

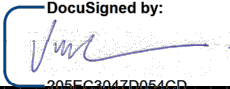


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**INTERNAL POLICY FOR PERSONAL DATA PROTECTION**

**IG4 CAPITAL INVESTIMENTOS LTDA.**

**Approved by:** \_\_\_\_\_

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**Flávia Andraus Troyano**

**Compliance Officer**

## INTRODUCTION

This Internal Policy for Personal Data Protection ("Policy") aims to regulate and provide instructions for the Personal Data Processing activities carried out by/within the IG4 Capital Investimentos Ltda. registered at CNPJ/ME (Brazilian Treasury Department National Register of Legal Entities) under no. 26,264,881/0001-41 ("IG4") and its outsourced companies within the scope of activities on behalf of IG4 in order to ensure their compliance with the provisions of Brazilian Law No. 13,709 of August 14, 2018 ("LGPD" or "Brazilian Government General Data Protection Act").

This Policy must be interpreted and used in conjunction with the Code of Ethics, Conduct, Procedures and Internal Controls (*Compliance*) and with the IG4's Risk Policy, in its latest versions, as well as other information security policies implemented by IG4.

Also considering that the IG4's activities may be subject to the scope of the General Data Protection Regulation of the European Union [*General Data Protection Regulation – Regulation EU 2016/679* ("GDPR")], and notwithstanding the fact that the LGPD is largely inspired by the GDPR, the Personal Data Processing involving Mirabella Advisers LLP, IG4 Capital Advisors LP or otherwise involving Processing activities for the provision of products or services to individuals located in the EU/EEA or monitoring the behavior of individuals located in the EU/EEA shall also comply with the applicable provisions of the Mirabella Advisers LLP's *Compliance Manual* and the a *Data and Cyber Security Policy* developed by IG4 Capital Advisors LP.

In carrying out its activities, IG4 carries out several Personal Data Processing operations, always seeking the best interest of the Personal Data Holders and respecting their rights.

During the performance of Personal Data Processing operations IG4 may be characterized as a Personal Data Controller, Personal Data Operator, Personal Data Controller and Operator or Personal Data Co-Controller in accordance with the LGPD definitions, reinforcing IG4 in all the positions it may occupy and its commitment to complying with the applicable rules of privacy and Personal Data protection.

This Policy is part of the IG4 Data Protection Governance Program currently being implemented.

## **I. DEFINITIONS**

Processing Agent: Controller or Operator of Personal Data.

ANPD (Brazilian Authority Data Protection Agency): is a public administration body responsible for ensuring, implementing and monitoring compliance with the LGPD throughout the Brazilian territory, including by means of the application of administrative sanctions provided for in the LGPD.

Operator: natural or legal persons, under public or private laws, which process Personal Data on behalf of the Controller.

Employees: all those who have a position, function or corporate, employment, commercial, professional, contractual or trust relationship with IG4.

Consent: free, informed and unambiguous statement by which Holders agree with their Personal Data Processing for a specific purpose.

Controller: natural or legal persons, under public or private laws, which are responsible for decisions regarding the Personal Data Processing.

Personal Data: any information relating to an identified or identifiable natural person, including Personal Data of investors and Employees.

Sensitive Personal Data: Personal Data about racial or ethnic origins, religious beliefs, political opinions, membership in a union or organization of religious, philosophical or political natures, data relating to health or sexual life, genetic or biometric data, when linked to a natural person.

Person in charge or Data Protection Officer ("DPO"): An individual or legal entity appointed by the Processing Agent to act as a communication channel between the Processing Agent, the Data Holders and the Brazilian Data Protection Authority.

Supplier: IG4's suppliers and service providers such as securities brokerages.

LGPD: it is the Brazilian law 13,709 of August 14, 2018 also known as the Brazilian Government General Data Protection Act.

Holder: an individual to whom the Personal Data that are being processed refer.

Processing: any operation performed with Personal Data such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, Processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, disclosure or extraction.

## **II. RECIPIENTS**

This Policy applies (i) to IG4's Employees (ii) to all third parties, whether individuals or legal entities acting for or on behalf of IG4 in operations involving Personal Data Processing that are carried out within the scope of activities conducted by IG4, including Suppliers and (iii) to Personal Data Processing Agents outside IG4 that in any way relate to IG4, including Suppliers.

Adherence to the Data Protection Governance Program, including this Policy, is mandatory for all recipients indicated above insofar as they relate to IG4. All operations involving Personal Data Processing subject to the LGPD that are carried out within the scope of activities conducted by IG4 or on its behalf are subject to these provisions.

