External Privacy Notice - Foresight Commerce Academy

1. What is the Foresight Commerce Academy?

Foresight Commerce Academy "Foresight" is the go-to platform for high-level commerce learning. Foresight's content is grounded in 3 main pillars: Business, Technology and Architecture, and it offers on-the-job training through focused programs.The platform is designed to meet the training requirements of **VTEX** and those of the ecosystem while supporting and enabling each individuals' career development.

Who does this Privacy Notice apply to?

To **Students** who access Foresight ("Students"). These Students can be::

- Enrolled by instruction of the company in which they work ("Client");
- Foresight's direct contractors;
- **VTEX** employees.

To **Teachers** who teach at Foresight ("Teachers").

All together referred to as "Data Subjects".

- Who is VTEX?

VTEX is a company listed on the New York Stock Exchange (NYSE: VTEX), owner of Foresight.

- Who is the Client?

The Client is a company that has contracted Foresight's services.

- Roles in the processing of personal data

VTEX and its Clients act as independent controllers of personal data ("Controllers"), having different purposes in relation to the processing of Students' personal data.

VTEX also acts as personal data controller in relation to Teachers.

- What does this mean?

It means that **VTEX** will collect and process the personal data provided by the Data Subjects within the Foresight platform and according to the purposes described below in order to carry out all the necessary steps for completing courses and issuing certificates.

The Client, on the other hand:

(i) may send the Students' personal data to Foresight for the purpose of registering on the platform; and

(ii) may receive performance evaluation reports regarding the Student's completion of the courses.

- This Notice does not apply to:

*(i) the **VTEX** platform;*

(ii) environments controlled by Clients;

(iii) applicants for jobs at **VTEX**.

As a company with global Clients, **VTEX** operates in accordance with the data protection laws of several countries around the world, based on the General Data Protection Regulation ("GDPR").

What personal data does VTEX process in Foresight? For what purposes?

Personal data processed	Purpose of processing
Students data: - Full name - E-mail address - Phone number - Job title - Country - Company	• Register on the Foresight Commerce Academy platform
Students data: - E-mail - Country - Company	• Creation of engagement reports
Teachers data: - Name - LinkedIn profile - Face picture - Job title - Company	• Credits in the class description
Teachers data: - Name - E-mail	• Points credits in the contribution program • Communications via e-mail

VTEX defines the lawful basis of performance of contract as applicable for the processing of

Data Subjects' personal data.

2. How long does VTEX process my personal data?

The data will be kept for a period of 10 (ten) years after inactivity on the platform following the termination of the contract, unless, at the request of the Data Subjects, it is deleted before the established retention period.

3. Does VTEX share your personal data?

VTEX does not disclose or commercialize personal data of Students and Teachers. The sharing of Students' personal data between **VTEX** and Clients may occur according to the conditions contracted by the Client.

VTEX may share your personal data for the purpose of preventing fraud or other crimes. **VTEX** must also comply with legal obligations, court or administrative orders (e.g., personal data protection authorities) and cooperate with investigations conducted by competent agencies (e.g., law enforcement; U.S. Federal Trade Commission (FTC); U.S. Department of Transportation (DOT); any other authorized U.S. statutory agency).

4.1. Data Processors

For the purposes of storing and operating Foresight, **VTEX** may need to transit the personal data of Students and Teachers on the following external platforms.

Sub-processors	Personal data processed	Purpose of processing
Webflow	**Leads data (Potential contracting companies):** - Name - E-mail - Phone number - Country - Company	- Storage of Foresight data - Collection of leads for users who fill in the form available at https://www.commerceacademy.org/contact-sales
Sleekplan	**Students data:** - E-mail	Sending e-mails to students with notices about new content
The Members	**Students data**: - Name - E-mail - LinkedIn	- Access to the platform for studies and content consumption - Issuance of engagement reports. - Single Sign On (LinkedIn)
Hubspot	**Students data**: - Name - E-mail	Sending e-mail notifications about new programs, new features, and progress in

		completing courses
Pipedream	**Students data**: - Name - E-mail	Sending data between tools to automate processes
EICOM e Accredible	**Students data**: - Name - E-mail	Badging of credentials issued when the user passes an exam
VTEX Admin	**Students data**: - Name - Email - Phone number - Address - Position - Company	- Processing registration and payment for credential exams - Sending emails about the application: approved payment, cancellation, etc.
Active Campaign	**Students data**: - Name - Email - Phone number - Address - Position - Company **Teachers data**: - Name - E-mail	- Automations for sending emails with credential exam access data, general instructions, exam results, etc. - CRM - management of the history of exams taken for support and reporting purposes
Inspera Exam Portal	**Students data**: - Name - E-mail	- Access to the platform where the credential exams will take place

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.

5. What are your Data Subject rights and how can you fulfill them?

At any time, you can request and obtain free exercise of your rights as a Data Subject through the 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, it will notify you of the same.

6. 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.

Remember: personal data travels securely through the **VTEX Platform.**

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 **Merchants** so that they can take the necessary measures with the Data Protection Authorities of their jurisdiction and, if applicable, with the Shoppers.

For more information on the security measures and practices adopted by **VTEX**, visit our Security Practices page or our Security Help Center.

Check out our AWS sub-processor certifications (ISO 27001, PCI DSS, CSA, NIST and many others) on the AWS Compliance Program page.

→ If you are a **Merchant** and would like more information on information security practices and resources in e-commerce stores, visit our Security Help Center.

7. Contact

- If you have any questions, concerns or complaints about our Privacy Notice; about the processing of personal data and compliance measures of **VTEX**; about your Data Subject rights; or about our certification to the *Data Privacy Framework*:
- Send a message via the link https://www.commerceacademy.org/request-removal-of-personal-content;
- Or contact VTEX's Data Protection Officer (Angela Fonseca) by e-mail at dpo@vtex.com.

8. 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 access the functionalities of **Foresight**.

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

Version	Approved by		Date
	Name	Function	
1.0	Angela Fonseca	Corporate Lawyer & Data Protection Officer (DPO)	07/08/2024