Privacy Policy

Last updated: November 6, 2026

This Policy explains how VVend (`vvendi.com`, its subdomains and the market's own domains that a market connects to it) handles personal data, in line with Brazil's General Data Protection Law (Law 13.709/2018, **LGPD**) and the Brazilian Civil Rights Framework for the Internet (Law 12.965/2014, Marco Civil). It covers people with a VVend account (market owners and staff), the customers and suppliers a market registers, and anyone visiting a market's public shop or offers.

By using VVend, you confirm that you have read and understood this Policy. The rules for using the service are in the Terms of Use.

1. Who we are and what we do

VVend is operated by **Fireho** (CNPJ 15.548.991/0001-19), based in Monte Santo de Minas, MG, Brazil ("**we**"). It is a management system for markets and supermarkets: till, stock, purchasing and suppliers, the customer's account (credit and prepaid), loyalty points, the weekly basket, a public shop, offers on the store's TV, and staff payroll.

2. Roles: controller and processor

The LGPD separates whoever decides about the data (controller) from whoever handles it on someone else's behalf (processor). In VVend, both roles exist:

Situation	Controller	Processor
Your VVend account, sign-in, browsing, subscription billing and support	**Us**	Our providers
Data the market enters: customers, accounts, sales, points, baskets, suppliers, chats, purchases, staff and payroll	**The market**	**Us**
The single person record tied to the phone and CPF typed in (section 3.2)	**Us**	Our providers

When we act as **processor**, we handle the data according to the market's instructions, the Terms of Use and the contract, when there is one. The market answers for the legal basis, for transparency towards the data subjects (its customers, suppliers and employees) and for honouring their rights. Requests that reach us about that data are forwarded to the market responsible.

Of the data the market enters, we are controller only of the person record described in section 3.2; the data subject may ask for access to it and object to it at sac@vvendi.com (art. 18, §2).

3. Data we handle

3.1. Your account

- **Sign-up:** name, email, phone (when given), password (stored only as a hash), language and time zone; photo and other profile fields, if you fill them in; CPF and address, if you enter them on your account page.
- **Market staff:** which market you work at and in which role (owner, admin, cashier and the like). Whoever invites a colleague gives their name and their email or phone.
- **Market data:** name, legal name, CNPJ, address, contacts, logo, brand colours, own domain, and the points and shop settings.

3.2. The market's customers

When the market opens an **account** (customer card) for someone, it enters the **name**, and may enter the **phone** and the **CPF**. With that we keep, on the market's behalf:

- the card code (the printed QR), the balance, any credit limit the market grants, purchases made on the account, payments, prepaid top-ups and any block;
- the **loyalty points**: each line earned or spent, tied to the sale behind it;
- the **weekly basket**, when there is one: its items, the weekday and each week's sale.

To find the same person at the next visit, the phone and CPF typed in are linked to a single person record in VVend, the same one in every market where she shops and the one behind her own account, if she already has one; that record does not become an account with a password on its own, and each market sees only what it typed itself. We are the controller of that record (sections 2 and 4).

3.3. The market's suppliers

The market registers its suppliers: name, CPF or CNPJ, phone, email, sections and tags, prices by quantity, quotes received and purchases made. These are mostly company data; they may be personal data when the supplier is an individual or a sole trader.

The chat with the supplier. If the market connects **its own WhatsApp number** to VVend (the chip), the chip keeps in VVend every one-to-one message that reaches the market's number and those the market sends from the phone itself, with their files (photos, audio, documents): the text, the number that wrote, the date and who on the staff replied. Those from numbers no supplier has land in the market's inbox; messages from groups, statuses and channels are not kept. Files are kept in our storage, in Brazil, and only the market's staff and, for support and security, VVend's administrators open them. VVend has no bot or assistant on WhatsApp.

3.4. Sales, till and payments

- **Sales:** products, quantities, amounts, the till, who sold, the payment method and the receipt. VVend's receipt **is not a tax document**.
- **Cash and card on the card machine:** we record only the payment method and the amount. The card goes through the market's own machine; **VVend neither receives nor keeps customers' card data**.
- **Pix:** a Pix lands in the market's own account, at its bank (Asaas or Sicoob today). To create the charge, the bank receives the amount and, of the customer, only **the account's name and the CPF the cashier typed**. The market's access keys to its bank are stored encrypted.

3.5. Payroll

When the market uses payroll, it enters for each staff member: name, CPF, start and end dates, regime, salary, working hours, the **number** of dependants for income tax (never their names), each month's events and, if it wants, the contract file. We compute payslips with INSS, IRRF and FGTS. Each person sees their own payslips in their account.

