

# Ebury Bank

## Privacy and Data Protection Policy

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## 1 Objective

Law No. 13,709, of August 14, 2018 (General Data Protection Law – “**LGPD**”), is the Brazilian legislation responsible for regulating activities that involve the use of information from individuals (“**Personal Data**”) by third parties, whether in a physical or digital environment, in order to protect the rights to freedom and privacy of natural persons (“**Data Subjects**”) a set of rules that protects and enables individual rights to privacy and protection of personal data of their Data Subjects (“**Personal Data**”) and how they can be used by third parties, respecting the Data Subjects individual choices.

This Privacy and Data Protection Policy (“**Policy**”), applicable to Ebury Banco de Câmbio S.A. (“**Ebury Bank**”), aims to reinforce the commitment to privacy, security and transparency regarding the use of Personal Data necessary for the provision of our services (“**Services**”).

## 2 Scope

This Policy applies to all those who have Personal Data processed by Ebury Bank, considered a Data Controller, whether physically or digitally.

## 3 Legal Basis

Law No. 13,709/2018 (General Personal Data Protection Law - LGPD): Provides for the processing of personal data, including in digital media, by a natural person or legal entity governed by public or private law, with the aim of protecting the fundamental rights of freedom and privacy and the free development of the personality of the natural person

## 4 Detailing

### 4.1 Collection and Processing of Personal Data

#### 4.1.1 Collection of Personal Data

To provide the Services, the companies that make up Ebury Bank need to use data obtained in different contexts, for example: (a) voluntary provision by Data Subjects when completing registrations to contract services; (b) collection of data during the Data Subjects access to the website do Ebury Bank, (c) collection of data Subjects provided by partners, suppliers and service providers contracted for specific purposes by Ebury Bank; or (d) collection of data that is publicly available. To facilitate understanding, we have listed below the Personal Data that we may process in our activities.

Data	Information
<b>Identity Data</b>	<ul style="list-style-type: none"> <li>● Full name;</li> <li>● Tax identification number;</li> <li>● Identification Document;</li> <li>● Date of place of birth;</li> <li>● Nationality;</li> <li>● Membership;</li> <li>● Residential and commercial addresses;</li> <li>● Tax residence;</li> <li>● E-mail;</li> <li>● Mother's name;</li> <li>● Phone number;</li> <li>● Passport number; and</li> <li>● Photos of personal documents.</li> </ul>
<b>Financial Data</b>	<ul style="list-style-type: none"> <li>● Banking information;</li> <li>● Information on the payment methods used by the Data Subject;</li> <li>● Values of monthly income and assets;</li> <li>● Income reports;</li> <li>● Other information to assess financial capacity; and</li> <li>● Information generated by bureaus of credit</li> </ul>
<b>Browsing data</b>	<ul style="list-style-type: none"> <li>● IP;</li> <li>● Hora e data de acesso;</li> <li>● Geolocalização;</li> <li>● Dados sobre o seu Dispositivo de acesso; e</li> <li>● Cookies</li> </ul>
<b>Usage data</b>	<ul style="list-style-type: none"> <li>● Profile and purchasing behavior; and</li> <li>● Transaction volume</li> </ul>
<b>Biometric Data (1)</b>	<ul style="list-style-type: none"> <li>● Facial biometrics; and</li> <li>● Digital printing</li> </ul>

Ebury Bank, considered a Data Controller, verifies and validates the authenticity of the Data Subjects identification and qualification information, and the Data Subjects is solely and exclusively responsible for the veracity of the Personal Data voluntarily provided when registering and/or contracting the Services.

All Personal Data provided by Data Subjects are considered confidential and, therefore, Ebury Bank undertakes to adopt technical and administrative measures capable of protecting them, observing the guidelines on security standards established in current legislation.

#### 4.1.2 Purpose of Using Personal Data

The Personal Data listed in item 4.1.1. above are used for the following purposes:

- Payments, chargebacks and refunds, sending transaction notifications, identity verification, identification and prevention of fraud and security threats, data analysis, systems maintenance and data hosting;
- To analyze transactions and consumption profile, for the purposes of behavioral analysis and prevention of fraud, money laundering, financing of terrorism and other illicit activities, Know Your Client - KYC activity and other risk management activities, reports to the Federal Revenue of Brazil, fraud prevention measures, security threats, risk assessment as required by the Central Bank of Brazil and other competent authorities, in Brazil and abroad to comply with regulations, reporting suspicious transactions to the Financial Activities Control Council (COAF), among other activities;
- To monitor and improve performance and enhance the Services;

- To manage the relationship with the Data Subject, including service via our communication and service channels;
- To send direct marketing communications via interaction channels maintained with the Data Subject;
- To identify and authenticate the Data Subject appropriately, in order to ensure the security of our operations;
- To comply with legal and regulatory obligations to which Ebury Bank is subject;
- So that Ebury Bank can exercise rights in judicial, administrative or arbitration claims;
- To develop and improve our Services;

(1) Biometric Data are considered Sensitive Personal Data, which Ebury Bank may collect and use in the cases provided for in applicable legislation, such as compliance with legal obligations and guaranteeing fraud prevention and the Security of the Data Subject.

