

Privacy Notice of Julius Baer Brasil Gestão de Patrimônio e Consultoria de Valores Mobiliários Ltda.

for clients and business partners

The following information is intended to provide you with an overview of how your personal data is processed by Julius Baer Brasil Gestão de Patrimônio e Consultoria de Valores Mobiliários Ltda. (hereafter “JB Brasil”), as the controller of the personal data. It also outlines your rights, as an owner of personal data, under the Law nº 13.709 de 2018 (“Lei Geral de Proteção de Dados” or “LGPD”). Herein we refer to ‘you’ as a client, a business partner, or a prospect of JB Brasil. The term ‘business partners’ includes persons related to a client, such as beneficial owners, employees, family relatives, authorised signatories, agents, and/or representatives.

1 Contact details of JB Brasil and the Data Protection Officer (“DPO”)

Julius Baer Gestão de Patrimônio e Consultoria de Valores Mobiliários Ltda.

Data Protection Officer

Erica Tiemi Arakaki

Av. Brigadeiro Faria Lima, 4285, 10º andar
04538-133, São Paulo, SP, Brasil
privacidade_jbfo@juliusbaer.com

2 Contact details of JB Brasil’s representative in the European Union

Bank Julius Baer Europe S.A.

Data Protection Officer

25, rue Edward Steichen

2540 Luxembourg

dataprivacy.lux@juliusbaer.com

3 Which personal data is collected and processed by JB Brasil?

JB Brasil collects and processes personal data that it receives from you and that it generates as part of the business relationship with you. Personal data includes data that directly identifies you as an individual (e.g. name, address, telephone number) or that allows for identification when used in connection with other information (e.g. your bank account number). In addition to personal data received directly from you, JB Brasil also collects and processes personal data about you from public sources (e.g. the internet, social media, debtor directories, land registers, trade and association registers) or data it receives from other Julius Baer Group companies or third parties.

JB Brasil collects and processes the following personal data in particular:

- personal details and identification data (e.g. name, address, contact data, date and place of birth, nationality, passport, ID documents, personal situation, occupation, interests and preferences, business connections);
- authentication data (e.g. specimen signature);
- personal data arising from the preparation, execution, and performance of contracts and the fulfilment of obligations, particularly in relation to services or transactions (e.g. account, deposit, and transaction data, including details of the principal and the recipient, powers of attorney and related inquiries);
- advertising and sales data;
- personal data relating to contacts (e.g. correspondence, inquiries, minutes of consultation, contact notes);
- account details, recordkeeping data, information regarding your personal background and financial situation (e.g. information relating to compliance and/or regulations, such as credit reports, origin of

wealth and funds, financial knowledge and experience), and/or company related data (such as its business activities, purpose, ownership and organisational structure, and number of employees);

- sensitive personal data, such as biometric data; information regarding religious, ideological, or political views or activities; information relating to health; and information on convictions or sanctions under administrative or criminal law;
- personal data regarding related third parties such as beneficial owners, employees, family relatives, authorised signatories, agents, and/or representatives;
- personal data that is transmitted and automatically collected during the use of websites, mobile applications, or other electronic services provided by JB Brasil (electronic services). This data includes date and time of access, name of files 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;
- other personal data comparable to the categories outlined above.

4 For what purpose and on what legal basis does JB Brasil use your personal data?

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

The processing of your personal data allows JB Brasil to provide you with the contractually agreed services, to carry out contracts with you, and to take any appropriate steps prior to entering into a contract.

Data processing is primarily driven by products or services requested by you (e.g. accounts, wealth management, discretionary asset management and advisory services). JB Brasil uses your personal data, among other purposes, to identify individuals; verify documents; provide advice, wealth management, wealth planning, discretionary asset management; for trading and to support the execution of transactions; as well as to realise collateral, liquidate accounts, and settle contractual relationships. Where applicable, further details can be found in your contract documents.

b) On the basis of regulatory requirements and legal obligations

The activities of JB Brasil and of other Julius Baer Group companies are subject to various Brazilian and foreign laws and regulations, and JB Brasil and other Julius Baer Group companies have to fulfil the requirements laid down by supervisory, regulatory and self-regulatory authorities in Brazil (e.g. Comissão de Valores Mobiliários – “CVM”, Associação Brasileira

das Entidades dos Mercados Financeiro e de Capitais – “ANBIMA”) and abroad. The processing of personal data is used, among other things, for the verification of identity and age; prevention of fraud and money laundering; compliance, including with ‘Know Your Customer’ requirements; the fulfilment of tax related, monitoring, and reporting obligations; as well as the assessment, investigation, analysis, and management of risks by JB Brasil and other Julius Baer Group companies.

