



PRIVACY NOTICE

At Hedgepoint we are guided by the importance of the trust guiding and transparency principles. For this reason, this Privacy Notice ("Notice") is intended to explain to you, in a clear and didactic manner, how we collect and treats your Personal Data.

1. DEFINITIONS

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

Anonymization: Personal Data derived from a Data Subject that, by technical and available means, make it impossible the identification of this Data Subject.

Consent: free, informed and unequivocal expression of the Data Subject or his/her legal guardian that he/she agrees with the treatment of his/her Personal Data for a specific purpose.

Personal Data: information that allows direct and indirect identification of the Data Subject.

Hedgepoint Group/ Hedgepoint / HPGM / Us: means the economic group of hEDGEpoint, composed of the companies described in item 2 below;

System: means any softwares infrastructure used by HPGM.

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

Data Subject: natural person to whom the Personal Data to be treated refers.

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

2. PERSONAL DATA CONTROL

This Notice is intended to explain how the **Hedgepoint Group** or any of its companies uses, shares and discloses your Personal Data. Below are our companies of 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 Code 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 30 Cecil Street, #19-08 Prudential Tower, 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 SERVIÇOS LTDA., headquartered at Av. José de Souza Campos, 507 - 9th floor, Cambuí, Zip Code 13.025-320, Campinas/SP, Brazil;

3. PERSONAL DATA CATEGORY

Currently, we may collect and treat the following Personal Data:

- Full name;
- Proof of Residence (dated up to 3 months);
- Power of attorney (when applicable);
- Professional Resume;
- Position / Area of expertise;
- Telephone / Cell Phone Number;
- Email;
- Personal document (RG, CPF, CNH, Passport, Marriage and/or Divorce Certificate);
- Financial Statements / Balance Sheet;
- Income Tax Returns;
- Bank Information (Bank, Name and Account Number);
- *W-form* (*W-8BEN* for USA non residents and *W9* for US citizens);
- Copies of Different Agreements (when applicable);
- Authorization term for consultations in the SCR (Credit Information System);
- Identification form of agricultural activities performed by the Producer (when applicable).

All Personal Data mentioned above will be collected and treated by Hedgepoint as necessary. In addition, Personal Data considered sensitive by applicable privacy legislation Personal Data is treated only when it is essential and in compliance with such legislation.

4. TREATMENT, PURPOSE AND FOUNDATION

Hedgepoint may treat Data Subject's Personal Data for these purposes:

Purpose	Legal Basis
Registration of potential customers in the HPGM registration tools.	We treat Personal Data based in our legitimate interest to promote our activities.
Registration and updating customer registration in HPGM registration tools.	We treat your Personal Data to carry out preliminary contractual procedures or the performance of a contract with you.
Contact with you by means of the HPGM sales team, including activities prospects such as the agenda of calls and meetings.	We treat your Personal Data to carry out preliminary contractual procedures or the performance of a contract with you.



Sending "email marketing" in the format of, including, but not limited to, newsletter and materials provided by HPGM's market intelligence team.	We treat your Personal Data based in your Consent. You may revoke your Consent at any time by contacting dataprivacy@hedgepointglobal.com. In the event in which you revoke your Consent, you will no longer receive any contact from HPGM. You understand that the revocation of your Consent does not affect the lawfulness of the treatment that we carried out with your Personal Data prior to the revocation of your Consent.
Submission of surveys, including, but not limited to, satisfaction and opinion surveys about the services provided by HPGM	We treat your Personal Data based in your Consent. You may revoke your Consent at any time by contacting dataprivacy@hedgepointglobal.com. In the event in which you revoke your Consent, you will no longer receive any contact from HPGM. You understand that the revocation of your Consent does not affect the lawfulness of the treatment that we carried out with your Personal Data prior to the revocation of your Consent.
Risk assessment of customers/suppliers and potential customers/suppliers (<i>Know Your Supplier – KYS/Know Your Customer – KYC</i>)	We treat your Personal Data in compliance with the regulatory obligation imposed by Circular No. 3,978/2020 of the Central Bank of Brazil and based on our legitimate interest in protecting our business.
Credit assessment of customers and potential customers with or without credit offer	We treat your Personal Data to carry out preliminary contractual procedures or the performance of a contract with you.
Investigations and measures to prevent and combat unlawful acts, fraud, crimes and guarantee our safety and that of our Clients	We treat and monitor your Personal Data based on our legitimate interest in fighting illegal acts and to ensure that all applicable laws are followed.
Defense in judicial and/or administrative proceedings	We treat your Personal Data to exercise rights, protect HPGM's intellectual property, and/or defend HPGM in lawsuits and/or legal proceedings.
Personal Data sharing with government and/or regulatory authorities (when necessary)	We treat your Personal Data to fulfill requests for government and/or regulatory authorities.
Contracts Management and Services Provision	We treat Personal Data aiming our legitimate interest to promote our activities.



Sharing Personal Data with credit bureaus and collection agencies, in case of non-payment of amounts owed to HPGM	We treat Personal Data based in our legitimate interest to implement all available remedies for credit recovery.
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Hedgepoint also can receive Third Parties Personal Data, such as information on criminal and credits checks permitted by law.