3.6. Data collected automatically

- **Access logs:** IP address, date and time, pages visited and what was sent in forms, without passwords, phones, CPF, emails, amounts and searches, kept as the Marco Civil requires.
- **Cookies and local storage:** see section 11.
- **Audience metrics:** we use Google Analytics, on every page, including the staff pages, to measure visits in aggregate.

3.7. Data received from third parties

- **Sign in with Google or Apple:** see sections 5 and 6.
- **Banks:** confirmation that a Pix was paid.
- **WhatsApp:** messages that reach the market's chip (section 3.3).

4. Why we use data and on which legal basis

Data	Purpose	Legal basis (LGPD)
Account, sign-in and staff	Create and keep the account, authenticate, control permissions	Performance of contract (art. 7, V)
Single person record (phone and CPF typed by a market)	Recognise the same person and avoid duplicate records, without showing one market what another typed	Fireho's legitimate interest, as controller of this record (art. 7, IX, and art. 10)
Customers, accounts, points and baskets	Provide the market with till, account and loyalty	The market's, as controller; us as processor
Suppliers and chats	Provide the market with purchasing and the chat	The market's, as controller; us as processor
Payroll	Compute payslips and show each person their own	The market's, as controller; us as processor
Subscription billing	Charge and reconcile payments	Performance of contract (art. 7, V) and legal obligation (art. 7, II)
Access logs	Security, incident investigation, legal compliance	Legal obligation (art. 7, II; Marco Civil, art. 15)
Usage metrics	Improve VVend, in aggregate	Legitimate interest (art. 7, IX)
Service emails	Account, access and billing notices	Performance of contract (art. 7, V)
Support and the help button	Answer questions and take suggestions	Performance of contract (art. 7, V)
Fraud prevention and account blocking	Stop abuse and the return of a blocked account	Legitimate interest (art. 7, IX)

Data	Purpose	Legal basis (LGPD)
Legal defence	Exercise rights in judicial, administrative or arbitral proceedings	Art. 7, VI

For the data the market controls, the usual bases are: performance of contract (art. 7, V) for the account and the basket; credit protection (art. 7, X) for store credit; legal obligation (art. 7, II) for payroll.

VVend does not need sensitive personal data (art. 5, II, and art. 11) and asks for none. Do not send such data in free-text fields or in chats.

We do not sell personal data and do not use it for third-party advertising. We send no marketing email without your consent. A market's customers and suppliers are **never** shown to another market.

5. Google user data

You can sign in to VVend with your Google account (Google Sign-In). In that case:

- **What we access.** Only the `email` and `profile` scopes: your **name**, your **email address**, your **Google account identifier** and the address of your **profile photo**. We request no offline access, keep no refresh token and **do not access Gmail, Drive, Calendar, Contacts or any other data in your Google account**.
- **How we use it.** To create your account or link it to an existing account with the same email, authenticate you on later visits and show your name and photo in the interface. Nothing else.
- **How we store it.** Name, email, identifier and photo address sit in your account record, in our database, with the same security as the rest of the account data.
- **Who we share it with.** Nobody, except the infrastructure providers that host the service (section 7), as far as needed to run it, or

when required by law.

- **How we delete it.** When you delete your account, signing in with Google no longer works. Name, email, the Google account identifier and the photo address are kept, as in section 12, and used for nothing else.

VVend's use and transfer to any other app of information received from Google APIs will adhere to the Google API Services User Data Policy, including the Limited Use requirements.

In particular, Google user data is **not sold**, **not used for advertising**, **not used to train general artificial intelligence or machine learning models** and **not read by humans**, except with your express consent, when needed for security (such as investigating abuse) or to comply with the law.

To revoke access, go to myaccount.google.com/permissions and remove VVend. After that, sign in with email and password or another method; if you also want to close the account, section 12 says what is erased and what is kept.

Google Analytics, mentioned in section 3.6, is a site metrics tool and has nothing to do with Google Sign-In data.

6. Apple, email, passkeys and notices

- **Sign in with Apple.** We receive from Apple the account identifier, the email (which may be a private Apple relay address) the name, if you choose to share it, and a token we keep only to revoke access when you delete the account. We use them only to create the account and authenticate you.
- **Sign-in link.** A single-use link sent by email that opens a session for the account it was made for.
- **Passkeys.** The private key stays on your device or password manager; we keep only the public key and the passkey's identifier.

- **Notices.** VVend notifies **by email only**, sent from `no-reply@vvendi.com`. We send no push notifications and no WhatsApp messages to the market's customers.

