



PRIVACY NOTICE

At Hedgepoint, guided by the principles of security and transparency, we are committed to protecting the privacy and the data we control or operate. For this reason, we have prepared this Privacy Notice (“Notice”) to clearly, precisely, and comprehensibly explain how we collect and process your Personal Data.

1. DEFINITIONS

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

Anonymization: Technical means that, when applied, prevent the identification of the data subject.

Consent: The free, informed, and unambiguous expression of will by the Data Subject or their legal guardian agreeing 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 / Us: Refers to the economic group of Hedgepoint, consisting of the companies described in item 2 below.

System: Any software infrastructure used by HPGM.

Third Parties: Partners, suppliers of goods and/or services essential to Hedgepoint's activities, as well as government and/or regulatory authorities.

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

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

2. PERSONAL DATA CONTROL

This Notice explains how the Hedgepoint Group or any of its companies use, share, and disclose your Personal Data. Below are the companies of our economic group:

HEDGEPOINT COMMODITIES LLC – 311S, Wacker Drive, Suite 550, Chicago, IL, USA.

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

HEDGEPOINT GLOBAL MARKETS LLC – 251 Little Falls Drive, Wilmington/DE, USA.



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

HEDGEPOINT GLOBAL MARKETS S.A. – Yaguarón, 1407, Office 1506, Montevideo, Uruguay.

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

HEDGEPOINT GLOBAL MARKETS LIMITED – Gate District Gate Building, 15th floor, Unit GD-GB-00-15-BC-19-B, P.O. Box 506908, Dubai, UAE.

HEDGEPOINT SERVIÇOS LTDA. – 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 its economic group collect, process, and share your data.

3. PERSONAL DATA CATEGORIES

Hedgepoint handles personal data in several ways, such as Collection, Storage, Sharing, Use, Modification, Deletion, and Disposal. It is important for you to know that:

- a. The data collected during your consultation is stored and processed in the cloud and subsequently transferred to our systems.
- b. Currently, we may collect and process the following Personal Data:
 - Full name;
 - Proof of Residence (dated within the last 3 months);
 - Power of Attorney (when applicable);
 - Professional Résumé;
 - Job Title / Area of Work;
 - Phone / Mobile Number;
 - Email;
 - Personal Identification Document (ID, CPF, Driver's License, Passport, Marriage and/or Divorce Certificate);
 - Financial Statements / Balance Sheet;
 - Income Tax Returns;
 - Banking Information (Bank, Account Name, and Number);
 - W-form (W-8BEN for non-U.S. residents and W9 for U.S. citizens);
 - Copies of various Contracts (if applicable);
 - Authorization form for credit checks in the SCR (Credit Information System);
 - Identification form for agricultural activities carried out by the Producer (if applicable).



All the Personal Data mentioned above 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 under the applicable personal data privacy legislation is processed only when essential and in compliance with such legislation.

4. PROCESSING, PURPOSE, AND LEGAL BASIS

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

- Registration of potential clients;
- Registration and updating of client records;
- Contacting you by the HPGM sales team, including prospecting activities such as scheduling calls and meetings;
- Sending marketing emails, including but not limited to newsletters and materials provided by HPGM's market intelligence team;
- Organization, promotion, and management of events (in-person or virtual), including sending invitations, RSVPs, informational communications, collecting feedback, and sending post-event materials. Processing will be based on the company's legitimate interest in cases of prior relationships, or on consent when necessary;
- Sending surveys, including but not limited to satisfaction and opinion surveys regarding 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 the offer of credit;
- Investigations and preventive measures against unlawful acts, fraud, crimes, and ensuring our security and that of our Clients;
- Legal 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 the event of non-payment of amounts owed to HPGM.

The data collected is processed only for the time necessary to fulfill the purpose determined at the time of collection, primarily to comply with legal or regulatory requirements relevant to the business and in accordance with the laws of each country where Hedgepoint operates as a Data Controller or Processor. 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.



Personal data is processed to offer services that are of interest to the data subject. To achieve this, it may be necessary to cross-reference collected data so that actions are aligned with what the data subject expects to receive from Hedgepoint, according to the service agreement.

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

If you are located in Brazil, HPGM will register your Personal Data and information related to fraud incidents, attempts, and/or indications, for the purpose of fraud prevention and ensuring the security of operations. This data may be shared within 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 laws and regulatory standards.

