General External Privacy Notice

1. Who does this Privacy Notice apply to?

To You, the Personal Data Subjects ("**You**" or "**Data Subjects**") that has commercial relations with **VTEX**.

In other words, You may be a:

- **VTEX** Websites user.
- **VTEX** Customer, Partner, Vendor employee or Vendor (if natural person).
- **VTEX** Potential Customer, Potential Partner or Potential Vendor employee.
- **VTEX** Customer, Partner or Vendor majority shareholder or legal representative.
- Member of or participant in a **VTEX** professional community, membership program or similar business initiative.
- Student in a **VTEX** educational program.
- Employees of a Seller operating in a Store within a **VTEX** Client's marketplace environment, or the Seller (if it is a natural person). For more information about Sellers, please visit the **VTEX** Help Center.

- Who is **VTEX**?

VTEX ("**we**", "**us**", "**our**") is a company listed on the New York Stock Exchange (NYSE: VTEX), owner of the **VTEX Platform**, a *multi tenant* platform that offers complete e-commerce solutions for large companies, the VTEX Customers.

This Notice does not apply to:	For this, You can find more information in:
Environments controlled by VTEX Customers or the **VTEX Platform**.	- Our External Privacy Notice (for Shoppers) or the **VTEX** Customer's Privacy Notice.
Candidates for jobs at **VTEX**.	- Our Hiring Notice.
VTEX Events Participants.	- Our Privacy Notice for Events or consult the specific Privacy Notice for the Event you attended.
VTEX employees.	- Our Employee Privacy Policy (available on our internal channels).

As a company with global operations, **VTEX** complies with the data protection laws of several countries around the world, taking as a parameter the *General Data Protection Regulation* ("GDPR"), recognized as the most robust framework for safeguarding personal data.

2. What personal data does VTEX process and for what purposes does VTEX process such personal data?

Data subject it applies to	Personal data processed	Purpose and lawful basis of the processing
VTEX Websites user	Navigation information collected by Cookies.	**Cookies** - By necessary Cookies: guarantee **VTEX** Websites' functionality. The lawful basis for this specific processing is **VTEX**'s legitimate interest. - By performance Cookies: measure and improve the performance of **VTEX** Websites. - By functional Cookies: provide enhanced functionality and personalisation for **VTEX** Websites. - By targeting Cookies: profile of your interests and show You relevant adverts on **VTEX** Websites and other sites. The lawful basis is consent.
VTEX Websites user	Name; Contact information; Additional information as requested on forms in **VTEX**'s websites.	**Contact through Websites** For contacting You, when you fill **VTEX** Websites' forms. The lawful basis is **VTEX**'s legitimate interest. Examples: To exercise Your Data Subject rights, if You fill the DSR form on the **VTEX** Website. To share data with Partners, to allow them to contact You, if you fill in Partner's specific form on the **VTEX** Partner Portal.
VTEX Websites user	Name; Contact information; Additional information as requested on forms in **VTEX**'s websites.	**Newsletter** For sending You newsletters about **VTEX**, when You subscribe through forms on **VTEX** Websites (such as the **VTEX** website, the Developers Portal and the Help Center). The lawful basis is consent.

Customer or Partner employee **Potential Customer or Partner employee**	Name; Employment; Contact information (email and/or phone number); Workplace; Communication information and/or history.	**Business Relationship** Manage sales opportunities, analyze **VTEX**'s performance, and maintain Customer and Partner relations. Customer and Partner Relationship Management. Lead generation for Potential **VTEX** Customers and Partners. The lawful basis is **VTEX**'s legitimate interest.
Customer or Partner employee / Potential Customer or Partner employee	Name; Contact information; Job title; Workplace; Communication preferences; Interaction with our emails (such as opens and clicks).	**Marketing Communications** Send You newsletters, content, event invitations and other information about VTEX, when You have opted in. Understand how You interact with our emails (such as opens and clicks), to improve our communications. You can unsubscribe at any time using the link available in our emails. The lawful basis is consent.
Potential Customer or Partner employee	Name; Contact information (business email and/or phone number); Job title; Workplace; Information about Your company.	**Prospecting** Identify and contact professionals from companies that may be interested in VTEX solutions. Complement the information we have about You and Your company, to make our contact more relevant. For this, VTEX may obtain Your professional data from publicly available sources and from business data providers, or receive it when You fill out a form on professional social networks, such as LinkedIn. You can ask us to stop at any time through our Data Subject Request channel. The lawful basis is **VTEX**'s legitimate interest.
Customer or Partner employee	Name; Contact information; Unique ID for authentication.	**Technical Support and Security** Provide technical support and improve service experience, which ultimately benefits both **VTEX** Customers and **VTEX** Partners by enhancing product adoption and increasing sales. Offering easy communication methods for high-quality support. The lawful basis is **VTEX**'s legitimate interest.

