PRIVACY POLICY

1. SCOPE

XP Investments UK LLP ("XP", "we" or "us") is responsible for your Personal Data (defined below). Protecting your privacy and the confidentiality of your Personal Data is fundamental to the way we do business.

This privacy policy (the "Privacy Policy") will inform you as to how we look after your Personal Data when you visit the XP website (the "website") and describes the types of Personal Data we collect, how we may use that information and with whom we may share it.

"Personal Data" means any information about a living individual from which that person can be identified. It does not include data where it is no longer possible to identity the person (anonymous data). For the purposes of applicable data protection law, including the General Data Protection Regulation ((EU) 2016/679) (the "Data Protection Laws"), your Personal Data will be controlled by XP.

This Privacy Policy may be updated by us at any time and any changes will be effective once posted on our website. If we make any substantial changes to this Privacy Policy, we may place a notice on the website so that you are aware of any changes to how your Personal Data is collected and used. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

2. THE DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of Personal Data about you which you provide on our website such as your:

- Name;
- email address;
- telephone number and
- certain technical data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

We also collect, use and share anonymised aggregated data such as statistical or demographic data for any purpose. Anonymised aggregated data may be derived from the Personal Data which you provide to us but is not considered to be Personal Data in law as this data does not directly or indirectly reveal your identity. For example, we may anonymise and aggregate [the technical data] we collect to calculate the percentage of users accessing a specific website feature. However, if we combine or connect the aggregated data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

We do not collect any special categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political

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opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW WE USE YOUR PERSONAL DATA AND HOW LONG WE KEEP IT FOR

We will only keep your Personal Data for as long as is necessary to fulfil the purposes we collected it for including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have given us specific and informed consent.

We have set out below a description of all the ways we plan to use your Personal Data that you may provide to us, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

PURPOSE/ACTIVITY	TYPE OF PERSONAL DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
For the purposes of providing, you with newsletters which you have requested to receive. If you have an account with us, you may have chosen to receive our Market Commentary updates. You can unsubscribe from receiving these e-mails at any time by clicking the “unsubscribe” link contained in all our newsletters.	Name; and email address.	Express opt-in Consent.

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PURPOSE/ACTIVITY	TYPE OF PERSONAL DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
For the purposes of contacting you. If you wish to communicate with us by sending an email to xpinvestments@xpi.co.uk, we may ask you for information such as your name and telephone number, so we can respond to your questions and comments.	Name; Telephone Number; and Email address.	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated).
To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and to use data analysis to improve our website, services and marketing. We may use the Personal Data you provide on our website for our internal purposes. For example, administration of the website, market research, data analytics and compliance with our legal obligations, policies and procedures.	Name; and Email address.	(a) Necessary for our legitimate interests to keep our website updated and relevant, to develop our organisation and to inform our marketing strategy). (b) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud). (c) Necessary to comply with a legal obligation.

4. HOW AND WHOM WE SHARE YOUR PERSONAL DATA WITH

We do not sell, rent, trade or otherwise disclose Personal Data you submit through our website, except as described in this Privacy Policy. We share or disclose your Personal Data when necessary to provide services or conduct our business operations as described below. When we share your Personal Data, we do so in accordance with Data Protection Laws. We may also occasionally share non-personal, anonymised, statistical data with third parties. Below are the parties with whom we may share Personal Data and why.

- Within the XP Group: XP Group's businesses are supported by a variety of our teams and functions. We may make Personal Data available to them, if necessary, for the provision of services, account administration, sales and marketing, customer and technical support. All our employees and contractors are required to follow our data privacy and security policies when handling Personal Data.
- Our third-party service providers: We partner with and are supported by service providers some of which are located outside the EEA. We will make Personal Data available to our service providers only when necessary to fulfil the services they provide

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to us, such as software, system and platform support, cloud hosting services. Our third-party service providers are not permitted to share or use the Personal Data we make available to them for any other purpose than to provide services to us.

- Third parties for legal reasons: We will share Personal Data when we believe it is required, such as:
    - To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence.
    - In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); and
    - To protect our rights, users, systems and services.

5. USE OF ARTIFICIAL INTELLIGENCE SOLUTIONS

We may use artificial intelligence ("AI") based solutions and tools to support our business operations, including customer support, data analysis, fraud detection and prevention, security monitoring, operational efficiency, and the development and improvement of our products and services. Any use of AI involving personal data will be carried out in accordance with applicable data protection laws and subject to appropriate technical and organisational measures designed to protect individuals' rights and freedoms.

6.COOKIES

This website automatically receives and stores users' IP addresses, cookie information and statistical information about the users' online experience and the pages they request. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. We may also anonymise and aggregate this data and may use it for statistical and analysis purposes to assess how our website is performing.

By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

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- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website. All cookies will expire after 2 (two) years.

7. LINKS TO OTHER WEBSITES

Occasionally, we may provide links to other websites for your convenience and information. These websites operate independently from our website and are not under our control. These websites may have their own privacy notices or terms of use, which XP strongly suggests you review if you visit any linked website. We are not responsible for the content of these websites, any products or services that may be offered or any other use of the linked website.

8. HOW WE PROTECT PERSONAL DATA

We maintain administrative, technical and physical safeguards for the website that are designed to protect against loss, misuse or unauthorised access, disclosure, alteration or destruction of the Personal Data we collect through our website.

9. INTERNATIONAL TRANSFERS

We may transfer the Personal Data we collect through our website outside of the European Economic Area (EEA) to other countries where we do business, such as the United States and Brazil, which may not have the same data protection laws as the country in which you reside.

Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where applicable, we will transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer Personal Data to them if they are part of the Privacy Shield which requires them to provide similar protection to

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Personal Data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

10. YOUR RIGHTS

Data Protections Laws may give you the right to request certain information from us (and certain other rights as set out in the table below).

Access	The right to be provided with a copy of your Personal Data (the right of access)
Rectification	The right to require us to correct any mistakes in your Personal Data
To be forgotten	The right to require us to delete your Personal Data—in certain situations
Restriction of processing	The right to require us to restrict processing of your Personal Data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: • at any time to your Personal Data being processed for direct marketing (including profiling); • in certain other situations to our continued processing of your Personal Data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

You can request this information by contacting our Privacy Team (click here or visit the website *https://atendimento.xpi.com.br/#formulario > LGPD*) and include your name, country of residence and the specific information requested. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee

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if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. CONTACT US

If you have any questions, complaints or suggestions related to the terms of this Privacy Policy or regarding to the use of your personal data, click here to register your request or visit the website https://atendimento.xpi.com.br/#formulario. Then, in the field "What topic do you want assistance on?" select LGPD and the subject you want to discuss.

Your request should include your name, e-mail and account number. This information is necessary to identify the requester and send the response.

- Data Protection Officer: **Júlia Azevedo Duarte**
- Access: website https://atendimento.xpi.com.br/#formulario

12. COMPLAINTS

We hope that we can resolve any query or concern you may raise about our use of your information. If you are not happy with the way that we have handled your Personal Data or a data subject access request, you also have the right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at *https://ico.org.uk/concerns/*.

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