

BRAZIL
ANNEX TO THE GLOBAL PRIVACY STATEMENT

Last updated: 01 March 2026

WHAT IS THIS ANNEX ABOUT AND WHEN IT IS RELEVANT TO YOU

This annex to the CNH Global Privacy Statement contains additional information and details which are specific to Brazil.

This annex is relevant to you if:

- your Personal Data is processed by an CNH entity established at Brazil.
- you are a Brazil resident, and your Personal Data is processed by a CNH entity Brazil that carries on business in the country which includes actively collecting Personal Data.

APPLICABLE DATA PROTECTION LAWS

The primary Data Protection law in Brazil is the General Protection Law – nº 13.709/2018 – “LGPD”, and the regulation that gives guidance about the international data transfer is RESOLUTION CD/ANPD No. 19, OF AUGUST 23, 2024 available here: [Atos Normativos — Agência Nacional de Proteção de Dados](#)

LEGAL JUSTIFICATION FOR THE PROCESSING OF PERSONAL DATA UNDER LGPD

The LGPD provides legal justifications for the processing of Personal Data (Article 7 or Article 11 of LGPD). Under the LGPD, at least one of these must apply for the processing of Personal Data to be lawful.

You can find an explanation of the legal justifications for the processing of your Personal Data in Section 3 of the Privacy Statement.

INTERNATIONAL DATA TRANSFERS

The international transfer of personal data will be limited to the minimum necessary to achieve its purposes, covering data that is relevant, proportionate and not excessive in relation to the purposes of the data processing.

In case your Personal Data is transferred from Brazil to recipients in other countries, we will ensure that the recipient of your Personal Data offers an adequate level of protection. In the event this is not possible we may transfer Personal Data only with your consent or in specific circumstances identified by the law.

Cross-border data transfers can be carried out if one of the following conditions is met:

- **Legal Basis:** one of the legal hypotheses provided for in Article 7 or Article 11 of LGPD; and
- **Countries or international organizations:** that provide a degree of personal data protection adequate to that provided in LGPD, and in complementary rules, as recognized by an adequacy decision issued by the ANPD;
- **Standard contractual clauses;**
- **Global corporate standards;**
- **Specific contractual clauses; or**
- **regularly issued seals, certificates and codes of conduct.**

TRANSPARENCY MEASURES

According to article 17 of the resolution CD/ANPD nº. 19 the controller shall publish on its website a document containing information in Portuguese, in simple, clear, accurate, and accessible language, on the international transfer of data, this section is aimed to provide information about the international data transfers available between CNH entities Brazil across the world.

Parties:	Transfer Mechanism:	Purposes:	Duration of the Processing
Between CNH Entities	INTRA-COMPANY DATA SHARING AND PROCESSING AGREEMENT see entity list and location at section 12 of the Privacy Statement	Human Resources: employee systems management, information consolidation, and reporting.	Duration as necessary to perform the obligations among the involved Parties according to the main contract to which the
		Marketing and Communications: global corporate communications, surveys, events management, and global website management.	
		Network Development: partner and dealer portal management, performance analysis, satisfaction surveys, and reporting.	

		Finance: financial control, results consolidation, reporting, and sustainability initiatives.	designation as controller/controller is referred to
		Legal and Compliance: whistleblowing channel management, internal investigations, and compliance reporting and analysis.	
		Procurement and Purchasing: global vendor, contract, and project management.	
		IT and Information Security: management of IT systems and applications, information security, and incident and cybersecurity management.	
		Telematics and Connectivity Services: provision and management of connectivity-related services.	
		Audit: internal and external audit management, reporting, and consolidation.	
CNH Entities and Microsoft	Contract/SCC via Licensing Documents	The company uses Microsoft's enterprise solutions solely to support internal operations in a secure and efficient manner. These tools enable corporate communication, productivity, collaboration, information management, and secure access to systems. All Microsoft products are used strictly for professional purposes and in accordance with internal policies, contractual obligations, and applicable data protection laws.	Duration as necessary to perform the obligations among the involved Parties

SECURITY MEASURES AND RESPONSABILITIES

The LGPD determines that processing agents must adopt security, technical and administrative measures to protect personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate or unlawful processing, as well as being able to formulate rules of good practice and governance that establish the conditions of organization, operating regime, procedures, including complaints and petitions from data subjects, security regulations, technical standards, specific obligations for those involved in processing, educational actions, internal supervision and risk mitigation mechanisms and other aspects related to the processing of personal data.

You can find an explanation of security measures and responsibilities under sections 7, 8 and 12 of the Privacy Statement.

YOUR PRIVACY RIGHTS

You may exercise the following rights in accordance with LGPD (Article 9, 18 and 20):

- Confirmation of the existence of data processing;
- Access to personal data;
- Correction of incomplete, inaccurate, or outdated data;
- Anonymization, blocking, or deletion of unnecessary, excessive, or non-compliant data;
- Data portability to another service or product provider;
- Deletion of personal data processed based on consent, except where retention is legally required;
- Information about public and private entities with which the controller has shared the data;
- Information about the possibility of not providing consent and the consequences of refusal;
- Withdrawal of consent at any time;
- Right to object to processing, when based on legal grounds other than consent and in case of non-compliance with the LGPD;
- Review of decisions based solely on automated processing of personal data that affect the data subject's interests (including profiling, credit, consumer, or professional decisions);
- Right to file a complaint regarding data processing before the Brazilian Data Protection Agency (ANPD); and
- Right to clear, adequate, and transparent information about data processing activities (transparency principle).

If you wish to exercise one or more rights listed above, you can submit a request to us at any time by:

- completing the online Privacy Request Form.
- sending an email to: Privacy-LATAM@cnhind.com

CONTACT INFORMATION

Given that CNH is a global organization, there may be different controllers that process your Personal Data, alone or jointly. A list of CNH subsidiaries and data protection officers LATAM which may be responsible for processing your Personal Data is available below:

Company Name	Registered Office	Data Protection Officer (if applicable)
CNH ARGENTINA S.A.	Av. Roque Saenz Peña 615 - Piso 11 - C.P. 1405 - Ciudad Autónoma de Buenos Aires - Argentina	DPO: Lindamaria Lima
CNH Industrial Brasil Ltda.	Avenida David Sarnoff, nº. 2.237, Sala CNH, bairro Cidade Industrial, Contagem/MG – CEP: 32.210-900 Brazil	E-mail: Privacy-LATAM@cnhind.com
CNHI COMERCIO DE PEÇAS LTDA	Avenida David Sarnoff, nº. 2.237, Sala CNH, bairro Cidade Industrial, Contagem/MG – CEP: 32.210-900. Brazil	
CNH INDUSTRIAL CAPITAL ARGENTINA S.A.	Av. Roque Saenz Peña 615 - Piso 11 - C.P. 1405 - Ciudad Autónoma de Buenos Aires - Argentina	DPO: Lorena Camargo E-mail: protecaodedadosbcnh@cnh.com
CNH Industrial Capital Corretora de Seguros Administração e Serviços Ltda.	Av. Juscelino Juscelino Kubitschek, 11.825, Cidade Industrial, Curitiba/PR -Brazil	
CNH Industrial Capital South America SpA	Las Condes, Calle: Av Apoquindo 3721 Of 131, Chile	
Banco CNH Industrial Capital S.A.	Av. Juscelino Juscelino Kubitschek, 11.825, Cidade Industrial, Curitiba/PR -Brazil	