7. Sharing

We share data only as far as needed, with:

Category	Who	What for
Hosting and network	Servers rented from Hostinger, in Brazil; DNS and network (Cloudflare); file storage (Magalu Cloud, in Brazil)	Running the service
Email	Amazon Web Services (Amazon SES, in São Paulo)	Account, access and billing emails
SMS	SMS provider (GTI)	Sending the code that confirms your phone and the sign-in by phone
Support email	Google (Google Workspace)	Receiving what you write to `sac@vvendi.com`
The market's Pix	The market's bank (Asaas or Sicoob)	Creating and confirming the Pix of a sale or top-up
Subscription billing	Sicoob (boleto and Pix) and, when available, Asaas (card)	Charging the market for VVend
WhatsApp	WhatsApp (Meta), through the market's own number	Carrying the messages of the market's number (section 3.3)
Sign-in	Google, Apple	Authentication, when you choose it
Address	Google (Google Maps)	Completing the address you type on your account page
Metrics	Google (Google Analytics)	Aggregate visit statistics
Artificial intelligence	Google (Gemini), DeepInfra, Anthropic and a model on our own server	The help button (section 8)
Market	The market you are linked to	It is the controller of the data it enters
Authorities	Courts, prosecutors, ANPD, police and tax authorities	When required by law or a valid order

Providers handle data under their own contracts or terms of service, and only for the purposes above.

What is public. A market's public shop and the offers on the store's TV show products, prices and the market's brand. They **do not show** customer or supplier data.

In a **merger, acquisition, spin-off or sale** of part of the business, data may pass to the successor, who will be bound by this Policy. We will give notice before any relevant change in how data is handled.

8. Artificial intelligence

The round help button answers questions about VVend and takes suggestions and complaints, with the help of AI models (Google Gemini, DeepInfra or Anthropic). What goes to the provider is your question, the conversation, your name, language, the markets you work at, a city guessed from your IP or area code, and the notes the assistant keeps about you for later conversations; we send no passwords or payment data. All three are used through paid APIs (Gemini on Google's paid tier), which do not use what we send to train models. Part of the answers come from a model running on our own server, in Brazil. The notes and the conversations are erased when you delete your account (section 12). Do not write customers' data, CPF or sensitive data in the help button.

Today AI does not write to suppliers and does not decide prices, sales, credit, points or payroll: those are system calculations on the records, or a person's decision. If that changes, this Policy changes first. **AI answers can be wrong**; they are not legal, accounting or tax advice.

9. International transfer

The servers, the database and the files are in Brazil, on machines rented from Hostinger and in Magalu Cloud's storage. Email (Amazon SES)

is in Brazil too, in São Paulo.

Some providers handle data **outside Brazil**, especially in the United States: Google (sign-in, Google Analytics, Google Maps, Gemini and Google Workspace), Apple (sign-in), Anthropic and DeepInfra (the help button), Meta (WhatsApp) and Cloudflare (network, with servers in many countries). These transfers rely on art. 33 of the LGPD: when needed for the contract with you (art. 33, IX, with art. 7, V) and, in the other cases, on standard contractual clauses approved by the ANPD (art. 33, II, b; ANPD Resolution CD/ANPD 19/2024). You may ask for the full clauses at sac@vvendi.com.

10. Retention

We keep personal data only as long as the purposes of this Policy require:

- **Account:** until the account is deleted; after that, what section 12 keeps.
- **Access logs: 6 months**, as art. 15 of the Marco Civil requires, or longer under a court order or an incident under investigation.
- **Subscription billing:** for the periods tax and accounting law sets, usually 5 years.
- **Market data** (customers, sales, suppliers, chats and their files, payroll): while the market is a client and for the export period in the Terms of Use. The market, as controller, answers for its own periods, including those of labour and tax law.
- **Backups** are replaced in their normal cycle.
- **Defence of rights:** for the applicable limitation period (art. 16 of the LGPD).

11. Cookies and local storage

Type	Example	What for	Can you turn it off?
Essential	Session cookie, request forgery protection, "remember me"	Keep you signed in and safe	No, sign-in does not work without them
Preferences	Language, light or dark theme, printer settings and the store TV pairing	Remember your choices	Yes, in the browser
Metrics	Google Analytics	Aggregate visit statistics	Yes, in the browser, with blocking extensions or with the Google Analytics opt-out add-on

We use no advertising cookies.

12. Deleting your account

How to ask: on your account page, the *Delete my account* button, or by email to sac@vvendi.com.

What happens: the account is closed at once and can no longer sign in.

