



ICBC do Brasil Banco Múltiplo S.A.

Client Privacy Policy

Effectiveness: February/2022

PUBLIC INFORMATION

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1. OBJECTIVE

This Privacy Policy (“Policy”) describes how we collect and use Personal Data to which we have access from natural persons related to our Clients, such as legal representatives, partners, shareholders, proxies, guarantors (“Processed Personal Data”) during the duration of the Client’s relationship with ICBC do Brasil Banco Múltiplo SA (“ICBC Brasil”) and during the use of Internet Banking.

ICBC Brasil is fully committed to protecting the privacy and security of Personal Data Processed.

In order to preserve and protect the privacy of natural persons related to its Clients, ICBC Brasil undertakes hereby to respect and demonstrate compliance with the privacy and data protection laws in force in Brasil. The main objective of this Policy is to inform about the operations of treatment of Processed Personal Data and to comply with the principle of transparency in the processes of treatment of Personal Data, whether by digital or physical means, based on the General Data Protection Law, No. 13,709 of August 14th, 2018 (“LGPD”).

ICBC Brasil is the Controller of Processed Personal Data and this means that we are responsible for deciding how we will maintain and process such Personal Data. According to the LGPD, it is our role to be transparent with our Clients and Data Holders about the processing of Personal Data provided. This Policy is applicable to all natural persons linked to our Clients who have maintained or maintain a legal relationship with ICBC Brasil. We may update it at any time, and when we do so, we will inform and make available an updated version.

It is important that our Clients read this Policy, along with the Summary of the Information Security and Cybersecurity published in our website, as well as other Privacy Terms that we may provide on specific occasions, when we collect or process Personal Data provided, so that they are aware of how and why we are using this information and which are the rights of the Data Holders, in accordance with the LGPD.

2. CONCEPTS AND ABBREVIATIONS

ANPD – Brazilian National Data Protection Authority.

LGPD - General Data Protection Law No. 13,709, of August 14, 2018.

Controller - Individual or legal entity, of public or private law, that has the competence to make decisions regarding the processing of personal data, in this case, ICBC Brasil.

Operator - Individual or legal entity, of public or private law, that processes personal data following the guidelines defined by the Controller.

Processing Agents – the Controller and the Operator.

Personal Data - information related to the identified or identifiable natural person.

Sensitive Personal Data - Data of racial or ethnic origin, religious conviction, political opinion, membership of a union or organization of a religious, philosophical or political nature, data relating to health or sex life, genetic or biometric data, when linked to a natural person.

Anonymization - Process through which the data loses the possibility of association, directly or indirectly, with an individual, considering the reasonable technical means available at the time of processing.

Anonymized Data - Personal Data relating to a holder that cannot be identified, considering the use of reasonable technical means available at the time of its processing.

Pseudoanonymized Data - It is the processing through which a Personal Data loses the possibility of association, directly or indirectly, with an individual, if not through the use of additional information kept separately by the controller in a controlled and secure environment.

Data Protection Officer (DPO) - Person appointed by the Controller as responsible for supervising the processing of the Data, who acts as a communication channel between the controller, Data Holder and ANPD.

Processing of Personal Data - Any operation carried out with Personal Data, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction.

Holder or Holders - Any natural person to whom the personal data being processed refers.

Clients – Any and all clients of ICBC Brasil.

Consent - It is one of the hypotheses that authorizes the Processing of Personal Data based on the free, informed and unequivocal expression of the Data Holder when agreeing to the Processing of their Personal Data for a specific purpose informed by ICBC Brasil.

3. PRINCIPLES OF PERSONAL DATA PROTECTION

All activities involving the processing of Personal Data by ICBC Brasil must observe the principles listed in the LGPD, which are:

- 1) **Purpose:** carrying out the processing for legitimate, specific and informed purposes to the Holder, without the possibility of further processing in a way that is incompatible with these purposes;
- 2) **Adequacy:** compatibility of the processing with the purposes informed to the Holder, according to the context of the processing;
- 3) **Necessity:** limitation of the processing to the minimum necessary for the accomplishment of its purposes, with coverage of the relevant, proportional and not excessive data in relation to the purposes of the data processing;
- 4) **Free access:** guarantee, to the Holders, of facilitated and free consultation on the form and duration of the treatment, as well as on the completeness of their Personal Data;
- 5) **Data Quality:** guarantee, to the Holders, of accuracy, clarity, relevance and updating of the Processed Data, according to the need and to fulfill the purpose of its processing;
- 6) **Transparency:** guarantee, to the Holders, of clear, accurate and easily accessible information about the execution of the processing and the respective Processing Agents, observing the commercial and industrial secrets;
- 7) **Security:** use of technical and administrative measures capable of protecting the Processed Data from unauthorized access and from accidental or unlawful situations of destruction, loss, alteration, communication or dissemination;
- 8) **Prevention:** adoption of measures to prevent the occurrence of damage due to the processing of Processed Data;

- 9) **Non-discrimination:** impossibility of carrying out the treatment for discriminatory purposes, illicit or abusive;
- 10) **Responsibility and accountability:** demonstration, by the agent, of the adoption of effective measures capable of proving compliance with the LGPD and other personal data protection rules published by the ANPD.

