



ABN AMRO CLEARING BRASIL GROUP



EXTERNAL PRIVACY POLICY

SEPTEMBER/2024

## Index

1. PURPOSE .....	3
2. DEFINITIONS .....	3
3. TO WHOM THIS POLICY APPLIES .....	4
4. WHAT PERSONAL DATA DOES ABN AMRO CLEARING BRASIL GROUP PROCESS? .....	5
5. FOR WHAT PURPOSES IS PERSONAL DATA PROCESSED? .....	6
6. WITH WHOM IS PERSONAL DATA SHARED? .....	7
7. HOW IS PERSONAL DATA STORED? .....	7
8. HOW IS YOUR PERSONAL DATA PROTECTED? .....	8
9. WHAT ARE YOUR RIGHTS AS A PERSONAL DATA SUBJECT? .....	8
10. PERSONAL DATA OF CHILDREN AND ADOLESCENTS .....	9
11. UPDATES AND VALIDITY .....	10
12. LEGISLATION AND JURISDICTION .....	11
13. CONTACT .....	11



Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025

## 1. PURPOSE

The **ABN AMRO CLEARING BRASIL GROUP** is committed to protecting the Personal Data it accesses in accordance with the legislation applicable to its business, particularly the General Data Protection Law (Law No. 13,709/2018, “LGPD”), as well as best practices for privacy and data protection in its operating market.

Therefore, the **ABN AMRO CLEARING BRASIL GROUP** has created this Privacy Policy (“Policy”) to clarify, in a simple, transparent, and objective manner, how it handles Personal Data in the context of conducting its business activities.

## 2. DEFINITIONS

The following definitions apply to this Policy:

**“ABN AMRO CLEARING BRASIL GROUP”:** means Banco ABN AMRO CLEARING S.A. (“Bank”), together with ABN AMRO CLEARING Corretora de Valores e Títulos Mobiliários LTDA (“Broker”);

**“ANPD”:** means the National Data Protection Authority, the authority responsible for ensuring the dissemination and enforcement of Personal Data protection standards in Brazil;

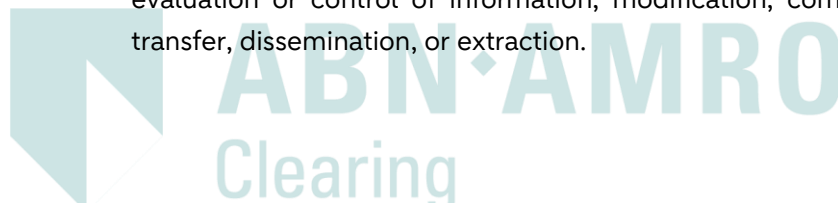
**“Personal Data” or “Data”:** means any information related to an identified or identifiable person, including electronic identifiers;

**“Sensitive Personal Data”:** means Personal Data regarding racial or ethnic origin, religious belief, political opinion, membership in a union or organization of a religious, philosophical, or political nature, data related to health or sexual life, genetic or biometric data, when linked to a natural person;

**“LGPD”:** means Law No. 13,709/2018, referred to as the General Data Protection Law, which provides, among other provisions, data subjects' rights, the legal bases for Personal Data processing, and obligations and requirements related to information security incidents involving Personal Data;

Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025

- “Policy”:** means this Privacy Policy;
- “Personal Data Subject” or “Data Subject”:** means the natural person to whom the Personal Data subject to Processing Activities pertains;
- “Personal Data Processing Activity” or “Processing Activity”:** means any operation performed with Personal Data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, deletion, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.
- “Personal Data Subject” or “Data Subject”:** means the natural person to whom the Personal Data that is subject to Processing Activities pertains.
- “Personal Data Processing” or “Processing”:** means any operation performed with Personal Data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, deletion, evaluation or control of information, modification, communication, transfer, dissemination, or extraction.



