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LIST OF ABBREVIATIONS, CONCEPTS AND ACRONYMS

ANPD - National Data Protection Agency.

Controller - Individual or legal entity under public or private law, responsible for decisions regarding the Handling of Personal Data.

CVM – Brazilian Securities and Exchange Commission.

Personal Data or Data - Information related to an identified or identifiable individual.

Sensitive personal data - Personal data on racial or ethnic origin, religious conviction, political opinion, affiliation to a trade union or organization of a religious, philosophical or political nature, data relating to health or sexual life, genetic or biometric data, when linked to an individual.

DPO - Data Protection Officer.

Data Officer - Person appointed by the Controller and/or Operator, as applicable, to act as a communications channel between the Controller, Data Subjects and ANPD.

TC S.A. (Group) – For policy's purposes, "Company" shall refer TC Traders Club S.A., CNPJ [EIN] 26.345.998/0001-50, with address at Rua Leopoldo Couto de Magalhaes, Bairro Itaim Bibi, São Paulo/SP, Postal Code: 04542-000, and all companies in which the Company holds or shall hold a direct or indirect equity interest, such as but not limited to TC MATRIX LTDA, TC Radio LTDA, TC Mover & TC School Informação e Educação LTDA, TC Gestao Empresarial LTDA, SENCON; TC Comercio LTDA, Economática; ("Companies" or "Subsidiaries").

Lawful Interest - Legal basis for Handling of Personal Data, as provided for in articles 7, IX and 10 of the LGPD (General Data Protection Law), which validates Data Handling based in short, on (i) the legitimacy and lawfulness of interest by TC S.A. or third parties to perform a certain Handling of Personal Data, (ii) assessment of an actual need for this Treatment for the purpose intended by TC S.A., and (iii) a balance



between interests by TC S.A. or third parties and rights by the Subject, including the latter's lawful expectations regarding the Handling of Personal Data.

Law 12965, April 23, 2014 - Establishes principles, guarantees, rights and duties for using Internet in Brazil.

Law 13853 dated July 8, 2019 - Amends Law 13709 dated August 14, 2018, to provide for the protection of Personal Data and creation of ANPD; and makes other provisions.

LGPD - Law 13709, August 14, 2018 (and amendments).

Operator - Individual or legal entity under public or private law, in charge of Handling of Personal Data on behalf of the Controller.

Data subject - Individual to whom the Personal Data refer, that are subject to Handling.

Handling - Every operation undertaken with Personal Data, including as a limitation those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, information evaluation or control, modification, communication, transfer, dissemination, or extraction.



1. OBJECTIVES

TC S.A. intends by means of this Policy to demonstrate in a clear, direct, and objective manner how it treats any Personal Data it receives from you, our customer; this means precisely that we shall demonstrate how and for what reasons we collect your Data, the manner in which they are stored, how, for what purpose, and on what basis you authorize us to share them with third parties - and finally yet no less relevant, how we maintain and in which cases we delete or remove your Data from our database.

As a Data Controller, TC S.A.'s Data Privacy guidelines are designed to ensure the security, integrity, and proper Handling of your Personal Data during performance of activities related to Handling of your Personal Data. TC S.A.'s privacy program is supported on solid procedures for analysis, control, monitoring, and constant updating of processes involving Personal Data within TC S.A.

TC S.A.'s culture warrants, assures and values plurality and diversity. Thus, the privacy and Data protection procedures that we shall speak on in this Policy apply to any individual without distinction, regardless of any physical, social, gender, age, race, color, religion, origin, gender identity, sexual orientation, marital status, or health condition.

Hence, you shall grasp below several essential aspects on the Handling of your Personal Data by TC S.A.:

- Controller's identification
- Data categories processed by us
- Purpose of Handling of your Data
- Consent and exercise of your rights as a Data Subject



2. REFERENCES

Building TC S.A.'s policies means compliance with current legislation, regulations when applicable and best market practices. To this end, you shall be able to see below that on more than one occasion we shall mention Law 13709/2018, the General Data Protection Law, or LGPD, which is this Policy's focal point. Also, we shall refer to Law 13853 dated July 8, 2019, which changed several LGPD aspects. Naturally, TC S.A. also guides its Policy, under the principles of the 1988 Constitution of the Federative Republic of Brazil and in the Internet Regulatory Framework, Law 12965 dated April 23, 2014.