4. PERSONAL DATA COLLECTED

Personal Data is any information relating to an identified or identifiable individual. This does not include data in which the individual's identity has been removed and does not allow their re-identification, considering reasonable technical measures available at the moment (anonymized data).

We will process Personal Data that was: (i) provided directly by the Client when initiating the relationship or contracting products or services with ICBC Brasil; or (ii) obtained from external public sources, with due legal basis.

We will treat the following categories of Personal Data about the Holders:

- Personal Characteristics – Full name, date of birth, marital status, gender, age, nationality, birthplace, affiliation, profession, position in the company, name of spouse, signature;
- Identification generated by official bodies - CPF, RG (number, date of issue and issuing body), National Driver's License (CNH), Foreign Identity Card, passport (if foreign), marriage certificate (if applicable);
- Contact information: Personal e-mail, residential and business address, mobile number, business and/or home telephone, Internet Banking user code;
- Declarations: (i) About classification as a politically exposed person (PEP) or Related PEP; (ii) About having US tax residency; or (iii) related to applicability of FATCA regulation.
- Financial information: Current assets, annual income, percentage of equity held in companies.

The information collected through our service channels is stored using strict standards of secrecy and integrity, as well as physical and logical access controls, always observing the highest ethical and legal principles. If the user linked to the Client or a third party decides to provide his/her personal information on institutional websites and/or on Internet Banking to use ICBC Brasil services, such information will be treated in accordance with the purposes defined in the Internet Banking Services Agreement and in the Terms and Conditions of Use. Once the User's Personal Data has been informed, ICBC Brasil may treat, in accordance with the provisions of this Policy.

5. PROCESSING PURPOSES

Under the terms of the LGPD, ICBC Brasil processes the Personal Data to which it has access only for specific purposes and in accordance with the necessity and legal bases provided for in the referred law, such as: (i) for due compliance with legal obligations and regulatory, (ii) for the regular exercise of rights in judicial, administrative or arbitral proceedings; (iii) for credit protection, (iv) whenever necessary for the execution of the contracts signed with its Clients; or (v) to serve the legitimate interests of ICBC Brasil, its Clients or third parties.

For any other purpose that requires the consent of the Data Holders, the processing will be subject to their respective free, informed and unequivocal consent.

ICBC Brasil, as controller of Processed Personal Data, may collect, use, process and store, always in strict compliance with applicable legislation, the Personal Data to which it has access from natural persons related to Clients, as well as registration information and financial instruments for the following purposes: (i) to ensure greater security and prevent fraud, money laundering, terrorist financing and other illicit acts; (ii) ensure their proper identification, qualification and authentication; (iii) carry out credit risk analyses; (iv) comply with decisions of administrative or judicial authorities; (v) take actions due to pre-contractual relationships or during contracting or post-contracting (collection and others); (vi) Handle complaints, queries and requests made on behalf of the Client; (vii) Support the Data Holder in our communication channels; (viii) Carry out audits; (ix) Use cookies, in accordance with the Cookies Policy published on our website; (x) perform registration maintenance and updating; (xi) security and physical access control to ICBC Brasil premises.

Any and all new online services made available by ICBC Brasil will automatically be subject to the Client Privacy Policy in force at the time of use.

6. USE OF COOKIES

We use cookies during the navigation of natural persons linked to our Clients and third-party users on our website.

Cookies are small files recorded on the user's access device, while browsing the internet, which are stored in their browser and help to store their preferences and personalize their access.

Thus, we may use cookies and collect, process and store user navigation information to:

- allow navigation to be more efficient and faster;
- improve usability, experience and user interactivity when using our websites and Internet Banking and during your internet browsing;
- give more assertive and relevant information to our Client's needs and interests;
- seek greater efficiency in relation to the frequency and continuity of our communication;
- respond to queries and requests;
- perform general statistics verification.

We remind that the User can, at any time, activate mechanisms in your browser to inform you when cookies are activated or even prevent them from being activated.

The User can disable cookies that are not essential for using our website through your browser preferences. Without them, your browsing may be limited and some website functionality may be compromised. Read more about the use of cookies in our Cookie Policy published in our website.

