

TERMS OF USE AND PRIVACY POLICY

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 holders of personal data (“**Holders**”) share with us.

Legacy Capital’s Privacy Policy was created to reaffirm our commitment to the security and privacy of information collected from Holders on our official channels, through the interactions with **Legacy Capital’s** products and services, and with respect to the public pages on our website, emails and/or social media:

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

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

In 2018, Brazil approved the General Data Protection Act (“**LGPD**”), Law No. 13,709/18, which ensures the protection of personal data of individuals. Companies' compliance to LGPD 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 clients and, as result, such compliance increases the level of trust of the company.

CONCEPTS

The terms below shall be interpreted as follows:

- Personal Data: refers to the information related to an identified or an identifiable individual;
- Database: refers to structured set of Personal Data, established and stored in one or more locations, in electronic or physical medium;
- Holder: refers to any individual who is directly identified as the owner or issuer of Personal Data subject of Processing;
- Controller: refers to any individual or legal entity, of public or private law, that processes Personal Data and may decide on how will Personal Data Processing occur. Therefore, any mentions and references to Controller herein shall be interpreted as to Legacy Capital;
- Processor: refers to any individual or legal entity, of public or private law, that processes Personal Data, in consonance with Controller's instructions;
- Processing Agents: refers to those that process Personal Data, that is, they participate in operations that involve Personal Data. They are also known as Controller and Processor;
- Processing: refers to the activities carried out with Personal Data, whether such operations refer to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, deletion, evaluation or control of information, modification, communication, transfer, diffusion or extraction;
- Consent: refers to the unequivocal and informed manifestation of the free will of the Personal Data Holder, expressing the agreement to the Processing thereof for a determined and specified purpose;
- International Transfer of Personal Data: refers to 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**”): refers to the governmental body responsible for overseeing, implementing and enforcing compliance with the LGPD throughout Brazil. ANPD was structured by Decree No. 10474/2020, 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.

PERSONAL DATA PROCESSING

Personal Data Processing will be performed with due observance of Controller’s duty to submit Holder 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 Holder 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 Holder or third parties, in compliance with the legitimate interest of Controller or third parties, except if Holder’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 Holder Consent in order to conduct the Processing, and shall also obtain a specific Consent from Holder to communicate or share Personal Data with other Controllers or Processors, pursuant to 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. Holder's Consent shall be provided in writing or by any other means that state the Holder's free will.

Personal Data Holder may withdraw Consent at any time, upon the express statement of Holder through a free procedure that ensures the exclusion of processed Personal Data, so that their Personal Data will no longer be processed.

With respect to Personal Data processed by Controller, Holder is entitled to obtain from Controller, at any time and upon request:

- I - confirmation of the existence of processing;
- II - access to Personal Data;
- III - correction of incomplete, inaccurate or outdated Personal Data;
- IV - anonymization, blocking or deletion of unnecessary or excessive Personal Data, or if processed Personal Data is not compliance with the provisions of Law No. 13,709;
- V - Personal Data portability to another service provider or product supplier, upon express request and with due regard to trade and industrial secrets, pursuant to the regulations of the supervising body;
- VI - Personal Data portability to another service provider or product supplier, upon express request and with due regard to trade and industrial secrets, pursuant to the regulations of the Brazilian authority;
- VII - elimination of Personal Data processed upon Holder Consent, except whereas set out in article 16 of Law No. 13,709;
- VIII - information of public and private entities with which Controller established a shared use of Personal Data;
- IX - information on the possibility of not giving consent and on the consequences of the refusal to give consent; and
- X - withdraw of consent, as provided in paragraph 5, of article 8, of Law No. 13,709.

Furthermore, Personal Data shall be deleted following the end of their Processing, and Controller shall only maintain the data necessary for the compliance of a legal obligation, as mentioned above in item VI, **Legacy Capital's** regulatory obligation, study by a research entity, transfer to third party, and for the exclusive use of Controller, with access by third parties being prohibited.

Personal Data Processing Agents shall keep records of Personal Data Processing they perform. Accordingly, ANPD may determine and request Controller to prepare a report on the impact of Personal Data protection, including sensitive Personal Data.

Controller and Processor shall be responsible for property, emotional distress, individual or collective damages arising out of their breach of applicable laws.

Our Privacy Policy below explains how **Legacy Capital** collects and processes your individual Personal Data:

1. We receive all information User actively provides, such as, for example, name, Personal Data, and email, including automated information, such as device characteristics, internet protocol ("**IP**"), access information, geolocation data, application history, and data entered to log in, we store it in a secure environment, the **Legacy Capital** Database;
2. All information collected from users travel safely as we use a standard Internet encryption process;
3. Personal information submitted by users will be collected through ethical and legal means;
4. Users shall be notified whenever their Personal Data is being collected, so they can freely decide whether they will furnish the data, and users shall also be informed about the consequences of their decision;
5. Except as otherwise provided by law or a judicial decision, user information shall never be transferred to third parties or used for intents other than those for which information was collected;
6. Under the terms hereof, access to the collected information is restricted to authorized and qualified personnel that need it exclusively for the performance of their duties;

