EXTERNAL PRIVACY NOTICE

BANCO SUMITOMO MITSUI BRASILEIRO, S.A.

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I. Purpose

Banco Sumitomo Mitsui Brasileiro S.A. ("**SMBCB**") is an affiliate of Sumitomo Mitsui Banking Corporation – Japan ("**SMBC**"). SMBCB, together with other worldwide affiliates of SMBC, constitutes the "**SMBC Group**".

SMBCB, together with other American affiliates of SMBC, belongs to the American Division of the SMBC Group, therefore, subject to the same global operating guidelines, as applicable for each jurisdiction, including for privacy matters.

Following the Online Privacy Notice standards of SMBC, available by clicking in **HERE** ("**Notice**"), SMBCB presents this addendum to the Notice (the "**Addendum to the Notice**" or simply, the "**Addendum**") aiming at providing specific clarification on how Personal Information is processed, including its collection, use and protection within SMBCB, as well as what are the rights of data subjects and how they can be exercised within SMBCB's privacy office, according to SMBCB's internal procedures and the Brazilian Federal Law no. 13,709 of August 14th, 2018, as amended (Brazilian Privacy Act – "**LGPD**").

SMBCB reserves the right, at its sole discretion, to modify at any time the provisions contained in this Addendum to the Notice, without prior notice to you.

When you access or interact with SMBCB's website or use its services ("**Services**"), we may store certain information ("**Personal Information**" or "**PI**") about you. Therefore, this Addendum to the Notice applies to "**you**", an individual related to SMBCB, or a client, prospective client, or counterparty; specifically, an employee, consultant, contractor, consumer, client, legal representative, agent, shareholder, investor, or beneficial owner, or if you are a beneficiary of a financial transaction (payment or shares) or contracts, policies or trust, or an ultimate beneficial owner, a company shareholder, or an internet user and all other users and customers of the Services, regardless of the tool of access to the Services, including, but not limited to access by computer, cell phone or tablet.

Some electronic applications or channels of SMBCB may contain specific terms of use and privacy policies, these will complement and/or prevail over the terms of this Addendum, as applicable.

The Terms of Use and Conditions available at: [Sumitomo Mitsui Banking Corporation - Home](#) is linked to this Addendum.

II. Who is SMBCB?

SMBCB, severally or jointly with any other company within SMBC, determines the purposes and means of the processing of your PI, therefore being the controller of your PI, responsible for ensuring security, respect for the purpose and transparency of the processing thereof. If you have any comments, questions, or concerns about any of the information in this Addendum, or any other issues relating to the processing of your PI by SMBCB under this Addendum please contact the SMBCB's privacy office at:

Banco Sumitomo Mitsui Brasileiro S.A.
Address: Av. Paulista nº 37, 11º e 12º floors, São Paulo/SP
Website: https://www.smbcgroup.com.br/

III. Why does SMBCB process your PI?

As permitted by law, Personal Information is processed by SMBCB for different purposes, including, but not limited to the ones listed below:

- **Execution of services and/or contracts**: provision of services by SMBCB, including but not limited to, payment processing, guarantee and/or collateral contracts, service agreements, service order execution, financial and securities transactions, financial contracts, business relationship and customer service.
- **Compliance with legal and/or regulatory determinations:** complying with regulations, instructions and sector norms (i.e. Central Bank of Brazil - BACEN, Securities and Exchange Commission - CVM, National Monetary Council - CMN), conducting compliance procedures such as Know Your Customer ("**KYC**", or partners, employees and service providers), and/or sharing information with regulatory agencies when determined by applicable regulations or the regulatory agencies themselves.

- **Regular exercise of SMBCB rights:** processing is necessary for the establishment, exercise or defense of legal claims or whenever SMBCB is acting in its judicial capacity.

- **Legitimate interests of the SMBCB**: when there is a relevant and appropriate business and/or legal relationship between SMBCB and you, provided that your interests or your fundamental rights and freedoms of are not overriding, taking into consideration your reasonable expectations based on your relationship with SMBCB.

