

VINCI COMPASS

Global Privacy Policy Vinci Compass

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Vinci Compass Global Privacy Policy

This Global Privacy Policy ("Policy") applies to the collection, use, sharing and in general processing of personal data relating to clients, prospective clients, job candidates and, generally, users of our applications and devices, participants in events, visitors to our websites, and individuals interacting with funds, products and services offered and managed by Vinci Compass Investment Ltd. ("VINP") and its subsidiaries, agencies, branches, affiliated and other entities under its direct or indirect control, in which VINP holds more than 60% of the total share capital ("Vinci Compass"). This Policy also applies to Vinci Compass' partners, employees, service providers and members of its administrative or management staff and is intended to comply with the relevant and applicable privacy and data protection laws.

This Policy might be complemented, amended and subject to local equivalent policies applicable to Vinci Compass, which may be required to comply with specific laws and regulations in the countries in which Vinci Compass operates. For specific information and regulations applicable in your jurisdiction, please consult the local privacy policy or contact your local Data Protection Officer (DPO).

Data Protection Officer (DPO) Contact Information

Brazil

Carolina Meira

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Other Jurisdictions

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1. Who is the Personal Data Controller?

For the purposes of this Policy, the Controller of your personal data is Vinci Compass. This designation applies regardless of whether you have entered into an employment contract, internship agreement, or similar document; shared your information for selection and recruitment purposes; or provided your data within the context of commercial and contractual relationships

2. What Kind of Personal Data Do We Process?

To the extent permitted by the applicable laws and subject to the conditions, limitations and restrictions imposed by such applicable laws, Vinci Compass may in certain circumstances process one or more of the following personal data.

Identification, Registration, and Contact Information

Full name, place and date of birth, gender, email address, home address, phone numbers, emergency contact, ID document data and copies (e.g., personal ID cards, taxpayer ID cards, driver's licenses) and photos.

Education and Professional Background

Professional background, academic transcript, resume, proof of education level, professional certificates, and professional licenses.

Professional and Corporate Data Regarding Vinci Compass

Position, working hours, work performance, remuneration, promotions, professional background at Vinci Compass, user credentials, biometric data, surveillance footage, corporate event images.

Compensation and Benefits

Bank account details, payroll information, income statements, beneficiary ID number, benefits received, and information on dependents for benefit purposes (e.g., full name, date of birth, personal ID card, taxpayer ID card).

Labor Data

Copies and/or information regarding employment documents, other labor-related registrations, and when applicable union membership details.

Health Data

Copies and/or information regarding medical certificates, pre-employment medical exams, doctor's notes, and other health-related information related to health insurance (including dependents covered under the plan).

Clients' Data

Identification numbers, account identification details, investment statements, family information, professional information, authentication data, monitoring data, judicial data, preferences, and information about users of Vinci Compass' applications.

Personal Data of Minors

Name, date of birth, gender, ID, CPF, nationality, and address of minors who are dependents, beneficiaries, or clients of Vinci Compass' products and services.

3. For Which Purposes Do We Collect and Process Personal Data?

We use personal data for the purposes described in this Section 3, always in accordance and to the extent permitted by the applicable laws and subject to the conditions, limitations and restrictions imposed by such applicable laws.

Employees' Data

We may process our employees' personal data to manage the employment contract, internship agreement, service agreement, or similar document, and all aspects of the contractual relationship. In this context, we may process personal data to:

- Prepare and enter into employment contracts, manage the relationship under such documents.
- Fix and manage compensation and bonuses.
- Process payments of compensation, bonuses, and related taxes.
- Manage social security, pension plans, and legal leaves.
- Assess professional performance and make decisions on promotions.
- Grant access to necessary systems according to duties.
- Facilitate booking of hotel rooms and air tickets for business travels.
- Send communications regarding the contractual relationship and respond to queries.
- Promote and announce events at Vinci Compass and other locations, marketing campaigns, and other actions for brand promotion using professional and personal data, including photos.
- Manage benefit plans.