- For decision-making on suitable marketing media, analysis of statistics and risks;
- For fraud prevention and security of operations and Services, as well as for credit protection;
- To enable the legitimate interests of Ebury Bank or third parties, respecting applicable limitations;
- To record and process your personal data and information related to occurrences, attempts and/or signs of fraud, with the purpose of preventing fraud and ensuring the security of operations and customer data, and may share them with companies in your conglomerate and/or institutions third parties, such as other financial system institutions and regulatory bodies, in compliance with applicable legal and regulatory obligations; and
- Compliance with legal and regulatory obligations.

If the Data Subject refuses to provide the Personal Data necessary to provide the Services due to law or regulation or terms of the Service provision contract, it is possible that Ebury Bank will be unable to provide the Services properly.

Personal Data is used to meet the purposes described above. If the Processing of Personal Data is necessary for a new purpose not originally related, Ebury Bank will disclose such information, providing explanations about such context.

#### 4.1.3 Processing of Personal Data

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

The period for Processing Personal Data by Ebury Bank will vary according to:

- with the types of Services contracted/provided/supplied;
- for the purposes of the Processing;
- with the contractual and legal provisions in question.

Therefore, the Processing of Personal Data will be terminated when:

- the purpose for which the information was collected is achieved or when the Personal Data is no longer necessary or relevant to achieve this purpose;
- when the Data Subjects Consent is revoked, if the legal basis for its collection or Processing was Consent;

- upon determination of the competent authority to do so.

#### 4.2 Sharing of Personal Data

Ebury Bank ensures the privacy and protection of Data Subjects data, in accordance with data protection and banking secrecy standards, and only shares their information for the purposes set out in this Policy.

Any sharing of information will be done strictly to the extent necessary and in accordance with strict security and confidentiality standards, as well as bank secrecy rules and other privacy protection laws and regulations, always respecting and ensuring that third parties respect the confidentiality of your information.

As we offer a Service that involves exchange operations and financial transactions, Ebury Bank may work together with companies to provide them appropriately, which may involve sharing your Personal Data, and 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:

- between the companies that make up Ebury Bank, to enable the maintenance, operability and continuity of our content, products and services;
- with commercial partners, service providers, suppliers and subcontractors, for the perfect and correct execution of our Services;
- with search engine and analytics providers to assist with improvements and optimizations of the Ebury Bank website;
- with regulatory and supervisory bodies that require such sharing, upon request, court order or legal provision expressed by authorities that have legal competence to do so.

Ebury Bank does not license, sell or transfer Personal Data for the purpose of obtaining profit or undue advantage, and does not act in a manner inconsistent with the provisions of this Policy.

#### 4.3 Storage, Retention and Deletion of Personal Data

The Data Subjects Personal Data will be stored by Ebury Bank for as long as necessary to achieve the purposes described in this Policy, with the information kept in a secure and controlled environment. In this context, even if any relationship between the Data Subject and Ebury Bank has ended, it is possible that some information will be maintained to comply with legal and regulatory obligations, as well as to exercise rights in administrative, judicial or arbitration claims.

To determine the appropriate retention period for Personal Data, Ebury Bank will consider the amount, nature and sensitivity of the Personal Data. If certain Personal Data are no longer necessary to achieve 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.

#### 4.4 International Data Transfer

Ebury Bank is headquartered in Brazil and Personal Data is collected in accordance with Brazilian law. However, it is possible that Personal Data may be transferred internationally in order to store it on cloud computing servers located outside Brazil used by Ebury Group, the Group in which Ebury Bank is included, employees from other countries or to provide the Services with commercial partners, service providers, suppliers and subcontractors located in other countries due to the purposes described in this Policy.

The following topics, relating to the international transfer of data, are described in this Policy:

- Collection of Personal Data;
- Purpose of Use of Personal Data;
- Processing of Personal Data;
- Sharing of Personal Data;
- Storage, retention and deletion of personal data;
- Data Subject Rights;
- Customer Service Channels.

Ebury Bank ensures that the transmission of Personal Data is carried out in accordance with applicable privacy laws and, in particular, that appropriate contractual, technical and organizational measures are observed, ensuring greater security of Personal Data.

The standard Ebury Bank terms and conditions, as defined in Resolution CD/ANPD No. 19/2024, can be found [here](#).

#### 4.5 Security Measures

Ebury Bank adopts appropriate security measures to ensure the integrity of Personal Data, such as information security standards practiced by the industry when collecting and storing Personal Data.