3. SCOPE

This topic can be better understood if we ask ourselves: *"Who should comply with this Policy?"* The answer is simple: Every employee, service provider and director of TC S.A. is directly subject to this Policy and to the procedures regarding Data protection and privacy, to which they have access during their functions.

This Policy shall apply to all Companies part of the TC Grupo TC S.A. We are constantly expanding, yet you shall find our main businesses in the topic "List of abbreviations, concepts and acronyms" above. The Controller of your Personal Data is the Company TC S.A., with which you have a direct business relationship.

4. APPLICATION / TARGET AUDIENCE

The terms of this Policy must be complied with so that you, the Data Subject, should have your right to privacy preserved. Hence, this Policy's Target Audience, i.e. the reason why we follow the recommendations in this document, is to ensure that our customers and investors have the best possible experience when they entrust their Personal Data to us. This Policy therefore applies to all customers and TC S.A. investors.

5. RESPONSIBILITIES

Corporate governance related to policies and procedures related to Data privacy at TC S.A. are the responsibility of the Company's Top Management bodies. The Company's Top Management bodies shall not only be responsible for defining the policies and procedures related to Data privacy in the Company itself, but also of the other Grupo TC S.A. companies.

Managing the TC S.A. Data privacy structure is carried out jointly by the Statutory Board of Executive Officers, the Ethics and Compliance Committee, in addition to the DPO or Data Officer, as referred to in the LGPD itself.

Each of these bodies plays a relevant and fundamental role for your Data's security to be ensured.

5.1 Statutory Board of Executive Officers

In each Grupo TC S.A Company, the Statutory Board of Executive Officers is obliged to warrant adequate and sufficient subsidies to ensure that your Personal Data are processed in accordance with the LGPD and other locally applicable legislation.

5.2 Ethics and Compliance Committee

The Company's Ethics and Compliance Committee is obliged to ensure that the Company's Data Handling takes place in accordance with legislation (LGPD), and therefore that this Policy is the most faithful reproduction of procedures that occur in practice in the Company's day-to-day and that of other Companies in Grupo TC S.A.

5.3 DPO or Data Officer

Firstly, it should be made clear that the DPO (or Data Officer) is the person appointed by the Controller and who shall be directly responsible for intermediating



the relationship between the Controller, - in this case the TC S.A. Company with which you have a relationship - and the Data Subject (you). The DPO also reserves himself the right to implement, develop and maintain the necessary and appropriate controls, processes, and procedures so that your Data are processed in a way that ensures your total privacy as far as provided for by law.

Hence the DPO is a kind of guarantor of Handling of Personal Data within TC S.A., and among other activities that the DPO performs, it is important to highlight several of these here, for you to better understand your role in the Handling of your Personal Data:

i. Assurance that the Data are collected in accordance with legislation, duly supported by an appropriate legal foundation. In other words, in those cases in which consent should be granted for collection, for example, assurance that information on the purpose of use is clear to the Subject on this occasion.

ii. Assurance that the Data collected are processed in accordance with the law, i.e. that your Data are stored, maintained, shared or transferred, and when applicable, deleted or removed within the legal limits.

iii. Assurance that your rights as a Data Subject are met, of course, whenever the request to exercise your right is lawful and feasible.

iv. Assurance of appropriate implementation, development, and maintenance of procedures to provide:

a) Adequate communication of this Policy to the target audience and to whomever else as required.

b) Adequate and sufficient policies to cover the TC S.A. Data Privacy framework.

c) Response to requests from Data Subjects.



d) Appropriate Controls and Procedures to ensure that there is no access by unauthorized persons to Personal Data, as well as inadequate Data disclosure.

e) Assurance that the Data shall not be kept longer than required (save for the Data's anonymization/pseudo-anonymization).

f) Assurance that the Data obtained are in fact relevant, and thus avoiding excessive Data (collecting more data than necessary for undertaking the activity/contract).

5.4 Board of Directors

The Board of Directors of TC S.A. is composed of members of its corporate staff as well as by three (3) external and independent directors. The Board of TC S.A. on data privacy is responsible for analyzing and approving governance guidelines, such as policies and procedures related to data privacy.