## **III. PURPOSE**

This Policy establishes guidelines and rules to ensure that its recipients understand and comply with the provisions of the LGPD and its possible regulations as well as decisions by the ANPD during the Personal Data Processing operations under its responsibility and interactions with current and future Personal Data Holders, third parties or other recipients within the scope of its activities regardless of the type of Personal Data or the means used for its registration, transmission or otherwise Processing.

In addition, the Policy provides Personal Data Holders, including Employees, with information about the Processing carried out by IG4 or on its behalf and what the Data Holders' rights are in such a situation.

## **IV. PRINCIPLES**

The Personal Data Processing activities must present good faith and the following principles pursuant to Article 6 of the LGPD:

**Purpose**: to carry out the Processing for legitimate, specific, explicit and informed purposes to the Holder without the possibility of further Processing in a manner that is incompatible with these purposes;



**Adequateness:** compatibility of the Processing with the purposes informed to the Holder, according to the Processing context;

**Necessity:** limitation of the Processing to the minimum necessary for its purposes accomplishment with coverage of the relevant data that is proportional and not excessive in relation to the data Processing purposes;

**Free access:** guaranteeing to Holders free and easy consultation on the form and duration of Processing as well as on their Personal Data integrity;

**Data quality:** guaranteeing the Data Holders the accuracy, clarity, relevance and updating of the Data according to the needs and for the fulfillment of their Processing purposes;

**Transparency:** guaranteeing Holders clear, accurate and easily accessible information about the Processing and the respective Processing Agents, complying with commercial and industrial secrets;

**Security:** the use of technical and administrative measures to protect Personal Data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication or disclosure;

**Prevention:** the adoption of measures to prevent the occurrence of damage due to the Personal Data Processing;

**Nondiscrimination:** the impossibility of carrying out the Processing for illicit or abusive discriminatory purposes;

**Responsibleness and accountability:** the demonstration, by the agent, of the adoption of effective measures capable of proving observance and compliance with the rules of Personal Data Protection and even the effectiveness of these measures.

IG4 undertakes to comply with the above principles and recipients must act in order to assist IG4 in its compliance with such principles. Regarding Suppliers these must commit to implement and maintain in their organizations practices and Policies aimed at complying with the principles of the LGPD and its provisions in general, complying, at least, with the standard implemented by IG4.

## **V. PROCESSED PERSONAL DATA**

IG4 and the other recipients of this Policy undertake to process only Personal Data strictly necessary for their core activities or for conducting their internal activities, including hiring Employees and Suppliers, making investments and running the organization, including to fulfill legal and regulatory obligations and internal rules of *Compliance*.

IG4 may request Personal Data from investors or representatives of investors and investees, including name, age, nationality, address, e-mail address, telephone numbers, CPF (Brazilian Taxpayer Identification Number), personal identification documents, qualifications, professional history, bank details and it may use background check services.

IG4 may also request Personal Data from Suppliers' representatives in order to guarantee their powers of representation of the companies as well as the absence of conflicts or impediments to their hiring including name, nationality, address, e-mail address, telephone numbers, CPF (Brazilian Taxpayer Identification Number), personal identification documents and qualifications and it may use background check services.

For selection and hiring of Employees as well as for the provision of benefits linked to their position with IG4, IG4 may request data including name, age, nationality, address, e-mail address, telephone numbers, personal identification documents, qualifications, professional history, bank details and it may use background check services. It may also be necessary to process data on the Employees' dependents as beneficiaries of certain IG4's policies/benefits including name, CPF (Brazilian Taxpayer Identification Number), personal identification documents, address, telephone numbers, e-mail address and the nature of the relationship with the Employee.

## **VI. LEGAL BASIS FOR PROCESSING**

All Personal Data Processing operations within the scope of IG4's activities must have a legal basis that legitimizes their performance with a stipulation of the purpose and designation of those responsible for the Processing under the terms of Art. 7 and 11 of the LGPD.

IG4 undertakes to periodically evaluate the purposes of its Processing operations considering the context in which these operations are inserted, the risks and benefits that can be generated to the Personal Data Holder and the IG4's legitimate interest.

Among the legal bases used by IG4 are:

- Consent;
- To comply with legal or regulatory obligations;
- Execution of a contract or preliminary procedures related to a contract to which the Personal Data Holder is a party;
- Regular exercise of rights in judicial, administrative or arbitration proceedings;
- When necessary to serve the legitimate interests of IG4 or a third party and
- For the protection of credit.

IG4 shall carry out and require from its Operators records of its Processing operations based on Processing categories, each of which must be described based on its purposes, serving as an aid and support for its periodic assessment of compliance with the regulatory framework for the Personal Data Protection.