7. Employees who make improper use of such information, in breach of our Privacy Policy, shall be subject to the penalties established in our disciplinary procedure, without excluding any civil or criminal liability;
8. We will maintain the integrity of the information we receive;
9. Our website may contain links to other external websites, the contents and privacy policies of which are not under **Legacy Capital's** responsibility;
10. Any contractor that provides us with support services shall comply with our privacy and information security standards;
11. For the purposes of operations and risk management, we may exchange information about our customers with reputable sources of reference, regulatory bodies and clearing services;
12. **Legacy Capital** shall delete the collected information if: (i) the purpose for which the information was collected is completed or when Personal Data is no longer necessary or relevant to achieve such purpose, in accordance with the purposes described herein; (ii) User withdraw Consent, in the event where it is necessary; or (iii) the relevant authority requests the deletion.
13. **Legacy Capital** may collect information about how users access this website, by transferring a small text file known as a "cookie" to users' devices. This information alone does not identify any individual, and **Legacy Capital** uses it to determine whether the website has already been accessed and if the user has agreed to the disclaimer. This statistical analysis of user interactions with our website does not provide us with, and/or allow us to collect and store any Personal Data. Users can block cookies by changing their browser settings; however, this action may adversely impact their experience in the website.

As this policy is subject to eventual updates due to our commitment to continuous improvement, we recommend that you consult it from time to time.

To the extent applicable, **Legacy Capital** controls and processes all Personal Data in accordance with the principles of Law No. 13,709 of 2008, the Brazilian General Data Protection Act, which grant to all users certain rights, including accessing their stored information and request that such information not be used for a specific purpose. In order to exercise such rights, users shall contact dpo@legacycapital.com.br or through the LGPD Channel, which can be accessed at: <https://app.compliasset.com/legacy-lgpd>. Through such email address, Personal Data Holder may request a copy of their Personal Data stored and processed by **Legacy Capital**, as well as the alteration, correction or deletion of any information.

If you would like to make a request, complaint, or contact our Data Protection Officer ("DPO"), please send an email to dpo@legacycapital.com.br or through LGPD channel, which can be accessed at: <https://app.compliasset.com/legacy-lgpd>. In any case, you also have the right to file a complaint with the ANPD. Depending on the complexity of your statement, you may receive and answer instantly or within the period of time defined by Law.

STORAGE OF PERSONAL DATA

If Personal Data Holder is an active customer, their data will be kept for the duration of the contractual or business relationship. Thus, **Legacy Capital** may store your Personal Data in a Database for eventual legal compliance, for the term of five (5) years after the end of the contractual or business relationship.

If Holder is a potential customer with no specific contractual or business relationship, his Personal Data shall not be kept for more than three (3) years after their last access.

If Holder is a candidate and is not hired, the shared information shall be deleted from the **Legacy Capital** Database within three (3) years after the sharing.

SECURITY MEASURES

Legacy Capital adopts security, technical and administrative measures to ensure the protection of Personal Data against unauthorized access and accidental or unlawful destruction, loss, alteration, communication or any other

form of improper or unlawful Processing. Information security is also one of the pillars to which Personal Data Processing Agents shall comply and observe. If there is a Personal Data leakage or unauthorized access, the conflict originated thereof may be solved out of court through a direct conciliation between Controller and Personal Data Holder.

PERSONAL DATA SHARING

Personal Data stored and processed by **Legacy Capital** might be shared with business partners that develop outsourced activities to comply with the deal signed between Personal Data Holder and **Legacy Capital**.

Eventually, **Legacy Capital** may be required to disclose personal information by law, court order, litigation or upon Governmental Authorities' request, whether for purposes of national security, law enforcement or other matters of public importance.

INTERNATIONAL TRANSFER OF PERSONAL DATA

Eventually, an International Transfer of Personal Data to countries or international organizations that offer Personal Data protection may occur, in the event of international legal cooperation between public intelligence, investigation and prosecution bodies, for the protection of life, among other possibilities.

Any transmission or sending of Personal Data, physical or electronic, to a company or individual based in a location outside the Brazilian territory shall be considered an International Transfer of Personal Data. This means that software, websites and other applications based outside Brazil shall be in full compliance with the LGPD, just as **Legacy Capital**. The mechanisms to make the exportation of Personal Data conform to LGPD would be the existence of (i) specific contractual clauses, (ii) standard contractual clauses, (iii) global corporate standards, and (iv) seals/certificates/codes of conduct. Thus, there may be a contractual clause that states that legal relationship is in compliance with the LGPD.

The data storage software contracted by **Legacy Capital**, which is physically based outside Brazil, shall be adjusted to meet the requirements of rules

regarding International Data Transfer. If the Processing Agents use any good or service based outside Brazil, they shall ensure a Processing in accordance with Brazilian law.

COOKIES

The **Legacy Capital** website use cookies, as set out in item 13 above. Thus, by accessing our website, you agree to the insertion of cookies on your device.

Cookies are text files that contain data sent from a website to your computer's web browser while you are browsing it. Cookies have different functions. They specifically allow you to easily browse webpages, remembering your preferences and optimizing the user experience. Such cookies can be stored on your device in order to identify it.

POLICY UPDATE

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date on which the last changes were published and we offer access to the archived versions for your appreciation. If the changes are significant, we shall send a more prominent notice, which includes, for some services, notification of changes to the Privacy Policy by email.