

## 1. OBJECTIVE:

1.1.The Privacy Policy of Góes International Corp., a legal entity governed by private law, headquartered in the British Virgin Islands, with representation in the Federative Republic of Brazil, through LG Bank Empreendimentos e Tecnologia EIRELI (the latter registered with the CNPJ/MF under no. 36.948.490/0001-08, which is hereinafter referred to, for the purposes of this formulation, simply as "LGBANK"), was developed with the goal of exercising the commitment to protect the sensitive data of its Users. We will now present how the information of customers, former customers and customers (all of which will be treated only by "Users") will be obtained, used and protected, as well as what the rights are and how to exercise them, all so that there is transparency and clarity in relations with LGBANK.

## 2. ACCEPTANCE:

2.1.As a fundamental condition for accessing and using LGBANK functionalities, the User declares that they have read this Privacy Policy thoroughly and carefully, being fully aware that when sending a contract proposal, accessing the institution's website and platforms features and/or informing LGBANK of their personal data, they will be checking, freely, their express agreement with all the terms stipulated herein.

2.2.IF YOU DO NOT AGREE WITH THE ENTIRE PRIVACY POLICY, WE RESPECTFULLY REQUEST YOU DISCONTINUE YOUR ACCESS TO THE CUSTOMER PORTAL AND OTHER DIGITAL PLATFORMS, AND DO NOT PROVIDE YOUR PERSONAL DATA OR EFFECTIVELY TO CONTRACT ANY PRODUCT OR SERVICE.

## 3. DATA COLLECTION:

3.1.In order for it to provide its services, it is imperative to obtain some information about the Users. LGBANK may obtain sensitive data provided directly by the User, by third parties or obtained automatically, according to the service provided.

3.2.LGBANK will store all personal data entered or sent when accessing one of its channels (both the website and the application) or when contracting products and/or services, which are provided by any of the related and/or associated companies.

3.3.For credit analysis and protection, LGBANK may acquire data made available on databases from information providers. When using information base providers, LGBANK elects reputable companies that respect the rules of privacy and data protection, in addition to demanding that they comply with the data processing rules established by it.

3.4.When using database providers, LGBANK will elect reputable companies that respect the rules of privacy and data protection.

3.5.LGBANK can also obtain a series of information automatically, using some market technologies, such as cookies, beacons, pixel tags and local shared objects, in order to improve your browsing experience on its services. according to the Users' preferences and habits.

3.5.1. When the User browses digital platforms or uses products or services that are made available through the Internet, LGBANK collects the data reported in Annex I, especially those listed in the "Electronic Records" line.

3.5.2. LGBANK uses cookies to facilitate use and better adapt its website and applications to the interests and needs of its Users, as well as to improve its structures and contents. Cookies can also be used to speed up your future activities and experiences on your channels..

3.5.3. Through the use of cookies, the website stores information about browser activities. These activity records (commonly known only as logs), may include data such as the access IP address, actions taken on the website, pages accessed, dates and times of each action, and information on the device used, which include the operating system version, the browser, among other installed applications, being used only for metrics and statistics purposes of the services provided, for the investigation of undue changes in its systems and records or fraud, not having as purpose, the providing data to third parties without the express authorization of the User.

3.5.4. The User can configure their mobile device, if they wish to block, the collection of cookies or other data, but in this case, some LGBANK functions may be limited.

3.6. For all data collection, LGBANK will always follow these fundamental rules:

- Only essential information will be obtained for the provision of the services offered;
- If necessary, authorization will be requested to obtain new data, accompanied by proper justification; and
- Sensitive data obtained will only be used to meet the purposes informed to the User.

3.7. LGBANK is not responsible for the accuracy, veracity or lack of data and/or information provided by the User or for their outdatedness, being the User's sole and exclusive responsibility to declare their data and information accurately and update it whenever necessary, using for this, the service channels aimed at this purpose, which are disclosed.