7. DATA SHARING

We may have to share Processed Personal Data with third parties. We always require third parties to respect the security of shared Personal Data and treat it in accordance with the LGPD.

7.1 Data sharing with third parties

We will share Processed Personal Data with third parties only when and if required by law, if necessary for the performance of contracts entered into with Clients or preliminary procedures related to such

contracts, for the regular exercise of rights in legal or administrative proceedings, for credit protection or when we have a legitimate interest in doing so.

ICBC Brasil may share the necessary Processed Personal Data with the following counterparties and/or in the following cases:

- With the Central Bank of Brazil Credit Information System;
- With counterparties in credit assignment operations;
- With suppliers and providers of data processing services or related to fraud or money laundering prevention;
- Law firms hired for financial transactions or for litigation matters;
- Whenever you are obliged to disclose them, whether by virtue of a legal provision or applicable regulation, an act of a national or international competent authority, a court order or warrant;
- With the entities of credit protection and defense agencies;
- Public registry offices for the purpose of notarization, certified copies, registration of guarantees or protest;
- Electronic signature platforms.

7.2 How safe are my personal data with third parties and other ICBC Brasil entities?

All of our third-party service providers and other ICBC Brasil entities must have appropriate security measures in place to protect Personal Data Processed in accordance with our policies and in accordance with applicable legislation involving protection of Personal Data. We do not allow our third-party service providers to use Processed Personal Data for their own purposes. We only allow them to process Personal Data for specified purposes and in accordance with our instructions and regulations on the protection of Personal Data.

7.3 How we respond to legal requirements?

When any authority requests access to Processed Personal Data and this request is supported by current law or court order, ICBC Brasil will comply with such request and share the Personal Data. In these cases, ICBC Brasil will only provide the information strictly necessary for the fulfillment of the request.

7.4 Transfer of Processed Personal Data outside Brazil

We will share the strictly necessary Processed Personal Data with our controller located in China in order to: (i) ensure contractual performance or preliminary proceedings related to the contracts thought (a) the

identification of the Clients and respective guarantors and signatories and (b) comply with audit or internal controls procedures related to money laundering and terrorism; (ii) for the accomplishment of legal and regulatory obligation related to fraud prevention, money laundering, terrorism and other illicit acts.

Furthermore, we may share the necessary Processed Personal Data with the agencies of our controller located in Shanghai, Dubai and Panama when they act as direct creditors of the Client in order to: (i) ensure the execution of contracts or guarantees and preliminary proceedings related to contracts with the purpose to allow: a) the proper identification and qualification of the Client and Guarantors and its respective signatory legal representatives, (b) comply with audit or internal controls procedures related to money laundering and terrorism; (ii) comply with legal and regulatory obligation related to fraud prevention, money laundering, terrorist financing and other illicit acts;(iii) “Know Your Customer” proceedings; and (iv) credit risk analysis.

All transfers will be carried out (i) under the specific consent of the Data Holders, pursuant to art. 33, item VIII of the LGPD; or (ii) when necessary for the execution of a contract or preliminary procedures related to a contract or guarantee, compliance with legal or regulatory obligation or for the regular exercise of rights under judicial or arbitral proceeding pursuant to art. 33, item IX of the LGPD.

The other entities of ICBC Brasil will treat the Personal Data shared with a level of protection equivalent to that which ICBC Brasil adopts in relation to the Personal Data Processed.

8. SECURE TREATMENT OF PERSONAL DATA

We have created measures to protect the security of your information. A summary of these measures are available in the Summary of the Information Security and Cybersecurity Policy published in our website.

Third parties will only treat Personal Data Processed in accordance with our instructions and if they have agreed to treat them confidentially and keep them under minimum security standards.

We implement appropriate security measures to protect Processed Personal Data from unauthorized access and from accidental or unlawful situations of destruction, loss, alteration, communication or dissemination. In addition, we limit the access of Processed Personal Data to authorized employees to the direct use of this information, only as strictly necessary, and its use for other tasks is limited. They will only process the Personal Data of the Holders in accordance with our instructions and are subject to the duty of confidentiality.

We have created procedures to handle any suspected security breaches or incidents. In the event of a security incident that may cause relevant risk or damage to Data Holders, ICBC Brasil will notify the ANPD and the Data Holder, taking all the measures foreseen in the LGPD.

9. DATA RETENTION

9.1 How long will we keep your personal data?

We will only retain the Processed Personal Data for the time necessary to fulfill the purposes for which it was collected, such as the financial and service contracts entered into with the Client, being possible to keep it also to meet any legal, regulatory, accounting or audit requirements, as well as our legitimate interests. To determine the appropriate retention period for Processed Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes by other means and also the legal retention term (if any).