5. DURATION OF PROCESSING AND STORAGE

Hedgepoint processes your Personal Data in accordance with the principles of purpose and necessity, meaning 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 auditing purposes, compliance with legal and/or regulatory obligations, for the regular exercise of HPGM's rights, for our Legitimate Interest, or for the period necessary according to the legal basis that justifies the retention of the Personal Data, in which case your Personal Data will be stored for at least five (5) years.

As our priority is to provide the highest possible level of 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. PERSONAL DATA SHARING

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, as well as for the security and prevention of misuse of registration tools.

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

In the case of foreign exchange transactions carried out through foreign exchange correspondent 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, please 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, which 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 division being transferred, will be transferred along with that division, and the new controlling party will be permitted to process the Personal Data according to 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 applicable legislation and within the scope 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. To this end, HPGM complies with all requirements established by applicable personal data privacy laws and adopts best practices in security and privacy to ensure the integrity and confidentiality of your Personal Data.

We will also share your Personal Data when required by law or by any court, whether domestic or foreign.

In the case of international data transfers, Hedgepoint uses standard clauses as recommended by regulatory bodies to ensure the proper handling and security of shared and transferred data.

7.1. Method, duration, and specific purpose of international transfer

In the case of international data transfers, Hedgepoint carries them out with the highest technical and administrative rigor, for the period necessary to fulfill the intended purpose at the time of data collection. This is always done in accordance with Brazilian and international laws regarding the retention period of such data, as well as Article 33 of the LGPD, taking into account:

- Whether the destination country offers an adequate level of data protection;



- Whether the company has adopted robust and appropriate contractual mechanisms, such as Standard Contractual Clauses (SCCs) or data transfer agreements;
- Whether consent has been obtained from the data subject when necessary;
- Whether the company uses technical measures such as encryption to protect transferred data;
- Whether approved global corporate rules (Binding Corporate Rules - BCRs) are in place.

7.2. Identification and contact details of the controller

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

7.3. Uso compartilhado de dados pelo controlador e a finalidade

Hedgepoint shares your data internationally with:

- Group companies for compliance with legal obligations and internal policies;
- A cloud data storage partner in the United States;
- 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. SEGURANÇA

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

We ensure that the personal information provided is stored in a controlled, secure environment, protected from unauthorized access, guaranteeing that users' personal information will not be accessed, used, or disclosed without authorization. Users' data is protected from accidental or unlawful situations of destruction, loss, or improper alteration.

Measures, safeguards, and risk mitigation mechanisms adopted:



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

However, as we believe that all caution is important, we recommend that you take precautions to protect your data while using the Internet. We further recommend that you avoid accessing suspicious or unreliable websites, never share your passwords with anyone, and always be careful when posting your data on social media or any other public platform.

We have the right to assume that any person accessing our Systems using a password or contact method assigned to you has the right to do so. You will be solely responsible for the activities of any person accessing our Systems or contacting us using a password or contact method assigned to you, even if that 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 address: dataprivacy@hedgepointglobal.com.

9. YOUR RIGHTS

In accordance with applicable data privacy laws in the countries where we operate, you may have rights including, but not limited to:

- Confirmation, access, and correction of data and the manner in which it is processed, as well as the right to access and correct incomplete, inaccurate, or outdated data being processed by Hedgepoint.
- Anonymization, blocking, or deletion of personal data obtained through Consent for processing, or data that is excessive or unnecessary for the intended purpose.
- Data portability 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 the consequences of refusal, as outlined in **item 11** of this notice.
- The right to file a complaint against the controller with the ANPD through the link: <https://www.gov.br/pt-br/servicos/abrir-requerimento-relacionado-a-lgpd>.
- Upon request, availability to the data subject of the full terms used for international data transfer, while respecting trade and industrial secrets.
- You are not required to pay any fee to exercise your rights.

To exercise your rights as a data subject described above, please use the communication channels mentioned under the title "**12. Contact**" in 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 review this Notice regularly.

11. CONSENT

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

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

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

12. CONTATO

HPGM has a designated professional responsible for the diligent handling of Personal Data — our Data Protection Officer (DPO).

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

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

Name: Franklin Cavalcante (DPO)

E-mail: dataprivacy@hedgepointglobal.com