
PRIVACY POLICY

POL601 v.1

PRIVACY POLICY

1. AREA(S) RESPONSIBLE

- 1.1. R&T Governance and Architecture Management (Presi/Dites/Geati)

2. SCOPE

- 2.1. This policy guides BB Tecnologia e Serviços' behavior. The guidelines contained in the policy were defined based on the Controller's guidelines, considering the specific needs and the legal and regulatory aspects to which BBTS is subject.

3. OBJECTIVE

- 3.1. The purpose of this policy is to establish principles and guidelines to be observed in any type of treatment such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction of personal data by BBTS. The aim is to present to external and internal audiences the institutional position on the confidentiality and protection of personal information, the privacy of data subjects, the use of cookies in the browser, the processing carried out by partners, the practices and precautions adopted by the Organization and its commitment to transparency.

4. REGULATIONS

- 4.1. Law No. 13,709 of August 14, 2018, known as the General Personal Data Protection Law (LGPD).

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5. REVIEW PERIODICITY

- 5.1. The Privacy Policy must be reviewed every three (3) years, or extraordinarily at any time.

6. CONCEPTS

- 6.1. **LGPD:** acronym used for "General Personal Data Protection Law".
- 6.2. **Processing agents:** controller(s), operator(s) and suboperator(s) of personal data
- 6.3. **Controller:** a natural or legal person, governed by public or private law, who is responsible for decisions regarding the processing of personal data. This is the agent responsible for personal data. E.g. BBTS, Banco do Brasil and other clients.
- 6.4. **Personal data:** any data which, alone or together with other data, is capable of identifying a person, directly or indirectly. Examples: name, e-mail address, telephone number, ID, CPF, registration number, IP address of devices, cookies in internet browsers, geolocation, license plate number, set of behaviors, characteristics and/or interests of a person.
- 6.5. **Sensitive personal data:** personal data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or religious, philosophical or political organization, data relating to health or sex life, genetic or biometric data (photograph, video, audio, facial recognition and fingerprint), when linked to a natural person.
- 6.6. **Operator:** natural or legal person, public or private, who processes personal data on behalf of the controller. E.g. BBTS when it processes personal data for customers, Microsoft when it hosts personal data in the cloud for BBTS, among other suppliers who process personal data on behalf of BBTS.
- 6.7. **Data subject:** natural person to whom the personal data being processed refers.
- 6.8. **Data processing:** "processing" is any operation carried out with personal data. Examples of data processing include: collecting, producing, receiving, classifying, using, accessing, consulting, reproducing, printing, transmitting, distributing, processing, archiving, storing, deleting, evaluating or controlling information, modifying, communicating, transferring, disseminating or extracting

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7. ENUNCIATED

Privacy Policy

Who we are

BB Tecnologia e Serviços S.A. (BBTS) is a company affiliated to Banco do Brasil, which is committed to the values of our controlling shareholder, maintaining the belief that it is possible to build a more efficient and better world with honesty, respect and integrity.

Our strategic purpose is: "To generate value and efficiency for our customers through intelligent solutions". For this to be possible, compliance and protection of private data is essential. To learn more about our responsibilities towards your personal information, please find below our Privacy Policy.

Who does this policy apply to?

This policy is aimed at the company, customers, employees, users, shareholders, partners or any other person who has a relationship with BBTS.

Confidentiality is important to us

The confidentiality and privacy of your data is our commitment, whenever there is any interaction that contains it, so that:

We have established confidentiality agreements, terms of responsibility or secrecy terms with our personal data operators;

- We have information and cyber security controls in place to preserve the confidentiality, integrity and

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availability of the information it handles and/or operates;

We raise awareness and disseminate best practices related to maintaining compliance and information and cyber security.

Your protection

We adopt the best security practices to guarantee the integrity and confidentiality of the data collected, adopting mechanisms to protect against misuse, unauthorized access attempts, fraud, damage, sabotage and theft.

We have adopted controls for the protection of personal data, such as:

- Inventory of assets and data, stored, processed and transferred;
- Access management and authentication;
- Vulnerability management and treatment;
- Asset protection mechanisms and platforms used;
- Data isolation in mobile assets.

We periodically review the controls and readjust them whenever necessary to maintain the compliance, protection and resilience of our information and cyber security.

Stay tuned!

So that we can guarantee the confidentiality and protection of your personal data, it is important that you also take the following precautions:

- only use the official channels provided by BBTS.
- pay attention to the origin of the messages, not accessing websites in the name of BBTS through links received by e-mail, SMS, WhatsApp, Telegram and others from unknown sources that are not the official ones of BBTS, Banco do Brasil or other companies of the conglomerate;

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- always keep your browser and antivirus up to date;
 - update your personal data, whenever there are any changes, through any of the service channels available, especially through the customer service page on the BBTS website;
 - always be aware of the information contained in this privacy policy and if you are a client or contractor, also read the contracts signed with us;

Our commitment

We strive for legality, impersonality, morality and transparency for society, customers, employees, users, shareholders, partners or anyone else who comes into contact with BBTS.

As a data controller, we determine how and why we use your personal data and, if you wish, you can request access to this information through our service channels, as presented on our official Privacy website.

We are committed to observing and applying the premises given by Law 13.709/2018 (Personal Data Protection Law - LGPD) and the National Data Protection Authority - ANPD, in our processes, policies, standards and procedures, as a way of promoting our respect for protection, privacy, integrity, justice, transparency, sustainability and ethics, committing ourselves to protecting personal data, collected and used, throughout its life cycle.

