



Confidence
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Corporate Privacy and General Data Protection Policy

Executive Summary

Support the governance of the privacy and data protection program by establishing data protection requirements that must be applied across the Travelex Confidence Group to comply with applicable laws and regulations, and related global guidelines.



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1. INTRODUCTION

13,709, of August 14, 2018 (General Data Protection Law - LGPD), is a set of rules that protects and enables individual rights to privacy and protection of personal data (Data). The law establishes privacy rules on how personal data can be used by third parties, respecting the individual choices of the holder (owner) of this data.

In order to carry out its activities, the Travelex Confidence Group collects, stores and processes Data from employees, job applicants, contract employees, consultants, customers and suppliers, and will always treat this Data properly, in accordance with the LGPD. and this policy.

All actions/practices/assumptions established in this Policy will be in force for companies of the Travelex Confidence Group along with the start of the term of the LGPD.

2. PURPOSE

Support the governance of the privacy and data protection program by establishing data protection requirements that must be applied across the Travelex Confidence Group in order to comply with applicable laws and regulations, and related global guidelines.

This Policy should be read in conjunction with the relevant standards that are referenced in this document.

3. SCOPE AND APPLICABILITY

This Policy is applicable to all areas (whether business or administrative) that process, handle and/or handle personal information on behalf of Travelex Confidence Group companies.

For the application of this Policy, consideration must be given to the processing of personal data, as well as data that in any way are intended to form part of a filing system (for example, online and offline records, carried out in any electronic format or digital, which extends to data "cloud" storage and backup solutions).

4. CONCEPTS

- a) Concepts such as "Personal Data; Treatment; Holder; Data Controller; Data Handler; Data Processing Agreement; Sensitive Personal Data; Data Officer (also called DPO (Data Protection Officer))" are used as defined in the LGPD.
- b) Travelex Confidence Group: means any legal entity or subsidiary within the Travelex Group in Brazil and its employees, and contracted third parties authorized to act on its behalf.

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5. PRINCIPLES

5.1. Data Protection

In order to comply with the LGPD and data protection, the Travelex Confidence Group has adopted the following legal principles, which will be respected in all acts relating to the processing of personal data.

5.2. Legality, Justice and Transparency

Personal data are treated in a legal, fair and transparent manner.

The Travelex Confidence Group will only process Personal Data for which it has a legal basis, as defined in the LGPD.

Consents for the use of data will always be obtained in a recordable form and filed by the Travelex Confidence Group.

5.3. Limitation of purpose and minimization of data

The Travelex Confidence Group will process personal data for specific purposes identified and which have been expressly informed to the holder. The data will not be used for purposes other than those informed to the individual, without notification regarding legal grounds or without the express consent of the holder.

5.4. The accuracy and maintenance of records

Strictly necessary personal data is processed, without processing other unnecessary data. They will be updated as necessary, and in the event of inaccurate processing, reasonable steps will be taken to ensure that they are deleted or corrected without delay, taking into account the purposes for which they are processed.

The accuracy of personal data will be verified at the time of collection and kept up to date until the end of data processing.

Employees of the Travelex Confidence Group are instructed to correct in the relevant system of records/files and inform the data protection officer (DPO), whenever they find that personal data processed is inaccurate. In the event of a request for rectification of a record, formalization that the record has been altered will take place within 15 (fifteen) days.

5.5. Storage Limitation

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Personal data should only be retained for as long as necessary to fulfill the original purpose for which it was collected. The Document Retention Policy defines how long information containing personal data will be stored and the criteria used to determine the period.

Upon expiration of the retention period, unless there is a new supervening reason for retaining them beyond the standard period, records containing personal data will be securely deleted and may also be anonymized as set out in the LGPD.

5.6. Da integridade e confidencialidade

The Travelex Confidence Group uses appropriate technical and/or organizational measures to ensure the security of personal data, including its protection against unauthorized or illegal treatment and against accidental loss, destruction or damage.

Consideration is given to the circumstances behind the processing, the technology available, the cost of implementing protective measures, and the size of the risk posed to individuals in the treatment.

For Travelex Confidence Group employees, this principle refers to:

- a) Only access personal data that you have permission and exclusively for authorized purposes - in case of doubt, contact the DPO;
- b) Do not allow any other person, including other Group employees, to access personal data, unless you have verified that they have the appropriate permissions;
- c) Keep personal data secure (eg, by complying with rules on access to facilities, computers, password protection, encryption and secure file storage and destruction, and other precautions set out in the Travelex Confidence Group Cyber Security Policy);
- d) Not to remove personal data (including personal data in hard copy files) or devices that contain personal data (or that can be used to access it) from Travelex Confidence Group premises unless appropriate security measures are in place (such as pseudonymization, encryption, or password protection) to protect your information and device;
- e) Do not store personal data on local units or on personal devices used for work purposes, without prior authorization from your superior.

