

Privacy Policy

Data Protection General Law (Federal Law No. 13.709/18 or "LGPD")

We, at BOCOM BBM (Financial Conglomerate), are committed to keep our clients informed of the personal data collected, used, stored or, in any other way, treated in the context of the commercial and contractual relationship established with us.

This policy is aimed to 'natural person' customers, representatives and collaborators of corporate clients, and our websites' users ("Customer" or "you"), and aims to provide clear and accurate information about the treatment we give to personal data, in accordance with the Data Protection General Law (Federal Law No. 13.709/18 or "LGPD") and any other legislation applicable to privacy and data protection.

1. What is Personal Data?

Personal data is any information able to identify directly or indirectly (through association, for example) an individual, such as Name, CPF, e-mail, and others.

For more information regarding your personal data's treatment, contact the Data Protection Officer ("DPO") of BOCOM BBM sending an email to protecaodedados@bocombbm.com.br.

2. Who is your personal data's controller?

For the purposes of the applicable legislation, the controller is the person who is in charge of the decisions regarding to personal data's treatment. BOCOM BBM is the controller of your personal data, which is under our custody, and uses it to achieve the purposes described in Section 5 of this Policy.

3. How do we collect your personal data?

Directly with you: we collect and process personal data obtained directly from you in the context of our commercial and contractual relationship. We may also obtain your personal data indirectly, for example, from recording telephone calls and exchanging emails. In these cases, your data will not be treated routinely, but it may be necessary for other purposes in the future (such as in the case of investigations or analysis for compliance of applicable norms).

Data obtained from other sources: we also process data that we obtained from public sources (such as the press, public websites, public databases) or that are legitimately shared with us by third parties (such as service providers and companies within BOCOM BBM's conglomerate).

4. Which personal data is treated?

To the extent permitted by applicable law, we may treat the personal data described below.

- **Identification, registration and contact data:** full name, date and place of birth, nationality, gender, photo, full address, phone numbers and e-mail address.
- **Identification documents:** copies and/or numbers of identification documents, such as RG, CPF, CNH, passport, professional licenses and certificates.
- **Financial information:** source of income, equity, information about guarantees (such as mortgages and pledges), shareholdings and information about credit history.
- **Data from the relationship with BOCOM BBM:** customer identifier numbers, account identification details, account movements, relationship identifiers (for example, customer segment and account currency). Data related to your interactions with us, through websites, social media, meetings, calls, chats, e-mails and telephone contact.
- **Family information:** marital status, name and identification data of the spouse, number of children.
- **Information about third parties:** affiliation, representatives, represented, guarantor, counterparties, attorneys, employees, partners or beneficiaries.
- **Professional information:** information about your academic background and occupation.
- **Authentication data:** such as signatures and passwords.
- **Monitoring data:** video recordings and telephone recordings.
- **Background information:** information related to criminal record, infractions or list of international restrictions, in compliance with the rules applicable to BOCOM BBM.
- **Connection data:** IP address, network used, and information collected through "cookies".
- **Identification as a Politically Exposed Person ("PEP"):** information related to your PEP status, when applicable.
- **Preferences:** data regarding habits and preferences, dietary and access restrictions (for example, for the purpose of organizing events).

5. For what purposes do we collect and process your personal data?

We use personal data for the purposes presented in this Section 5 always as permitted by applicable law.

5.1. We will treat your personal data when we have legal and regulatory obligations that require such treatment.

We are subject to several legal and regulatory obligations, including, without limitation, (i) regulations applicable to banks and investment companies, issued, for example, by the Central Bank of Brazil, the Securities Commission (CVM) and the National Monetary Council (CMN), as well as other financial market regulations; (ii) laws related to the prevention of money laundering and the financing of terrorism; (iii) tax obligations. We are also subject to compliance with judicial and administrative orders. In this context, your personal data may be processed for the following purposes:

- Validate your identity, prevent or detect fraud, financial crimes and market abuse;
- Respond to regulatory control obligations and notifications related to the financial market;
- Meet requirements to maintain our regulatory licenses and permissions;
- Comply with regulations to assure the protection from investors (through, for example, investment profile assessments);
- Keep records required by law or specific regulation;
- Dimension and manage business risks for BOCOM BBM according to legal and regulatory requirements; and
- Comply with judicial or administrative orders.

5.2. We will treat your personal data as necessary to maintain the interests and continuity of our business, to ensure the security of our Customers and third parties, to ensure compliance with our contractual obligations with third parties and to defend our interests in judicial, administrative or arbitration proceedings.

We exercise our activities always looking for:

- Develop, improve and implement products and services;
- Develop and promote our business and commercial relationships and guarantee the satisfaction of our Customers and other interested third parties;
- Protect our business and the integrity of the financial market;
- Manage risks and protect our systems, infrastructure and facilities;
- Defend our rights in judicial, administrative and arbitral proceedings;
- Exercise and defend our rights in foreign countries, including those where BOCOM BBM is located, for example, the Bahamas (for more information on international data sharing see Section 7 of this Policy);
- Comply with legal and regulatory obligations and cooperate with authorities and regulatory authorities in foreign countries, including those where we are located, such as the Bahamas; and
- Support other companies that are part of our economic group to achieve some of the objectives mentioned above.

