

## Third Party 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 suppliers, service providers and other partners, in relation to your personal data collected, used, stored or otherwise processed in the context of the process of competition, contracting, execution of partnerships, supply and provision of services to BOCOM BBM.

This policy is directed to our natural personal Suppliers/Third Parties and, in the appropriate cases, may apply to the representatives and employees of corporate Suppliers/Third Parties ("Supplier/Third Party" or "you"), 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](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 the Supplier/Third Party:** We collect and process personal data made available directly by you in the context of our business and contractual relationship. We may also obtain your personal data indirectly, for example, from the recording of telephone calls and the exchange of corporate emails or through access to registration information contained in the corporate/shareholder framework of the organization of which you are a member. In these cases, your data will not be treated routinely, but it may be necessary for other purposes in the future (such as in case of investigations or analysis for the purposes of compliance with applicable standards).

**Data obtained through other sources:** we also process personal data about the Supplier/Third Party that we have obtained from public sources (such as the press, public websites, public database) or that are legitimately shared with us by third parties (such as by other service providers and companies of the BOCOM BBM economic group, for example).

#### 4. 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, nationality, gender, job title, full professional address, contact numbers and professional email address, sensitive data (for example: biometric data for access to the BOCOM BBM office).
- **Identification documents: copies and /or numbers of identification documents,** such as R.G., CPF, CNH, passport and professional licenses.
- **Family information:** marital status, name and identification data of the spouse, number of children.
- **Monitoring data:** video recordings and telephone recordings.
- **Background data: information related to** criminal convictions and offenses and information related to financial history, in compliance with the rules applicable to BOCOM BBM.
- **Identification as a Politically Exposed Person ("PEP"):** information related to your status as a politically exposed person, where applicable.
- **Preferences:** data relating to habits and preferences, dietary and accessibility restrictions (e.g. for the purpose of organizing events).
- **Social network data:** information available in your corporate profiles on social networks.

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

We use personal data for the purposes set out in Section 5, where permitted by applicable law.

Under the terms of the General Data Protection Law (Law No. 13,709/2018), BOCOM BBM processes the personal data of suppliers, service providers, and partners 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 financial market; to execute contracts and preliminary procedures related to the contracting and provision of services; to meet the legitimate interests of BOCOM BBM, such as risk management, audits, compliance, and corporate security; for credit protection; and for the regular exercise of 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.

Your personal data may be used to:

- Registration and maintenance of the Supplier/Third Party register with BOCOM BBM;
- Sending corporate and individual communications;
- Eventual audit of the Supplier / Third Party to verify any restrictions and quality of processes, as well as compliance with the contract;
- Management and drafting of contracts and other corporate documents;
- Management of customer acquisition and maintenance strategies;
- Management of access of the Supplier / Third Party to the systems of BOCOM BBM that he/she needs to have access to provide the services;

- Management of service channels and whistleblowing channel;
- Processing of the amount payable in consideration for the service provided by the Supplier/Third Party;
- Realization of events;
- Satisfaction survey;
- Organization of training;
- Analysis and permission of access of Suppliers / Third Parties to the premises of BOCOM BBM;
- Accreditation of the Supplier/Third Party for the use of the services available on the premises of BOCOM BBM;
- Settlement of claims;
- Management of the environment and corporate and work security on the premises of BOCOM BBM;
- Financial risk management, including through investigation of solvency and credit risks in relationships we have with you or intend to have;
- Management of tax operations;
- Compliance with legal or regulatory obligations, such as tax obligations and regulatory obligations applicable to the financial market;
- Checks on *know-your-service provider procedures*;
- Defense in judicial, administrative or arbitral proceedings, as necessary;
- Comply with legal and regulatory obligations and cooperate with authorities and regulatory bodies of foreign countries, including those where we are located, such as the Bahamas; and
- Support other companies that are part of the economic group of BOCOM BBM to achieve some of the aforementioned objectives.

In specific situations, we may ask for your consent to process your personal data. You may withdraw your consent at any time by contacting our Person in Charge, or his substitute. The withdrawal of consent does not affect the lawfulness of the data processing carried out during its term.

Our Foreman, or his substitute, is at your disposal if you would like more details about the contractual purposes for which your personal data is used. Contact details for contacting the Person in Charge, or his substitute, can be found in Section 1 of this Policy.

## **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:

- Organs and entities of the public administration;
- Associations, administrative entities and self-regulatory entities;
- Other credit institutions and financial services;
- Third parties involved in transactions carried out by us, including to provide services contracted by you within the framework of our contractual relationship (for example, correspondent banks, brokers, stock exchanges, clearing houses, depositaries, fiduciaries, trade repositories, processing units and custodians of third parties, issuers, investors, potential buyers and other participants in the transaction and their representatives);
- A natural or legal person, public authority, agency or regulatory body to which you have given us your consent to transfer personal data, where applicable;
- Professional advisors, including law firms, accountants, auditors and tax consultants;
- Insurers; and
- Other service providers and partners engaged by us, primarily to provide IT, 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.**

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

### 10.2. 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.

### 10.3. 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.

### 10.4. 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.*

### 10.5. 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.

### 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

| Responsibility  | Accountable  |
|---|--|
| 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.      | 09/03/2021          | Revision | Internal Controls / Compliance    |
| 3.      | 21/10/2022          | 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.

#### 14. Approvers

Tatiana Ferro - Manager of Internal Controls and Operational Risk

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