

Corporate Privacy and General Data Protection Policy

Executive Summary

To support the governance of the privacy and data protection program, establishing the data protection requirements that must be applied throughout the Travelex Confidence Group in order to comply with applicable laws and regulations, and global guidelines related to the subject.

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1. INTRODUCTION

Brazilian Law No. 13.709, of August 14, 2018 (General Data Protection Law - LGPD), is a set of rules that protects and enables individual rights to privacy and protection of Personal Data (Data). The law establishes privacy rules on how Personal Data can be used by third parties, respecting the individual choices of the data subject (owner).

In order to enable the performance of its activities, the Travelex Confidence Group collects, stores and processes data from employees, job applicants, contracted employees, consultants, clients and suppliers, and will always process this data appropriately, in accordance with the LGPD (Brazilian General Data Protection Law) and this policy.

All actions/practices/premises established in this Policy will be in effect for the Travelex Confidence Group companies from the moment the LGPD (Brazilian General Data Protection Law) comes into force.

2. OBJECTIVE

To support the governance of the privacy and data protection program, establishing the data protection requirements that must be applied throughout the Travelex Confidence Group in order to comply with applicable laws and regulations, and related Global guidelines.

This Policy should be read in conjunction with the relevant standards referenced in this document.

3. SCOPE AND APPLICABILITY

This Policy applies to all areas (whether business or administrative) that process, handle, and/or handle personal information on behalf of Travelex Banco de Câmbio companies.

SA ("Bank") and Confidence Corretora SA ("Brokerage") of the Travelex Confidence Group.

For the purposes of this Policy, the processing of Personal Data must be considered, as well as data that is intended to form part of a filing system (for example, online and offline records, kept in any electronic or digital format, which extends to cloud data storage and backup solutions).

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4. CONCEPTS

- a) Concepts such as "Personal Data; Processing; Data Subject; Data Controller; Data Processor; Data Processing Agreement; Sensitive Personal Data; Data Protection Officer (also called DPO)" are used as defined in the LGPD (Brazilian General Data Protection Law).
- b) Travelex Confidence Group: means any legal entity or subsidiary within the Travelex Group in Brazil and its employees, and third parties contracted with authorization to act on its behalf.

5. PRINCIPLES

5.1. Regarding data protection

To ensure proper compliance with the LGPD (Brazilian General Data Protection Law) and data protection, the Travelex Confidence Group has adopted the following legal principles, which will be respected in all actions related to the processing of Personal Data.

5.2. Legality, justice, and transparency.

Personal Data is processed in a lawful, fair and transparent manner.

The Travelex Confidence Group will only process Personal Data for which it has a legal basis, as defined in the LGPD (Brazilian General Data Protection Law).

Consent for the use of data will always be obtained in a recordable manner and stored by the Travelex Confidence Group.

5.3. From purpose limitation and data minimization

The Travelex Confidence Group will process Personal Data for specific identified purposes that have been expressly communicated to the data subject. The data will not be used for purposes other than those informed to the individual, without notification regarding the legal basis or without the express consent of the data subject.

5.4. Regarding accuracy and record keeping.

We process strictly only the necessary Personal Data, without processing any unnecessary data. This data will be updated as needed, and in the event of inaccurate processing, reasonable measures will be taken to ensure that it is deleted or corrected without delay, taking into account the purposes for which it is processed.

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The accuracy of Personal Data will be verified at the time of collection and kept up-to-date until the end of data processing.

Travelex Confidence Group employees are instructed to correct inaccurate information in the relevant records/files system and inform the Data Protection Officer (DPO). In the event of a request to correct a record, notification that the record has been changed will be provided within 15 (fifteen) days.

5.5. Due to storage limitations

Personal Data should only be retained for as long as necessary to fulfill the original purpose for which it was collected. The Document Retention Standard defines how long information containing Personal Data will be stored and the criteria used to determine that period.

After the retention period expires, unless there is a new, supervening reason to retain them beyond the standard period, records containing Personal Data will be securely deleted and may also be anonymized, as established in the LGPD (Brazilian General Data Protection Law).