### 3. TO WHOM THIS POLICY APPLIES

This Policy applies to all individuals who access and otherwise use the **ABN AMRO CLEARING BRASIL GROUP** website and its functionalities, as well as to all individuals with whom **ABN AMRO CLEARING BRASIL GROUP** maintains commercial or legal relationships and whose Personal Data is therefore processed by **ABN AMRO CLEARING BRASIL GROUP**, for example:

- Legal representatives and employees of institutional clients;
- Legal representatives and employees of service providers in general, as well as brokers, distributors, and partner institutions;
- Any individuals using the **ABN AMRO CLEARING BRASIL GROUP** institutional website, for example, to apply for job openings in selection processes or use the communication channel provided on the website;
- Individuals with whom **ABN AMRO CLEARING BRASIL GROUP** has had commercial relationships in the past and who may still have their Personal Data processed in

Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025

legacy databases, which are maintained by **ABN AMRO CLEARING BRASIL GROUP** for lawful and legitimate purposes.

#### 4. WHAT PERSONAL DATA DOES ABN AMRO CLEARING BRASIL GROUP PROCESS?

To conduct its activities, **ABN AMRO CLEARING BRASIL GROUP** must perform certain Personal Data Processing Activities, which may involve, but are not limited to, the following Personal Data:

- Identification data, such as name, signature, nationality, identification document numbers (e.g., ID, CPF, passport, foreign ID) and possibly copies of these documents, information related to the Data Subject's position and workplace, among other information that may be requested as applicable to the contractual relationship between **ABN AMRO CLEARING BRASIL GROUP** and the Data Subject;
- Contact data, such as address, telephone number, extension, email (particularly corporate contact information);
- Data automatically collected by **ABN AMRO CLEARING BRASIL GROUP** through cookies during access to the institutional website, as detailed in the "Cookie Statement" and "List of Cookies";
- Supplementary data of candidates in selection processes, in addition to identification data, such as academic background and professional experience, languages spoken, certifications obtained, age, date of birth, gender, photograph (as included in resumes by the Data Subjects themselves);
- Financial and banking data, such as bank account details and credit history;
- Communications data from the Data Subjects with **ABN AMRO CLEARING BRASIL GROUP**, such as email content and messages sent by Data Subjects through the communication channel provided on the institutional website;
- Background check data and other Personal Data whose processing may be required from **ABN AMRO CLEARING BRASIL GROUP** due to regulatory obligations related to anti-money laundering, as applicable;
- Video surveillance image data, recorded and stored in a non-individualized manner.

The Personal Data mentioned in this item is provided by the Data Subjects themselves or by the legal entities they represent. Additionally, Personal Data may appear in

Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025

corporate documents, powers of attorney, invoices, contracts with clients, and various other contracts in which **ABN AMRO CLEARING BRASIL GROUP** is a party. In some situations, the Data may also be collected directly from public or publicly available sources, such as public database systems or corporate social networks where Data Subjects publish their Personal Data, as well as may be provided by third parties, including private entities with which **ABN AMRO CLEARING BRASIL GROUP** has relationships, public and regulatory authorities, the B3 stock exchange, and BACEN.

Finally, we clarify that **ABN AMRO CLEARING BRASIL GROUP** does not intentionally process Sensitive Personal Data of Data Subjects covered by this Policy.

## 5. FOR WHAT PURPOSES IS PERSONAL DATA PROCESSED?

The Personal Data indicated in **Item 3** of this Policy is processed for the following purposes:

- Execution of contractual obligations: for entering into contracts of various types and to fulfill obligations contractually assumed with the Data Subject or the legal entity they represent. In this context, Personal Data will be processed, for example, for onboarding procedures, registration, party qualification, contract management, general relationship and communication;
- Compliance with legal and regulatory obligations: considering that the financial sector is highly regulated, Personal Data is processed to meet legal and regulatory obligations arising from applicable legislation governing ABN AMRO CLEARING BRASIL GROUP's activities, including Compliance obligations, anti-money laundering, and anti-terrorism financing, as well as resolutions and circulars from BACEN and other specific applicable rules, including self-regulatory ones;
- Compliance with internal policies, codes, and documents: Personal Data may also be processed in the context of ABN AMRO Group's internal policies and codes, such as internal information security policies, Compliance policies, supplier code of conduct, and ethics codes, for example;
- Communication and support for Data Subjects: Personal Data may be processed to communicate with Data Subjects, for example, through the communication channels available on the institutional website, including to respond to Data Subjects' requests related to this Policy and the LGPD, as outlined in Item 12 below;
- Defense of interests: Personal Data may be processed to defend the rights and interests of ABN AMRO CLEARING BRASIL GROUP in potential judicial, administrative,

Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025

arbitral, or extrajudicial proceedings, including in cases brought against ABN AMRO Group Brazil for any reason;

- Recruitment and selection: to recruit and select candidates for job openings at ABN AMRO CLEARING BRASIL GROUP;
- Other purposes: the Personal Data indicated in item 3 may also be processed for other purposes that are not conflicting or excessive in relation to the purposes listed above, always in compliance with applicable Brazilian legislation, based on legitimate interests of ABN AMRO CLEARING BRASIL GROUP or third parties, except where the Data Subject's legal rights and guarantees prevail.

## 6. WITH WHOM IS PERSONAL DATA SHARED?

In conducting its activities, ABN AMRO CLEARING BRASIL GROUP may share Personal Data with other ABN AMRO Group organizations and with other public or private legal entities, for example: service providers, financial institutions, brokers, internal and external auditors, B3, BACEN, CVM, COAF, and other competent public authorities, always within the limits necessary to fulfill its obligations, in accordance with applicable laws and market best practices, aiming to ensure the security and confidentiality of Personal Data.

Additionally, ABN AMRO CLEARING BRASIL GROUP clarifies that sharing may occur with companies located in foreign territories, such as other ABN AMRO Group companies and globally contracted service providers. It informs that it adopts all necessary technical and administrative measures to ensure Personal Data is transferred and stored within the same security parameters used in Brazil, in accordance with LGPD and ANPD regulations on the topic, as well as aligned with the global procedures adopted by ABN AMRO Group for international transfer of Personal Data.

Moreover, if a police, administrative, or judicial authority requests access to the Data Subject's Personal Data and this request is supported by applicable legislation, ABN AMRO CLEARING BRASIL GROUP may share the Personal Data to meet such a request.

Finally, ABN AMRO CLEARING BRASIL GROUP may share Personal Data to protect its interests in any type of dispute, including administrative and judicial claims.

## 7. HOW IS PERSONAL DATA STORED?

The Personal Data processed for the purposes described in this Policy will be stored by ABN AMRO CLEARING BRASIL GROUP only for the period necessary to fulfill the purposes for which it was collected, such as during the period in which the Data Subject, or the legal entity

Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025

they represent, has an active contract with ABN AMRO CLEARING BRASIL GROUP, or further, for the time necessary to:

- Regular exercise of rights in judicial, administrative, or arbitral proceedings, considering, for this purpose, applicable statutory limitation periods;
- Compliance with legal or regulatory obligations; and
- Meeting the legitimate interests of ABN AMRO CLEARING BRASIL GROUP or third parties, always respecting the legitimate expectations of the Data Subject.

## 8. HOW IS YOUR PERSONAL DATA PROTECTED?

The **ABN AMRO CLEARING BRASIL GROUP** makes every effort to protect the Personal Data processed by implementing appropriate technical and organizational measures to safeguard this information against unauthorized, illegal processing, accidental loss, destruction, or damage. This is achieved, for example, by storing Personal Data in a secure operational environment, where access is segmented and restricted by passwords, or in physical files, where access is granted only to authorized employees.

Additionally, the Personal Data processed by the **ABN AMRO CLEARING BRASIL GROUP** is stored on servers subject to strict information security controls, including periodic audits and the use of encryption in the processes of storing and transferring Personal Data.

The security measures adopted are consistent with industry standards and the nature of the Personal Data that the **ABN AMRO CLEARING BRASIL GROUP** processes, adhering to the best practices available in the market.