c) To pursue and protect legitimate interests of JB Brasil

To pursue and protect its legitimate interests, JB Brasil will also process your personal data for the following purposes (examples):

- communication with you in relation to your inquiries or your potential interests, or to inform you about the products and services of JB Brasil and of other Julius Baer Group companies;
- initiation of a business relationship and contact;
- prevention and investigation of breaches of contract, criminal acts, and other noncompliance issues;
- identification and analysis of your potential needs, and optimisation of client contact;
- risk management within JB Brasil and Julius Baer Group companies;
- assertion of rights and legal claims and defence in legal disputes, e.g. in relation to tax, civil, criminal or administrative claims;
- managerial oversight, consolidation, and maintenance of data relating to you that JB Brasil and Julius Baer Group companies process (singleclient view);
- business development, advertising, marketing, market research, or surveys;
- safeguarding of JB Brasil’s IT security and IT operations;
- outsourcing of Bank functions and services to Julius Baer Group companies or to service providers and agents appointed by JB Brasil;
- video surveillance for security purposes;
- measures to ensure the security of buildings and systems (e.g. entry controls).

d) On the basis of your consent

With your consent, JB Brasil is legally authorised to process personal data for specific purposes (e.g. the evaluation of 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 personal data.

Please note that 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, JB Brasil may collect and process your personal data regardless of your consent, 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, or for legitimate interests of JB Brasil or third parties, among others.

e) Recording and storage of communication

With your consent, JB Brasil is authorised to record and archive telephone conversations and electronic communication between JB Brasil and you or any other person authorised by you. JB Brasil ensures to treat any such recordings in accordance with this Privacy Notice and the Data Protection Policy.

The communication retained by JB Brasil as set out above may be reviewed and used for security and evidence purposes (e.g. evidence of instructions received, advice given, compliance with legal and regulatory requirements).

5 Who can access your personal data?

a) Disclosure to other Julius Baer Group companies

JB Brasil may disclose personal data to other Julius Baer Group companies, which may process such data in particular for the purpose of performing tasks and services relating to the account holder's business relationship with JB Brasil and/or Julius Baer Group companies, for the purpose of international supervision and oversight, investigations, and for risk management and compliance.

b) Disclosure to business partners and other third parties

JB Brasil may disclose personal data to contractual partners and other third parties, as this is deemed necessary, e.g. for efficiency gains or internal management purposes, for the performance of the contract with you, and/or for the settlement of transactions (e.g. sale/buy/delivery/holding of securities, funds, war rants, commodities, derivatives, or any other financial instruments).

Recipients may include, among others, stock exchanges and their reporting offices, central depositories, (sub)custodians, brokers, clearing agencies, banks,

trade repositories, transfer agents, administrators, issuers, investment funds, and regulatory bodies or any other authorities.

c) Disclosure to Group internal and third-party service providers

JB Brasil may disclose personal data to other Julius Baer Group companies and to third-party service providers and their subcontractors ("Service Providers") retained to provide services for JB Brasil, or to which it outsources functions and business areas of JB Brasil. The relevant services or functions may concern in particular the following areas: IT services (e.g. data hosting and processing; IT development, support and operation); the use of internet based services (e.g. online commercial register); the processing of transactions and services (e.g. payments); wealth management services, asset management services and ancillary activities; services related to the administration, trading, execution, and processing of financial instruments and other financial assets; compliance and risk management functions; accounting (financial accounting and controlling); marketing and sales-related activities; reporting, logistics, printing services, debt collection, as well as other back and middle office activities. Where the Service Providers have access to your personal data, JB Brasil requires them to comply with appropriate confidentiality, data protection, and data security requirements.

d) Disclosure to authorities and courts

Where required by law or regulation, or necessary to protect its legitimate rights and interests, JB Brasil may disclose your personal data to third parties. This may, among others, include public bodies and institutions (e.g. CVM, ANBIMA, supervisory authorities, courts, or other competent bodies).

6 Does JB Brasil transfer personal data across borders?

JB Brasil may disclose personal data to recipients outside of Brazil, including to jurisdictions where Julius Baer Group companies are established or located (see www.juliusbaer.com/en/aboutus/ourlocations), or to other jurisdictions, including the European Union or European Economic Area member states and countries with an adequate level of data protection as specified by the LGPD, or other jurisdictions around the world where any of the third parties as outlined under section 5 above are located or where JB Brasil executes transactions or provides services.

The specific countries where the recipients of your personal data are located may vary as they correspond with the applicable services and the respective purpose(s) defined in this Privacy Notice.