In some circumstances, we may anonymize personal information so that it can no longer be associated with the Data Holder, considering the use of reasonable technical means available at the time of its processing. In this case, the data will no longer be considered as Personal Data and may be used by ICBC Brasil.

10. RIGHTS OF DATA HOLDERS

10.1 The rights of the Data Holder involving the Processing Personal Data

In certain circumstances, the Data Holder has the following rights under the LGPD:

- **Access, confirmation of the existence of treatment and information about sharing:** This right allows the Data Holder to request and receive a copy of their Processed Personal Data, as well as request confirmation of the treatment that we are performing on their Personal Data. The Data Holder also has the right to receive information about any public and private entities with which we share data, if any.

- **Correction of data:** This right allows the Data Holder to request the correction of their Personal Data if they identify any error in them that some of them are incorrect, incomplete or outdated. However, for this correction to be effective, it may be necessary to check the validity of the Personal Data provided.
- **Request anonymisation, blocking or deletion of data:** This right allows the Data Holder to ask us to anonymize, block or delete their Personal Data in the following scenarios: (a) unnecessary personal data; (b) excessive personal data; or (c) personal data processed in violation of the LGPD. All Personal Data collected will be anonymized or deleted from our servers when you request it or when it is no longer necessary or relevant for us to offer you our services, unless there is another reason for its maintenance, such as a possible legal obligation to retain Personal Data or if there is a need for preservation to protect our rights.
- **Data Portability:** When applicable, we will provide the Data Holder, or a third party chosen by the Data Holder upon express request, with the Processed Personal Data.
- **Opposition to processing:** The Data Holder also has the right to contest where and in what context we are processing their Personal Data for different purposes. In certain situations, we can demonstrate that we have legitimate reasons to continue to process your data, which override your rights, if, for example, they are essential for the fulfillment of a contract with us.
- **Information about the public and private entities with which the Controller has shared the Processed Personal Data.**
- **Withdraw of consent and know the consequences of not providing consent:** The Data Holder has the right not to provide consent, at which time he will be informed about the consequences of the denial. You also have the right to withdraw your consent at any time, however this will not affect the lawfulness of any processing of Personal Data previously performed on the basis of that consent.

If the Data Holder would like to exercise any of its rights in relation to the Processed Personal Data, please contact dpo@br.icbc.com.cn.

10.2 What we may need from the Data Holder?

We may need to request specific information from the Data Holder to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any other rights). This is an appropriate

security measure to ensure that Processed Personal Data is not disclosed to any person who does not have the right to receive it.

11. RIGHT TO REVOKE CONSENT

On occasions where we may have requested the Data Holder's consent for the processing or transfer of the Processed Personal Data, the Data Holder will have the right to withdraw its consent for this specific treatment at any time. To withdraw your consent, please contact dpo@br.icbc.com.cn. Once we have received notice from the Data Holder withdrawing consent, we will no longer process such Personal Data for the purpose or purposes originally consented to, unless we have another legal or legitimate basis for doing so or are required by law.

12. RESPONSE TO PRIVACY INCIDENTS

In the event of privacy incidents, all procedures and persons responsible will be activated to ensure that the necessary measures are taken to mitigate the risks. To this end, data protection incidents are considered to be cases of:

- Unauthorized accesses;
- Leakage of Personal Data;
- Accidental or unlawful situations of destruction, loss, alteration or improper communication of Personal Data; and
- Any form of inappropriate or unlawful data processing.

In these cases, in which they may cause relevant risk or damage to Data Holders, the DPO will communicate the privacy incident to the ANPD and to the Data Holders, taking all the measures provided for in the LGPD.

If you have reason to believe that the Processed Personal Data has been lost, stolen or otherwise put at risk of unauthorized access or disclosure, please inform the DPO of ICBC Brasil immediately via email dpo@br.icbc.com.cn.

13. RELATED DOCUMENTS

- General Data Protection Law (Law 13.709/18)
- Civil Rights Framework for the Internet (Law 12,956/14)

14. PERSONAL DATA PROTECTION CHARGE

In compliance with the LGPD, we appointed a Personal Data Officer (DPO) who will guide Clients and Data Holders regarding the practices adopted in relation to the protection of Personal Data, receive complaints and communications from Data Holders, provide clarifications and adopt measures, among other functions related to the protection of Personal Data processed by ICBC Brasil, as may be established in complementary rules. If you have any questions or requests, please contact dpo@br.icbc.com.cn.

15. CHANGES TO THIS POLICY

We reserve the right to update this Policy at any time and will provide an updated version whenever we make substantial changes.