The records of Personal Data Processing operations may be consulted by the Data Holder as well as by public authorities competent to access and retain data on their behalf, safeguarding the Data Holder's rights.

When the Processing is carried out on the basis of the Holder's Consent such Consent shall be expressly obtained in writing or by another means that demonstrates the Holder's expression of will and for certain purposes and the Holder must be informed about their rights regarding the Consent given.

Data from children and adolescents processed by IG4 or on its behalf shall be gotten to obtain benefits as the Employees' dependents with express consent from at least one of their legal guardians.

## **VII. HOLDERS' RIGHTS**

Every Holder is guaranteed the Ownership of their Personal Data and the fundamental rights of freedom, intimacy and privacy under the terms of Art. 17 of the LGPD. IG4 undertakes to respect the rights of Personal Data Holders provided for in applicable legislation, including the right to obtain from IG4, in relation to their Personal Data processed by it, at any time and upon request:

- i) confirmation of the existence of Processing;
- ii) access to the data;
- iii) correction of their incomplete, inaccurate or outdated data;

- iv) anonymization, blocking or elimination of unnecessary, excessive or processed data in violation of the LGPD provisions;
- v) data portability to another service provider, upon express request, in accordance with ANPD regulations, complying with commercial and industrial secrets, not including data that have already been anonymized by IG4;
- vi) elimination of Personal Data processed with the Holder's Consent, except for the provisions of Art.16 of the LGPD;
- vii) information from public and private entities with which the Controller made shared use of Data;
- viii) information about the possibility of not providing Consent and about the consequences of denial;
- ix) revocation of Consent, upon an express declaration from the Holder, by means of a free and facilitated procedure ratifying the Processing carried out under the terms of the Consent previously declared while there is no request for elimination, subject to the provisions of item (vi) above.

The recipients of this Policy undertake to respect the rights of Holders in the exercise of their obligations to IG4, helping IG4 to respond to any requests from Holders.

## **VIII. DUTIES**

The duties of care, attention and proper use of Personal Data extend to all recipients of this Policy in the development of their work and activities at or for IG4, committing to help IG4 to fulfill its obligations in the implementation of its strategy of privacy and Personal Data Protection.

### Personal Data Holders' Specific Duties:

To the extent applicable, it is incumbent upon the Data Holders to notify IG4 of any changes to their Personal Data in their relationship with IG4 (e.g. change of address) by means of the Person in Charge so that the Person in Charge can ensure that it is processing updated and necessary data.

### The Employees' Specific Duties:



Sharing of Holders' Personal Data between IG4 departments is allowed provided that its purpose and legal basis are complied with, observing the principle of necessity. And Personal Data Processing is always restricted to the development of activities authorized by IG4 and in compliance with the access permissions established by IG4.

Duties of Employees, Suppliers, Personal Data Processing Agents and third parties:

- (i) They shall not make available or guarantee access to Personal Data held by IG4 to any unauthorized or pertinent persons in accordance with IG4's standards;
- (ii) They shall obtain the necessary authorization for Data Processing and have the necessary documents that demonstrate the designation of their competence to carry out the lawful Data Processing operation under the terms of the normative framework of IG4 which is existing or to be prepared and
- (iii) They shall comply with the standards, recommendations, information security guidelines and prevention of information security incidents published by IG4.

Duties of all recipients of this Policy:

All recipients of this Policy have the duty to contact the IG4's Person in Charge when the following actions are suspected or actually occur:

- (i) Personal Data Processing Operation carried out without a legal basis that justifies it;
- (ii) Personal Data Processing without IG4's authorization in the scope of the activities it develops;
- (iii) Personal Data Processing Operation that is carried out in violation of IG4's Policies;
- (iv) Deletion or destruction unauthorized by IG4 of Personal Data from digital platforms or physical collections in all of IG4's facilities or used by IG4 and
- (v) Any other violation of this Policy or any of the Data Protection principles set out above.

**IX. DURATION OF PROCESSING**

Termination of the Personal Data Processing carried out by IG4 or on its behalf shall occur in the following cases:

- (i) verification that the purpose has been achieved or that the data is no longer necessary or relevant to the achievement of the specific purpose sought;
- (ii) end of the Processing period;
- (iii) communication from the Holder, including in the exercise of their right to revoke the Consent or
- (iv) assignation of the Brazilian authority when there is a violation of the provisions of the LGPD.