We may process personal data to maintain and improve efficiency and workplace processes, inform managerial and administrative decisions, and manage employees efficiently. This includes:

- *Preparing management and performance reports to inform Vinci Compass management, estimate and optimize future workforce, understand commercial needs, identify departmental improvements, and develop and retain talents.*
- *Analyzing opinions through questionnaires and research among employees.*
- *Setting up employee's directories containing contact information, including photos.*

We may process personal data to ensure the safety of Vinci Compass, employees, and third parties, ensure compliance with obligations under contracts with third parties, and defend Vinci Compass' interests in judicial, administrative, or arbitration proceedings. This includes:

- *Preventing and identifying unlawful, improper, or malicious activities (e.g., identity theft and fraud).*
- *Ensuring physical integrity of employees and third parties at Vinci Compass' premises.*
- *Defending Vinci Compass' interests in legal proceedings.*
- *Conducting due diligence in consolidation, acquisition, or merger transactions.*
- *Identifying potential criminal or financial risks affecting Vinci Compass and its clients.*

We may process personal data whenever legal and regulatory obligations require such processing. This includes:

- *Compliance with financial and tax regulations.*
- *Continuous know-your-employee requirements.*
- *Work safety.*
- *Compliance with social security obligations.*
- *Other legal requirements.*

We may process personal data to protect life and physical integrity of employees and third parties, such as:

- *Protecting health and safety as required by applicable laws.*
- *Contacting emergency persons in case of potential emergencies.*

Candidates' Data

We may process personal data to evaluate the candidate's suitability for job or internship positions offered by Vinci Compass to the extent permitted by the applicable laws and subject to the conditions, limitations and restrictions imposed by such applicable laws. This includes:

- Receiving, analyzing, and responding to applications.
- Verifying provided information and checking professional and academic references.
- Assessing the candidate's profile for job offers.
- Facilitating the interview/recruitment process.
- Preparing offer letters for successful applications.
- Contacting potential candidates identified through public sources for suitable job offers.

We may process personal data to contact and communicate with candidates for present or future job positions. If not selected for a present position, contact information may be used to inform candidates about future opportunities.

We may process personal data to maintain and improve recruiting activities, for internal planning, management reports, and legal compliance. This includes:

- Managing and improving recruiting activities.
- Preparing management reports and assessments regarding recruiting metrics.
- Submitting reports to governmental bodies as required by the applicable law.
- Conducting background checks as needed and permitted by the applicable law.

We will process personal data whenever legal and regulatory obligations require such processing, including:

- Fraud prevention.
- Corporate security and internal controls.
- Compliance with financial and tax regulations.
- Continuous know-your-employee requirements.
- Health and safety obligations.
- Preventive and occupational medical examinations.
- Labor authorizations for non-Brazilian candidates.

- Promoting a discrimination-free workplace and complying with labor and social security laws.

We will process personal data to protect life and physical integrity of our candidates and third parties, as required by applicable laws.

Clients' Data

We will process clients' personal data to comply with legal and regulatory obligations, to the extent permitted by the applicable laws and subject to the conditions, limitations and restrictions imposed by such applicable laws, including among others:

- Verifying identity and preventing fraud.
- Complying with regulatory requirements in the financial market.
- Maintaining regulatory licenses and permissions.
- Complying with investor protection regulations.
- Keeping legally required records.
- Managing business risks.
- Complying with court and administrative orders.

We may process personal data to protect Vinci Compass' business interests, ensure safety, comply with obligations under contracts, and defend interests in legal proceedings. This may include:

- Developing and implementing products and services.
- Promoting business and ensuring client satisfaction.
- Protecting business and market integrity.
- Managing risks and protecting systems, infrastructure, and premises.
- Defending rights in legal proceedings.
- Exercising rights abroad and complying with foreign regulations.
- Supporting other companies in Vinci Compass economic group.

We process personal data to ensure compliance with contractual obligations. This may include:

- Taking pre-contractual measures as needed.
- Fulfilling obligations and exercising rights under contracts.
- Terminating agreements as requested by the client or decided by Vinci Compass.

Given the wide array of products and services offered by Vinci Compass, the extent and nature of personal data processing pursuant to this Section will vary according to the specific product or service.

For more details on the contractual purposes for which your personal data may be used, Clients should contact the DPO responsible for their jurisdiction. The contact details of the applicable DPO can be found in the "Data Protection Officers (DPO) Contact Information" section of this Policy.

4. Data on Minors

As mentioned before, Vinci Compass may collect and process the personal data of minors (such as name, date of birth, gender, ID, CPF, nationality, and address) in cases where they are dependents, beneficiaries, or clients of Vinci Compass' products and services, always in the best interest of such data subjects and in compliance with the provisions of the applicable data protection statute.