6. ABOUT THE DATA COLLECTED BY US:

6.1 What Data Categories does TC S.A. collect?

Most of the Data we collect are based on the information that you, a TC S.A. customer, provide us at the time of your registration in our website, application or on any of our other electronic properties ("Platforms"), or Data generated from what you have informed us. Categories of such Data may vary but in general TC S.A. may handle:

	Full name; Signature; Birth date; Nationality; Landline and cell phone number; Marital status; Full address and proof of address; Email address; Identity card (RG) data and images; Data and images from the registration of individuals; Social Security Number (CPF); Data and images from the National Driver's License (CNH); Copy or numbers of other government identification documents; Personal data contained in
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Personal data	articles of incorporation and powers of attorney; Organization or company to which they belong or are registered with and related information; Position or role; Geolocation data when using the Application; Photographs collected for the security systems of TC S.A; Information on personal and professional history and, as permitted by law, criminal records; Technical information such as your IP address, device ID, location Data (based on your IP) and browsing across our Platforms; as well as oral or written Communication between the Customer and TC S.A. and its platforms, Photographs (contained in the user profile, should the customer insert them). In case of related accounts with other profiles, via Facebook or Twitter for example, Data collected are informed by the respective companies at the time of the link being authorized, and are under their responsibility.
Financial data	Bank data; Salary; Shareholders' equity Investments; Credit card information; Credit card bill information; Income tax data; Brokerage notes; Information on market credit and income commitment, and financial transactions in general.
Sensitive Data	The activity that TC S.A. provides does not require direct collection of Data classed as sensitive by the LGPD, but on occasion TC S.A. may gain access to some marginal information of this nature by means of any other information you make available to us and to which you authorize access.
Public data	TC S.A. may obtain your Data through public search engines or information made public by you, such as websites or background check providers, always in accordance with applicable law.
Children and adolescents data	TC S.A. services are not intended for minors. Hence TC S.A. does not collect, process or have access to this type of information.
Use of cookies	TC S.A. may collect information through cookies on its website or other TC S.A. electronic properties. Cookies are internet files that temporarily store information on domains that you have accessed. TC S.A. ensures compliance in the collection of this category of information pursuant to the LGPD.



7. HOW WE USE YOUR PERSONAL DATA

7.1 For what Purposes does TC S.A. use your Personal Data?

Always supported on the legal bases listed by the LGPD, so that we can Process your Data, TC S.A. uses your Data to perform contractual services, offer you new services and an increasingly improved and more personalized experience. Here are some of the activities that TC S.A. Is able to perform with your Data:

- Allow you to navigate the Platform, including aggregated or non-aggregated analysis of Customer behavior, identifying issues and making improvements to the Platform; including feature customizing and security monitoring;
- Allow the provision of the services offered by TC S.A, registration, feasibility of transactions, permission and feasibility of contract signing;
- Respond to requests and contacts, receive complaints, investigate reports or respond to requests from customers and other subjects involved in the operation;
- Establish contacts between TC S.A and customers, including to guarantee the fulfillment of obligations;
- Allow the provision of assistance and ancillary services offered by the companies of Grupo TC S.A, possibly related to the contracts established with clients;
- Manage the relationship with customers, including through communication using available means, direct marketing, advertising and promotional actions;
- Perform an analysis of customers' behavioral, consumer and/or financial profile based on Data provided to customize content suited to their profile;



- Offer TC S.A. marketing and advertising services, including targeted advertising according to behavior, consumer and financial profile and/or location analysis;
- Conduct satisfaction or other surveys;
- Verify customers' personal data;
- Exercise of TC S.A rights, including in contracts and legal, administrative or arbitration proceedings, as well as for compliance with legal obligations;
- Prepare responses to authorities in the context of judicial or administrative proceedings, in compliance with legal, regulatory or any other lawfully required matters by TC S.A or in defense of its legitimate rights and interests;
- To carry out activities to prevent fraud and illegal activities, including measures to protect TC S.A, Customers and/or third parties; and
- Protect credit where applicable.