In a more detailed but not exhaustive way, in order to achieve the objectives listed above, we may use your personal data, within the limits permitted by applicable law, to:

- Maintain commercial relations with Customers and third parties;
- Provide services to Customers;
- Promote events of interest to Customers;
- Due Diligence in transactions in which BOCOM BBM and / or other companies in the economic group are involved;
- Fulfill contractual or pre-contractual obligations or exercise rights in the context of a contractual relationship with third parties;
- Exercise rights and defend themselves in court in Brazil;
- Comply with laws, regulations and court orders in foreign countries;

- Comply with regulatory guidelines, best practices and control routines associated to the financial market;
- Handle complaints and/or denouncements;
- Store certain information in a single jurisdiction, within the limits permitted by applicable law, in order to coordinate BOCOM BBM's services and commercial activities and satisfy other administrative demands of its economic group;
- Facilitate operational actions related to our business relationships (for example, through payment and billing processing);
- Perform consulting service with credit analysis agencies to investigate solvency and credit risks in our relationships or in the one we intend to have;
- Security and operation purposes of our IT systems;
- Checks in know your customer procedures or in relation to politically exposed people;
- Answering requests from regulatory agents, self-regulators or external audit companies;
- For financial and tax regulation purposes, which may include sharing necessary information with tax, social security and labor authorities; and
- Surveillance by video monitoring and measures to ensure the physical and property security of BOCOM BBM's people and facilities (for example, access controls to BOCOM BBM facilities).

5.3. We will treat your personal data to guarantee our contractual obligations in our relationship.

We will treat your personal data to maintain our business relationship in accordance with the contractual arrangement we have entered into. Such processing will take place with the aim of:

- Take the necessary pre-contractual measures in order to conclude the contract with you or take other measures upon your request or upon your representative's request, before concluding the contract;
- Fulfill obligations or exercise rights that have been established under the terms of the contract entered between us; and
- End our contractual relationship, at your request or by decision of BOCOM BBM.

Our DPO is at your disposal if you want more details about the contractual purposes for which your personal data is used. Contact details for speaking with him are found in Section 1 of this Policy.

5.4. Finally, we will treat your data in some situations upon obtaining your consent

In specific situations, we may ask for your consent to treat your personal data. You can withdraw your consent at any time by contacting our DPO, whose contact details are found in Section 1 of this Policy. The withdrawal of consent does not affect the legality of the data processing carried out during its validity.

6. With whom do we share your personal data?

Whenever necessary, to achieve the purposes described in Section 5 above, BOCOM BBM may share your personal data, pursuant to this Section 6.

6.1. BOCOM BBM will be able to share its data with other companies in its economic group, including the BOCOM BBM headquarters in China, for example:

- Ensure the provision of a service or product that depends on another company in the economic group;
- Facilitate the realization of BOCOM BBM's business and the provision of services to Customers on a global level;
- Control risks and for the internal management of the business, including when an internal approval by another company in the economic group is needed;
- Transmit information to any member of the group in connection with any services that we think you or your Organization may be interested in;
- Prepare financial or regulatory reports; and
- Meet the legitimate interest of BOCOM BBM, observing the rules established under the LGPD.

6.2. BOCOM may also share your personal data with:

- Public administration authorities and entities;
- Associations, administrative entities and self-regulatory entities;
- Other credit institutions and financial services in order to maintain a business relationship with you or the organization in which you belong (depending on the contract, for example, correspondent banks, custodian banks, brokers, stock exchanges, credit risk rating agencies);
- Third parties involved in transactions carried out by us, including to provide services contracted by you under our contractual relationship (for example, correspondent banks, brokers, stock exchanges, clearinghouses, depositaries, fiduciaries, operations repositories, processing units and third party custodians, issuers, investors, potential buyers and other participants in the transaction and their representatives);
- A natural person or a legal entity, public authority, agency or regulatory authority to which you have given permission to transfer personal data, when applicable;
- Professional advisors, including law firms, accountants, auditors and tax consultants;
- Insurers; and
- Service providers and partners hired by us, mainly to provide IT services, logistics, printing, telecommunications, advisory and consulting services, and sales, marketing and translation services.

6.3. If we are involved in a merger, acquisition or incorporation process, your personal data may be shared in a due diligence phase or, later, transferred to the acquiring company or person.

7. Transfers of your personal data outside Brazil.

As already mentioned in this Policy, in certain circumstances, we may transfer your data to another country. You acknowledge that data protection legislation in other countries may not guarantee the same level of data protection as the data protection legislation applicable in Brazil.

For transfers to other countries where there is no government recognition that they have an adequate level of data protection compared to the LGPD, we will implement contractual and operational data transfer mechanisms that meet the standard imposed by the LGPD.

The international transfer of personal data to companies of our economic group located in foreign countries is regulated by an intra-group international data transfer agreement.

Please contact our DPO if you would like more details about the specific safeguards applied to the international sharing of your personal data. The DPO contact details can be found in Section 1 of this Policy.

