



PRIVACY AND DATA PROTECTION POLICY OF BEXS GROUP

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1. INTRODUCTION

Law no. 13.709, of August 14, 2018 (General Data Protection Law — "**LGPD**"), is a set of rules that regulates the use of information about individuals ("**Personal Data**") by third parties, processing whether in a physical or digital environment, in order to protect fundamental rights to freedom and privacy of natural persons ("**Data Subjects**").

This Privacy and Data Protection Policy ("**Policy**"), applicable to the companies that make up the **Bexs Group**, aims to reinforce our commitment to privacy, security, and transparency regarding the processing of the Personal Data necessary to provide our services ("**Services**").

2. DEFINITIONS

Definitions and terms in this Policy are listed in **EXHIBIT I**.

3. SCOPE

This Privacy Policy applies to all those who have Personal Data processed by the Bexs Group, either physically or digitally.

4. COLLECTION AND PROCESSING OF PERSONAL DATA

4.1. Collection of Personal Data

For the provision of the Services, the companies that make up the Bexs Group need to process data obtained in several different contexts, such as: **(a)** Data provided directly from Data Subjects when filling out forms in order to contract our Services; **(b)** collection of data during the Data Subject's access to the Bexs Group website, **(c)** data provided by partners, suppliers, and contracted service providers for specific purposes by the Bexs Group, or **(d)** collection of publicly available data. The categories and types of Personal Data processed in our activities are listed below:

Data	Information
Identity Data	a) Full name; b) Tax identification number; c) Identity card;



	d) Date and place of birth; e) Nationality; f) Parents' names; g) Residential and business addresses; h) Tax residence; i) Email; j) Mother's name; k) Phone number; l) Passport number; and m) Photos from personal documents.
Financial Data	a) Banking information; b) Information on the payment methods used by the Holder; c) Monthly income amounts and property; d) Income tax return; e) Other information for the assessment of the financial capacity; and f) Information generated by credit bureaus.
Browsing Data	a) IP; b) Time and date of access; c) Geolocation; d) Data on your access device; and e) Cookies.
Usage Data	a) Profile and purchasing behavior; and b) Volume of transactions.
Biometric Data ¹	a) Facial biometrics; b) Fingerprint.

Bexs Group verifies and validates the authenticity of the identification and qualification information of the Subject, and is solely and exclusively responsible for the truthfulness of the Personal Data voluntarily provided when registering and/or contracting the Services.

All Personal Data provided by the Subjects are considered confidential and, therefore, Bexs Group undertakes to adopt the technical and administrative measures appropriate to protect them, complying with the guidelines on security standards established in the current legislation.

¹ Biometric Data is considered Sensitive Personal Data that Bexs Group may collect and use for the purposes established in the applicable legislation, such as to comply with legal obligations and for fraud prevention and security of the Data Subject.



4.2. Purpose of the Use of Personal Data

The Personal Data collected is used for the following purposes:

Purposes	<ul style="list-style-type: none">a) For the provision of the Services, including payment processing, chargebacks, and refunds, sending transaction notifications, identity verification, identification and prevention of fraud and security threats, data analysis, system maintenance, and data hosting;b) For the analysis of transactions and consumption profile, for behavioral analysis purposes, as well as for the purposes of preventing fraud, money laundering, terrorist financing and other illicit activities, Know Your Client - KYC activities and other risk management activities, reports to the Revenue Federal, fraud prevention measures, security threats, risk assessment as required by the Central Bank of Brazil, and other authorities;c) To monitor and enhance performance and improve the Services;d) For the management of the relationship with the Subject, including service via our communication and service channels;e) For the sending of direct marketing communications via applicable channels;f) To properly identify and authenticate Data Subjects, in order to enable the security of our operations;g) To comply with legal and regulatory obligations to which the Bexs Group is subject;h) To enable Bexs Group to exercise its rights in judicial, administrative or arbitration procedures;i) To develop and improve our Services;j) For the decision making on the appropriate means of marketing communication, statistics and risks analysis;k) For fraud prevention and security of operations and Services, as well as for protection of credit;l) To fulfill the legitimate interest of the Bexs Group or of third parties, with respect to the applicable limitations;m) To carry out the registration and the data treatment process of personal data and information, related to occurrences, attempts and/or indications of fraud, with the purpose of preventing fraud and ensuring the security of operations and the client's data, and will be allowed to share it with companies in the Conglomerate and/or third party institutions or other financial system institutions and regulatory bodies as well, in compliance with applicable legal and regulatory obligations;n) Compliance with legal and regulatory obligations.
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If the Data Subject refuses to provide the Personal Data necessary to provide the Services due to the law, regulation, or terms of the Services agreement, Bexs Group will possibly not be able to provide the Services or provide them appropriately.

