **Web beacons:** Web beacons (also known as web bugs or web beacons) are small sequences of code that enable the delivery of a graphic image on a web page for the purpose of transmitting data back to us. We use information from web beacons for various purposes, including:
 - Understanding how users respond to email campaigns;
 - Traffic reports for our websites and compatible services;

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 12 / 14
---	----------------------------	----------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

- Counting unique visitors, auditing, advertising and email reporting, and personalization across our websites and compatible services.

It is important to note that each user is responsible for ensuring that the settings of their computer or mobile device reflect their consent to accept or reject cookies. Most browsers allow users to set rules to receive notifications before accepting cookies or to refuse them altogether. Users do not need to have cookies enabled to use or browse most of Vega Farm Analytics’s websites and online services; however, in such cases, we cannot guarantee access to all available features.

We recommend that users review and understand the cookie settings of the web browsers they use.

6.9 LEGAL BASIS FOR PERSONAL DATA PROCESSING

By using Vega Farm Analytics’ services or engaging in a contractual relationship with the company, individuals acknowledge the processing of personal data as described in this Policy and as permitted by Applicable Laws.

6.10 APPLICABLE LAW AND JURISDICTION

This Privacy Policy shall be governed by the laws of the United States and, where applicable, the laws of the State of Texas, without prejudice to any rights that may apply under Applicable Laws.

7. POLICY COMMITMENT

Vega Farm Analytics is committed to transparency, ethics, and responsibility throughout all stages of personal data processing, ensuring compliance with Applicable Laws and internal Corporate Governance guidelines.

8. ANNEXES

Not applicable.

Prepared by: Ivone Masago e Luanda Bessa	Approved by: Enéas Brum	Page: 13 / 14
---	----------------------------	----------------------

	PRIVACY POLICY VEGA FARM ANALYTICS	Code: PO-GOV-32
		Date: 05/02/2026
		Review: 0
		Class: Public

9. REFERENCE

- Texas Data Privacy and Security Act (TDPSA);
- Federal Trade Commission Act (FTC Act), Section 5;
- Applicable U.S. state privacy laws;
- Internal corporate governance and information security policies.

10. ACRONYMS

- TDPSA: Texas Data Privacy and Security Act
- FTC: Federal Trade Commission
- PIA: Privacy Impact Assessment