

Candidates Privacy Policy

General Data Protection Law (Federal Law No. 13,709/18 or "LGPD")

We, at BOCOM BBM (Financial Conglomerate), are committed to raising the awareness of our candidates ("candidate" or "you"), in relation to your personal data collected, used, stored, or otherwise processed in the context of the process of data processed in the context of the BOCOM BBM selection and recruitment process in which you participate or have participated.

This policy is directed to our natural personal of Candidates and aims to provide clear and precise information about the treatment we give to personal data, in accordance with the General Data Protection Law (Federal Law No. 13,709/18 or "LGPD") and any other legislation applicable to privacy and protection of data.

1. What is Personal Data?

Personal data is any information capable of identifying an individual directly or indirectly (through association, for example), such as Name, CPF, e-mail, among others.

For more information about the processing of your personal data, please contact the Data Protection Officer ("Foreman"), or his substitute, of BOCOM BBM via email protecaodedados@bocombbm.com.br.

2. Who is the controller of your personal data?

For the purposes of the applicable legislation in the context of the BOCOM BBM selection and recruitment process the controller is the person responsible for decisions regarding the processing of personal data. BOCOM BBM is the controller of your personal data and uses it to achieve the purposes described in Section 5 of this Policy.

3. What personal data is processed?

To the extent permitted by applicable law, BOCOM BBM may process the personal data described below.

Identification, registration and contact data: full name, date and place of birth, gender, e-mail address, home address, telephone(s), identification document(s) data (such as RG, CPF, CNH, as applicable), photo and affiliation.

Academic and professional history: professional and academic history, resume, proof of education, professional certificates and professional license

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

We use personal data for the purposes set out in this Section 4, where permitted by applicable law.

Under the terms of the General Data Protection Law (Law No. 13,709/2018), BOCOM BBM processes candidates' personal data for specific purposes and in accordance with the legal bases provided for in the respective Law, such as: to comply with legal and regulatory obligations applicable to the selection process; to assess the suitability of the candidate's profile for job or internship opportunities; to conduct recruitment stages, including interviews, reference checks, and proposal preparation; to meet the legitimate interests of BOCOM BBM, such as improving selection processes, risk management, and corporate security; and for the regular exercise of rights in judicial, administrative, or arbitration proceedings. For any other purpose requiring consent, processing will be conditional upon the free, informed, and unequivocal expression of the data subject, who may revoke consent at any time.

4.1. We will process your personal data as necessary to assess the suitability of your profile for employment or internship opportunities at BOCOM BBM.

Your personal data may be used to:

- Receive, review and respond to your application for a selection or recruitment process;
- Verify the information provided by you and check your professional and academic references;
- Evaluate the adequacy of your profile to the opportunity for which you are applying for a vacancy and, in certain cases, to other opportunities to work or internship at BOCOM BBM;
- Facilitate the interview/recruitment process;
- To prepare an offer letter if your application is successful; It is
- In order to suggest suitable opportunities for you on BOCOM BBM, where we identify you as a potential candidate from information we collect from public sources.

4.2. We will process your personal data as necessary to contact and interact with you.

When considering your candidacy for BOCOM BBM, you may be considered for both a current and future opportunity. In this sense, if you are not selected for a current job vacancy or internship, we may use your data to contact you in the future and to present you with a job vacancy or internship that we consider suitable for your profile.

4.3. We will process your personal data as necessary to maintain and improve our recruitment processes, for internal planning and management reporting, and to comply with laws and regulations.

In this sense, we process your personal data when anonymization is not possible, to:

- Manage and improve our recruitment processes, for example to make the application process easier and more efficient;
- Prepare and execute management reports and analyzes related to recruitment metrics, such as duration of the recruitment process; It is
- Create and submit reports or other information to public bodies, if required by applicable law.

4.4. During the selection process for a specific vacancy or if you accept a specific offer, we may process your information for verification purposes, when necessary and to the extent permitted by applicable law, in particular in view of the regulations applicable to the financial market.

4.5. We will treat your personal data when BOCOM BBM has legal and regulatory obligations that require such treatment.

In this sense, we process your personal data, for example:

- Fraud prevention;
- Internal controls and company security;
- Checks on know your employee procedures or in relation to politically exposed persons, to the extent permitted by applicable law;
- For financial and tax regulatory purposes, which may include sharing necessary information with tax, social security and labor authorities;
- Health and safety obligations;
- Preventive or occupational medicine assessments, where applicable;
- Regarding work permits if you are not Brazilian; and
- Provide a work environment free of unlawful discrimination (eg diversity and equal opportunity monitoring) and comply with other labor and social security laws.

4.6. We will process your personal data to protect your life and physical integrity, as well as that of other Candidates and third parties.

In this sense, we process your personal data, for example:

- To protect your health and safety, to the extent permitted and as required by applicable law.

5. With whom do we share your personal data?

When necessary to achieve the purposes described in Section 4 above, BOCOM BBM may share your personal data with third parties, under the terms of this Section 5.

