

## **PRIVACY NOTICE - CANDIDATES**

At hEDGEpoint we are guided by the importance of the trust guiding and transparency principles. For this reason, candidate, this Privacy Notice ("Notice") is intended to explain to you, in a clear and didactic manner, how we treat your personal data when you participate in our selection process, according to the applicable Personal Data privacy legislation.

#### 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.

**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;

**E 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, during the phases of our selection process, we treat the following Personal Data:

- Full name;
- Date of Birth:
- Updated address of the last 3 months and their receipts;
- Nationality and Place of Birth
- Professional Resume:
- Mother's full name;
- If you have a disability and specification;
- Telephone / Cell Phone Number;
- Email:
- Number of RG, CNH and CPF;
- Schooling (completion Degree, course and educational institution);

All Personal Data mentioned above will be 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 treats Data Subject's Personal Data for these purposes:

Purpose	Legal Basis
Candidate registration in the HPGM database	We treat Personal Data based in our legitimate interest in the recruitment and selection of the Candidate. We treat the Personal Data of people with under 18 years of age based on no specific consent and highlighting given by less than two countries or by legal representative. In this sense, the Personal Data treatment of minors under 18 years of age will be carried out in their best interest.
Candidate assessment in the selective process	We treat your Personal Data based on our legitimate interest in following up on Candidates' assessments in the selection process.
Presentation of tests and surveys, including, but not limited to, technical	We treat your Personal Data based in your Consent.



and behavioral tests, as well as satisfaction surveys regarding the HPGM selection process.	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 carried out with your Personal Data prior to the revocation of your Consent.  We also note that HPGM may apply tests to the candidates through third-party tools that have their own privacy notices.
Candidate Risk Assessment	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 carrying out background checks in order to assess whether there are risks to our business  As part of the risk assessment procedure, we may use the information received to query Serasa, SPC, Boards of Trade or any other public or private database for the purpose of conducting a risk assessment.
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.

hEDGEpoint can also receive Third Parties Personal Data, such as professional background and references, previous experience and information on criminal checks permitted by law.

### 5. STORAGE TREATMENT DURATION

hEDGEpoint treats your Personal Data for the duration of the selection process or longer.

Where applicable, and even after hEDGEpoint has completed the screening process, 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.

You can inquire about the duration of Personal Data treatment by submitting a request to <a href="mailto:dataprivacy@hedgepointglobal.com">dataprivacy@hedgepointglobal.com</a>.

#### 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 during the selection process stages.

In addition, we will disclose your Personal Data when required by law or by 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 provided by the Candidates, 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 Personal Data privacy 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 <a href="mailto:dataprivacy@hedgepointglobal.com">dataprivacy@hedgepointglobal.com</a>.

#### 8. YOUR PERSONAL DATA PROTECTION RIGHTS

Subject to applicable Personal Data privacy laws in the countries in which we operate, you may have rights related to your Personal Data, 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 Personal 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 <a href="mailto:dataprivacy@hedgepointglobal.com">dataprivacy@hedgepointglobal.com</a>.

### 9. SECURITY

We treat your Personal 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 Personal Data. It is important to highlight that we request only the Personal Data of the candidates by means of hEDGEpoint official emails.

However, we recommend that candidates take precautions in order to protect their Personal 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 Personal Data on social networks or any other public environment. If you have any questions or suspect fraud about the message received, please contact us via the following email: <a href="mailto:dataprivacy@hedgepointglobal.com">dataprivacy@hedgepointglobal.com</a>.

#### 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 participating in our selection process, you confirm that you are aware of and agree with all the terms stipulated in this instrument.

## 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. For this, we provide below the contact of our DPO:

Name: Franklin Cavalcante

Email: dataprivacy@hedgepointglobal.com