

Privacy Policy for Clients

Last update on 10/08/2020

Barclays Brasil Assessoria Financeira Ltda. is committed to raising the awareness of its legal representatives, partners or any other data subjects who may come to contact Barclays on behalf of a corporate client ("Data Subject" or "you") in relation to the protection of personal data. For this reason, we present our privacy policy ("Privacy Policy"), with the purpose of providing Data Subjects with clear and accurate information about the collection, use, storage and other types of processing of personal data performed by Barclays in the context of its relation with the corporate client that you are a part of or that you represent.

This document aims at providing, in an objective way, information about the characteristics and scenarios of processing of your personal data.

Personal data processed by Barclays

While permitted by applicable laws, we may collect and process the following types of personal data about you.

- **Registration data.** Barclays may process your registration data to formalize the contract of the corporate client with Barclays, when you are a representative empowered to sign on behalf of the corporate client. In this case, Barclays will process your full name, address, marital status, profession, number of an identification document and nationality.
- **Contact information.** Barclays may process your e-mail address, as well as your phone number to contact you.
- **Additional information.** In addition to the data mentioned above, Barclays may process other data for the purpose of know your client analysis, in accordance with applicable legislation and Barclays internal policies. Thus, Barclays can still process information of your passport, driver's license number, copy of a utility bill and the confirmation if you are a politically exposed person.

Barclays may collect this information directly from you, through profiles publicly available on social networks or through third parties.

With whom do we share your personal data?

Barclays may share your personal data with third parties or business partners. The sharing takes place based on the following criteria and purposes:

- **Technology service providers.** We may share your personal data with service providers hired by Barclays for the purpose of providing software and other information technology services.
- **Consultation platforms.** We may share and receive information from third parties that provide data consultation services for the purpose of know your client analysis. Barclays will only process personal data that are necessary to carry out such an analysis, based on the applicable legislation and its internal policies.
- **Request from competent authority.** Barclays may share your personal data with third parties, including government agencies, for the purpose of responding to investigations, judicial measures and lawsuits, as well as investigating, preventing or adopting measures regarding illegal activities, suspected fraud or situations involving threats in potential to the physical security of any person or if required by law.
- **New business.** If Barclays is involved in a merger, acquisition or sale of all or part of assets, your personal data may be shared with the acquirer. In circumstances where the identity of the controller of your personal data is changed as a result of any transaction, you will be notified of any choices you may have about your personal data.

International transfers of your personal data

Barclays may transfer some of your personal data to service providers located abroad, including cloud service providers. In addition, Barclays will share your information with other companies in its economic group for the purposes of know your client analysis.

When your personal data is transferred outside of Brazil by Barclays, Barclays will take appropriate measures to ensure adequate protection of your personal data in accordance with the requirements of applicable law, including entering into appropriate personal data transfer contracts.

How long will we retain your personal data?

Barclays stores and maintains your information (i) for the time required by law; (ii) until the end of the processing of your personal data, as mentioned below; or (iii) for the time necessary to preserve Barclays' interest or obligations, such as during applicable statutory terms or compliance with legal or regulatory obligations.

The end of the processing of personal data will occur when any of the following situations is verified:

- The purpose for which the data was collected has been achieved.
- The personal data collected is no longer necessary or relevant to achieve the specific purpose sought.
- Manifestation of the Data Subject for cases in which Barclays received consent for certain processing of personal data.
- Legal or regulatory determination.

In cases of termination of the data processing (indicated above), except for the cases established by applicable law or by this Privacy Policy, personal data will be duly eliminated.

Your rights in relation to the personal data we process about you

You will have certain rights in relation to your personal data, which include, but are not limited to:

- **Confirmation of the existence of data processing.** If the Data Subject is not sure whether Barclays processes his personal data or not, you can request confirmation of the existence of processing, in accordance with the applicable legislation.
- **Access.** The Data Subject has the right to request access to the personal data that was collected and are being processed by Barclays.
- **Correction of incomplete, inaccurate or outdated data.** The Data Subject may, at any time, request the correction of personal data that are incomplete, inaccurate or out of date.
- **Information on shared use of data.** Information on the sharing of personal data can be found in this Privacy Policy. Barclays makes itself available to the Data Subject in the event of further clarification.
- **Automated decision review.** The Data Subject may request the review of decisions taken solely on the basis of automated processing of personal data that affect his interests,

including decisions designed to define his personal, professional, consumer and credit profile or aspects of his personality.

- **Elimination, opposition, anonymization or blocking of personal data.** In cases where the Data Subject does not agree with the processing and understands that Barclays may be processing some data that is not necessary or that otherwise does not meet the requirements of the applicable legislation, the Data Subject will have the right to object to the processing or to request the anonymization, deletion or blocking of his personal data, unless Barclays can demonstrate legitimate reasons for the processing. The Data Subject may also request the elimination of personal data that has been collected by Barclays with the consent of the Data Subject, at any time, through free and facilitated manifestation. The elimination of personal data can only be complete for personal data that are not necessary for Barclays to comply with legal, contractual obligations, to protect its legitimate interest and in the other legally admitted cases.
- **Consent withdrawal.** The Data Subject may revoke the consent that he has given Barclays to process his personal data for certain purposes, at any time, by means of a free and facilitated statement. It is important to inform that the processing carried out prior to the withdrawal of the consent are ratified and that such request will not imply the elimination of the personal data previously processed and that are maintained by Barclays based on other legal grounds.

In case of doubts regarding this Policy or to exercise these rights, please contact Barclays via the following email brazildp@barclays.com.

Protection of personal data

Barclays uses appropriate organizational technical measures to protect your personal data against unauthorized or illegal processing, as well as against accidental loss, destruction or damage. Your personal data is stored securely on protected equipment, with a limited number of people having access to the equipment and only individuals with legitimate reasons will have access to your personal data.

Changes to this Privacy Policy

Barclays reserves the right to change this Privacy Policy at any time. In the event of material changes to the Privacy Policy, the Data Subject will be duly notified.

Identification of Controller and Data Protection Officer

Barclays Brasil Assessoria Financeira Ltda. is the controller of your personal data. You will be able to contact the Data Protection Officer by the email brazildp@barclays.com.