6. CORPORATE GUIDELINES

6.1. Sensitive personal data

If the Travelex Confidence Group needs to process sensitive personal data, the special conditions that underlie the treatment will be verified, as defined in the LGPD.

6.2. Sharing personal data (in or outside brazil)

Personal Data may be shared with third parties only after appropriate safeguards and contractual arrangements are in place.

- a) Transfer of Personal Data to Third Parties

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The Travelex Confidence Group shares some of your personal data with certain types of recipients who will process your personal data on our behalf, for example, cloud service providers, which would include Amazon Web Services Inc., telecommunications services, payment gateways and security service providers.

We disclose your personal data to fraud prevention agencies, such as ThetaRay Ltd, in the provision of certain services. These agencies keep a record of our enquiries and record, use and pass on the information we provide to them to make assessments and help make decisions about you to prevent fraud and money laundering.

We share information about you with law enforcement or other government officials if we are required to do so by law or legal process, or when we believe that disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity, such as financial crime.

We share your information with third parties when:

- a) you have given us your prior consent to do so;
- b) we are processing your information through a trusted business partner who is acting on the explicit instructions of the Travelex Confidence Group and in accordance with this Policy, confidentiality and security levels.

Our business partners include:

- a) payment gateways and payment service providers.
- b) international money transfer service providers.
- c) identity verification providers and credit reference agencies.
- d) anti-fraud, anti-corruption and anti-money laundering check providers.
- e) cloud service and online security providers.
- f) third-party service providers to the Travelex Confidence Group.
- g) telecommunications, chat and network service providers.
- h) marketing communications providers.
- i) online advertisers and targeted advertising providers.
- j) social networks.

Prior to sharing, the Third Party will be assessed by the Travelex Confidence Group regarding its compliance with the obligations established in the LGPD, the Group's policies on data



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privacy, and a "Data Processing Agreement" will be signed between the parties, which will establish the conditions between the Data Controller and the Data Processor regarding the processing of data, including the description of the processing performed.

In the event that the Travelex Confidence Group is acquired by a third party or enters into any type of merger or other acquisition, your information, when necessary, will be shared with the relevant party."

The Travelex Confidence Group does not share information for marketing purposes and does not sell your information.

6.3. Direct marketing

The Travelex Confidence Group follows strict data protection requirements regarding direct marketing to its customers.

Holders have the right to object to receiving direct marketing at any time. Whenever the request is received, the Travelex Confidence Group must include the holder in a list of individuals who have opted out of receiving direct marketing, ensuring that no further communication with this object will be sent to them.

The Travelex Confidence Group has relationships with online advertisers and social media networks (our marketing partners). These partners use cookies and similar technologies for marketing purposes and may serve targeted advertising about the Travelex Confidence Group while on a third-party website, at the Group's request and only with the consent of the website visitor. You can choose to "opt out" of third-party cookies that enable this type of marketing at any time by visiting our cookie preferences center.

6.4. Rights of holders

The Travelex Confidence Group is prepared to meet the demands of Owners regarding the use of their data. If necessary, contact us as instructed in item 10.

Travelex Confidence Group employees aware of requests from Holders regarding their personal data, must address the requests to the DPO and return to the requesting Holder within 15 days.

6.5. Safety

The Travelex Confidence Group has security measures in place to protect information provided through its websites from unauthorized disclosure, use, alteration or destruction. However, it clarifies that no transmission over the Internet can be guaranteed to be secure. Therefore, despite efforts to protect information, there is no way to guarantee the security of all information transferred over the Internet.

As part of the use of Travelex Confidence Group websites, the Holder is asked to configure the username and password. The holder is responsible for maintaining the confidentiality of his username and password and is responsible for all activities carried out when registered using his name and password.

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7. SPECIFIC CONSIDERATIONS - CUSTOMER DATA

The Travelex Confidence Group collects personal data for the provision of Group services or through interacting with our websites, participating in our surveys or promotions. The information collected is information provided by customers, information collected automatically, or information that we receive from third parties.

Personal data is collected in the following ways:

7.1. Information provided by customers

Customers provide information when purchasing or using the services of the Travelex Confidence Group, when communicating with the Group (whether in writing, over the phone or in any other way), or when participating in any of the promotions or surveys.

In cases where the Travelex Confidence Group requests information, it will be collected in the forms or pages of the websites, including when the customer registers an account with the Group:

- a) By signing up to receive the Travelex Confidence Group newsletter, your name, email address and information indicating how you heard about the Group will be collected. You may also be asked for information about your marketing preferences;
- b) When purchasing any service from the Travelex Confidence Group, the information necessary to complete the contracted transaction will be collected. This information may include your name, date of birth, home address, billing address, office address, email address, the form(s) of identification and the information contained in those forms of identification, telephone number cell phone, landline number, credit or debit card information, other payment details such as your bank information, as required by us to complete your transaction and provide you with your payment options and travel details (including future travel dates and destinations).

