

Collaborators 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 Collaborators ("collaborator" 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 relationship established with us.

This policy is direct to our collaborators 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 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.

Professional and corporate data related to BOCOM BBM: position held; working hours and time attendance; work performance; remuneration; promotions; professional history at BOCOM BBM; registration number; network username and password; activities carried out from devices accounts, platforms and/or corporate applications; biometric data; closed-circuit television footage; corporate event images.

Compensation and benefits details: bank account details; payroll-related information; income reports; beneficiary number and information related to benefits granted, as applicable; information on benefit dependents, if any (including full name, date of birth, RG and CPF number).

Labor data: copies and/or data related to CTPS, NIS, PIS, PASEP and NIT and union affiliation data.

Health data: occupational health certificate and admission medical examination; information contained in medical certificates and other health information relating to your use of health insurance (including your dependents admitted to said plans).

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 employees' 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, including labor, social security, and tax obligations; to execute employment contracts, internships, or service agreements and manage benefits; to serve the legitimate interests of BOCOM BBM, such as information security, fraud prevention, and performance management; to protect the physical integrity and health of employees; and to exercise rights in judicial, administrative, or arbitration proceedings. For any other purpose that requires consent, the processing will be conditional on the free, informed, and unequivocal expression of the data subject, who may revoke their consent at any time.

4.1. We will process your personal data to manage the employment contract, internship or provision of services or similar instrument entered into with you and all aspects related to the established contractual relationship.

In this sense, we process your personal data to:

- Draw up and sign the employment contract, internship, provision of services or similar instrument to be executed and to administer the entire relationship arising from said contract;
- Determine and administer your salary and any bonuses;
- Process the payment of your salary, any bonuses and corresponding taxes;
- Manage social security, retirement and legal leave issues;
- Review your professional performance and make decisions regarding promotions;
- Grant access to the systems necessary for the performance of its duties;
- Facilitate the booking of accommodation and tickets in case of corporate travel;
- Send you communications about the contractual relationship and answer any questions you may have;
- Promote and publicize internal events;
- Ensure that you perform the functions and duties for which you were hired, including when this requires interaction with third parties (for example, with customers, public authorities, representative bodies, other financial institutions, self-regulatory bodies, etc.);

- Facilitate your transfer to another BOCOM BBM unit, when applicable; and
- Manage benefit plans.

4.2. We will treat your personal data as necessary to maintain and improve efficiency and processes in the work environment, to inform managerial and administrative decisions and for the effective management of Employees.

In this sense, we process your personal data to:

- Prepare management and performance reports, when the anonymization of your data is not possible, aiming to:
 - inform BOCOM BBM's management about HR sector metrics that can help us make managerial decisions;
 - predict and optimize our future workforce;
 - understand business needs and identify areas of BOCOM BBM that need improvement; and
 - understand how we can improve, develop, and retain talent.
- Analyze your opinions, when there are questionnaires and surveys among Employees to which you respond, and
- Create Collaborator directories, with information that facilitates contact.

4.3. We will process your personal data, as necessary, to keep BOCOM BBM, Collaborators and Third Parties safe, to ensure compliance with our contractual obligations assumed with third parties and to defend our interests in legal, administrative or arbitration proceedings.

In this sense, we process your personal data:

- To prevent and detect malicious (such as malware), inappropriate or illicit activities, as well as identity theft and fraud. In this sense, your data may be processed both to guarantee the restriction of access to Employees' data, if you have authorization to access them (such as, for example, through the use of your biometrics to authenticate access), and in the course of legitimate corporate investigations (such as, for example, from monitoring the use of a BOCOM BBM corporate device used by you);
- To ensure the physical integrity of our Collaborators and third parties on BOCOM BBM premises, as well as the patrimonial integrity of such premises (such as, for example, through the use of closed circuit television cameras and the use of biometrics to block physical access);
- To defend our interests in judicial, administrative or arbitration proceedings;
- In the context of negotiations for possible mergers, acquisitions and incorporations; and
- In exceptional situations and in accordance with legal and regulatory obligations applicable to the financial market, to identify reputational, financial or criminal risks that could affect BOCOM BBM and its customers, though, for example, know your employee procedures, always to the extent permitted by law.

4.4. 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:

- In contexts related to compliance with financial market, financial and tax regulations;
- In relationships with unions, as applicable;
- For work safety purposes;
- To fulfill social security obligations; and
- By legal determination.

4.5. We will process your personal data to protect your life and physical integrity, as well as that of other Collaborators 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; and
- To contact your emergency contact in cases of potential emergencies.

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 BMM may share your data with other companies in our economic group, including our headquarters in China to:

- Purposes of centralizing personnel administration.
- Administration and internal management; and
- Consolidation of BOCOM BBM information by headquarters.

5.2. BOCOM BBM may also share your personal data with:

- Third parties, including those located in foreign countries, that relate to BOCOM BBM within the scope of the duties for which you were hired, so that you can exercise them or so that BOCOM.
- BBM can develop its business (for example, data from representation, identification and corporate contact, powers of attorney, terms of ownership);
- Payroll service providers for the purpose of administering payroll and other payments;
- Companies that offer and manage benefits such as health plan, dental plan, transport vouchers, food and meal vouchers, insurance, and payroll loans, among others and as applicable;

- Health service providers, responsible for assisting employees and carrying out admission or dismissal exams;
- Providers of HR software and other information technology for the purposes of managing Employees by BOCOM BBM; and
- Companies contracted to organize internal events.

5.3. Finally, BOCOM BBM may 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; and
- 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.

5.4. 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.

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:

Type	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. Versioning 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