

TERMS OF USE AND PRIVACY POLICY

I. INTRODUCTION

These Terms of Use and Privacy Policy ("**Terms**") are intended to regulate access to the website contents, mobile app or any other official means of support ("**Digital Media**") developed and/or provided by Legacy Capital Gestora De Recursos Ltda. ("Legacy Capital" or "Controller").

Legacy Capital is an independent asset manager, and its core principle is to protect the privacy of information and personal data ("**Personal Data**") that Data Subjects ("**Data Subjects**") share with us.

Legacy Capital's Privacy Policy was created to reaffirm our commitment to the security and privacy of information collected from Data Subjects on our official channels, through the interactions with Legacy Capital on public pages on our website, emails and/or social media:

- LinkedIn – [linkedin.com/legacycapitalgestoraderecursos](https://www.linkedin.com/company/legacycapitalgestoraderecursos)
- Instagram - [@legacy.capital](https://www.instagram.com/legacy.capital)
- www.legacycapital.com.br

It is worth mentioning that, under no circumstance will Legacy Capital store Personal Data that Data Subjects disclose on social media, which are used only for establishing contact with Data Subjects.

In 2018, Brazil approved the General Data Protection Act ("**LGPD**"), Law No. 13,709/18, which ensures the protection of personal data of individuals. Compliance with the LGPD by companies is important since the flow of processed Personal Data must be systematized and used in accordance with the law, for a good privacy practice before their customers and, as result, such compliance increases the level of trust.

II. CONCEPTS

It is necessary to take into account how the following terms should be interpreted:

- **Personal Data:** information related to an individual that identifies or may identify, directly or indirectly, an individual;

- **Database:** structured set of Personal Data established and stored in one or several locations, in electronic or physical support;

Data Subject: a natural person whom the Personal Data subject to Processing refer to;

- **User:** the Data Subject whose Personal Data is subject to Processing on **Legacy Capital's** Website and social media.

- **Controller:** an individual or public or private legal entity that is responsible for decisions relating to the Processing of Personal Data; In this document, any mentions and comments to Controller will be understood as related to **Legacy Capital**;

- **Operator:** an individual or public or private legal entity that Processes the Personal Data in accordance with the Controller's instructions;

- **Processing Agents:** are those that carry out the Processing of Personal Data, that is, they participate in transactions involving Personal Data; they are also known as Controller and Operator;

- **Processing:** every transaction carried out with personal data, such as those relating to the collection, production, receipt, rating, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, assessment or control of the information, modification, communication, transfer, diffusion or extraction;

- **Consent:** means an unequivocal, informed expression of the free will of the Personal Data Subject expressing the agreement to the Processing of such Personal Data for a certain, specified purpose;

- **International Transfer of Personal Data:** means the transfer of Personal Data to a territory outside Brazil, to a foreign country, or to an international organization of which Brazil is a member;
- **Shared Use of Personal Data:** refers to the communication, diffusion, international transfer, interconnection of Personal Data, or shared Processing of Databases by governmental bodies and public entities in the compliance with their legal powers, or between them and private entities, reciprocally, with specific authorization for one or more Processing modalities authorized by such public entities, or between private entities;
- **Brazilian Data Protection Authority (“ANPD”):** is the governmental body responsible for overseeing, implementing and enforcing compliance with the LGPD throughout Brazil. This authority was structured by Decree No. 10,474/2020, which provides for the regulatory structure and the descriptive chart of commission offices and positions of trust of the ANPD, in addition to reallocating and transforming the commission offices and positions of trust.
- **Law:** means all applicable constitutional and nonconstitutional law, which includes, without limitation, laws, decrees, ordinances, resolutions, normative instructions and other orders issued by relevant authorities. In particular, Law No. 13,709, dated August 14, 2018 – General Personal Data Protection Law (“LGPD”).

III. PERSONAL DATA PROCESSING

Personal Data Processing will be performed with due observance of Controller's duty to submit the Data Subject Consent and comply with the legal or regulatory obligations.

Other Personal Data Processing activities that may be carried out are related to the performance of contracts or preliminary procedures related to a contract in the event that Personal Data Subject is a contracting party; to the regular exercise of rights in judicial, administrative or arbitration proceedings; to the protection of life or physical safety of the Data Subject or third parties, in compliance with the legitimate interest of Controller or

third parties, except if Data Subject's fundamental rights and freedoms that require Personal Data protection prevail, including in cases related to credit protection.

It should be emphasized that **Legacy Capital** will obtain the Personal Data Subject Consent in order to conduct the Processing, and will also obtain a specific Consent from Data Subject to communicate or share Personal Data with other Controllers or Processors, depending on the type of their relationship with Legacy Capital. Personal Data sharing shall only occur where necessary for the regular conduction of Legacy Capital's activities, as mentioned in this Policy. The Data Subject's Consent will be provided in writing or by any other means that state the Data Subject's free will. The Data Subject's consent will be granted in writing or by any other means demonstrating statement of will of the Data Subject.