7.2. Information collected automatically

The Travelex Confidence Group also collects certain information through automated means, such as cookies and web beacons, whenever you visit the Group's websites or use the Group's services. Note: More information can be found in the cookies section.

Details of visits to online services are collected. This includes on-page interaction and website activity of online services, including the website from which the access was originated, the pages viewed during the visit, and the page viewed immediately after leaving.

When you download the mobile application or access the services from a handheld device, personal information such as your name, email address, username, password, system and mobile device information (e.g. android) may be collected. or IOS) and your geographic location. Depending on your marketing and cookie preferences and your geographic location

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settings, the application's targeted marketing and advertising messages may be displayed. Information about your use of the application may also be collected for the purpose of improving the performance of the application and digital online services.

The information collected automatically is used to:

- a) Administer the sites for internal operations, including troubleshooting;
- b) Ensuring that the content of our websites is presented in the most effective way for the user and their devices;
- c) As part of efforts to keep websites safe and secure;
- d) Measure or understand the effectiveness of the advertising we serve to users and to deliver relevant advertising;
- e) Make suggestions and recommendations to the user about products or services that may be of interest to them;
- f) Prevention and detection of crimes and public safety, through the collection of CCTV images of customers, when they visit the facilities of the Travelex Confidence Group.

7.3. Information received from third parties

The Travelex Confidence Group receives information from third parties (including publicly available information). This information includes:

- a) Non-personal information used to supplement existing information, such as demographics and affluence metrics (e.g. socio-demographic groupings via corresponding zip code information);
- b) Information about the Owner from other Travelex Confidence Group companies and other sources with whom the Group works to provide the Services (including Group partners, third-party payment and delivery service providers, advertising networks, analytics and service providers verification), credit reference agencies, fraud prevention services, and social media platforms).

8. STRUCTURE AND MANAGEMENT PROCESS

8.1. How information collected from clients is used

Information is used in a variety of ways. To provide the requested services, to keep the holders informed and to improve their experience with the quality of the services.

a) To provide a requested service or enter into a contract with the holder:

Process and fulfill orders and otherwise provide the requested Travelex Confidence Group information and services;

Fulfill any contract entered into between the holder and the Travelex Confidence Group for the provision of services;

Provide you with alerts, in-app messages or other messages and newsletters you have registered to receive;

Provide service messages, including messages to notify you of changes to the Travelex Confidence Group services or changes to our terms, conditions and policies.

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b) For situations where there is the consent of the holder

Referring to situations not directly related to the performance of the contracted services. How to contact the holder for marketing and research matters; verify geographic location to provide location-based services; allow Travelex Confidence Group and third party websites to display relevant and targeted advertisements.

c) For situations where there is a legitimate interest

Improve the customer experience and the quality of services offered by the Travelex Confidence Group. This may include tracking emails to find out when they are opened and read and the type of device from which emails are accessed;

Data analysis and research to enable insights to be gained to help make the Travelex Confidence Group's services personalized and relevant, as well as to develop the Group's business processes and services. By doing so, the data is anonymized so that we can continue to use it for analysis and research after the period in which it was used to process the services.

8.2. Specific considerations - employee data

The Travelex Confidence Group collects specific (but not exclusive) personal data relating to employees, apprentices, contractors, consultants and job seekers (all hereinafter referred to solely as "employees"), and only Personal data necessary for the operation of the company is requested. No other personal information is collected.

In relation to special categories of personal data, the Travelex Confidence Group adheres to the standards set out below (except where the law allows otherwise):

- a) During the pre-selection, interview and decision-making stages, questions will be asked related to sensitive data (eg, race or ethnic origin, union membership, health, disabilities), where there is a legal requirement for such data are reported to government agencies.
- b) Special categories of personal data will be processed only for the purposes of administering sick pay, maintaining sick-absence records, ensuring health and safety in the workplace, assessing fitness for work, monitoring assistance and facilitating work-related health and illness benefits, opportunities for monitoring and payment of equality reports, where we need to comply with legal obligations or exercise rights in relation to employment, where necessary in connection with legal claims.

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8.2.1. Access and retention of Personal Data

Employees have the right to ask Travelex Confidence Group access to information held about them. The retention time for employee information is defined in the Document Retention Standard.

The Travelex Confidence Group must ensure that employees' personal information is protected in a manner appropriate to its sensitivity and value. This must be done in accordance with the requirements set out in the Corporate Cybersecurity Policy on access, monitoring, transfer, storage, and backup.