8. PERSONAL DATA SHARING:

8.1 With whom does TC S.A. share your Personal Data?

TC S.A. may share your Data among its group companies and group business areas, all covered by this Policy with regard to lawful Data Handling practices and confidentiality obligations. Such sharing is intended to meet TC S.A.'s legitimate interests as well as yours, such as advertising of other services likely to be of interest to you for the support and development of new services or businesses, to enable us to update your Data and for the provision of contractual services, among others.

We may also share your Data with service providers, business partners, and third parties in general (which the LGPD refers to as "Data Operators") that in some



manner assist TC S.A. in providing the service or part of the service contracted by you, our customer. We always seek to evaluate the commitment of such third parties in relation to Data protection and to enter into contractual obligations on information security and Personal Data protection with them, in order to minimize risks for Data Subject.

In addition, TC S.A. may be requested by any authority or regulatory body to share its Data, in administrative, judicial, compliance with court or regulatory orders, and possibly also in investigations and in relation to countering unlawful actions, such as fraud, financial crimes and corruption.

Sharing shall take place by means of secure channels managed by TC S.A.'s Information Security and Data Security teams, which ensure your Data's protection.

9. DATA SUBJECT'S RIGHTS

The LGPD contains a roster of rights that you as Data Subject are able to exercise on providing your Data. TC S.A. Is equipped with resources in order to provide the most appropriate and efficient response whenever you wish to exercise any of your rights.

9.1 What are your Rights as a Data Subject?

Your rights:	It consists of:	How to request them:
Confirmation of the existence of handling	In case of queries, you may ask TC S.A. to confirm whether it actually processes your Personal Data.	privacidade@tc.com.br
Access to personal data	You may request TC S.A. To send you a report on what Personal Data it holds on to you in its databases.	privacidade@tc.com.br
Correction of incomplete, inaccurate or outdated personal data	You may (and should) request that your Data be updated to reflect any changes, or corrected in the event of any inconsistency that you notice or become aware of.	privacidade@tc.com.br
Anonymization, blocking or deletion of unnecessary and	You may request Personal Data that is processed unnecessarily, or in excess of the service provided, be deleted or anonymized.	privacidade@tc.com.br



excessive personal data, or data handled in non-compliance with Brazil's General Data Protection Law (LGPD)		
Portability of Personal Data to another service or product provider.	As soon as ANPD regulates Data portability, you may request TC S.A. to share your Data with other service providers.	privacidade@tc.com.br
Deletion of Personal Data Handled with the Data Subject's consent, save in cases of compliance with legal obligations and others provided for in the LGPD.	If you have given your consent for TC S.A. to access Data for other purposes, such as offering personalized advertising, you may request deletion of such Data when you no longer wish to have it used for that purpose.	privacidade@tc.com.br
Information on the public and private entities with which TC S.A. has shared your Data	You may request TC S.A. to provide you with information on the public and private entities with which it has shared your Data.	privacidade@tc.com.br
Information on the likelihood of not providing consent and on the consequences of denial.	You are entitled to question and be informed of what shall happen if you do not consent to the collection/use of certain Data for a specific purpose, and you have the right to be informed of which consequences may result from your refusal to provide consent.	privacidade@tc.com.br
Withdrawal of consent pursuant to the LGPD.	You may request withdrawal of your consent for the purposes under which it was provided. It is important to keep in mind that this revocation may result in being unable to employ some features, part of the service or even full termination of the services provided, although it does not preclude employing your Data provided that it is anonymized, or handling of which is based on other legal foundations.	privacidade@tc.com.br
Right of refusal	You may object to some Handling of your Data if the Handling is not based on any of the legal foundations as provided in the LGPD.	privacidade@tc.com.br
Right of petition	You may petition on your rights pursuant to the ANPD regarding your Data.	privacidade@tc.com.br
Right of review of automated decisions	You may request that automated procedures such as those based on algorithms and mechanisms to detect personal, professional, consumer, credit and personality profiles, be reviewed according to your preferences.	privacidade@tc.com.br

Form and conditions of exercise: The rights mentioned above shall be ensured and may be exercised by the Subject in the precise terms as described in the LGPD. All requests, complaints, requests for information or exercise of rights by the



Data Subject may be made in writing addressed to the e-mail mentioned above. In all cases, the Data Subject shall inform at least the following:

- a) Full name of Data Subject;
- b) ID Card or Tax ID number of Data Subject;
- c) Request description.
- d) Defense in lawsuits, for example.