5.6. Regarding integrity and confidentiality

The Travelex Confidence Group uses appropriate technical and/or organizational measures to ensure the security of Personal Data, including its protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

The circumstances surrounding the processing, the available technology, the cost of implementing protective measures, and the size of the risk posed to individuals in the treatment are all taken into consideration.

For Travelex Confidence Group employees, this principle refers to:

- a) Only access Personal Data that you have permission to access and exclusively for authorized purposes - if in doubt, contact the DPO;
- b) Do not allow any other person, including other Group employees, to access Personal Data unless you have verified that they have the appropriate permissions;
- c) Keep Personal Data secure (for example, by complying with the rules for access to facilities, computers, password protection, encryption and secure storage and destruction of files and other precautions established in the Travelex Confidence Group Cybersecurity Policy);
- d) Do not remove Personal Data (including Personal Data in printed files) or devices containing Personal Data (or that can be used to access it) from Travelex Confidence Group premises unless appropriate security measures are in place (such as pseudonymization, encryption or password protection) to protect the information and the device;

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- e) Do not store Personal Data on local drives or on personal devices used for work purposes without prior authorization from your supervisor.

6. CORPORATE GUIDELINES

6.1. Sensitive Personal Data

Should the Travelex Confidence Group need to process sensitive personal data, the special conditions justifying the processing will be verified, as defined in the LGPD (Brazilian General Data Protection Law).

6.2. Sharing Personal Data (within or outside of Brazil)

The Travelex Confidence Group may share Personal Data with third parties, always in a limited, legitimate and secure manner, based on the specific purposes permitted by applicable law and through the adoption of appropriate technical and contractual safeguards.

a) Sharing with suppliers and operational partners Personal Data

Personal Data may be shared with suppliers and service providers that support our operational and technological activities. This includes, for example, cloud hosting services, payment solutions, information security, identity verification, fraud prevention, and customer service.

Before sharing, third parties are assessed for compliance with the LGPD (Brazilian General Data Protection Law) and the Group's internal policies. Contracts signed with these suppliers include specific data protection clauses, ensuring confidentiality, use limited to the contracted purpose, and the adoption of appropriate technical and organizational measures to protect the data.

b) Personal Data Sharing with public authorities

The Travelex Confidence Group may share Personal Data with public authorities, regulators, or other government agencies whenever required by law, regulatory obligation, or court order. This sharing occurs, for example, with bodies such as the Central Bank, the Federal Revenue Service, COAF (Council for Financial Activities Control), among others.

c) Sharing for the protection of rights

In certain situations, we may share Personal Data to protect the rights, safety, or property of the Travelex Confidence Group, our clients, employees, or

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from the general public, including in investigations of fraud, financial crimes or breaches of contract.

d) Sharing within the Travelex Confidence Group | Personal Data

Personal Data may be shared between Group companies for operational, administrative, and service execution purposes. This sharing is governed by internal data processing agreements, which guarantee the confidentiality and security of the information.

e) Sharing with business partners

Personal Data may also be shared with business partners who support the provision of services that are of interest to customers or that may be of interest to them, provided there is a legal basis for such sharing, such as the consent of the data subject or the execution of the contract. These partners always operate under specific guidelines for data processing and security.

f) International data transfer

The Travelex Confidence Group may transfer Personal Data outside of Brazil, for example, to service providers whose infrastructure is located abroad. In such cases, the transfer will only be carried out to countries with an adequate level of Personal Data protection, in accordance with the LGPD (Brazilian General Data Protection Law), or through appropriate contractual guarantees (such as standard clauses) that ensure the protection and confidentiality of the information.

Before the international transfer, the following measures will be observed:

- Assessment of the level of protection in the destination country;
- Entering into specific contractual clauses with the recipients;
- Verification of compliance with local data protection laws, where applicable.

g) Sharing Limits

The Travelex Confidence Group does not sell its customers' Personal Data and does not share it with third parties for direct marketing purposes, except with the express authorization of the data subject.

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Prior to the data transfer, the Travelex Confidence Group will:

- i. Ensure that the country to which Personal Data is transferred has an adequate level of data protection;
- ii. Ensure that standard contractual clauses are in place with the third party to guarantee the protection and security of the transferred Personal Data (as applicable);
- iii. Ensure that local data protection and privacy requirements have been met before data transfer.

