



PRIVACY NOTICE

At Hedgepoint, guided by the principles of security and transparency, we are committed to protecting the privacy and data that we control or operate. For this reason, we have prepared this Privacy Notice ("Notice") to explain to you, in a clear, precise, and didactic manner, how we collect and process your Personal Data.

1. DEFINITIONS

In this Notice, the terms below shall have the following meanings:

Anonymization: Technical means that, when applied, make it impossible to identify the data subject.

Consent: The free, informed, and unequivocal expression of the Data Subject or their legal representative who agrees to the processing of their Personal Data for a specific purpose.

Personal Data: Information that enables the direct or indirect identification of the Data Subject.

Hedgepoint Group / HPGM / We: Means the Hedgepoint economic group, composed of the companies described in item 2 below;

System: Means any software infrastructure used by HPGM.

Third Parties: Means partners, suppliers of goods and/or services essential to the execution of our activities, and governmental and/or regulatory authorities..

Data Subject: Natural person to whom the Personal Data being processed refers.

International Transfer: Transfer of Personal Data to a foreign country or international organization.



2. PERSONAL DATA CONTROL

This Notice aims to explain how the Hedgepoint Group or any of its companies uses, shares, and discloses your Personal Data. Below are our companies within the same economic group:

HEDGEPOINT COMMODITIES LLC, headquartered at 311S, Wacker Drive, Suite 550, Chicago/IL, United States of America..

HEDGEPOINT GLOBAL MARKETS DISTRIBUIDORA DE TÍTULOS E VALORES MOBILIÁRIOS LTDA., headquartered at Av. José de Souza Campos, 507 - 9th floor, Cambuí, ZIP 13.025-320, Campinas/SP, Brazil.

HEDGEPOINT GLOBAL MARKETS LLC, headquartered at 251 Little Falls Drive, Wilmington/DE, United States of America.

HEDGEPOINT GLOBAL MARKETS PTE.LTD, headquartered at 36 Robinson Road, 20-01 City House, Singapore.

HEDGEPOINT GLOBAL MARKETS S.A., headquartered at Yaguarón, number 1407, office 1506, Montevideo, Uruguay.

HEDGEPOINT SCHWEIZ AG (HEDGEPOINT SWITZERLAND LTD), headquartered at Seefeldstrasse 307, 8008 Zurich, Switzerland.

HEDGEPOINT GLOBAL MARKETS LIMITED, headquartered at Gate District Gate Building, 15th floor, unit GD-GB-00-15-BC-19-B, P.O. Box 506908, Dubai, United Arab Emirates.

HEDGEPOINT SERVIÇOS LTDA., headquartered at Rua Funchal, 418, suite 1801, E-Tower Building, Vila Olímpia, ZIP: 04551-060, São Paulo/SP, Brazil.

This privacy notice explains how Hedgepoint and the companies of the same economic group collect, process, and share your Data.

3. CATEGORY OF PERSONAL DATA



Hedgepoint uses several forms of personal data processing, such as: Collection, Storage, Sharing, Use, Modification, Deletion, and Disposal. It is important that you are aware that:

a. The data collected in your inquiry is stored and processed in the cloud and subsequently transferred to our systems.

b. Atualmente, podemos coletar e tratar os seguintes Dados Pessoais:

- Full name;
- Proof of Residence (dated up to 3 months);
- Power of Attorney (when applicable);
- Professional Resume;
- Position / Area of expertise;
- Phone / Mobile number;
- Email;
- Personal document (ID, CPF, Driver's License, Passport, Marriage and/or Divorce Certificate);
- Financial Statements / Balance Sheets;
- Income Tax Returns;
- Banking Information (Bank, Name and Account Number);
- W-form (W-8BEN for non-US residents and W9 for US citizens);
- Copies of various Contracts (if applicable);
- Authorization term for inquiries in the SCR (Credit Information System);
- Identification form for agricultural activities performed by the Producer (if applicable).

All the above Personal Data will be collected and processed by Hedgepoint as necessary, and the information provided is not used to make any automated decisions.

Personal Data considered sensitive by the applicable personal data privacy legislation is processed only when indispensable and in accordance with such legislation.