The use of Personal Data is carried out exclusively for the purposes described above. If the Processing of Personal Data is required for a new purpose not originally provided for, Bexs Group will disclose such information, providing explanations on such request.

4.3. Processing of Personal Data

The Processing of the Personal Data of the Data Subjects complies with the good faith and principles listed in the LGPD and other applicable rules, among which we highlight: **(a)** purpose; **(b)** transparency; **(c)** security; and **(d)** prevention.

The term for the Processing of Personal Data by Bexs Group will vary according to:

- a) the kinds of Services contracted/provided/rendered;
- b) the purposes of the Processing;
- c) the contractual and legal provisions in question.

Thus, the end of the Processing of Personal Data will occur when:

- a) the purpose for which the information was collected is reached or when the Personal Data is no longer necessary or relevant to reach this purpose;
- b) when the Data Subject's Consent is revoked if the legal grounds for its collection or Processing was the Consent;
- c) upon determining the competent authority to do so.

5. PERSONAL DATA SHARING

Bexs Group cares for the privacy of Data Subjects data and, in compliance with the data protection and banking secrecy rules, only shares their information for the purposes set forth in this Policy.



Any sharing of information will be done strictly to the extent necessary and in accordance with strict standards of security and confidentiality, as well as the rules of banking secrecy and other laws and rules of privacy and data protection, always respecting and making third parties respect the confidentiality of such information.

As we offer a Service that involves foreign exchange transactions and financial transactions, Bexs Group may work together with companies to provide them appropriately, which may involve sharing Personal Data, provided that only the necessary data will be shared with those that guarantee compliance with market security standards.

The sharing of Personal Data with third parties may occur in the following situations:

- a) among the companies that make up the Bexs Group, to ensure the maintenance, operability and continuity of our Services;
- b) with business partners, service providers, suppliers, and subcontractors for the perfect and correct execution of our Services;
- c) with search and analysis mechanisms providers, to assist in improvements and optimizations of the Bexs Group website;
- d) with regulatory and supervisory authorities that require such sharing, upon request, judicial order or legal provision by competent authorities.

Bexs Group does not license, sell, or transfer Personal Data for profit or undue advantage nor does it act in a manner contrary to that set forth in this Policy.

6. STORAGE, RETENTION, AND DELETION OF PERSONAL DATA

The Personal Data of the Data Subject will be stored for as long as it is necessary for the purposes described in this Policy, and the Personal Data will be kept in a safe and controlled environment. In this context, even if the relationship between the Data Subject and the Bexs Group has ended, some information will be kept for the fulfillment of legal and regulatory obligations, as well as for the exercise of rights in administrative, judicial, or arbitration claims.



In order to determine the appropriate retention period concerning Personal Data, Bexs Group will consider the amount, nature, and sensitivity of the Personal Data. If certain Personal Data is no longer necessary for the purpose of reaching a certain purpose, they will be deleted or subject to Anonymization, that is, they will lose the ability to identify or make a Data Subject identifiable.

7. INTERNATIONAL DATA TRANSFER

Bexs Group is headquartered in Brazil and the Personal Data is collected in accordance with Brazilian law. However, Personal Data may be transferred internationally in order to store it on cloud computing servers located outside Brazil or to provide the Services with business partners, service providers, suppliers, and subcontractors located in other countries due to the purposes described in this Policy.

Bexs Group ensures that the transmission of Personal Data will be carried out in accordance with applicable privacy laws and, in particular, that appropriate contractual, technical, and organizational measures will be observed, ensuring greater security to the Personal Data.

8. SECURITY MEASURES

Bexs Group adopts security measures capable of ensuring the integrity of Personal Data, such as information security standards applied by the industry when collecting and storing Personal Data.

Personal Data may also be stored using cloud computing technology and other technologies that arise in the future, always aiming to improve our services and security.

Bexs Group uses standards and best practices adopted in the market, among which:

- a) Two-factor authentication to access information;
- b) Security as a code, in order to enable quick and efficient automation and responses to security events in the technological environment;



- c) Encryption for data at rest, in transit, and in use to ensure information integrity;
- d) Continuous monitoring of the environment;
- e) Continuous analysis and testing of information security in our systems, carried out by internal and external teams;
- f) Periodic audits.