Recipients of personal data may potentially forward the information to their branches or Group entities, Service Providers, or to other market participants or authorities within and/or outside of their jurisdiction.

Countries to which JB Brasil transfers your personal data may potentially not have laws that afford the same degree of protection to personal data as in Brazil. In these cases, JB Brasil will generally ensure an adequate level of data protection by one of the mechanisms provided for in LGPD, e.g. contractual, organisational, and technical measures.

7 How long will your personal data be stored?

JB Brasil processes and retains your personal data for as long as it is required for the specific purpose for which it was collected, or to comply with legal or regulatory requirements.

If your personal data is no longer required for said purposes, JB Brasil might still retain and process your personal data when authorised by LGPD for further processing. Examples for this would be:

- the fulfilment of retention obligations under applicable law;
- the fulfilment of specific regulations that require JB Brasil to retain the data;
- for compliance or risk management in accordance with applicable laws; or
- the exercise of JB Brasil's rights in relation to claims and any type of legal or regulatory action.

8 What are your rights under LGPD?

LGPD grants you the following rights:

- to confirm if JB Brasil is processing your personal data;
- to request that information on personal data that JB Brasil or Julius Baer Group companies held on record be shared with you;
- to demand that information be rectified if it is incorrect, incomplete or outdated;
- anonymisation, blocking or erasure of unnecessary/excessive data, or data not processed in accordance with the LGPD;
- to ask that your personal data be deleted if JB Brasil is not permitted or is not legally obliged to retain the personal data;

- to demand that the processing of your personal data shall be restricted if
 - you have disputed its accuracy, for the duration needed to verify the accuracy of your personal data, or
 - its processing may lack a legal basis and you prefer a restriction of processing to the deletion of your personal data;
- to object to the processing by JB Brasil if
 - JB Brasil only processes personal data based on its legitimate interests – in this case, it will cease the processing unless this is outweighed by its own interests or it needs to process the data in order to exercise its rights, or
 - the processing is based on your consent (e.g. for direct marketing);
- to demand that your personal data which you have provided to JB Brasil be transferred to a third party indicated by you in a generally useable, machine readable, and conventional format;
- information about public and private entities with which JB Brasil shared your personal data; information about the possibility of refusing to provide consent and the respective consequences;
- revocation of consent; and
- to demand that an individual automated decision be reviewed by a natural person. You also have the right to state your view.

You also have a right of appeal (as far as this affects you) to the Autoridade Nacional de Proteção de Dados.

9 What personal data are you required to supply?

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

Under the regulations on combating money laundering and the financing of terrorism, in particular, JB Brasil is obligated to verify your identity based on 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 JB Brasil to comply with these regulations, you are required to supply it with the necessary information. If this information changes during the business relation-

ship, you are obliged to notify JB Brasil without delay. If you do not provide JB Brasil with the necessary information, it will not be able to commence or continue a business relationship with you.

10 Does JB Brasil use automated decision-making?

As a basic principle, JB Brasil does not use fully automated decision-making for commencing and conducting its business relationships. If JB Brasil does apply this procedure in exceptional cases, it will inform you in accordance with LGPD.

11 Is your data processed automatically and used for profiling?

JB Brasil may process your personal data automatically in certain areas with the aim of evaluating certain personal criteria. JB Brasil may use your personal data for profiling. Profiling is any type of automated processing of personal data. This consists of using the personal data to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning the economic situation, personal preferences, interests, reliability, behavior, and location or change of location. JB Brasil may use, process, and combine publicly available data as well as third-party data about you for this purpose. Profiling may take place, for example, in the following cases:

- to comply with the legal and regulatory obligations of JB Brasil, Julius Baer Group companies, or Service Providers and agents engaged by JB Brasil;
- to check the client relationship and to combat money laundering, terrorist financing, and asset threatening crimes (including in payment transactions). These measures serve to protect you and to fulfil legal obligations;
- in order for JB Brasil to use 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;
- in the context of assessing your creditworthiness, JB Brasil 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, for example, include income ratios and expenditure, existing liabilities, occupation, employer, duration of employment, experience of the business relationship to date, the contractual repayment of previous loans, as well as information from credit rating agencies. The results of the analysis assist JB Brasil in the decision-making process within the context of product sales and are also incorporated into the ongoing risk management.

12 Where can you find JB Brasil's current Privacy Notice?

You can find the currently applicable version at www.juliusbaer.com/clientdataprivacypolicy#Brasil

JB Brasil reserves the right to amend this Privacy Notice from time to time and will inform you of such an amendment in an appropriate manner.

13 How can you contact JB Brasil?

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

São Paulo, May, 2024