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PRIVACY NOTICE OF JULIUS BAER BRASIL CONSULTORIA DE VALORES MOBILIÁRIOS LTDA.

The following information is intended to provide you with an overview of how your data is processed by JULIUS BAER BRASIL CONSULTORIA DE VALORES MOBILIÁRIOS LTDA (JBAO) and outlines your rights under the applicable data protection legislation. Which specific data is processed and how it is used depends upon the requested or agreed services and the steps taken prior to entering into a contract.

1. Contact details of JBAO and the Data Protection Officer

JULIUS BAER BRASIL CONSULTORIA DE VALORES MOBILIÁRIOS LTDA.

Data Protection Officer:

Thierry Sébastien Battistini

privacidade.jbao@juliusbaer.com

Rua Elvira Ferraz, No. 68, 11th floor,

Vila Olímpia, São Paulo, State of São Paulo

Zip Code 04552-040, BRAZIL

2. Which data is used by JBAO?

JBAO processes data that it receives from you and that it generates as part of the business relationship with you. This includes personal data (including sensitive personal data), i.e. data that directly identifies you as a client (e.g. name, address, telephone number, etc.), or data that allows for identification when used in connection with other information (e.g. your bank account number). In addition to data that JBAO receives directly from you, it also obtains and processes data on you from publicly available sources (e.g. the Internet, [social] media, debtor directories, land registers, trade and association registers, the print media, etc.) or that JBAO receives from other Julius Baer Group companies or from authorised third parties.

JBAO processes the following personal data in particular:

- personal details (e.g. name, address and other contact data, date and place of birth, as well as nationality);
- identification data (e.g. identification documentation data);
- authentication data (e.g. specimen signature);
- data arising from the fulfilment of obligations, in particular related to services or transactions (e.g. account and transaction data including details of the principal and the recipient);
- record-keeping data (e.g. minutes of consultation);
- accounting data (e.g. contact notes), details relating to your personal background and financial situation (e.g. information on compliance and/or regulatory matters such as credit reports, origin of wealth and funds, financial knowledge and experience) and/or company-related data (e.g. business activities, purpose, ownership and organizational structure as well as number of employees);
- sensitive personal data, such as your biometric data, information regarding your religious, ideological or political views or activities and relating to your health;
- data regarding related third parties such as beneficial owners, employees, relatives, authorised signatories, agents and/or representatives;
- data that is transmitted and automatically collected during the use of websites, mobile applications or other electronic services provided by JBAO (electronic services). This data includes date and time of access, name of the file downloaded as well as the amount of data transmitted and the access result, your web browser, the browser language and the requesting domain and IP address. Further information can be found in the privacy policy

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- or the legal provisions of the respective electronic service;
- other data comparable to the categories outlined above.

3. For what purpose and on what legal basis does JBAO use your data?

a) To fulfil contractual obligations and take steps prior to entering into a contract.

The processing of your data allows JBAO to provide you with the contractually agreed services and to take steps prior to entering into a contract. Data processing is primarily driven by services requested by you. JBAO uses your data, among other purposes, to identify individuals, verify documents, analyse needs, provide advice and wealth management. Further details can be found in your contract documents or in the Additional Terms and Conditions.

b) To safeguard interests.

JBAO will also process your data for the following purposes in order to protect its own legitimate interests or the interests of third parties:

- prevention and investigation of criminal acts;
- testing and analysis of your potential needs and optimisation of client contact;
- risk management (e.g. calculation of eligible equity capital for banks) within JBAO and Julius Baer Group companies;
- assertion of legal claims and defence in legal disputes;
- supervision, consolidation and updating of the data relating to you that JBAO and Julius Baer Group companies process (single-client view);
- consultation and exchange of data by or with information agencies (e.g. debt collection registers) for determination of creditworthiness or default risks in the credit business or, if required, in the case of seizure protection accounts or base accounts;
- advertising, market research or surveys;
- safeguarding JBAO's IT security and IT operations;

- outsourcing of functions and services to Julius Baer Group companies or to service providers and other agents appointed by JBAO;
- video surveillance for safeguarding access rights, collecting evidence in case of bank robberies, fraud prevention;
- measures to ensure the security of buildings and systems (e.g. entry controls);
- measures for business management purposes and for the development of new services and products;
- collection of personal data from publicly available sources for the purpose of market research and business development.

c) On the basis of your consent.

Provided your consent has been given, JBAO is legally permitted to process personal data for specific purposes (e.g. the evaluation of transaction patterns for marketing purposes, etc.).

You are able to withdraw your consent at any time. Please note that the withdrawal of consent has no retroactive effect on the processing of your data.

Please note that the Brazilian General Data Protection Law (Law No. 13.709/2018 – the “LGPD”) sets forth several situations in which the processing of personal data is allowed regardless of the consent of the data subject.

This means that, in some cases, JBAO may collect and process your personal data regardless of your consent (if there is a “legal basis” in the LGPD that allows us to do this), such as for the execution of contracts or preliminary measures thereof, for the fulfillment of legal and regulatory obligations, for the regular exercise of rights in contracts or in judicial, administrative and arbitration proceedings, for credit protection, for guaranteeing the prevention of fraud and the security of the data subject, for legitimate interests of JBAO or third parties, among others.

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In other cases, when necessary, we may ask for your consent to use your personal data.

4. Who can access your data?

Within JBAO and other Julius Baer Group companies, access is granted only to personnel requiring your data for the fulfilment of JBAO's contractual and legal obligations towards you (need-to-know principle).

Service providers and other agents appointed by JBAO process your data for the same purpose. These include companies in the areas of IT (e.g. data hosting and processing, IT development, support and operation), wealth management services and ancillary activities, compliance and risk management functions, accounting (financial accounting and controlling), as well as other back- and middle-office activities.