#### **4. DATA PROCESSING:**

4.1. The treatment of sensitive data by LGBANK has several purposes, depending on the User's relationship. Thus, it will be presented below, in a non-exhaustive way, the main hypotheses where the sensitive information of the Users will be treated:

- a) For the execution of due diligence and/or preliminary contractual acts when the User submits a contract proposal;
- b) For the execution of a contract that the User signs with LGBANK;
- c) To meet legal demands and regulatory bodies to which LGBANK is subject;
- d) To exercise rights in administrative, arbitration and judicial proceedings, including to serve as evidence in case of unlawful acts or in disagreement with this Policy or other normative document made available by LGBANK;
- e) For the relationship and the offer of information related to the products and services contracted by LGBANK Users;
- f) In the construction and evaluation of the profile of its Users, so that personalized products that are compatible with their needs can be offered;
- g) In the establishment of statistical research, tests, evaluations and development, aiming at the management and assessment of business risks, the improvement and/or creation of new products;
- h) In cases of complaint, when there is quotation of LGBANK on social networks or specific platforms, in order to resolve the points complained of, as well as adopt the necessary measures to resolve the situation in the best way possible;
- i) For credit protection;
- j) To meet the legitimate interests of LGBANK or third parties connected to it, always within the limits of its expectations, and never at the expense of its interests, rights and fundamental freedoms; or

k) To carry out activities and tasks aimed at preventing the occurrence of fraud.

4.2. The treatments performed by LGBANK meet the principles of purpose, necessity, adequacy, transparency and non-discrimination under the laws and regulations governing the privacy and protection of sensitive data and may include the data that are related to the end of this policy to facilitate its visualization.

### **5. INTERNATIONAL USE, STORAGE AND TRANSFER:**

5.1. The database formed within the limits and purposes of LGBANK's business is your sole responsibility, but its use, access and sharing, when necessary, will be made in accordance with the laws and regulations governing confidentiality, secrecy and data protection and with the guidelines of this Privacy Policy, the Complementary Privacy Policies/Notices, the Cyber Security Policy, among others.

5.1.1. The User is co-responsible for confidentiality of their data and personal information. The sharing of passwords and access data violates LGBANK's Privacy Policy.

5.2. Internally, the User data will only be accessed by professionals duly authorized by LGBANK, respecting the principles of proportionality and necessity, as well as the purpose for LGBANK's objectives, in addition to the commitment to confidentiality, secrecy and preservation of privacy under this Policy of Privacy.

5.3. Personal data processed by LGBANK, listed in Annex I, may be stored both in Brazil and abroad, on its own servers or those contracted by and under the responsibility of LGBANK.

5.3.1. Depending on the Product or Service, in order to operate efficiently and improve performance, LGBANK may carry out an international transfer of its customers' sensitive data. In this case, LGBANK will take the necessary measures to ensure that the information processed internationally complies with this Policy and also with the other data processing and security policies and procedures of LGBANK.

5.4. No information processing is completely safe, as it will always be susceptible to the possibility of technical failures, malware and/or similar actions. In this regard, LGBANK adopts its best practices to preserve your privacy and protect your sensitive data. However, in the remote possibility of episodes of this nature, LGBANK guarantees its best efforts to remedy those resulting from the event, always ensuring due transparency to the Users.

### **6. DATA RETENTION AND DISPOSAL:**

6.1. Sensitive data, processed by LGBANK, will be deleted when they are no longer necessary for the purposes for which they were obtained, or when requested by the User, except in the event of the need to comply with a legal or regulatory obligation, transfer to third parties (provided that the data processing requirements are met) and exclusive use of LGBANK, including for the exercise of their rights in judicial or administrative proceedings.

6.1.1. If there is a request to delete the data by the User, this can only occur if there is no longer any purpose of use or legal, regulatory or judicial obligation that justifies its retention.

6.2.No information storage is completely secure, as it will always be susceptible to the possibility of technical failures, malware and/or similar actions. In this regard, LGBANK adopts its best practices to preserve your privacy and protect your sensitive data. However, in the remote possibility of episodes of this nature, LGBANK guarantees its best efforts to remedy those resulting from the event, always ensuring due transparency to the Users.

### **7. DATA SHARING:**

7.1.Sometimes LGBANK will need to share its Users' sensitive data with third parties. The situations that will involve sharing your information are:

- a) Automatically or manually, with service providers or partners to support the development and provision of services made available to the User, provided that they are duly approved by the LGBANK security processes;
- b) With public or private information banks, for identification and/or authentication of the Users in contracting processes with LGBANK, to prevent risks, money laundering, identification of politically exposed person or FATCA, for credit analysis, registration update and prevention of fraud, including the use of biometrics (facial, digital or other).
- c) With authorities, government entities or other third parties, for the protection of the Organization's interests in any type of conflict, including lawsuits and administrative proceedings;
- d) In the event of corporate transactions and transactions involving LGBANK, in which case the transfer of information will be necessary for the continuity of services;
- e) In compliance with a court order or at the request of administrative authorities that have legal competence for your request; or
- f) Sensitive data may also be shared with some partner companies located abroad.