8.2.2. Accuracy of employee personal information

For the purpose of keeping employee information up to date, each employee is encouraged to update their personal profile and other personal information maintained in the Travelex Confidence Group's systems whenever their personal circumstances change. The Group must ensure that any notification received from a person that their personal information is inaccurate or out of date is promptly responded to.

8.2.3. Transfer to Third Parties

Employees' personal information may be shared with third parties such as payroll providers, pension administrators and healthcare companies.

8.2.4. The following information about employees is collected:

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WHY WE COLLECT / PROCESS	WHAT WE COLLECT / PROCESS	HOW WE COLLECT
<p>to make a decision about:</p> <ul style="list-style-type: none"> • Recruitment and selection • Remuneration • benefits • Training and development • Performance Management • Internal and External Communication. 	<p>CV information, personal documents, proof of residency, contact numbers, dependent documents, work visas, credit checks, education/education related certifications and references cover letter, ethnicity statement, medical and health reports, statement of kinship, authorization for the use of image and voice.</p>	<p>Directly with the employee;</p> <p>From suppliers (recruitment systems and agencies and Educational Institutions);</p> <p>From historical providers (credit bureau, assessment/assessment systems providers, etc.);</p> <p>From the direct superior;</p> <p>From the Human Resources department;</p> <p>From colleagues.</p>

9. RESPONSIBILITIES

All employees who handle and/or process personal information on behalf of Travelex Confidence Group companies, for any purpose, must comply with the requirements of this Policy.

Employees responsible for managing the Policy, ensuring and monitoring its application, are expected to have adequate training/qualification, whenever necessary.

Violation of this Policy may result in disciplinary action, which may lead to termination.

DPO - DATA PRIVACY OFFICER (DATA OFFICER)

In charge of taking care of matters relating to the protection of the organization's and its customers' data. It helps the company implement and adapt its processes and structure a compliance program with a focus on greater security of the information under its tutelage.

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Professional appointed by the Travelex Confidence Group to act as a communication channel between the Group, data subjects and the National Data Protection Authority (ANPD); (Wording provided by Law No. 13,853, of 2019)

Support and reference within the privacy program by advising senior leaders and stakeholders on data protection issues related to customers, partners and employees.

DPO - Data Officer must:

- a) To have access to the leaders of the key areas of the company;
- b) Have resources (human and material) to perform their duties;
- c) Have autonomy and authority to carry out their activities without their performance being pressured by financial results or commercial goals.

Any employee who has questions or concerns about data protection compliance, or believes that there has been any data breach or that the security around personal information has been compromised, should contact the Data Protection Officer (DPO) without delay by opening a "Data Security Incidents".

10. THIRD PARTY SERVICES

If you contract with the Travelex Confidence Group for a service from a third-party company, you will be providing your Personal Data directly to the service provider, to be processed as determined by it.

The Travelex Confidence Group will retain and process Personal Data in accordance with the provisions of this policy for the exclusive purposes of controlling contracts sent to partners.

For reference purposes, follow the links to access the Privacy Policies of the main partners of the Travelex Confidence Group:

- a) Mastercard Prepaid Card: <https://www.mastercard.com/news/latin-america/pt-br/noticias/comunicados-de-imprensa/pr-pt/2020/october/mastercard-e-lei-geral-de-protecao-de-dados-no-brasil/>
- b) Visa Prepaid Card: <https://www.visa.com.br/termos-de-uso/politica-de-privacidade.html>
- c) Allianz Insurance: <https://www.allianz.com.br/politicas-do-sistema.html>
- d) Assurant Insurance: <https://www.assurant.com.br/pre-consent-legal-pages/pol%C3%ADtica-de-privacidad>
- e) Shipping by DHL: https://www.dhl.com/content/dam/dhl/global/core/documents/pdf/summary_dpdhl_privacy_policy_pt.pdf



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- f) Moneygram: <https://www.moneygram.com/intl/Documents/Privacy-Notice/Updated-MoneyGram-Global-Consumer-Notice-Privacy-03.12.2021-Portuguese-Portugal.pdf>
- g) Western Union: <https://www.westernunion.com/content/wucom/global/br/privacy-statement.html>
- h) Tickets – RCA: <https://www.ingressosrca.com.br/termo-de-uso-e-politica-de-privacidade/>

11. COMMUNICATION CHANNEL

If you have any questions about this Policy or how the Travelex Confidence Group handles personal data, please contact the Personal Data Protection Officer Matheus Caravina Cabral at protecaodedados@travelexbank.com.br.

12. RELATED DOCUMENTS

- a) Document Retention Standard.
- b) Law No. 13,709, of August 14, 2018 (Brazilian General Data Protection Law – LGPD);
- c) Global Data Protection & Privacy Policy.

13. REVIEW

This policy was reviewed, updated, and approved on Nov 04, 2024. Subsequent reviews and updates should occur annually or in accordance with process reviews or adjustments to comply with legal or regulatory requirements.