However, even if, to the best of our ability, we employ robust measures to prevent incidents, security cannot be guaranteed against all possible threats, especially when considering the circumstances of the digital context.

9. COOKIES AND SIMILAR TECHNOLOGIES

Bexs Group's website uses the following types of cookies:

9.1. Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be turned off on our systems. They are usually only set up in response to actions you take that correspond to a request for services, such as setting your privacy preferences, logging in or filling out forms. You can set your browser to block or alert you to these cookies, but some parts of the website may not work.

9.2. Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore not associated with user identification data. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance.

9.3. Functional Cookies

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we



have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

9.4. Targeting Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites, based on identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

The following list indicate the cookies used by Bexs Group:

9.5. Categorizations Page

The Cookies tab of the Categories page lists all the cookies found by the scanner. Cookies are small text files that can be placed on your computer or handheld device by websites or web services that you use. They are used to ensure the proper functioning of websites and other online services, as well as to provide information to the owners of the website or online service.

9.6. Strictly Necessary Cookies

Host	Cookie Name	Cookie Types
.bexs.com.br	OptanonConsent	First Party
.bexs.com.br	OptanonAlertBoxClosed	First Party

9.7. Performance Cookies

Host	Cookie Name	Cookie Types
www.bexs.com.br	_ga	First Party
developers.bexs.com.br	_gid, _gat_UA-, _ga	First Party
com.br	_gclxxxx, _ga, _gclxxxx, _gat_UA-,	First Party



	_gid	
bexs.com.br	_ga, _gat_UA-, _gid, _gclxxxx	First Party

9.8. Functional Cookies

Host	Cookie Name	Cookie Types
bexs.com.br	_gd##### _sp_root_domain_test_x xxxxxxxxxxxx	First Party
com.br	_gd##### _sp_root_domain_test_x xxxxxxxxxxxx	First Party

9.9. Targeting Cookies

Host	Cookie Name	Cookie Types
bexs.com.br	_fbp	First Party
ads.linkedin.com	lang	Third-Party
linkedin.com	lidc, bcookie, li_gc, lang, AnalyticsSyncHistory, UserMatchHistory	Third-Party
youtube.com	CONSENT, YSC, VISITOR_INFO1_LIVE	Third-Party
www.facebook.com		Third-Party

9.10. Compatible services of Bexs Group.

The Bexs Group's compatible websites and services may also use other tracking technologies similar to Cookies, which may collect information such as IP addresses, log files, among others. This data is also used to help us adapt Bexs Group's websites and other compatible services to your personal needs.

See more details below:



a) IP Addresses. An IP address is a number used on the internet or a network to identify your computer. Every time you connect to the internet your computer receives an IP assigned by your internet service provider. We may register IP Addresses for the following purposes:

- (i) Handling of technical problems;
- (ii) Maintaining the protection and security of our websites and other online services;

b) Log Files. The Bexs Group, or a third party working on our behalf, may collect information in the form of log files that detail website activities and collect statistics about a user's browsing habits. Usually, these records are generated without association with user identification data and help us understand details such as, the type of browser and system used by users of our websites or online services.

Most browsers allow you to set rules to warn you before accepting Cookies or simply rejecting them. You do not need to have Cookies enabled to use or browse most Bexs Group websites and online services, however in this case we cannot guarantee that you will be able to access all of their features. We recommend that you look at the "help" button on your browser to see how to perform this type of configuration. Remember that if you use different browsers, or even different computers and/or handheld devices in different locations, You will need to ensure that each device and browser is set to your personal Cookies preferences.

9.11. Use of Cookies

The use of Cookies is usual in the digital platform of Bexs Group to improve the experience, both in terms of performance and in terms of usability, since the content provided will be directed to the needs of the Data Subjects, including Clients and Prospects.

9.12. Storage of Cookies

Cookies allow the Bexs Group digital platform to remember information about the Client visit, preferred language, location, and recurrence of sessions and other variables considered relevant to make the experience more efficient.



Certain types of Cookies are essential to the functioning of the website and cannot be disabled, while those Cookies called non-essential may be configured according to the preferences of the Data Subjects in its browser of choice. However, changing the settings of the Cookies used on the Bexs Group's pages may disable some functionalities and affect the proper usability of our tools and platforms.