The Consent may be revoked by the Personal Data Subject, so that his or her Personal Data is no longer processed, at any time through the Data Subject's express statement through a free procedure and guaranteeing that the Personal Data processed may be deleted.

In addition, at the end of the Processing the Personal Data will be deleted, and only the portion that is necessary for compliance with a legal obligation, as mentioned above in item VI, or a regulatory obligation by **Legacy Capital**, for poll study purposes, transfer to third parties and exclusive use by the Controller, will be kept, provided further that access by a third party will be prohibited.

Personal Data Processing Agents will keep records regarding the Personal Data Processing performed by them. In this sense, the ANPD may determine and require the Controller to draft an impact report on the protection of Personal Data, including sensitive Personal Data.

IV. WHAT PERSONAL DATA DOES LEGACY CAPITAL PROCESS AND FOR WHAT PURPOSE?

4.1. All information actively provided by the User, such as, for instance, name and email address, as well as information that is generated

automatically, such as the characteristics of the access device, internet protocol ("**IP**"), access information, data geolocation data, application history and data entered for login, is received and stored in a secure environment, in the **Legacy Capital** Database.

4.1.1. Legacy Capital's Website has a system of forms to be filled where, according to the type of communication intended by the User, the User is able to choose between:

- a. Contacting **Legacy Capital** – 'Contact';
- b. Forwarding a resume to **Legacy Capital** – 'Work for us'.

4.2. Legacy Capital collects the User's Personal Data through the Legacy Capital Website, for the following purposes:

- a. Performing User Contact;
- b. Receiving resumes from individuals interested in working for **Legacy Capital**;
- c. Avoid fraud and other illegal and prohibited activities, ensuring the integrity of **Legacy Capital's** Website, and complying with provisions of the Internet Civil Framework Law (in Portuguese, Marco Civil da Internet).

4.3. Legacy Capital may also collect and/or receive all types of information that the User voluntarily forwards through the communication channels to **Legacy Capital**.

V. PERSONAL DATA SHARING

5.1. All Personal Data that the User provides to **Legacy Capital** through the use of the Website is confidential and will not be shared with third parties, except as provided for in this Policy. By accepting this Policy, the User expressly and unequivocally represents that the User authorizes the sharing of Personal Data as provided herein.

5.2. Legacy Capital may share User information with the relevant authorities in compliance with legal obligations.

5.3. Legacy Capital may also be required to share data related to the IP address, date and time of access, by court order, pursuant to the terms set forth in the Internet Civil Framework Law.

5.4. Legacy Capital's Website may contain links to other external websites, whose content and privacy policies are not the responsibility of **Legacy Capital**. In this sense, it is important to highlight that this Policy applies only to **Legacy Capital's** Website and does not link to any other websites, including those reached by hyperlink available on **Legacy Capital's** Website. **Legacy Capital** has no responsibility or control over those other websites, as well as the use and disclosure of the User's personal information, and has no control over the privacy policies of other websites. When leaving **Legacy Capital's** Website, please consult the privacy policy of the website you access.

5.5. For transaction and risk management purposes, we may exchange information on our customers with reputable reference sources, regulatory bodies and clearing services.

VI. FOR HOW LONG IS PERSONAL DATA PROCESSED?

6.1. Legacy Capital will delete the collected information when: (i) the purpose for which the information was collected is achieved or when the Personal Data ceases to be necessary or relevant for the achievement of that purpose, according to the purposes described in these Terms; (ii) upon revocation of the Consent by the User, in cases where this becomes necessary; or (iii) upon order by a relevant authority for that purpose.

6.2. Laws may require Legacy Capital to retain certain information for specified periods of time. In other cases, Legacy Capital may retain Personal Data for an appropriate period after the User has ended the use of the Website, to protect itself from legal claims or for the administration of its business.

6.3. However, no information will be kept for a longer period than that occasionally permitted by regulatory Law, as amended from time to time,

unless the User gives written consent allowing the storage of Personal Data for a longer period.

VII. USER RIGHTS

7.1. The User, as the Personal Data Subject, is entitled to obtain from the Controller, in relation to the Personal Data processed thereby, at any time and upon request:

- I. confirmation of the existence of processing;
- II. access to the personal data;
- III. rectification of incomplete, inaccurate or out-of-date Personal Data;
- IV. anonymization, blocking or deletion of Personal Data that is unnecessary, excessive or processed in violation of the provisions of Law 13,709;
- V. portability of the Personal Data to another provider of services or products, upon express requirement and observing trade and industrial secret requirements, in accordance with the controlling entity's regulations;
- VI. elimination of Personal Data processed with the consent of the Data Subject, except in the cases provided for in Article 16 of Law No. 13,709;
- VII. information of private and public entities with which the Controller had shared use of the Personal Data;
- VIII. information on the possibility not to provide consent and on the consequences of refusal thereof; and
- IX. revocation of consent, pursuant to paragraph 5 of Article 8, Law No. 13,709.