		Security Incident Management. The lawful basis for the last is compliance with legal obligations.
Customer or Partner employee	Name; Employment; Contact information; Workplace; Communication information and/or history; Educational programs records for certificate emission; Tax ID (when required for invoicing); Payment information (for paid courses and exams).	**Educational Programs** Offering education programs. Design and adaptation of experiences according to cultural and societal patterns of the regions our initiatives address. Training programs about the **VTEX Platform**. Registration and payment for paid courses and certification exams, including issuing invoices and digital certificates. The lawful basis is performance of a contract.
Student		
Customer or Partner employee who acts as an instructor in a VTEX educational program	Name; Contact information; Job title and workplace; Photo; Professional social media profile.	**Educational Program Instructors** Credit You as an instructor in the description of the courses You create or teach. Contact You about the content of the courses. The lawful basis is **VTEX**'s legitimate interest.
Customer or Partner employee	Name; Email; Unique ID for authentication.	**Access to the VTEX Platform** Guarantee the Data Subject's access to the **VTEX Platform** to manage the **VTEX** Customer's Store. The lawful basis is **VTEX**'s legitimate interest.
Customer or Partner employee	Name; Email; Unique ID for authentication.	**Internal Audits** In specific cases, Your data may be accessed as a sample in VTEX's internal audits and control assessments.

		The lawful basis is compliance with legal obligations.
Potential Customer or Potential Partner employee	Name; Email; Unique ID for authentication; Usage information.	**Testing Environment** To ensure the Data Subject's access to the **VTEX** Platform testing environment prior to contracting, allowing the employer of the Data Subject to evaluate the Platform's functionalities. The lawful basis is **VTEX**'s legitimate interest.
Customer, Partner or Vendor majority shareholder or legal representative	Name; Date of birth; City of birth; Employment; Relevant information relating to the Data Subject's previous frauds, crimes, corruption, scandals etc.	**Third-Party Due Diligence** Third Party Due Diligence, to map and mitigate any risks related to **VTEX**'s relationship with the company or person subject to due diligence. Identify information that may be indicative of reputational risk, terrorist financing, fraud, or other financial crimes. Ensuring the security and integrity of the company's operations and maintaining trust with other Customers, Partners and stakeholders. The lawful basis is compliance with legal obligations.
Vendor employee or Vendor (if natural person)	Name; Employment; Contact information; Workplace; Communication information and/or history.	**Vendor Management** Manage vendor opportunities, analyze the best commercial and service provision possibilities. Negotiation and contract execution with Vendors through their employees, to ensure vendor reliability, compliance, and business continuity. The lawful basis is **VTEX**'s legitimate interest.
Vendor (if natural person)	Name; Tax ID; Bank account details; Invoices.	**Vendor Payments** Register You in VTEX's payment systems and pay for the services You provided, sharing the necessary data with banks. The lawful basis is performance of a contract. Keep payment records as required by tax laws. The lawful basis is compliance with legal obligations.

Customer, Partner or Vendor employee **Customer, Partner or Vendor majority shareholder or legal representative**	Name; Employment; Contact information; Signature.	**Contract Signing** Contract signing with Your employer. The lawful basis is legitimate interest.
Customer, Partner or Vendor employee visiting a VTEX office	Name; Identification document number; Images captured by security cameras.	**Office Visits** Register Your access to VTEX offices. For this, VTEX may share Your name and document number with the building administration, which may ask for additional information for access control under its own responsibility. Record images through security cameras to protect people, assets and facilities. The lawful basis is **VTEX**'s legitimate interest.
Employees of Sellers or Sellers (if it is a natural person)	Name; Job title; Contact information; Information provided within the VTEX Client's marketplace environment.	**Marketplace Operations** To enable the operation of the Client's marketplace and Store, including activities such as: - Registration and identification of the Seller in the Store, - Catalog and integration management, - Technical support, - Operational monitoring and processing of information necessary to enable order distribution and the functioning of the commercial and logistical routines defined by the Client. In this case, **VTEX** acts as a Data Processor and the **VTEX** Client acts as a Data Controller. Therefore, the lawful basis for the processing is defined by the Client.
Anyone that reaches out through the Compliance Channel	Name; Employment; Contact information; Any personal data related to the complaint.	**Compliance Channel** - Any person can send a complaint through our Compliance Channel, including VTEX Employees and those of its Clients and Partners, Website Users, Sellers, Shareholders, and Legal Representatives, among others.

		- That means You can send a complaint or You can be subject to one. In that case, VTEX will process your personal data to investigate the complaint. The lawful basis is compliance with legal obligations.
Member of or participant in a VTEX professional community or membership program	Name; Contact information; Employment and workplace information, including company and job title; Industry; Country; Membership and communication information and/or history.	**Communities and Membership Programs** Register and manage Your participation in **VTEX** professional communities and membership programs, including verifying eligibility, maintaining membership records, administering the program, and sending communications necessary for Your participation. The lawful basis is performance of a contract. Manage **VTEX**'s relationship with You and understand engagement with **VTEX** professional communities and programs, including lead generation and development of potential business relationships with You and/or the organization with which You are professionally affiliated. The lawful basis is VTEX's legitimate interest. Send You marketing and promotional communications, including newsletters, insights, content, event invitations, product information, and other **VTEX**-related updates, where You have opted in. The lawful basis is consent.

