

## Privacy Notice

This Privacy Notice ("Notice") aims to ensure transparency in the processing of your personal data, and it is intended to inform you about data processing operations in transparent manner, according to the applicable privacy law.

### 1. Data Controller

This privacy notice explains how **HEDGEPOINT SCHWEIZ AG (HEDGEPOINT SWITZERLAND LTD)** based in Seefeldstrasse 307, 8008 Zurich, Swiss and companies from the same economic group described below use and disclose your personal data.

Companies from same economic group:

**HEDGEPOINT GLOBAL MARKETS DISTRIBUIDORA DE TÍTULOS E VALORES MOBILIÁRIOS LTDA.**, based on Av. José de Souza Campos, 507 - 9º andar, Cambuí, CEP 13.025-320, Campinas/SP, Brazil;

**HEDGEPOINT COMMODITIES LLC**, based on 601 13Th St Nw ST 1000, Washington/DC, United States of America;

**HEDGEPOINT GLOBAL MARKETS LLC**, based on 251 Little Falls Drive, Wilmington/DE, United States of America

and **HEDGEPOINT SERVIÇOS LTDA.**, based in Av. José de Souza Campos, 507 - 9º floor, Cambuí, CEP 13.025-320, Campinas/SP, Brazil

Together defined as "we" and/or "HPGM".

### 2. Type of Personal Information

We currently collect and process the following personal information:

- Name
- Address and its evidence
- Professional Resume
- Position
- Area
- Phone/cellphone number
- E-mail
- Person identification (ID or Driver's license)

#### Data Processing activities in Switzerland

For the processing activities which take place in Switzerland, Federal Act of Data Protection (FADP) is applicable. This includes (i) any processing activity that has its effects in Switzerland, even if the processing activity occurs outside the country, (ii) data subject is resident in Switzerland, (iii) the controller has a branch in Switzerland or (iv) the effect of personality violation is in Switzerland.

Data from legal entities are object of protection under FADP and are subject to this notice. In this regard, we collect and process the following information from legal entities:

- Name
- Tax ID number
- Address and its evidence
- Date of foundation
- Market segment
- Activities developed and company history
- Corporate structure
- Financial and Accounting Documentation
- Quantity of employees
- Qualification seals
- Information regarding legal and administrative suits related to regulatory matters, money laundering and corruption
- Information regarding internal compliance and its controls
- Information regarding internal risk area and its controls
- Website

All data we process is collected during public research on internet or provided to us directly by you when exchanging business cards on events or when filling in registration forms (Know your Supplier, Know you Client, etc.).

### 3. Purposes & Legal Basis

We use the personal information for the following purposes and with the following Legal Basis:

Purpose	Legal Basis
Potential client registration on HPGM records tools	We process your personal data based on our legitimate interest in promoting our activities.
Client registration on HPGM records tools	We process your personal data in order to take steps on preliminary contract procedures or performance of a contract with you
Contact you by HPGM Sales team, including prospective activities as the schedule of calls and meetings	We process your personal data in order to take steps on preliminary contract procedures or performance of a contract with you
Sending of mail marketing as, but not limited to, newsletters and materials provided by HPGM's market intelligence team	We process your personal data based on you consent. You can withdraw your consent at any time by contacting <a href="mailto:dataprivacy@hedgepointglobal.com">dataprivacy@hedgepointglobal.com</a> . If you withdraw your consent, you will not receive any other contact from HPGM. You understand that the revocation of your consent does not affect the lawfulness of the processing of your

	personal data which occurred until the revocation of your consent.
Sending of Surveys, including but not limited to, satisfaction and opinions over HPGM services surveys	We process your personal data based on you consent. You can withdraw your consent at any time by contacting <a href="mailto:dataprivacy@hedgepointglobal.com">dataprivacy@hedgepointglobal.com</a> . If you withdraw your consent, you will not receive any other contact from HPGM. You understand that the revocation of your consent does not affect the lawfulness of the processing of your personal data which occurred until the revocation of your consent.
Execution of Know your Supplier (KYS) and Know your Client (KYC) proceedings	We process your personal data in order comply with regulatory obligation of Brazilian Central Bank Circular n. 3.978/2020.

#### 4. Processing duration & Storage

We will process your personal data for the period we conduct business with you or longer, for the regular exercise of HPGM rights, or for compliance with legal or regulatory obligations, in which case your data will be stored for at least 5 (five) years.

You can consult about the duration of data by sending a request to [dataprivacy@hedgepointglobal.com](mailto:dataprivacy@hedgepointglobal.com).

Your information is stored by our partner HubSpot in the United States of America. You can consult more about the storage by clicking [here](#).

#### 5. Share of personal data

We may share your personal data with our service providers or regulatory entities, only the necessary amount needed to comply with the purposes listed above, in case of functionalities technical support and for security and prevention of misuse of the records' tools.

We will also disclose your data when required to do so by law or any court, including but not limited to, Switzerland, United States of America, Brazil, Argentina or other countries we have operations.

We also may share your personal data if you request us to do so.

#### 6. International Transfer

Since HPGM operates globally, your personal data may be transferred abroad, including but not limited to the United States of America, Switzerland, Brazil, Argentina, Mexico, Uruguay and Singapore. For this, HPGM observes all the requirements demanded by applicable privacy law and adopts the best security and privacy practices to guarantee the integrity and confidentiality of your personal data.

You can consult about the international transfer of your data by sending a request to [dataprivacy@hedgepointglobal.com](mailto:dataprivacy@hedgepointglobal.com).

## **7. Your data protection rights**

Under applicable data protection law, you may have rights including, but not limited to:

- Your right to confirm your data is being processed.
- Your right of access to ask us for copies of your personal information.
- Your right to rectification, update or complete: you have the right to ask us to rectify personal information, which is inaccurate and, also to ask us to complete information which is incomplete.
- Your right to ask us to erase or anonymize your personal information in certain circumstances.
- Your right to ask us to restrict or stop the processing of your personal information in certain circumstances.
- Your right to withdraw your consent and the consequences.
- Your right to know with which public or private entities your data was shared with.
- Your right to ask that we transfer the personal information you gave us to another organization, or to you, in certain circumstances.
- Your right to not receive discriminatory treatment by HPGM.
- Your right to subject or not to a decision based solely on automated processing, including profiling (if any).
- Your right to complain to supervisory authority.

You are not required to pay any charge for exercising your rights. If you need any clarification or request about the use of your personal data, you can contact us at [dataprivacy@hedgepointglobal.com](mailto:dataprivacy@hedgepointglobal.com).