## 9. WHAT ARE YOUR RIGHTS AS A PERSONAL DATA SUBJECT?

Regarding the processing of Personal Data, **ABN AMRO CLEARING BRASIL GROUP** informs that it respects and guarantees the possibility of submitting requests based on the following rights provided for in the LGPD:

- Confirmation of the existence of Personal Data processing;
- Access to the processed Personal Data;
- Correction of incomplete, inaccurate, or outdated Personal Data;

Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025



- Anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- Portability of processed data;
- Deletion of any Personal Data processed based on consent, except in cases provided for in applicable legislation;
- Information about the public and private entities with which your Personal Data is shared;
- Information about the possibility of not providing consent and the consequences of such refusal; and
- Revocation of your consent, where applicable.
- If the Data Subject needs to exercise any of the rights described above or believes that their Personal Data has been and/or is being used in a manner incompatible with the purposes described in this Policy, they may submit their request through the contact information provided in Item 13 of this Policy.

Caso o Titular de Dados Pessoais necessite exercer qualquer um dos direitos acima descritos, ou ainda, acredite que seus Dados Pessoais foram e/ou estão sendo utilizados de maneira incompatível com as finalidades descritas nesta Política, o Titular poderá apresentar sua solicitação por meio de contato informado no **Item 13**, desta Política.

## 10. PERSONAL DATA OF CHILDREN AND ADOLESCENTS

The business activities of **ABN AMRO CLEARING BRASIL GROUP** do not presume the processing of Personal Data of children or adolescents; thus, Personal Data from these subjects is not intentionally collected. Should any collection or receipt of data from children or adolescents occur by **ABN AMRO CLEARING BRASIL GROUP**, all necessary measures to protect this Personal Data will be adopted, always in the best interest of such subjects, in accordance with the LGPD and other applicable regulations.

Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025

## 11. UPDATES AND VALIDITY

This Policy has been in effect since March 29, 2023.

The second version came into effect in July 2024.

**ABN AMRO CLEARING BRASIL GROUP** seeks to improve its activities daily and reserves the right to amend this Policy at any time, primarily to provide Personal Data subjects with an increasing level of transparency regarding how Personal Data is processed.

Furthermore, if this Policy undergoes significant modifications, **ABN AMRO CLEARING BRASIL GROUP** will disclose the amended version of this document to inform the Data Subjects about the new conditions for processing their Personal Data.

DATE	VERSION	DETAILS OF THE UPDATE	RESPONSIBLE
September 2024	V.02	Update to reflect the new names: Banco ABN AMRO S.A. to Banco ABN AMRO CLEARING S.A., ABN AMRO Corretora de Títulos e Valores Mobiliários Ltda to ABN AMRO CLEARING Corretora de Títulos e Valores Mobiliários Ltda, and Grupo ABN AMRO Brasil to GRUPO ABN AMRO CLEARING BRASIL.	Compliance
March 2023	V.01	First version.	Compliance

This Policy was prepared by the Compliance Department of GRUPO ABN AMRO CLEARING BRASIL and was reviewed, discussed, and approved by the members of the Executive Committee (BREC): Silvio Lomnitzer (CEO), Alessandra Hazl Dambock (CRO), and Washington Silva (CFO) on September 30, 2024.

Document:	PRIVACY POLICY		
Version:	02	Effective Date:	Starting September 2024
Validity:	Until September 2025		

## 12. LEGISLATION AND JURISDICTION

This Policy is governed, interpreted, and executed in accordance with the applicable current Brazilian legislation, especially the LGPD, regardless of the laws of other countries. The competent jurisdiction for resolving any doubts or disputes arising from this Policy is the district of São Paulo/SP.

## 13. CONTACT

**GRUPO ABN AMRO CLEARING BRASIL** is available to address any questions arising from this Policy or how we handle Personal Data, as well as to receive requests from Data Subjects, through the following email: [canal.comunicacao.br@abnamroclearing.com](mailto:canal.comunicacao.br@abnamroclearing.com).



Document:	PRIVACY POLICY				
Version:	02	Effective Date:	Starting September 2024	Validity:	Until September 2025