

## Clients and Website Users Privacy Policy

### General Data Protection 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 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](mailto:protecaodedados@bocombbm.com.br).

#### 2. Who is the controller of your personal data?

For the purposes of the applicable legislation, 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. 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. What 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 set out in this Section 5, where permitted by applicable law.

Under the terms of the General Data Protection Law (Law No. 13,709/2018), BOCOM BBM processes 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; to execute contracts signed with our clients or to adopt preliminary procedures related to these contracts; to serve the legitimate interests of BOCOM BBM, its clients, or third parties; for credit protection; and for the regular exercise of rights in judicial, administrative, or arbitration proceedings. For any other purpose for which the consent of the data subject is required, the processing will be conditional upon the free, informed, and unequivocal expression of the data subject, who may revoke their consent at any time.

### **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 Data Protection Officer, or his or her substitute, is available to you if you would like more details about the contractual purposes for which your personal data is used. The contact details for him or her, or his or her substitute, can be 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, or his substitute, 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?

Where 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 may share its data with other companies in its economic group, including BOCOM BBM's headquarters in China, for example:

- Ensure the provision of a service or the supply of a product to our customers who depend on another company of the economic group;
- Control the risks and for internal administration of the business, including when there is a need for internal approval by another company of the economic group;
- For financial or regulatory reporting purposes; and
- In compliance with 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 the 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 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 and their substitute can be found in Section 1 of this Policy.

## **8. 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 Candidate 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.

## **9. 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.

## 10. Use of cookies by BOCOM BBM.

### a. 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.

### b. 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.

### c. 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	Institutional Website

	information such as name and email address) and is only used for statistical purposes.	
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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.

**d. 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.*

**e. 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.

**11. 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.

**12. The responsibilities of this policy**

<b>Responsibility</b>	<b>Accountable</b>
Execution of the tasks of this policy	Information Security/ Internal Controls

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

### 13. 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.	12/14/2020	Revision	Information Security / Compliance
3.	03/09/2021	Revision	Internal Controls / Compliance
4.	10/21/2022	Revision	Internal Controls / Compliance
5.	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.*

### 14. Approvers

Tatiana Ferro - Manager of Internal Controls and Operational Risk

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