8. How long will we keep your personal data?

We store and maintain your information: (i) for the time required by law; (ii) until the end of the processing of personal data, as mentioned below; (iii) for the time necessary to preserve the legitimate interest of BOCOM BBM, as the case may be; (iv) for the time necessary to protect the regular exercise of BOCOM BBM's rights in judicial, administrative or arbitration proceedings. Thus, we will treat your data, for example, during the applicable statutory periods or as long as necessary to comply with legal or regulatory obligations.

The termination of the processing of personal data will occur in the following cases:

- When the purpose for which your personal data was collected is achieved and/or the personal data collected is no longer necessary or relevant to the achievement of such purpose;
- When you have the right to request the termination of treatment and the deletion of your personal data and do so; and
- When there is a legal determination in this regard.

In such cases of termination of the processing of personal data, except in the cases established by applicable law or by this Privacy Policy, personal data will be eliminated.

9. Your rights in relation to the personal data we process about you.

You have several rights in relation to your personal data. Such rights include, but are not limited to:

- Receive clear and complete information about the treatment of your personal data, including more details about the chances of sharing your personal data with third parties, pursuant to Sections 6 and 8 of this Policy;
- Request access to your personal data and / or confirmation of the existence of treatment of personal data by BOCOM BBM;
- Request that we rectify any inaccurate, incomplete and outdated personal data;
- Oppose the processing activities, request the anonymization and elimination of personal data, in specific circumstances;
- Request the portability of your personal data;
- Revoke consent at any time, when BOCOM BBM processes your personal data based only on consent; and

- Petition in relation to your data against the controller in the presence of the national authority.

There are legal circumstances that may not authorize the exercise of some of the rights provided above, or when the provision of the information may reveal any business secret of BOCOM BBM.

You will be able to exercise such rights by contacting the DPO through the email provided in Section 1 of this Policy.

10. Use of cookies by BOCOM BBM.

10.1. What are cookies?

Cookies are small text files saved on your computer, tablet or phone when you visit a website. They are responsible for collecting and storing information about your navigation within that environment, allowing it to be used later.

10.2. What we use cookies for?

BOCOM BBM uses cookies to ensure the correct functioning of the applications and the authentication of users. In addition, cookies may be used by BOCOM BBM as a means of analyzing the performance and use of the applications by users of the site.

10.3. What types of Cookies we use?

During the User's navigation on our Access Channels, we collect the following Cookies:

Type	Objective	Main channels
Functional	They are essential for the functioning of the website. Without these, our websites would not function optimally. These are stored temporarily as login information and expire as soon as the browser is closed.	Internet Banking e demais aplicações disponibilizadas aos nossos clientes.
Analytical	Information provided by analytical cookies allows us to analyze patterns of visitor behavior, and this information is used to improve the overall experience or identify areas of the website that need maintenance. This information is anonymous (it cannot be used to identify you and does not contain personal information such as name and e-mail address) and is only used for statistical purposes.	Institutional Site

At any time, you, the User of our services, may revoke your authorization regarding the use of cookies by using the settings of your preferred browser. However, we warn you that, depending on the choice made, certain functionalities of our services may not work as ideally expected.

10.4. How to disable Cookies?

You can disable or delete cookies as well as collection technologies in your browser settings, except for operational cookies. The latter, if disabled, will not allow you to use the site. You can access tutorials on the subject directly from the links below:

- If you use [Internet Explorer](#).
- If you use [Firefox](#).
- If you use [Safari](#).
- If you use [Google Chrome](#).
- If you use [Microsoft Edge](#).
- If you use [Opera](#).

We are not responsible for the information available on external sites indicated through links and for their privacy policies, particularly regarding the use of Cookies.

10.5. Considerations regarding the use of Cookies

We declare that all companies contracted to provide services in connection with the BOCOM BBM website must follow the guidelines of the Privacy Policy. If you have any questions, you can contact us through the channel available in Section 1 of this document.

11. Information security related to personal data.

BOCOM BBM uses appropriate technical and organizational measures to protect your personal data against unauthorized or illegal treatment and against its accidental loss, destruction or damage. Your personal data is securely stored on protected equipment. Only a limited number of people will have access to such equipment and only individuals with legitimate reasons will have access to your personal data.

We also recommend that you read our security guidelines on our website.

12.The responsibilities of this policy

Responsibility	Responsible
Execution of the attributions of this policy	Information Security
Monitoring the execution of the attributions of this policy	Information Security and Compliance
Maintenance of this policy	Information Security
Approval of this policy	Information Security / DPO

13. Version control and policy validity

This policy is valid for 3 years.

Version	Date	Historic	Authors
1.	08/26/2020	Creation	Information Security / Compliance
2.	12/14/2020	Review	Information Security / Compliance
3.	03/09/2021	Review	Internal Controls / Compliance

BOCOM BBM reserves the right to change this Privacy Policy at any time, by publishing the updated version on our website. The changes will be valid, effective and binding after the new version is prominently posted on our website. By continuing to use our products and services after a change to the Privacy Policy, you are agreeing to the new conditions.