### **8. RIGHT OF USERS AS DATA SUBJECTS:**

8.1.In compliance with applicable regulations, more specifically the respect required for the processing of sensitive data, LGBANK respects and guarantees the User the possibility of submitting requests from the beginning of the General Data Protection Law, based on the following rights:

- a) Confirmation of the existence of treatment;
- b) Access to data;
- c) Correction of incomplete, inaccurate or outdated data;
- d) Anonymization, blocking or deletion of unnecessary, excessive or non-lawful data;
- e) Data portability to another service or product provider, upon express request by the User;
- f) Deletion of data processed with the User's consent;
- g) Obtaining information about public or private entities with which Bradesco shared its data;
- h) Information about the possibility of the User not providing consent, as well as being informed about the consequences in case of refusal;
- i) Revocation of consent.

8.2.Part of the rights listed above may be exercised directly by the User, from the management of registration information, while another part will depend on sending a request through the available service channels, so that they can be evaluated and necessary actions can be taken.

8.3.The User is notified that any request to exclude basic information for the management of their registration with

LGBANK, when applicable, will result in the termination of the contractual relationship.

8.4.LGBANK will use its best efforts to meet the requests made by the Holders, in the shortest possible time. However, justifiable factors may delay or prevent its quick service, given that, in case of delay, LGBANK will present the User with the appropriate reasons.

8.5.Finally, the User must be aware that their request may be legally rejected, either for formal reasons (such as their inability to prove their identity), or for legal reasons (such as the request to delete data whose maintenance is the free exercise of LGBANK's right), being, however, in the event of impossibility of service, given that LGBANK will present the User with the necessary justifications.

### **9. JURISDICTION:**

9.1.This Privacy Policy is governed by and interpreted in accordance with Brazilian law, in Portuguese, and the forum of the User's domicile is elected to settle any dispute or controversy involving this document, except in the specific exception of personal, territorial or functional jurisdiction by applicable law.

### **10. APPLICABLE REGULATION:**

10.1. This Privacy Policy was prepared based on the applicable legislation on information security, privacy and data protection, including (whenever and when applicable) the Federal Constitution, the Consumer Defense Code (Federal Law No. 10.820/1990), or Brazilian Civil Code (Federal Law No. 10.406/2002), the Internet Civil Framework (Federal Law No. 12.965/2014) and its regulatory decree (Decree No. 8.771/2016), the General Data Protection Law (Federal Law No. 13.709/2018), and other sectorial or general rules on the subject.

### **11. CHANGES:**

11.1. The Privacy Policy, as well as the contents, the treatment of sensitive data and the functionalities of the digital channels, may be updated at any time for legal reasons, by the use of new technologies and functionalities and whenever LGBANK, in its sole discretion, understands that modifications, alterations, additions or removals are necessary. By continuing to access the Customers and Applications Portal after the changes, which will be posted on the Portal and Applications, the User will agree to the entirety of the changes.

11.1.1. The User must read the new version of the Privacy Policy when notified, in order to assess whether they agree with the changes made, and whether they wish to continue using and accessing LGBANK services and products.

11.2. LGBANK may, when necessary, establish in a supplementary instrument an additional and specific Privacy Policy for certain products or services. This information will be inserted in the contracts or Terms of Use of the products or services, in a specific clause, identified as the "Complementary Privacy Policy".

11.3. This Privacy Policy was last amended and posted on its Customer and Application Portal on [MONTH]/[YEAR].

**PRIVACY POLICY**

**ANNEX I**

<b>CATEGORY</b>	<b>DATA</b>	<b>GOAL</b>	<b>SOURCE</b>
<b>REGISTRATIONS INDIVIDUAL</b> <small>(Collected)</small>	???	???	???
<b>REGISTRATIONS LEGAL ENTITY</b> <small>(Collected)</small>	???	???	???
<b>FINANCIAL INDIVIDUAL</b> <small>(Generated)</small>	???	???	???
<b>FINANCIAL LEGAL ENTITY</b> <small>(Generated)</small>	???	???	???
<b>EQUITY</b> <small>(Collected)</small>	???	???	???
<b>BIOMETRY</b> <small>(Collected)</small>	???	???	???
<b>ELECTRONIC RECORDS</b> <small>(Collected)</small>	???	???	???
<b>THIRD PARTY DATABASE</b> <small>(Collected)</small>	???	???	???
<b>HEALTH DATA</b> <small>(Collected)</small>	???	???	???