5.1. BOCOM BBM may share your personal data with:

- Other companies in the BOCOM BBM economic group, including those located in a foreign country, for the purpose of assessing the Candidate's profile or internal approvals.
- Selection and recruitment service providers – we may share your personal data with service providers hired by BOCOM BBM for the purpose of providing software used within the Human Resources sector and other information technologies for managing the selection process, employment agencies specialized in recruitment and selection, external consultancy, among others; and
- Third parties involved in confirming Candidates' information – as per item 4.4. of Section 4 above, we may share your data with third parties who assist us with confirming and verifying your information through consultations with public sources, in accordance with our internal policies and to the extent permitted by law.

5.2. BOCOM BBM may also share your personal data with third parties, including public administration bodies and competent authorities, in order to:

- Respond to complaints, investigations, legal measures, legal proceedings;
- Comply with legal and regulatory obligations, including those of a labor, tax and social security nature; It is
- Investigate, prevent, or take action regarding illegal activities, suspected fraud or situations involving potential threats to the physical safety of any person or if otherwise required by law, to the extent permitted by applicable law.

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

6. 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 applicable data protection legislation in Brazil.

For transfers to third countries where there is no governmental 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 our economic group companies located in foreign countries is regulated by an intra-group international data transfer agreement.

Please contact our Officer, or his substitute, if you would like more details on the specific safeguards applied to the international sharing of your personal data. The contact details of the Person in Charge, or his substitute, can be found in Section 1 of this Policy.

7. How long will we retain your personal data?

We store and maintain your information: **(i)** for as long as 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 safeguard the regular exercise of BOCOM BBM's rights in judicial, administrative or arbitral proceedings. Thus, we will process your data, for example, during the applicable limitation periods or as long as necessary to comply with a legal or regulatory obligation.

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

- When the purpose for which the personal data of the Supplier/Third Party was collected is achieved and/or the personal data collected are no longer necessary or pertinent to the achievement of such purpose;
- When the Supplier/Third Party is within its rights to request the termination of the processing and deletion of your personal data and does so; and
- When there is a legal determination to that effect.

In these cases of termination of processing of personal data, subject to the hypotheses established by the applicable legislation or by this Privacy Policy, the personal data will be deleted.

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

You have several rights in relation to your personal data in accordance with the ANPD's transparency measures. Such rights include, but are not limited to:

- Receive clear and complete information about the processing of your personal data, including further details on the chances of sharing your personal data with third parties, pursuant to Sections 5 and 6 of this Policy;
- Request access to your personal data and/or confirmation of the existence of processing of personal data by BOCOM BBM;
- Request that we rectify any inaccurate, incomplete and outdated personal data;
- Oppose processing activities, request anonymization and deletion 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 on the basis of consent; and
- Petition in relation to your data against the controller before the national authority.

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

You may exercise such rights by contacting the Person in Charge or his substitute, via the email address provided in Section 1 of this Policy.

9. Use of cookies by BOCOM BBM.

9.1. 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 navigation within that environment, allowing it to be used later.

9.2. What do we use cookies for?

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

9.3. What types of Cookies do we use?

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

Kind	Goal	Main channels
Essential	They are essential for the functioning of the website. Without these, our websites would not work at their best. These are temporarily stored as login information and expire as soon as the browser is closed.	Internet Banking and other applications made available to our customers.
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 require maintenance. This information is anonymous (it cannot be used to identify you and does not contain personal information such as name and email address) and is only used for statistical purposes.	Institutional Website

When you access the website for the first time, you will be able to set your preference with regard to the cookies we use. In addition, at any time you, the User of our services, may revoke your consent to the use of cookies, using the settings of your preferred browser. However, we warn you that, according to the choice made, certain functionalities of our services may not work in the way ideally expected.

9.4. How to configure Cookies?

You can disable or delete cookies, as well as collection technologies, in your browser settings, with the exception of essential cookies. The latter, if disabled, will not allow the use of the website. You can access tutorials on the topic directly at 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 the external websites indicated through links and for the respective privacy policies, in particular, regarding the use of Cookies.

9.5. Considerations on the use of Cookies

We declare that all companies contracted to provide services related to 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.

10. Information security in relation to personal data.

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

11. The responsibilities of this policy

Responsibility	Accountable
Execution of the tasks of this policy	Information Security/ Internal Controls
Monitoring the execution of the duties of this policy	Information Security, Compliance and Internal Controls
Maintenance of this policy	Internal Controls
Approval of this policy	Internal Controls / In charge of BOCOM BBM

12. Version control and policy validity

This policy is valid for 3 years

Version	Date	Historic	Authors
1.	08/26/2020 - France	Creation	Information Security / Compliance
2.	03/09/2021	Revision	Internal Controls / Compliance
3.	10/21/2022	Revision	Internal Controls / Compliance
4.	02/06/2026	Revision	Internal Controls / Compliance

BOCOM BBM reserves the right to change this Privacy Policy at any time by posting the updated version on our website. The changes will be valid, effective and binding after the new version is disclosed on our website.

13. Approvers

Tatiana Ferro - Manager of Internal Controls and Operational Risk

Monique Verboonen - Person in charge or substitute for the processing of personal data