4. PROCESSING, PURPOSE, AND LEGAL BASIS



Hedgepoint may process the Personal Data of Data Subjects for certain purposes, including but not limited to those listed below:

- Registration of potential clients;
- Registration and updating of client records;
- Contact with you by the HPGM sales team, including prospecting activities such as scheduling calls and meetings;
- Sending “email marketing” in the form of, including but not limited to, newsletters and materials provided by the HPGM market intelligence team;
- Organization, promotion, and management of events (in-person or virtual), including sending invitations, RSVP, informative communications, collecting feedback, and sending post-event content. Processing will be based on the company’s legitimate interest when there is a prior relationship, or by consent when necessary;
- Sending surveys, including but not limited to satisfaction and opinion surveys about the services provided by HPGM;
- Risk assessment of clients/suppliers and potential clients/suppliers (Know Your Supplier – KYS / Know Your Customer – KYC);
- Credit assessment of clients and potential clients with or without credit offer;
- Investigations and measures to prevent and combat illicit acts, fraud, crimes, and to ensure our and our Clients’ security;
- Defense in judicial and/or administrative proceedings;
- Sharing of Personal Data with governmental and/or regulatory authorities (when necessary);
- Sharing of Personal Data with credit bureaus and collection agencies, in case of non-payment of amounts owed to HPGM.

The collected data is processed only for the time necessary to fulfill the purpose determined at the time of collection, mainly to meet legal or regulatory requirements relevant to the business and according to each country where Hedgepoint acts as Controller or Operator of personal data.



We also use legal bases such as legitimate interest to comply with our internal policies, always respecting the fundamental rights and freedoms of the data subject; contract execution or the data subject's consent.

The personal data of data subjects is processed to offer the services of their interest. For this to happen, it may be necessary to cross-reference collected data so that actions are directed to what the data subject expects to receive from Hedgepoint, according to the contract.

Hedgepoint may also receive Personal Data from Third Parties, such as information from criminal and credit checks permitted by law.

If you are located in Brazil, HPGM will register your Personal Data and information related to occurrences, attempts, and/or indications of fraud, in order to prevent fraud and ensure the security of operations, and may share it among the companies of the Hedgepoint Group and/or with Third Parties, such as other financial institutions that are part of the National Financial System and Brazilian regulatory bodies, in compliance with applicable legislation and regulatory standards.

5. DURATION OF PROCESSING AND STORAGE

Hedgepoint processes your Personal Data in accordance with the principles of purpose and necessity, that is, during the period in which we conduct our business and limited to the minimum necessary. However, when applicable, even after the termination of your Contract with us, we may store your Personal Data for an additional period for audit purposes, compliance with legal and/or regulatory obligations, for the regular exercise of HPGM's rights, for our Legitimate Interest, or for the necessary period according to the legal basis that justifies the retention of Personal Data, in which case your Personal Data will be stored for at least 5 (five) years.

As our priority is to provide the best possible security for your personal data, your information is stored and protected internally and by strategic information security partners, as specified in item 8 of this Privacy Notice.



You may inquire about the duration of the processing of your Personal Data by sending a request to dataprivacy@hedgepointglobal.com.

6. SHARING OF PERSONAL DATA

We may share your Personal Data with Third Parties or regulatory entities, only to the extent necessary to fulfill the purposes listed above. We may also share your Personal Data with technical support for functionalities of partner platforms and for security and prevention of misuse of registration tools.

Furthermore, any Personal Data processed by Third Parties must be processed in accordance with this Notice and applicable personal data privacy legislation.

In the case of contracting foreign exchange operations through correspondent banking services, your Personal Data will be shared with Ebury Banco de Câmbio S/A (CNPJ 13.059.145/0001-00).

For more information on how Ebury Banco de Câmbio S/A processes your Personal Data, visit:

<https://br.ebury.com/wp-content/themes/bexs-theme/assets/arquivos/politica-de-privacidade-grupo-bexs.pdf>.

We will also share your Personal Data when required by law or by an arbitral tribunal to which we are subject.

Hedgepoint may expand or reduce its business, and this may involve the purchase or sale of certain divisions or the transfer of control of certain business units to third parties. Personal Data, when relevant to any such transferred division, will be transferred along with that division, and the new controlling party will be permitted to process the Personal Data for the purposes established in this Notice.



We may also share your Personal Data if you request us to do so. Whenever sharing is carried out, it will be done in accordance with the authorization of applicable legislation and within the limits and purposes of our business.

7. INTERNATIONAL TRANSFER

As HPGM operates globally, your Personal Data may be transferred abroad, including but not limited to the United States of America, Switzerland, Brazil, Argentina, Mexico, Uruguay, Singapore, and the United Arab Emirates. For this, HPGM observes all requirements demanded by applicable personal data privacy legislation and adopts best security and privacy practices to ensure the integrity and confidentiality of your Personal Data.

Nós também compartilharemos seus Dados Pessoais quando exigido por lei ou em qualquer tribunal nacional ou no exterior.

We will also share your Personal Data when required by law or in any national or foreign court.

In the case of International Data Transfer, Hedgepoint uses standard clauses as recommended by legislative bodies and for better service and security of shared and transferred data.