3. Does VTEX share your personal data?

VTEX does not disclose or commercialize Your personal data.

The sharing of personal data between **VTEX** and Your employer may occur according to the processing activities detailed above.

However, it is important to know that **VTEX** may need to share personal data in the following instances:

- Third Party Service Providers:
    - **VTEX** may need to transit the personal data on external platforms, to be able to correctly complete the processing activities informed above.
- Legal or judicial obligation:
    - **VTEX** may also share your personal data in order to:

      - Comply with legal obligations or court order;

- Prevent fraud or other crime prevention purposes;

- Respond to a request for information from a competent data protection authority, or other public or governmental authorities, including to meet national security or law enforcement requirements.

If we must disclose your personal data in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, we may not be able to ensure that such recipients of your personal data will maintain the privacy or security of your personal data.

4. Does VTEX transfer your personal data to other countries?

VTEX might store your personal data in other countries.

If our service providers are ever located outside of Europe or the United States, we will require those third parties to maintain at least the same level of confidentiality that we maintain for such personal data ourselves. **VTEX** remains liable for the protection of your personal data that is transferred to our service providers, except to the extent that we are not responsible for the event giving rise to any unauthorized or improper processing not attributable to **VTEX**.

5. How long does VTEX process my personal data?

VTEX will keep your personal data until:

i. You request the deletion of your personal data;
ii. It is no longer necessary or relevant for us to provide you with our services, or
iii. The end of the retention period according to the laws applicable to a certain type of data, or the need to preserve data to protect **VTEX**'s rights.

6. What are your Data Subject rights and how can you exercise them?

At any time, you can request and obtain free exercise of your rights as a Data Subject through the Data Subject Request channel. Check out what these rights are:

- Confirmation of the existence of processing;
- Access to your personal data;
- Correction of incomplete, inaccurate or outdated personal data;
- Anonymization, blocking or deletion of personal data that is unnecessary, excessive or processed in breach of applicable data protection laws;
- Data portability (i.e. the right to ask for and receive a portable copy of your personal data that you have given us or that you have generated by using the **VTEX** Platform so that you can move it, copy it, keep it for yourself, or transfer it to another organization.);

- Deletion of your personal data;
- Information on the public and private entities with which **VTEX** has shared data;;
- Information on the possibility of not providing consent and the consequences of refusing, as applicable;
- The withdrawal of your consent, as applicable; and
- Petition in relation to your personal data against **VTEX** and/or the Merchants before the competent authorities, in particular the applicable Data Protection Authorities.

In the event that **VTEX** cannot comply with your request for technical, contractual or legal reasons, we will notify you of the same.

7. How do we protect your personal data?

We have robust security measures in place to protect the confidentiality, integrity and availability of your personal data:

- Accidental loss;

- Unauthorized access;

- Alteration;

- Disclosure.

Only employees authorized by **VTEX** can access them, always bound by confidentiality agreements and internal policies, under penalty of disciplinary action.

Our internal processes for detecting and managing cybersecurity threats are improved on an annual basis.

If any incidents are confirmed, we will immediately notify the Data Subjects as requested by the local applicable law.

8. Contact

If you have any questions, concerns or complaints about our Privacy Notice; about the processing of personal data and compliance measures of **VTEX** or about Your Data Subject rights:

- Send a message via the link https://vtex.com/en-us/trust/general/data-subject-request/;
- Or contact VTEX's Data Protection Officer by e-mail at dpo@vtex.com.

9. Changes to this Privacy Notice

It is important to know that we may change this Privacy Notice from time to time.

But rest assured! Whenever this happens, we will alert you to the changes by means of a notice on the website or in the app, by e-mail and/or notification on communication channels, making it as transparent as possible.

ATTENTION!

If you do not agree to the changes, you will not be able to use **VTEX**'s Websites or hold commercial relationships with **VTEX**.

In this case, you can request the deletion of your personal data in accordance with section 6 of this Notice.

Prepared by:

Version	Name	Job title	Date
1.0	Gabriela Tostes	Legal & Privacy Analyst	08/11/2024
2.0	Gabriela Tostes	Jr Corporate Lawyer & Privacy Analyst	04/12/2025
2.0	Maria Eduarda Salomão	Corporate Lawyer & Privacy Analyst	14/08/2026
3.0	Gabriela Tostes	Jr Corporate Lawyer & Privacy Analyst	13/11/2026

Approved by:

Version	Name	Job title	Date
1.0	Juliana Lopes	Global Head of Legal & Privacy	08/11/2024
2.0	Renan Sancho	Data Protection Officer (DPO) & Legal Counsel	04/12/2025
3.0	Renan Sancho	Data Protection Officer (DPO) & Legal Counsel	16/11/2026