6.3. Direct marketing

The Travelex Confidence Group adheres to strict data protection requirements regarding direct marketing to its customers.

Data subjects have the right to object to receiving direct marketing at any time. Upon receiving such a request, the Travelex Confidence Group will include the data subject on a list of individuals who have opted out of receiving direct marketing, ensuring that no further communications on this matter are sent to them. The Travelex Confidence Group has relationships with online advertisers and social media networks (our marketing partners). These partners use cookies and similar technologies for marketing purposes and may deliver targeted advertising about the Travelex Confidence Group while you are on a third-party website, at the Group's request and only with the visitor's consent. You can opt out of third-party cookies that enable this type of marketing at any time by visiting our cookie preferences center.

6.4. Rights of data subjects

The Travelex Confidence Group is prepared to meet the demands of Data Subjects regarding the use of their data. If necessary, please contact us as instructed in item 10.

Travelex Confidence Group employees who receive requests from Data Subjects regarding their Personal Data must forward the requests to the Data Protection Officer (DPO) and respond to the requesting Data Subject within 15 days.

6.5. Security

The Travelex Confidence Group has security measures in place to protect information provided through its websites against unauthorized disclosure, use, alteration, or destruction. However, it clarifies that no transmission over the Internet can be guaranteed to be secure. Therefore, despite efforts to protect information, it is impossible to guarantee the security of all information transferred over the Internet.

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As part of using Travelex Confidence Group websites, the Account Holder is required to set up a username and password. The Account Holder is responsible for maintaining the confidentiality of their username and password, and is responsible for all activities performed when logged in using their username and password.

7. SPECIFIC CONSIDERATIONS- CUSTOMER DATA

The Travelex Confidence Group collects Personal Data to provide Group services or through interaction with our websites, participation in our surveys or promotions. The information collected is information provided by customers, information collected automatically, or information received from third parties.

Personal Data is collected in the following ways:

7.1. Information provided by customers

Customers provide information when purchasing or using Travelex Confidence Group services, when communicating with the Group (whether in writing, by telephone or by any other means), or when participating in any of the promotions or surveys.

In cases where the Travelex Confidence Group requests information, it will be collected from forms or website pages, including when the customer registers an account with the Group:

- a) When you sign up to receive the Travelex Confidence Group newsletter, your name, email address, and information indicating how you heard about the Group will be collected. Information about your marketing preferences may also be requested.
- b) When you purchase any service from the Travelex Confidence Group, we will collect the information necessary to complete the contracted transaction. This information may include your name, date of birth, home address, billing address, office address, email address, identification form(s) and the information contained in those forms of identification, mobile phone number, landline phone number, credit or debit card information, other payment details such as your bank details, as required by us to complete your transaction and provide your payment options, and travel details (including future travel dates and destinations).

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7.2. Information collected automatically

The Travelex Confidence Group also collects certain information through automated means, such as cookies and web beacons, whenever you visit the websites or use the Group's services. Note: More information can be found in the cookies section.

Details of visits to online services are collected. This includes interaction on the page and activity on the online service website, including the originating website, pages viewed during the visit, and the page viewed immediately after leaving.

When you download the mobile application or access the services from a portable device, personal information such as your name, email address, username, password, system and mobile device information (e.g., Android or iOS) and your geographic location may be collected. Depending on your marketing and cookie preferences and your geographic location settings, targeted marketing and advertising messages from the application may be displayed.

Information about the use of the application may also be collected for the purpose of improving the performance of the application and digital online services. The automatically collected information is used for:

- a) Administering websites for internal operations, including troubleshooting;
- b) To ensure that the content of our websites is presented in the most effective way for the user and their devices;
- c) As part of efforts to keep websites safe and secure;
- d) To measure or understand the effectiveness of the advertising we serve to users and to deliver relevant advertising;
- e) To make suggestions and recommendations to the user about products or services that may interest them;
- f) Crime prevention and detection, and public safety measures, through the collection of CCTV images from clients when they visit Travelex Confidence Group facilities.