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

Ebury Bank uses standards and best practices adopted in the market, including:

- Double authentication factor for access to information;
- Security as code, in order to enable quick and efficient automation and responses to security events in the technological environment;
- Encryption for data at rest, in transit and in use, to ensure the integrity of information;
- Continuous monitoring of the environment;
- Continuous analysis and testing of information security in our systems, carried out by internal and external teams;
- Audits periodically

However, even if, within our ability, we employ robust measures to prevent incidents from happening, security cannot be unrestrictedly guaranteed against all existing threats, especially when considering the circumstances inherent to the digital context.

#### 4.6 Cookies and Similar Technologies

The Ebury Bank website uses the following types of cookies: Strictly necessary cookies, performance cookies, functionality cookies and advertising cookies. They are used for the following purposes on our website:

##### 4.6.1 Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be turned off in our systems. Typically, they are only configured in response to actions taken by you 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 about these cookies, but some parts of the site may not function properly.

**4.6.2 Performance Cookies**

These cookies allow us to count visits and traffic sources so that we can measure and improve the performance of our website. They help us know which pages are the most and least popular and see how visitors move around the site. All information collected by these cookies is aggregated and, therefore, is not linked to user identification data. If such cookies are not allowed, we will not know when the user has visited our website.

**4.6.3 Functionality Cookies**

These cookies enable the website to provide enhanced functionality and personalization. They may be established by Ebury Bank or by third party providers whose services we add to our pages. If such cookies are not permitted, some, or all, of these features may not function properly.

**4.6.4 Advertising Cookies**

These cookies may be set through our website by our advertising partners. They may be used by these companies to build a profile of your interests and show you relevant advertisements on other websites, based on their identification of your browser and internet device. If such cookies are not allowed, the user will receive less advertising targeted to their interests.

Below we list the cookies collected by Ebury Bank:

**4.6.5 Cookie List**

Cookies are small text files that may be placed on your computer or portable 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.

**4.6.5.1 Strictly Necessary Cookies**

Subgrupo	Cookies	Cookies utilizados
.br.ebury.com	OptanonConsent	Own
.br.ebury.com	OptanonAlertBoxClosed	Own

**4.6.5.2 Performance Cookies**

Subgrupo	Cookies	Cookies utilizados
<a href="http://www.br.ebury.com">www.br.ebury.com</a>	_ga	Own
<a href="http://developers.br.ebury.com">developers.br.ebury.com</a>	_gid, _gat_UA-, _ga	Own
<a href="http://com.br">com.br</a>	_gclxxxx, _ga, _gclxxxx,_gat_UA-, _gid	Own
<a href="http://br.ebury.com">br.ebury.com</a>	_ga, _gat_UA-, _gid, _gclxxxx	Own

#### 4.6.5.3 Functionality Cookies

Subgrupo	Cookies	Cookies utilizados
<a href="http://br.ebury.com">br.ebury.com</a>	_gd#####, _sp_root_domain_test_xxxxxxxxxx xx	Own
<a href="http://com.br">com.br</a>	_gd#####, _sp_root_domain_test_xxxxxxxxxx xx	Own

#### 4.6.5.3 Advertising Cookies

Subgrupo	Cookies	Cookies utilizados
<a href="http://br.ebury.com">br.ebury.com</a>	_fbp	Own
<a href="http://ads.linkedin.com">ads.linkedin.com</a>	lang	Third Party
<a href="http://linkedin.com">linkedin.com</a>	lidc, bcookie, li_gc, lang, AnalyticsSyncHistory, UserMatchHistory	Third Party
<a href="http://youtube.com">youtube.com</a>	CONSENT, YSC, VISITOR_INFO1_LIVE	Third Party
<a href="http://www.facebook.com">www.facebook.com</a>		Third Party

#### 4.6.6 Ebury Bank Compatible Services

Ebury Bank'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 Ebury Bank websites and other compatible services to your personal needs.

See more details below:

- **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 record IP Addresses for the following purposes:
  - a. Handling technical problems;

b. Maintaining the protection and security of our websites and other online services;

- **Log Files (Logs):** Ebury Bank, 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 user browsing habits. Typically, these records are generated without linking to 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 refusing them. You do not need to have Cookies enabled to use or browse most Ebury Bank 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 check the "help" button in your browser on how to perform this type of configuration. Remember that if you use different browsers, or even computers and/or portable devices in different locations, you will need to ensure that each device and browser is adjusted to your personal Cookie preferences.

#### 4.6.7 Use of Cookies

Cookies are frequently used on Ebury Bank's digital platform to improve the experience both in terms of performance and usability, as the content made available will be targeted to the needs of Data Subjects, including Customers and Prospects.