When and how we collect your data

In order to provide you with a personalized experience, we collect your data from the first interactions you make, ensuring the quality and effectiveness of the relationship established.

Your personal data is collected and processed when you:

- contact us through our service channels (chat, WhatsApp, website, telephone, etc.);
- uses or contracts our products and/or services;
- with their consent;
- browse our public website; and when:
- we consult external sources, including public data, such as credit bureaus, registry offices, information disclosed under the Access to Information Act and other sources for the purposes of validating data and enriching our databases or through our contact.

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What we use your data for

We only use your personal data for legitimate, specific, explicit, transparent, secure, preventive, responsible and informed purposes, without the possibility of further processing in a manner incompatible with these purposes and related to the activities we carry out, always observing current legislation and good market practices.

In this way, we seek to:

- offer products and services tailored to your profile, through their own or external channels (such as SMS, Whatsapp, telephone, among others);
- improve your satisfaction with us;
- provide a better experience with BBTS;
- comply with legal requirements (such as laws, regulations and resolutions);
- meet your needs and expectations as a customer, partner, employee, shareholder or user of our products and services;
- value fair, dignified, courteous and equitable treatment, ensuring the confidentiality of information.

BBTS takes care of your data

We periodically review our processes so that they are in line with the LGPD and so that only the information strictly necessary for processing is used.

We reject and do not authorize the processing any personal data for discriminatory, illegal or abusive .

We an ongoing training program throughout the organization to ensure compliance with the requirements of confidentiality, privacy and the protection of personal data.

We monitor compliance with regard to the use of personal data and take appropriate action when this is breached, respecting the legal system and internal disciplinary rules.

We take the necessary steps to ensure that any personal data we hold is kept accurate and up-to-date in relation

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to the purposes for which it was collected, and we offer data subjects the opportunity to request the deletion or correction of inaccurate or out-of-date data.

We do not keep personal data for longer than is necessary to fulfill the intended purposes and those provided for in the Brazilian legal system.

When it is unnecessary to identify the holder of data, occurs a anonymization or pseudo-anonymization of personal data.

We have incident response and business continuity plans, revised whenever necessary.

We have adopted internal processes and policies that ensure proper compliance with the rules and best practices regarding the protection of personal data.

Processing of sensitive personal data

BBTS may only process sensitive personal data:

- When the data subject or their legal guardian consents, in a specific and prominent manner, for specific purposes;
- Without the consent of the data subject, in cases where the processing is indispensable for:
 - a) The fulfillment of a legal or regulatory obligation by BBTS;
 - b) The regular exercise of rights, including in contracts and in judicial, administrative and arbitration proceedings;
 - c) Protecting the life or physical safety of the data subject or third parties; or
 - d) Ensuring the prevention of fraud and the security of the holder of personal data, in the processes identification and authentication of registration in electronic systems.

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Underage holders

BBTS will process the personal data of underage data subjects when this is required in order to comply with contractual obligations and/or to carry out internal activities, taking into account the General Data Protection Law and observing the appropriate legal hypotheses provided for, as well as taking into account the interest of this in relation to underage data subjects and the prior consent of their parents or legally recognized guardians.

International data transfer

We do not transfer your personal data to countries other than Brazil.

Partners who process your data

When we share data with partners, including companies in the BB financial conglomerate, only personal data that is necessary for the fulfillment of activities and in accordance with safeguards and good practices is sent.

If the service provider is outside the place of data collection, clauses related to the protection of personal data will be included in the contract, as a way of safeguarding the premises given by the LGPD and other related regulations.

Cookies

Cookies are small text files generated during your internet browsing and are used by us for authentication, security and personalization of our services.

We allow the user to freely choose to accept or refuse cookies, however, "session" cookies are necessary for the functioning of our websites, and when you close your browser, they will be automatically removed. We also consider that some cookies that are considered persistent, i.e. that are not deleted when you close your browser, are

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necessary for us to be able to recognize you whenever you return to our websites, so that we can offer you a personalized product or service.

If you wish, you can block cookies directly in your browser, preventing them from being created, or you can delete those that have been saved via your browser settings, but be aware: if you disable, reject or block cookies, certain parts of our website may not work properly.

Personal Data Governance

The management of privacy and personal data protection in our organization is monitored by senior management, both in its implementation and supervision. We have a Data Controller who acts and guides the organization in terms of compliance with personal data protection regulations.

We disseminate the culture secrecy, privacy and protection of personal data throughout the organization by means of awareness and training programs that include educational activities with our staff on a regular basis.

Thank you

Thank you for reading our privacy and personal data protection policy. It has been drawn up with the aim of being as useful, transparent and simple as possible.

Our intention is to ensure that we respect your interests and maintain an ethical, responsible and diligent relationship with you.

We also ask you to visit us from time to time, as we will publish updates to this Policy when necessary. You can find out when this policy was last updated at the bottom of this page.

Thank you!

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Service Channels

We have a number of service channels designed to help holders exercise their rights, respond to requests and answer any questions they may have. You can use these channels:

1. BBTS's official data privacy website: <https://privacidade.bbts.com.br>;
2. Official e-mail: privacidade@bbts.com.br;

Data controller: Manoel Enison Ramos Viana

8. APPROVAL

8.1. In Technical Note 2024/0158, this policy was appraised by the Executive Board on 03/19/2024 and approved by the Audit Committee (Coaud) on 03/27/2024, the Board of Directors (Conad) on 03/28/2024 and the Fiscal Council (Cofis) on 04/05/2024.