7.3. Information received third parties

The Travelex Confidence Group receives information from third parties (including publicly available information). This information includes:

- a) Non-personal information used to supplement existing information, such as demographic data and affluence metrics (e.g., socio-demographic groupings through corresponding zip code information);
- b) Information about the Owner from other Travelex Confidence Group companies and other sources with whom the Group works to provide the services (including Group partners, third-party payment and delivery service providers, advertising networks, analytics providers and identity verification services), credit reference agencies, fraud prevention services and social media platforms).

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8. STRUCTURE AND MANAGEMENT PROCESS

8.1. As The information collected from customers is used.

The information is used in various ways: to provide the requested services, to keep data subjects informed, and to improve their experience with the quality of the services.

a) To provide a requested service or to enter into a contract with the data subject.

- i. To process and fulfill requests and otherwise provide the Travelex Confidence Group information and services requested;
- ii. To fulfill any contract entered into between the holder and the Travelex Confidence Group for the provision of services;
- iii. To provide the holder with alerts, in-app messages, or other messages and newsletters that they have registered to receive;
- iv. To provide service messages, including messages to notify you of changes to Travelex Confidence Group services or changes to our terms, conditions, and policies.

b) For situations where the data subject consents.

Regarding situations not directly related to the provision of contracted services, such as contacting the data subject for marketing and research purposes; verifying geographic location to provide location-based services; and allowing the Travelex Confidence Group and third-party websites to display relevant and targeted advertisements.

c) For situations where there is a legitimate interest.

- i. To improve the customer experience and the quality of services of the Travelex Confidence Group. This may include tracking emails to know when they are opened and read, and the type of device from which emails are accessed;
- ii. Data analysis and research are conducted to provide insights and help personalize and make Travelex Confidence Group services more relevant, as well as to develop business processes and Group services. In doing so, data is anonymized so that we can continue to use it for analysis and research after the period in which it was used to process services.

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8.2. Specific considerations- employee data

The Travelex Confidence Group collects specific (but not exclusive) Personal Data relating to employees, trainees, contractors, consultants and job applicants (hereinafter referred to solely as "employees"), and only Personal Data necessary for the operation of the company is requested. No other personal information is collected.

Regarding special categories of Personal Data, the Travelex Confidence Group adopts the standards set out below (except where the law permits otherwise):

- a) During the pre-selection, interview, and decision-making stages, questions will be asked regarding sensitive data (e.g., race or ethnic origin, union membership, health, disabilities), where there is a legal requirement for such data to be reported to government agencies;
- b) Special categories of Personal Data will only be processed for the purposes of administering sick leave, maintaining records of absence due to illness, ensuring health and safety in the workplace, assessing fitness for work, monitoring assistance and facilitating work-related health and sickness benefits, monitoring opportunities and payment of equality reports, where we need to comply with legal obligations or exercise rights in relation to employment, when necessary in relation to legal proceedings.

8.2.1. Access and retention of Personal Data

Employees have the right to request access from the Travelex Confidence Group to information held about them. The retention period for employee information is defined in the Document Retention Policy.

The Travelex Confidence Group must ensure that employees' personal information is protected in a manner appropriate to its sensitivity and value. This must be done in accordance with the requirements set out in the Corporate Cybersecurity Policy regarding access, monitoring, transfer, storage and backup.

8.2.2. Precision employee's personal information

In order to keep employee information up-to-date, each employee is encouraged to update their personal profile and other personal information held in the Travelex Confidence Group systems whenever their personal circumstances change. The Group shall ensure that any notification received from an individual regarding their personal information being inaccurate or outdated is promptly addressed.

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8.2.3. Transfer to Third Parties

Employees' personal information may be shared with third parties, such as payroll providers, pension administrators, and healthcare companies.

8.2.4. They are collected information about to the of employees: following

WHY DO WE COLLECT / PROCESS?	WHAT WE COLLECT / PROCESS	HOW WE COLLECT
To make a decision about: <ul style="list-style-type: none"> • Recruitment and Selection • Remuneration • Benefits • Training and Development • Performance Management • Internal and External Communication. 	CV information, personal documents, proof of residence, contact phone numbers, declaration of ethnicity, etc.	Directly with the employee; From suppliers (recruitment systems and agencies and educational institutions); From credit history providers (credit bureaus, assessment/rating system providers, etc.); From the direct supervisor; From the Human Resources department; From colleagues.