10. DATA RETENTION AND DELETION:

10.1 Personal Data Retention Period:

TC S.A. shall keep your Personal Data in a secure and adequate manner in accordance with our Internal Data Retention Policy, which includes security and control procedures during the period in which TC S.A. has access to your Data, duly covered by appropriate legal foundations such as compliance with legal or regulatory obligations, or for defense in legal proceedings, for example.

Retention periods for Personal Data may vary depending on the purposes for which it was collected, or for subsequent legitimate purposes. Several of the criteria used by TC S.A. to assess appropriate retention periods include: (i) the Personal Data's nature and the activities involved, (ii) the Subject's interactions with TC S.A., and (iii) legal obligations. In order to provide security and business continuity, TC S.A. has backups of certain Data, which remain safe, with restricted access and segregated from other active Data, backed by some duty, likelihood or lawful interest in retention.

When occasionally service provision is terminated for whatever reason, TC S.A. may still keep your Data stored for periods as required by regulatory (such as



CVM) or legal issues (such as lawsuits), for the lawful exercise of your rights as well as for audit purposes.

10.2 Data Deletion

Following the respective period stipulated for retention of each item of Data, TC S.A. may completely delete your Data from the database or may preserve them permanently anonymized; which is a lawful option for data maintenance provided for in the LGPD and warrants total security, as definite anonymization shall under no circumstances permit identifying that data's Subject, as it is irreversible.

11. DATA SECURITY

Our servers are protected and controlled to ensure your Personal Data's security. We have adopted technical security measures and our database can only be accessed through previously authorized persons in order to perform their functions within TC S.A. However, we are aware that no security measure is 100% effective and capable of ensuring absolute security of Personal Data. Hence TC S.A. expressly recommends that all its employees, customers and other stakeholders adopt measures to protect themselves, for example, by not sharing login credentials for their accounts, not sending confidential information through unsafe methods (for example, by means of unencrypted emails) and by protecting your electronic devices (for example, with strong and reliable passwords).

12. TRADE IDEAS

Trade Ideas is TC S.A.'s official digital community, created for a class of users to contribute by sharing their experiences and comments regarding the financial market. All the information posted by this specific class of users is made available to



other users, and therefore, TC S.A. recommends not publishing in this environment any items of a personal nature, including Personal Data.

13. INTERNATIONAL DATA TRANSFER

Personal Data collected by the Grupo TC S.A shall always be processed based on the LGPD. TC S.A. is headquartered in Brazil, yet our subcontractors, service providers or partners may also be headquartered or may undertake Data Handling in countries other than Brazil. In this case, we shall comply with LGPD articles 33–36 and contractually require our subcontractors, service providers or partners to comply with LGPD provisions. Hence, when contracting our services and agreeing with this Policy, you also agree that your Personal Data may be subject to international transfers.

14. CONTACT US ON DATA PRIVACY: TC S.A. DATA PRIVACY CHANNEL

TC S.A. has a digital channel dedicated to Data privacy, to which you may forward your questions, queries or requests related to Data privacy.

Email: privacidade@tc.com.br

15. MISCELLANEOUS

15.1 CHANGE

This Policy may be revised, modified, amended or revoked at any time and with no need for previous notice by the Company's Board of Directors, especially in the event of supervening changes in any applicable laws and regulations, or in the event of any changes in the Company's business practices.



Any changes to this Policy shall be promptly made known to all users: TC S.A. target audience, service providers, directors, partners, contributors, and employees.

15.2 CONFLICT

In the event of a conflict between any item in this Policy and the Company's Bylaws or other Companies' articles of incorporations, the provisions of the Bylaws and the articles of incorporation shall prevail. And in the event of a conflict between any item in this Policy and applicable laws and regulations, the provisions of applicable laws and regulations shall prevail.

Omissions shall be decided by the Ethics and Compliance Committee.

15.3 AUTONOMY

Should any item in this Policy be considered invalid, unfeasible or unlawful, its provisions shall be limited whenever possible, so that the other items' validity, effectiveness and legality shall not be affected.

15.4 EFFECTIVENESS PERIOD

This Policy has been in effect since its publication on the Company's websites in February 2022.