#### 4.6.8 Cookies Storage

Cookies allow Ebury Bank's digital platform to remember information about the Data Subjects 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 for the functioning of the website and cannot be deactivated, while those so-called non-essential Cookies can be configured according to the Owner's preferences in their own browser. However, we highlight that changing the settings of the Cookies served on the pages made available by Ebury Bank may disable some functionalities and affect the adequate usability of our tools and platforms.

### 4.7 Rights of the Data Subject

Ebury Bank guarantees the Personal Data Data Subject the following rights set out in the LGPD:

- Confirmation of the existence of Treatment;
- Access to data;
- Correction of incomplete, inaccurate or outdated data;
- Anonymization, blocking or deletion of unnecessary, excessive or processed data that does not comply with the provisions of the LGPD;
- Data portability 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;
- Deletion of personal data processed on the legal basis of the Data Subjects Consent;
- Information from public and private entities with which the Controller shared data;
- Information about the possibility of not providing Consent and the consequences of refusal;
- Revocation of Consent, when this is the legal basis used for the Processing;

- Review of automated decisions made based on Personal Data that affect the Data Subjects interests;
- Petition to the competent authority, if the Data Subject understands that, even after requesting their Personal Data with the Controller, the request has not been processed properly.

The exercise of the rights presented in this Policy depends on the fulfillment of requirements set out in law, such as prior validation of the applicant's identity and the technical and legal feasibility of meeting such requests, ensuring confidentiality and Ebury Bank's commercial and business secrets.

The Data Subjects requests must be forwarded in accordance with the provisions of item 10 below, which will be processed and responded to by Ebury Bank in accordance with applicable legislation.

#### 4.8 Service Channels

In case of doubts regarding the provisions contained in this Policy or to exercise any rights provided for herein or in the relevant legislation, the Data Subject must contact our Manager through the following channel:

**DPO:** Luis Gonelli

**E-mail:** [privacidade@br.ebury.com](mailto:privacidade@br.ebury.com)

#### 4.9 General Provisions

This Policy relates exclusively to Ebury Bank Services. Products and services purchased from Ebury Bank partners will be subject to their own terms of use and privacy policies, determined by them.

The terms of this Policy may be modified at any time, due to legislative changes by regulatory bodies or in the Services provided, due to the update of technological tools or, when necessary, at the discretion of Ebury Bank.

Therefore, the date of the last update will be indicated in this Policy, and, in the event of a relevant update or modification, we will provide due transparency in relation to the content that may be modified.

**Date of last update:** 15/12/2025.

**Previous version:** 21/01/2025.

**5 Definitions and Abbreviations**

Term	Definition
Ebury Bank	Ebury Banco de Câmbio S.A.
Anonymization	Use of reasonable technical means available at the time of Processing, through which data loses the possibility of association, directly or indirectly, with an individual;
Legal bases	Hypotheses brought by the LGPD that authorize the carrying out of Personal Data Processing activities for specific purposes and informed to the Data Subjects;
Customer	Natural persons who effectively contract, use or access one or more services or products from Ebury Bank (whether for natural persons or for the legal entity of which the natural person is a representative or partner);
Consent	One of the ten legal bases provided for in the LGPD, which corresponds to the free, informed and unequivocal expression by which the Data Subject agrees to the Processing of their Personal Data for a specific purpose;
Controller	Person or company responsible for decisions regarding the Processing of Personal Data;
Cookies	Small file containing a sequence of characters, created and sent by <i>websites</i> to your computer whenever you visit them
Personal Data	Information related to the identified natural person or information that allows identification, such as name, address, CPF, ID, identity documents in general, telephone number, among others;
Sensitive Personal Data:	Personal Data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data when linked to a natural person;
Mobile Device	Any device ( <i>device</i> ) that can be used to access services offered by Ebury Bank;
Geolocation	Feature that, when activated by the Data Subject, allows defining the precise or approximate position of a Device and provides information such as the country, state, city and street where that Device is located, also providing the time at which it was accessed;
LGPD	General Data Protection Law - Federal Law No. 13,709, published on August 14, 2018, which regulates Personal Data Processing activities, including in digital media, by natural persons or legal entities governed by public or private law, with the aim of protecting the fundamental rights of freedom and privacy and the free development of the natural person's personality;
Prospect	Natural persons prospected by Ebury Bank or who have requested to contract a Service, without having become an Ebury Bank Customer (whether for natural persons or for the legal entity of which the natural person is a representative or partner);
Data Subject	Any identified or identifiable natural person to whom the Personal Data processed refers;
International data transfer	Transfer of Personal Data to a foreign country or international organization of which the country is a member;
Treatment	Any operation carried out with Personal Data, whether automated or not, that is, the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, storage, archiving, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

## 6 Maintenance of This Document

This Policy is kept up to date in line with the guidelines of Ebury Bank and the regulatory bodies to which it is subject.