

DATA PROTECTION: PRIVACY NOTICE

This Privacy Notice informs you, our clients, and individuals related to you whose data Banco Votorantim S.A., Luxembourg Branch (“Banco BV Luxembourg”) process in the course of our relationship with you (e.g. legal representatives, beneficial owners, contact persons, etc.) about the processing of your personal data (i.e. data by which you may be directly or indirectly identified), as well as of your rights pursuant to the Data Protection Legislation.

Data Protection Legislation means any applicable law, statute, decree, legislative enactment, order, regulation, rule or other binding instrument which implements Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (“GDPR”) and any statutory instrument, order rule or regulation implemented thereunder, as such legislation and guidance may be amended, replaced or repealed from time to time.

1. Who is the data controller and who to contact?

Any personal data provided to or collected by us will be processed in our capacity of controller or by our subcontractors and service providers as further described in this Privacy Notice in their capacity as processors.

If you or individuals related to you have any questions or comments or want to exercise your rights, you may contact us at +352 XX XX XX. We have appointed a Data Protection Officer (DPO). You can contact our DPO at dpo@bvluxembourg.com.

2. What personal data is processed?

We process the data that we receive through our business relationship with you. We receive the data either directly from you, e.g. in the context of opening a business relationship or placing an order.

In particular, the data we process about you includes:

- identification data (e.g. name, signature, e-mail, residential address, postal address, telephone number(s), country of residence, passport, identity card, tax identification number, permanent visa for specific countries, identification credentials to connect to internet banking services);
- electronic identification data (e.g. IP addresses, cookies, traffic data);

- personal characteristics (e.g. place and date of birth, marital status, gender and political exposure, nationality and citizenship);
- household composition (e.g. details on members of the family or household);
- banking and financial data (e.g. financial identification, financial situation, risk profile, investment horizon, source of wealth and source of funds deposited in/ transited through us and objectives and preferences and shareholdings);
- employment and occupation (e.g. employer, function, title, place of work);
- data received in the context of performing the agreement (e.g. securities orders, account positions and transactions, corporate actions, investment advices, suitability reports and power of attorneys);
- tax-related data in the context of the automatic exchange of information among OECD countries and the US (e.g. with regard to interest and dividends);
- communications (e.g. exchange of letters with you, telephone recordings and meeting minutes); images and sound (e.g. photos, copies of identifications documents and telephone recordings);
- advertisement and sales data (e.g. potential interesting products for you and lists of financial instruments).

We may collect Personal Data about you directly or from other public or private legitimate sources. Such sources may include third party data, public sources, internet and credit rating agencies.

3. For which purposes do we process your data and on which legal basis?

3.1 For the compliance with legal and regulatory obligations

3.2 For the performance of contractual obligations

3.3 For purposes that are in our or a third party's legitimate interest

3.4 With your consent

4. Who receives my data?

The following entities may receive your data:

- Other departments of the Banco BV Luxembourg or Banco Votorantim S.A. (“Head Office”) that process your personal data for credit assessment purposes, for outsourcing purposes, for establishing the business relationship with you and complying with our legal and regulatory obligations (e.g. customer due diligence, prevention of financial crimes such as money laundering, terrorist financing and market abuse, provision of banking and investment services and marketing, where applicable);
 - Processors (i.e. service providers) appointed by us, that process your personal data on our instructions;
 - Administrations, public services, local authorities and institutions (e.g. the Luxembourg financial sector supervisory authority, the CSSF, tax authorities) in the case of a statutory or regulatory obligation;
 - The respective shareholders, agents, employees, consultants, representatives, financial intermediaries, auditors, service providers, as well as any affiliates or subsidiaries of Banco Votorantim S.A. (and their respective agents, employees, consultants, representatives);
 - Entities that act on behalf of you or which have a business relation with you such as, payment recipients, correspondent and agent banks, beneficiaries, account nominees, representatives, intermediaries, market counterparties, upstream withholding agents, swap or trade repositories, clearing houses, clearing and settlement systems, companies in which you hold securities (if those securities are kept by the bank for you);
 - Specialised companies, such as the Society for Worldwide Interbank Financial Telecommunication (SWIFT) and clearing companies that process personal data relating to money transactions and that can use for those purposes processing centres that are located within the European Union or abroad (particularly the United States);
 - Other financial institutions or credit agencies in order to receive or provide credit reports;
 - External fund managers that provide asset management services;
 - Brokers that introduce or bring contacts to us;
 - Parties involved in the context of a company restructuring, transfer, divestiture, fusion or acquisition at the level of our Bank or Group;
 - Other entities (e.g. for marketing purposes), based on your consent.
5. How long will we keep your data?
- As far as necessary, we will keep your data for the duration of our business relationship, which includes the preparation and signing of a contract.
- In addition, we are subject to various retention and documentation obligations, which inter alia follow from the commercial code (Code de Commerce) and from anti-money laundering laws. The retention periods provided by those laws vary from five to ten years.
- Without prejudice to the above, Personal Data may be retained for as long as we have a legal or regulatory obligation to keep the Personal Data, or a legitimate interest to keep the Personal Data where required to establish, exercise or defend our legal rights.
6. Where is personal data transferred?
- For the purposes listed above, your personal data will be transferred to any of the aforementioned recipients and service providers which may be located in countries outside of the European Economic Area (the EEA).
- Personal data may be transferred to the following countries: Brazil, United States of America, Bahamas.
- Certain countries in which recipients and data processors may be located and to which personal data may be transferred may not have the same level of protection of personal data as the one afforded in the EEA. Personal Data transferred to countries outside of the EEA will be protected by appropriate safeguards such as standard contractual clauses approved by the European Commission and you may obtain a copy of such safeguards by contacting us at the contact details set out in section 1 above.
7. Do I have the obligation to provide the data?
- In the context of our business relationship, you only have to provide those personal data that are necessary for the formation, performance, and termination of a business relationship or that we are required by law to collect from you.

Without this data, we will generally refuse to sign or to perform the contract, or stop performing or, where appropriate, terminate an existing contract. In particular, anti-money laundering laws require us, before entering into a business relationship with you, to identify you, for example by demanding your identity card, your name, date of birth, place of birth, nationality and official residence. In order for us to comply with those legal requirements, you have to provide us, with the necessary information and documents and to inform us immediately of any subsequent change. We cannot enter into the desired business relationship with you, if you do not provide us with the necessary information and documents.

8. To what extent is my data going to be used for profiling?

We process your data partly by automated means in order to evaluate certain personal aspects (so called "profiling"). We use profiling in the following case: by virtue of statutory and regulatory requirements, we are obliged to take part in the fight against money laundering, economic crime and terrorist financing. For that purpose, we also analyse your data (inter alia your transactions). These measures are also for your own protection.

9. What are my rights?

9.1 Right to information, rectification, erasure and restriction of processing

You may request to obtain at no costs, within reasonable intervals, and in a timely manner, the communication of your personal data being processed, as well as all information on the origin of those data.

You also have the right to rectify your personal data held about you that is inaccurate.

9.2 Right to object

You may object to processing of your personal data which is based on the legitimate interests pursued by us or by a third party. In such a case we will no longer process your personal data unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You have also the right to object at any time to processing of your personal data for marketing purposes, which includes profiling to the extent that it is related to such

direct marketing. If you object to processing for direct marketing purposes, your personal data will no longer be processed for such purposes.

9.3 Right to withdraw consent

9.4 Right to data portability

9.5 Right to lodge a complaint

You can exercise your rights any time by contacting us at the contact details set out in section 1 above.

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at the email address indicated above and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to file a complaint with the Luxembourg data protection authority, the Commission Nationale pour la Protection des Données (CNPD), or another European data protection authority (e.g. in your country of residence), in the event you have concerns on the processing of your personal data.

11. Amendments of this privacy notice

We may amend this Privacy Notice from time to time to ensure that you are fully informed about all processing activities and our compliance with applicable Data Protection Legislation. You will be notified of changes to the Privacy Notice by appropriate means.