10. RIGHTS OF THE DATA SUBJECT

Bexs Group ensures the Personal Data Subject the following rights set forth in the LGPD:

- a) Confirmation of the existence of Processing;
- b) Access to data;
- c) Correction of incomplete, inaccurate, or outdated data;
- d) Anonymization, blocking, or deletion of unnecessary or excessive data, or data treated in non-compliance with the provisions of the LGPD;
- e) Portability of data to another service or product provider, upon express request, in accordance with the regulations of the national authority, observing commercial and industrial secrets, banking secrecy, and the provisions of the regulatory and supervisory body;
- f) Deletion of personal data processed legally based on the Consent of the Data Subject;
- g) Information of public and private entities with which the Controller performed the shared use of data;
- h) Information on the possibility of not providing the Consent and on the consequences of the denial;
- i) Revocation of the Consent, when this is the legal ground used for the Processing.
- j) Review of decisions based solely on automated processing of Personal Data which may affect the Data Subject's interests;
- k) Petitioning before the national authority, when the Data Subject understands that the request sent to the Controller has not been properly processed.



The Data Subject's requirements must be submitted in accordance with the provisions of item 10 below, which will be processed and answered by Bexs Group under the terms of the applicable legislation.

11. SERVICE CHANNELS

In the case of doubts regarding the provisions set forth in this Policy or for the exercise of any rights provided for herein or in the relevant legislation, the Data Subject must contact our Data Protection Officer on the following channel:

Data Protection Officer: Carlos Grilli

E-mail: privacidade@bexsbanco.com.br

12. GENERAL PROVISIONS

This Policy refers exclusively to the Services of Bexs Group. Products and services acquired from Bexs Group partners will be subject to their own terms of use and privacy policies determined by them.

The terms of this Policy may be amended at any time, due to legislative amendments by the regulatory bodies or to the Services provided, as a result of the updating of technological tools or, when necessary, at the discretion of Bexs Group.

For this reason, the date of the last update will be indicated in this Policy, and, in the event of substantial modification, we will provide adequate transparency regarding the content that has been changed.

Last update date: 01/11/2023

Previous versions: 05/01/2022



EXHIBIT I – DEFINITIONS

- (i) Anonymization:** use of reasonable technical means available at the time of the Processing, whereby a data loses the possibility of direct or indirect association with an individual;
- (ii) Legal basis:** legal grounds set in the LGPD that allow organizations to process Personal Data for specific purposes;
- (iii) Client:** individuals who effectively contract, use, or access one or more Bexs Group services or products (whether for individuals or for the legal entity of which the individual is a representative or a partner);
- (iv) Consent:** one of the ten legal bases according to the LGPD, it means the free, informed, and unequivocal manifestation, through which the Data Subject agrees with the Processing of Personal Data for a given purpose;
- (v) Controller:** person or company responsible for decisions relating to the Processing of Personal Data;
- (vi) Cookies:** small files containing a string of characters, created and sent by websites to your computer when you visit them;
- (vii) Personal Data:** information related to an individual identified or information that allows their identification, such as name, address, Individual Taxpayer's Register - CPF, Identity Card - RG, general identity documents, phone number, among others;
- (viii) Sensitive Personal Data:** Personal Data on racial or ethnic origin, religious belief, political opinion, union membership, or organization of a religious, philosophical, or political nature, data related to the health or sexual life, genetic or biometric data when related to an individual;
- (ix) Device:** any device that can be used to access the services offered by Bexs Group;
- (x) Geolocation:** a feature that, when activated by the Data Holder, allows you to define the precise or approximate position of a Device and brings information such as the country, state, city, and street where that Device is located, also providing the time at which it was accessed;



(xi) LGPD (General Data Protection Law): Federal Law no. 13.709, published on August 14, 2018, that regulates the activities of the Processing of Personal Data, including in digital media, by an individual or by a legal entity governed by public or private law, aiming to protect the fundamental rights of freedom and privacy and the free development of the personality of the individual;

(xii) Prospect: individuals contacted by Bexs Group or who have requested the contracting of a Service without becoming a Client of Bexs Group (either for individuals or for the legal entity of which the individual is a representative or partner);

(xiii) Data Subject: any identified or identifiable individual to whom the Personal Data processed refers;

(xiv) International data transfer: transfer of Personal Data to a foreign country or international organization the country is a member of;

(xv) Processing: any operation performed with Personal Data in an automated or non-automated manner, i.e., the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, storage, filing, deletion, evaluation, or control of the information, modification, communication, transfer, promotion, or extraction.