If the service providers concerned need to process your data on behalf of JBAO, they are contractually required to comply with the applicable non-disclosure obligations and data protection and/or bank client confidentiality requirements. Information relating to you is only forwarded by JBAO if this is stipulated in agreements you have concluded with JBAO, if there is a legal requirement, or if you have agreed to this (e.g. for a financial transaction on your behalf), or if JBAO is authorised to issue banking-related information.

Subject to these conditions, recipients of personal data can include, amongst others:

- public bodies and institutions (e.g. the Central Bank of Brazil, financial authorities or law enforcement authorities) in the event of a statutory or official obligation;
- other credit and financial services institutions or similar institutions to which JBAO transfers personal data within the context of its business relationship with you (e.g. correspondent banks, custodian banks, brokers, stock exchanges or information agencies);
- other Julius Baer Group companies for risk management purposes as a result of legal or

regulatory obligations, as well as service providers and other agents appointed by JBAO;

- other Julius Baer Group companies, for customer prospecting and offers of products and services;
- other data recipients for which you have given your consent.

5. Does JBAO transfer data across borders?

JBAO transfers your data to countries outside Brazil if:

- the data is transferred to other Julius Baer Group companies;
- this is required for the execution of your orders (e.g. payment and securities orders);
- it is a statutory requirement (e.g. disclosure obligations under tax law);
- it is provided for in your agreements with JBAO or in the Additional Terms and Conditions or you have given your consent in another way.

In case your data is transferred to another country, JBAO will take all the adequate measures and those required by law in order to guarantee that your data will remain protected, and that the transfer will be done according to one of the mechanisms provided for in the LGPD.

6. How long will your data be stored?

JBAO and/or Julius Baer Group companies processes and retains your data only for as long as is required to fulfil its contractual and legal obligations.

If data is no longer required for the fulfilment of contractual or legal obligations, it will be deleted at regular intervals, unless it is required for further processing. This requirement could be:

- to fulfil retention obligations under trade and tax law;
- to fulfil specific regulations that require JBAO to retain data;
- to assert, exercise or defend legal claims.

7. What are your rights under data protection law?

The LGPD grants you the following rights:

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- confirmation about the processing of your personal data;
- requesting that information on personal data that JBAO or Julius Baer Group companies holds on record be shared with you;
- demanding that the information be rectified should it be incorrect, incomplete or outdated;
- anonymization, blocking or erasure of unnecessary/excessive data, or data not processed in accordance with the LGPD;
- erasure of data processed based on consent, except for the cases in which we are legally authorized or required to maintain it;
- demanding that your personal data which you have provided to JBAO and Julius Baer Group companies be transferred to another provider in a generally useable, machine-readable and conventional format, minding possible industrial and trade secrets, and after the transfer of data is regulated by the Brazilian Data Protection Authority (ANPD);
- information about who your data is shared with;
- information about the possibility of refusing to provide consent and the respective consequences;
- revocation of consent; and
- review of automated decisions (including profile creation).

You also have a right of appeal to/file a petition with the respective data protection supervisory authority.

8. What data are you required to supply?

JBAO requires you to provide the data necessary for the acceptance and execution of a business relationship and the fulfilment of the associated contractual and/or legal obligations. Unless it obtains this data from you, JBAO will most likely be unable to enter into a contractual relationship with you.

Under the regulations on combating money laundering and the financing of terrorism in particular, JBAO is obligated to verify your identity on the basis of your identification document and in this context to collect and store your address, nationality, name, date and place of

birth as well as identification data prior to the commencement of a business relationship. In order for JBAO to comply with these regulations, you are required to supply it with the necessary information. If this information changes during the course of the business relationship, you are obliged to notify JBAO without delay. If you do not provide JBAO with the necessary information, it will not be able to commence or continue a business relationship with you.

9. Is the decision-making automated?

As a basic principle, JBAO does not use fully automated decision-making for commencing and conducting its business relationships. If JBAO does apply this procedure in exceptional cases, it will inform you accordingly where this is a statutory requirement. Should that be the case, as mentioned above, you will have the right to have the automated decisions reviewed according to the law.

10. Will your data be automatically processed?

In specific areas, JBAO will process your data on a semi-automated basis, the aim being to evaluate personal criteria (profiling), for example, in the following cases:

- In order to combat money laundering, the financing of terrorism and criminal acts, JBAO also conducts data assessments (among others in the background check during the onboarding). The aim of these measures is to protect you.
- JBAO uses assessment tools to provide you with relevant and appropriate information on its products and services. This enables it to carry out demand-based communication and advertising, including market and opinion research.
- As part of its assessment of your creditworthiness, JBAO uses an algorithm based on a mathematical/statistical process. This allows it to calculate the likelihood of clients being able to fulfil their payment obligations. The algorithm may include, for example, income ratios and expenditure, existing liabilities, occupation, employer, duration of employment, experiences of the business relationship to date, the contractual repayment of previous loans, as well as information from credit-rating agencies. The

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results of the analysis assist JBAO in the decision-making process within the context of advisory services and are also incorporated into the ongoing risk management.

11. Where can you find JBAO's current privacy notice?

You can find the applicable version at <https://www.juliusbaer.com/en/legal/client-data-privacy-policy/brazil>.

JBAO reserves the right to amend this privacy notice from time to time and will inform you of such an amendment in an appropriate manner.

12. How can you contact JBAO?

Should you have any questions about the treatment of your data, please contact your relationship manager or the Data Protection Officer mentioned in section 1, who will be able to assist you.

Sao Paulo, April 2021.