7.1 Form, duration, and specific purpose of the international transfer

In the event of international data transfer, Hedgepoint does so with the utmost technical and administrative rigor, for the period necessary to fulfill the intended purpose at the time of collection. Always respecting Brazilian and international laws regarding the period of use of such data, as well as Article 33 of the LGPD, observing:

If the destination country offers an adequate level of data protection;

- The company has adopted robust and adequate contractual mechanisms, such as Standard Contractual Clauses (SCC) or data transfer agreements;
- Obtaining the data subject's consent when necessary;
- If the company adopts technical measures such as encryption to protect the transferred data;



- Existence of the application of approved global corporate rules (Binding Corporate Rules – BCR).

7.2 Identification and contacts of the controller

Hedgepoint acts as the controller of personal data of its clients, service providers, employees, and agents. To contact us, use the email dataprivacy@hedgepointglobal.com.

7.3 Shared use of data by the controller and the purpose

Hedgepoint shares your data internationally with:

- Group companies for compliance with legal obligations and internal policies;
- Cloud data storage partner in the United States;
- With stock exchanges and other international bodies in the countries where the group operates (Switzerland, Singapore, Uruguay, Argentina, Mexico, United Arab Emirates, and the United States of America), for the management of client portfolios.

You may inquire about the International Transfer of your Personal Data by sending a request to dataprivacy@hedgepointglobal.com.

8. SECURITY

We treat the security of your Data with the utmost diligence, using the best standards and practices adopted in the market. We have a robust, highly qualified team responsible for ensuring the greatest care for your Data.

We ensure that the personal information provided is in a controlled, secure environment protected from unauthorized access, ensuring that users' personal information will not be accessed, used, or exposed in an unauthorized manner. User data is protected from accidental or unlawful situations of destruction, loss, or improper alteration.



Means, safeguards, and risk mitigation mechanisms adopted:

- Data encryption;
- Anonymization of personal data;
- Training and awareness of employees and service providers;
- Governance and technological processes for Information Security.

However, as we believe every precaution is important, we recommend that you take precautions to protect your Data while using the Internet.

We also recommend that you do not access suspicious and unreliable sites, never share your passwords with anyone, and always be careful when posting your Data on social networks or any other public environment.

We have the right to assume that anyone accessing our Systems using a password or contact designated to you has the right to do so. You will be solely responsible for the activities of anyone who accesses our Systems or contacts us using a password or contact method designated to you, even if such individual does not, in fact, have your authorization.

If you have any questions or suspect fraud regarding a received message, please contact us at the following email: dataprivacy@hedgepointglobal.com.

9. YOUR RIGHTS AS A DATA SUBJECT

According to the data privacy laws applicable in the countries in which we operate, you may have rights, including but not limited to:

- Confirmation, access, correction of data and the form of processing, as well as access to and correction of incomplete, inaccurate, or outdated data being processed by Hedgepoint.
- Anonymization, blocking, or deletion of personal data acquired through Consent for processing, or of excessive or unnecessary data for the intended purpose.
- Portability of data to another service or product provider.



- Information about the entities with which Hedgepoint shares or has shared the data subject's personal data.
- Information about the possibility of not providing consent and about the consequences of refusal, as per item 11 of this notice.
- Filing a complaint against the controller before the ANPD via the link <https://www.gov.br/pt-br/servicos/abrir-requerimento-relacionado-a-lgpd>.
- Provision to the data subject, upon request, of the full clauses used for the international data transfer, subject to commercial and industrial secrecy.

You are not required to pay any fee for exercising your rights.

To exercise your rights as a personal data subject described above, use the communication channels mentioned in the "12. Contact" section of this notice.

10. CHANGES TO OUR PRIVACY NOTICE

We reserve the right to make changes to this Notice at any time and without prior notice, by publishing the revised version on our website. These changes will take effect on the date the updated version is published. For this reason, it is important to reread this Notice regularly.

11. CONSENT

By becoming our Client or Supplier, you confirm that you are aware of and agree with all the terms set forth herein.

You may revoke your Consent at any time by contacting the DPO through the channel dataprivacy@hedgepointglobal.com.

If you revoke your Consent, you will no longer receive any contact from HPGM. You understand that revocation of your Consent does not affect the lawfulness of the processing we have carried out on your Personal Data prior to the revocation of your Consent.



12. CONTACT

HPGM has a specific professional responsible for the diligent processing of Personal Data, our DPO (Data Protection Officer).

We are available to answer any questions, suggestions, or requests regarding this Notice or the protection and processing of your Personal Data.

You can contact us through the Privacy Communication Channel or by contacting our DPO at the email address below:

Nome: Saron Correa (DPO)

Email: dataprivacy@hedgepointglobal.com