Vinci Compass will process such data in accordance with the purpose to which the parent or guardian has consented, and such data may be used to operate Vinci Compass' products and services and to comply with and manage regulatory, institutional, legal, and/or fraud prevention requirements.

Vinci Compass will not use data on minors for marketing purposes and/or for offering products and services.

5. Who Do We Share Personal Data With?

Whenever necessary for achieving the purposes described in Section 3, Vinci Compass may share personal data with third parties. However, sharing this information will be done when permitted and subject to the restrictions, limitations and conditions imposed or required by the local applicable laws.

Employees' Data

Vinci Compass may share employees' personal data with:

- Payroll service providers for managing compensation payments.
- Companies providing benefit management services.
- Healthcare providers for pre-employment medical exams.
- Software providers for the People & Management department.
- Event organizers and marketing campaign service providers.

- Government agencies and competent authorities for legal compliance.
- During consolidation, acquisition, or merger transactions.

Candidates' Data

Vinci Compass may share candidates' personal data with:

- Recruitment service providers and software providers for selection process management.
- Third parties verifying candidates' information.
- Government agencies and competent authorities for legal compliance.
- During consolidation, acquisition, or merger transactions.

Clients' Data

Vinci Compass may share clients' personal data with:

- Other companies in Vinci Compass' economic group.
- Government bodies and regulatory authorities.
- Financial institutions involved in transactions with Vinci Compass.
- Third parties providing services under client agreements.
- Professional advisors and service providers.
- During consolidation, acquisition, or merger transactions.

6. Transfer of Personal Data Abroad

Vinci Compass may transfer personal data to service providers located outside their country of operation, including cloud-based service providers to the extent permitted by the applicable laws and subject to the conditions, limitations and restrictions imposed by such applicable laws. For data transfers to countries lacking adequate data protection laws, Vinci Compass will implement contractual and operational mechanisms to ensure compliance with the applicable data protection statute. Transfers within Vinci Compass' economic group will be regulated by intergroup agreements and subject to the requirements of the applicable laws and regulations.

7. For How Long Do We Store Personal Data?

Vinci Compass stores personal data to the extent permitted by the applicable laws and subject to the conditions, limitations and restrictions imposed by such applicable laws:

- For as long as required by the applicable law.
- Until the purposes for data collection have been achieved.
- As necessary to protect Vinci Compass' legitimate interests.
- As necessary to fulfill legal or regulatory obligations.

Data processing will be terminated when:

- The purposes for data collection have been archive.
- The data is no longer necessary or relevant.
- A legal order requires termination.

Upon termination, personal data will be deleted unless otherwise required by the applicable law.

8. Rights Regarding Personal Data

Individuals have the following rights regarding their personal data:

- a. To receive information on data processing.
- b. To request access to and confirmation of data processing.
- c. To request rectification of incorrect, incomplete, or outdated data.
- d. To object to processing and request data anonymization or erasure.
- e. To request data portability.
- f. To withdraw consent where applicable.
- g. To make claims against the data controller.

The exercise of some of the rights listed above may not be allowed in certain legal circumstances or when the disclosure of the required information may result in the disclosure of Vinci Compass' trade secrets.

In case of a candidate that is not selected for a selection and recruitment process and wishes that Vinci Compass makes no future contact, then the candidate may request Vinci Compass to cease processing the candidate's personal data for that specific purpose.

These rights can be exercised by contacting your local DPO.

9. Personal Data Protection

Vinci Compass to the extent permitted by the applicable laws and subject to the conditions, limitations and restrictions imposed by such applicable laws has implemented technical and organizational measures to protect personal data against unauthorized processing, loss, destruction, or damage. Personal data is stored in protected equipment with access limited to authorized personnel. Under specific circumstances, as described in this Policy and in compliance with applicable laws and regulations, Vinci Compass may use photos, personal data such as name and professional data in events held at Vinci Compass or other locations, marketing campaigns and other actions to promote the Vinci Compass brand.

10. Changes to This Privacy Policy

This Policy has been reviewed and approved by the Vinci Compass Data Protection Officers (DPO) and may be amend at any time by publishing an updated version on the Vinci Compass website www.vincicompass.com. Please check this website regularly for the latest version of this Policy. Clients and Employees will be informed of any material changes.

For detailed information or specific queries, please contact the DPO responsible for your jurisdiction.

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Other Jurisdictions: Gabriel Bendeزú, email: gbendezu@vincicompass.com



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