Erased at once:

- password and passkeys; sign-in keys and links stop working at once;
- the photo you uploaded, the bio, the website, sex, location and notice preferences;
- conversations with the help button and the notes the assistant kept about you.

Kept:

- name, nickname, email, phone, CPF, address, birth date, language and time zone, and the data of the accounts used to sign in (Google, Apple: identifier, name, email and photo address), for the

applicable limitation period, for the regular exercise of rights (LGPD, art. 7, VI) and fraud prevention (art. 7, IX), kept restricted and used for nothing else; then erased;

- date and reason of closing;
- messages sent to support and suggestions;
- what you did on a market's behalf (sales, purchases, messages to suppliers): it is the market's history;
- subscription charges, for 5 years;
- access logs, for 6 months.

Why: the law requires keeping part of this (charges, under tax law; access logs, under art. 15 of the Marco Civil); the rest we keep by legitimate interest, for the period above, to defend ourselves and to stop a blocked account from coming back (LGPD, art. 16). Outside these cases, you have the right to final deletion (Marco Civil, art. 7, X). It is used for nothing else.

If you are a market's customer, your account there (balance, purchases, points, basket) belongs to the market: ask the market.

13. Your rights

Under art. 18 of the LGPD, you may ask at any time for:

- confirmation that we handle your data, and **access** to it;
- **correction** of incomplete, inaccurate or outdated data;
- **anonymisation, blocking or deletion** of unnecessary or excessive data, or data handled against the law;
- **portability** to another provider, under the regulations;
- **deletion** of data handled on the basis of your consent, within the limits of section 12;
- information on **who we share** your data with;
- information on the option not to consent and its consequences;

- **withdrawal of consent**;
- **objection** to handling based on another legal ground, when the law is not being followed;
- **review of automated decisions** that affect your interests (art. 20 of the LGPD).

How to ask. Requests are free of charge (LGPD, art. 18, §5). Write to sac@vvendi.com, preferably from your registered email; if you no longer have access to it, say so and we will ask for another way to confirm your identity. We may ask for information to confirm your identity first. We answer at once in simplified form, or within **15 days** with the full statement (art. 19 of the LGPD).

If the data belongs to a market (you are its customer, supplier or employee), the market is the controller: address your request to it. If you write to us, we will forward it and support the answer.

If you believe your rights were not honoured, you may complain to Brazil's **National Data Protection Authority (ANPD)** at gov.br/anpd, as well as to consumer protection bodies.

14. Security and incidents

We take technical and administrative measures proportional to the risk, such as encrypted connections (HTTPS), hashed passwords, encrypted bank keys, separation of each market's data, role-based access within each market, request limits, backups and access to servers and the database restricted to our technical staff. The database is never copied whole for development: only the site's pages and the assistant's instructions leave it, by name, never data about people or markets.

No system is infallible. If a security incident could bring relevant risk or harm to data subjects, we will notify the ANPD and those affected within 3 business days of learning of it (LGPD, art. 48; ANPD Resolution CD/ANPD 15/2024) and, when we are processors, tell the market within 48 hours, with what we know, so it can meet its obligations.

You have a part too: use a strong, unique password, prefer passkeys, do not share your account and tell us of any suspicious use.

15. Children and teenagers

VVend accounts are for people **18 or older**. We do not knowingly collect data from children or teenagers, and a market should not open a customer account for a minor without their guardian.

16. Users outside Brazil

VVend is made for Brazil but can be reached from other countries.

- **European Union and United Kingdom (GDPR / UK GDPR):** the legal bases in section 4 correspond to performance of contract, legal obligation and legitimate interest. You have rights of access, rectification, erasure, restriction, portability and objection, within the limits of section 12, and may complain to your country's data protection authority.
- **California (CCPA/CPRA):** the data categories and purposes are in sections 3 and 4. **We do not sell or "share" personal data** for cross-context behavioural advertising. You may ask to know, correct and delete your data, within the limits of section 12, with no discrimination for exercising these rights.

17. Changes to this Policy

We may update this Policy to reflect changes in the service, our providers or the law. The date at the top shows the version in force. Relevant changes will be announced in VVend or by email before they take effect.

If versions in other languages differ, the Portuguese version prevails.

18. Data protection officer and contact

Data protection officer. Fireho is a small processing agent (agente de tratamento de pequeno porte, ANPD Resolution CD/ANPD 2/2022) and, as article 11 of that Resolution allows, has appointed no data protection officer (encarregado). Instead it offers a channel for data subjects, the same on all its sites: sac@fireho.com, for complaints, requests and communications about personal data.

For any other matter in this Policy: sac@vvendi.com.

See also the Terms of Use.