7.2. Such rights may be limited in some situations – for example, when the User's request implies the disclosure of other people's personal information or when **Legacy Capital** is able to demonstrate that it has a legal obligation to carry out the Processing of Personal Data. In some cases, this may mean that Legacy Capital is able to retain Personal Data even if the User revokes consent.

7.3. Legacy Capital undertakes to clarify any questions that the User may have about the manner that **Legacy Capital** processes Personal Data. In case there are any doubts on how **Legacy Capital** processes Users' information, please contact **Legacy Capital's** Person in Charge at any time.

VIII – ARE RIGHTS SUBJECT TO RESTRICTIONS?

8.1. As provided by law, some pieces of Personal Data are critical for compliance with immediate and future legal obligations by **Legacy Capital**. In this sense, in cases where the exercise of the right of the Personal Data Subject conflicts with any of these legal obligations, **Legacy Capital** will have the obligation and the right to limit the exercise of the Data Subject's rights, as provided for in the LGPD.

8.2. In addition, in cases of excessive demand for the exercise of rights by Personal Data Subject's, delays may occur in complying with requests from Data Subjects, which in no way implies noncompliance with **Legacy Capital's** legal obligations.

8.3. In addition, **Legacy Capital** will always inform the applicant Personal Data Subject of the deadlines for complying with requests, as well as the deadlines in the events of delay due to excess demand or any other event that justifies it.

IX – HOW IS PERSONAL DATA PROTECTED?

9.1. Legacy Capital uses all its efforts to maintain the highest levels of security and has implemented technically and organizationally robust measures that are designed to ensure that Personal Data is not subject to unauthorized access, use, and disclosure.

9.2. These measures vary depending on the level of criticality of the Personal Data, and may include storage of this information in controlled, secure computer systems, password-protected online information systems and other similar controls designed to restrict access to Personal Data to those who have legitimate business interests to access it.

9.3. Since **Legacy Capital** cannot guarantee that unauthorized access will not occur, please be aware that all employees and service providers who process Personal Data on behalf of Legacy Capital take great care in preserving the security of any Personal Data, using their best efforts for the prevention of unauthorized access to these through the correct use of technology, procedures and governance. **Legacy Capital's** employees carry out training on cybersecurity and Personal Data Protection from time to time.

9.3.1. Access to the information collected under this document is restricted to authorized and qualified professionals who need it exclusively for the performance of their duties.

9.3.2. Employees who misuse this information in violation of our Privacy Policy will be subject to the penalties provided for in our disciplinary procedures, not excluding possible civil or criminal liability.

X – GENERAL PROVISIONS

10.1. Amendments to the Privacy Policy: as this policy is subject to occasional updates due to our commitment to continuous improvement and to ensure compliance with the applicable laws, we recommend that it be consulted from time to time.

10.2. International Transfer of Personal Data: eventually, there may be an International Transfer of Personal Data to countries or international bodies that provide for the protection of Personal Data; in cases of international legal cooperation between public intelligence, investigation and prosecution bodies; for the protection of life, among other possibilities.

10.3. Applicable Law and Jurisdiction: this Policy is governed, construed and governed by the laws of Brazil, and the jurisdiction where the headquarters of Legacy Capital is located is hereby elected to solve any doubts, questions and/or disputes arising from this Policy, and the Data Subject hereby waives any other, however privileged.

XI – HOW TO CONTACT LEGACY CAPITAL?

11.1. In case the Data Subject intends to contact Legacy Capital for any reason relating to the practices arising from this Policy, the Data Subject may contact the Legacy Capital's Data Protection Officer by email (dpo@legacycapital.com.br) or through the LGPD Channel on: <https://app.compliasset.com/legacy-lgpd>.

XII – COOKIES

12.1. Legacy Capital's Website uses cookies, as provided in item 13 above. Thus, by accessing our website, you agree with the inclusion of cookies on your device.

Cookies are text files containing data sent from a website to your computer's web browser as you browse the website. Cookies have different functions, in particular they allow you to easily navigate between pages, remember your preferences, optimizing the user experience. These cookies can be stored on your machine to identify your computer.

POLICY UPDATE

We amend this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always provide the date the latest changes were published and provide access to archived versions for your review. If the changes are material, we will provide more prominent notice, which includes, for some services, email notification of Privacy Policy changes.