The Personal Data shall be deleted after the end of its Processing, within the scope and technical limits of the activities, and conservation is authorized for the following purposes:

- (i) in compliance with legal or regulatory obligations by the Controller.
- (ii) a study by a research body, ensuring, whenever possible, the Personal Data anonymization;
- (iii) transfer to third parties, provided that the Data Processing requirements set out in the LGPD or
- (iv) exclusive use of the Controller are complied with, their access by third parties is prohibited and the Data is anonymized.

The Processing period, as well as the Data retention period to comply with legal and regulatory obligations, shall be monitored by IG4. And Policies shall be implemented to guarantee the control of the deadlines and allow the elimination of Personal Data.

#### **X. CONTRACTING AND SHARING WITH THIRD PARTIES**

The LGPD establishes joint and several liability for property, individual or collective damage and pain and suffering resulting from violations of Personal Data Protection legislation.

Due to the possibility that IG4 may be held liable for third parties' actions it is necessary to use the best efforts to verify, evaluate and ensure that such third parties comply with applicable Data Protection laws.

In this way, all contracts with third parties, especially with Suppliers, must contain clauses referring to the Personal Data Protection establishing duties and obligations for the Personal Data Processing and attesting to the third parties' commitment with the applicable Personal Data Protection legislation, in particular the LGPD.

These contracts shall be reviewed and submitted to IG4's Legal Department for approval, which shall be duly guided by the Person in Charge according to preapproved standards within IG4 and considering the specific conditions of each contract with regard to the Personal Data Processing process.

All third parties must sign the term of acceptance of this Policy and other IG4's Policies aimed at Data Protection and information security or agree with such documents by means of a specific clause in the contract to be entered into with IG4, submitting the activities contracted within the scope of the relationship with IG4 also to these regulations.

IG4 undertakes to share Personal Data collected or processed by it with third parties only to the extent necessary to achieve the purposes that have motivated the collection or Processing of such Data in the first place.

## **XI. PERSON IN CHARGE**

IG4's Person in Charge is Flávia Andraus. The Person in Charge can be contacted via e-mail [compliance@ig4capital.com](mailto:compliance@ig4capital.com).

The IG4's Person in Charge, assisted by their technical team, has the following responsibilities:

- To conduct the Data Protection Governance Program ensuring its inspection;
- To monitor compliance with applicable Personal Data Protection legislation in accordance with IG4's Policies;
- To guide the recipients of this Policy in relation to the IG4's Personal Data privacy and protection;

- To ensure that Data Protection rules and guidelines are informed and incorporated into IG4's routines and practices;
- To organize training on Personal Data Protection at IG4;
- To provide clarifications, offer information and report on the Personal Data Processing operations and their impacts to the pertinent public authorities if requested (including, but not limited to, the Public Prosecutor's Office and the Brazilian Authority Data Protection Agency);
- To respond to requests and complaints from Personal Data Holders whose data have been processed by IG4;
- To assist in audits or any other assessment and monitoring measure involving Data Protection and
- To prepare privacy and data protection impact reports, technical opinions and document review regarding Data Protection, as applicable.

We recommend that Data Holders contact the Person in Charge to exercise their rights as Data Holders as well as if they have complaints about their Personal Data Processing by and/or on behalf of IG4 or if they suspect or are aware of improper Processing of their Personal Data by the recipients of this Policy.

## **XII. INFORMATION SECURITY**

IG4 implements security, technical and administrative measures in accordance with the standards required for its industry that able to protect Personal Data from unauthorized access and from accidental or unlawful situations of destruction, loss, alteration, communication or any form of inappropriate or illicit Processing. Suppliers and other third parties covered by this Policy undertake to implement and maintain compatible security measures.

The security measures and rules for information security can be found in the IG4's Policies that deal with the subject, including the Code of Ethics, Conduct, Procedures and Internal Controls (*Compliance*) and the Information Security Policy.



### **XIII. INTERNATIONAL TRANSFERS**

IG4 may carry out the international transfer of Personal Data, including for storage purposes or to comply with regulatory obligations. To this end IG4 must comply with the rules of article 33 of the LGPD.

In cases where the transfer is carried out based on the Holder's Consent, said Consent must be specific and prominently, with prior information on the international nature of the transaction, clearly distinguishing it from other purposes.

### **XIV. TRAINING AND MONITORING**

Recipients of this Policy undertake to participate in training, workshops, meetings and skills training organized by IG4 by means of its Person in Charge to expand the culture of Personal Data Protection at IG4 as well as to help them understand their duties and how to comply them.

IG4 undertakes to periodically revisit this Policy and, at its discretion, make changes that update its provisions in order to reinforce IG4's permanent commitment to privacy and the Personal Data Protection with all changes made in a timely manner being communicated by means of IG4's official channels for communication with recipients.