- **Credit protection:** credit protection within Brazilian Financial System, such as assessing and managing credit limits and consulting SMBCB´s client's credit score.

- **In activities aimed at fraud prevention**: conducting internal investigations, such as to validate claims reports on such matter or identification and authentication processes for access SMBCB platforms.

- **Indirect product marketing**: upon specific consent for such purpose.

IV. How is the PI collected?

For the SMBCB to provide its services and offer its products, certain information must be collected. SMBCB processes Personal Information of persons who has or had a relationship with SMBCB, such as customers, attorneys, employees, people related to entities/companies that had or had a relationship with SMBCB, among others.

Only the data strictly necessary for achieving the purposes of the processing of PI will be collected.

- **Personal Information provided directly by SMBCB's customers**: SMBCB will collect all Personal Information entered or actively forwarded by the user when registering on our website through SMBCB's Registration Form when hiring a certain product or service. The PI collected varies according to the type of service contracted or registered in our channels. Examples of information collected are registration data (e.g. full name, "Cadastro de Pessoa Física" – CPF – equivalent to the US Social Security Number, e-mail, address, telephone, marital status); financial information (current account number, agency, income, investments).

- **Personal data provided by third parties**: SMBCB may, in good faith, receive Personal Information. from third parties, partners and service providers in order to be able to provide the services offered, as well as may collect data available from public sources or data manifestly made public by you.

- **Data collected automatically**: SMBCB also collects information automatically, including, but not limited to, access device characteristics, browser, IP address (date and time), IP source, click information, accessed pages.

V. With whom is the PI shared?

It might be necessary to share your PI to achieve the purposes of the processing of your PI, and/or when needed to achieve the purposes of your relationship with SMBCB, for instance sharing for the rendering of services and products to you. Other non-exclusive situations, which sharing may occur are listed in the Notice at "To whom do we disclose your PI?"

In case of international transfer of PI, the SMBCB undertakes to adopt PI protection guarantees for such sharing and always respect the purposes set forth in this Addendum and/or in the processing itself, provided that applicable laws are duly observed.

VI. How does SMBCB keep PI safe?

Any PI held by the SMBCB will be stored with the strictest security standards, which includes the adoption of certain security measures: including but not limited to, protection against unauthorized access to our systems.

Although the SMBCB adopts the best efforts to preserve privacy and protect PI no transmission of information is totally secure, and is always susceptible to technical failures, viruses or similar actions. In the remote possibility of occurrence of such episodes, SMBCB will adopt all appropriate measures to remedy the consequences of the event, always ensuring due transparency to you.

More information on how SMBCB protects your PI can be found in SMBCB´s information security policy available at: Sumitomo Mitsui Banking Corporation - About Us (smbcgroup.com.br)

VII. For how long is PI stored?

SMBCB will retain your information in accordance with local regulatory and law requirements, our records retention schedules, and/or other contractual or legal obligations.

SMBCB will retain your PI for the longer of:

a) the period permitted by applicable law or regulation; or

b) such other period necessary for SMBCB to meet the purpose of the processing of your PI; or

c) when you request the deletion, except in the event where your PI needs to be kept by SMBCB in order to comply with a legal or regulatory obligation.

VIII. What are the rights of the Data Subject and how can they be exercised?

SMBCB, in compliance with the applicable laws and regulations, respects and guarantees the rights established by LGPD, among which:

- Confirmation of the existence of processing;

- Access to data;

- Rectification of data;

- Anonymization, blocking or deletion of unnecessary, excessive or processed data in violation of the law;

- Data portability;

- Deletion of data processed with the customer's consent and/or user;

- Obtaining information on the public or private entities with which the SMBCB shares your PI;

- Objection;

- Withdrawal of Consent.

- Your legal rights can be exercised upon a request to SMBCB's privacy office or directly through the following link: Requesting Data Subject Rights (onetrust.com).