If you are located in Brazil, HPGM will register your Personal Data and information related to occurrences, attempts and/or evidence of fraud, with the purpose of preventing fraud and ensuring the security of operations, and HPGM 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 Brazilian National Financial System and regulatory bodies, in compliance with applicable laws and regulatory standards.

5. STORAGE TREATMENT DURATION

Hedgepoint treats your Personal Data during the period in which we do business with you or longer, for the regular exercise of HPGM's rights or to comply with legal or regulatory obligations.

Where applicable, and even after Hedgepoint has completed the Contract, we may store your Personal Data for an additional period for audit purposes, compliance with legal and/or regulatory obligations, to the rights regular exercise of HPGM or also by the term necessary according to the legal basis that justify the Personal Data retention, 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 by our partner HubSpot in the United States of America. You can consult more about the storage by clicking [here](#).

You can inquire about the duration of Personal Data treatment by submitting a request to dataprivacy@hedgepointglobal.com.

6. PERSONAL DATA SHARING

We may share your Personal Data with Third Parties or regulatory bodies only to the extent necessary to fulfill the purposes listed above. We may also share your Personal Data with the technical support of partner platform features and for the inappropriate use safety and prevention of the registration tools.

In addition, any Personal Data treated by Third Parties must be treated in accordance with this Notice and applicable data privacy legislation.

In the case of contracting exchange operations, through exchange correspondent services, your Personal Data will be shared with Bexs Banco de Câmbio S/A (CNPJ 13.053.145/0001-00). For more information on how Bexs Banco de Câmbio S/A treats your Personal Data, visit: <https://www.bexs.com.br/wp-content/themes/bexs-theme/assets/arquivos/politica-de-privacidade-grupo-bexs.pdf>.

We also will disclose your Personal Data when required by law or at any court.



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

We may also share your Personal Data if you ask us to do so.

Whenever it is done, the Personal Data sharing will be carried out in accordance with what is authorized by the applicable legislation and within the limits and purposes of our business.

7. INTERNATIONAL TRANSFER

As HPGM operates in the entire world, 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. Thus, HPGM complies with all the requirements required by the applicable Personal Data privacy legislation and adopts the best security and privacy practices to ensure your Personal Data's integrity and confidentiality.

We will also share your Personal Data when required by law or in any court at home or abroad.

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

8. SECURITY

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

However, as we consider that care is little, 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 websites, that you never share your password with anyone, and that you always take care when posting your Data on social networks or any other public environment.

We are entitled to assume that anyone who accesses our Systems using a password or contact assigned to you is entitled to do so. You will be solely responsible for the activities of anyone who accesses our Systems or communicates with us using a password or contact form assigned to you, even if that person does not, in fact, have your authorization.

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

9. YOUR PERSONAL DATA PROTECTION RIGHTS

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



- Your right to confirm that your Personal Data is being treated.
- Your right to request copies of your Personal Data from us.
- Your right to rectify, update or complete your Personal Data: you have the right to ask us to rectify inaccurate Personal Data and also to request that we complete incomplete Data.
- Your right to ask us to erase or anonymize your Personal Data in certain circumstances.
- Your right to ask us to restrict or stop treating your Personal Data in certain circumstances, in particular with respect to your Personal Data considered sensitive, by applicable Personal Data privacy legislation.
- Your right to revoke your Consent and its consequences.
- Your right to know with which public or private entities your Personal Data has been shared.
- Your right to know if your Personal Data is being sold or shared with someone and not to consent to its sale or sharing (in certain circumstances, in the case of the latter).
- Your right to request that we transfer the Personal Data you have provided to us to another organization, or to you in certain circumstances.
- Your right not to receive discriminatory treatment from HPGM.
- Your right to be subject or not to a decision based solely on automated treatment, including profiling (if any).
- Your right to complain to the supervisory authority.
- Your right to the portability of Personal Data.
- Your right to be notified about any intrusions to your Personal Data that may jeopardize your personal rights and freedoms.
- Your right to be notified in the event of deletion or restriction in the treatment of your Personal Data.
- Your right to have an effective judicial remedy against decisions of the supervisory authority.
- Your right to have an effective legal remedy against your Personal Data Controller when the he/she is not complying with the privacy rules.

You are not bound to pay any fee by exercising your rights. You can exercise your rights at any time by sending a request to dataprivacy@hedgepointglobal.com.

10. CHANGES IN PRIVACY NOTICE

We reserve the right to make changes to this Notice at any time and without notice by posting the revised version on our website. This changes shall be effective on the date the updated version is published. For this reason, it is important to read again this Notice regularly.

11. CONSENT

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

12. CONTACT

HPGM has a specific professional responsible by the diligent Personal Data treatment, our DPO (Data Protection Officer).



We are at your disposal to resolve any questions, suggestions or requests related to this Notice or to your Personal Data protection and treatment.

You can contact us through the [Privacy Communication Channel](#) or by contacting our DPO at the email address below:

Name: Dalila Antunes

Email: dataprivacy@hedgepointglobal.com