9. RESPONSIBILITIES

All employees who handle and/or process personal information on behalf of Travelex Confidence Group companies, for any purpose, must comply with the requirements of this Policy. Employees responsible for managing the Policy, ensuring and monitoring its application, are expected to have appropriate training/qualifications, whenever necessary.

Violation of this Policy may result in disciplinary action, which could lead to dismissal.

10. DPOData Privacy Officer

Responsible for handling matters related to the protection of the organization's and its clients' data. Assists the company in implementing and adapting its processes and structuring a compliance program focused on greater security of the information under its care. Professional appointed by the Travelex Confidence Group to act as a communication channel between

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The Group, the data subjects, and the National Data Protection Authority (ANPD); (Wording given by Law No. 13.853, of 2019).

To provide support and serve as a reference within the privacy program by advising senior leaders and stakeholders on data protection issues related to customers, partners, and employees, especially those related to:

10.1 Implementation and governance of personal data protection:

To be responsible within the Travelex Confidence Group for the implementation and compliance with Personal Data protection policies and procedures, to verify that data processing complies with the LGPD (Brazilian General Data Protection Law) and other applicable regulations, and to identify and mitigate risks to data privacy and security.

10.2 Preparation providing opinions, guidance, and training regarding the LGPD (Brazilian General Data Protection Law):

To provide training to Travelex Confidence Group employees on the LGPD (Brazilian General Data Protection Law), clarify doubts about the processing of Personal Data and the company's obligations, and promote a culture of Personal Data protection within the organization.

10.3 Preparation and document review:

To draft and maintain up-to-date documents such as privacy policies, records of personal data processing activities, and other documents related to data protection.

10.4 Analysis supplier risk:

Determine within the contract approval workflow whether the contract falls under the LGPD (Brazilian General Data Protection Law). Conduct risk analysis of suppliers regarding the LGPD.

10.5 Management of security incidents:

In the event of a data security incident, including leaks or breaches of Personal Data, coordinate with the IT management team to develop and implement a response plan.

To be responsible for notifying the ANPD (National Data Protection Authority) and data subjects about incidents, as required by the LGPD (Brazilian General Data Protection Law).

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10.6 Handling requests from the ANPD (National Data Protection Authority) and holders of Personal Data:

To be responsible for representing the Travelex Confidence Group before the ANPD (National Data Protection Agency), including responding to requests, providing necessary information, and receiving audits and inspections.

Receive and respond to requests from data subjects, such as requests for access, rectification, and deletion, received through all Travelex Confidence Group service channels, primarily via email.protecaodedados@travelexbank.com.br"

10.7 Cooperation with other areas:

Cooperate with other departments of the Travelex Confidence Group on matters relating to the LGPD (Brazilian General Data Protection Law), addressing any necessary requests.

Integrate the process of protecting Personal Data into the company's business, such as in product development and related areas.

DPO - Data Protection Officer must:

- a) Report directly to the president of TRAVELEX.
- b) Having access to the leadership of key areas within the company;
- c) Having the resources (human and material) to perform their duties;
- d) To have autonomy and control to carry out their activities without their performance being subject to pressure from financial results or commercial targets.

Any employee who has doubts or concerns about data protection compliance, or who believes that there has been a data breach or that the security of their personal information has been compromised, should contact the Data Protection Officer (DPO) without delay by opening a "Data Security Incident" report.

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11. CHANNEL COMMUNICATION

If you have any questions about this Policy or how the Travelex Confidence Group handles Personal Data, please contact the Data Protection Officer, Matheus Caravina Cabral, through [contact information would go here].protecaodedados@travelexbank.com.br.

12. RELATED DOCUMENTS

- a) Law No. 13.709, of August 14, 2018 (Brazilian General Data Protection Law – LGPD);
- b) Global Data Protection & Privacy Policy.

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