

EXTERNAL PRIVACY NOTICE

BANCO SUMITOMO MITSUI BRASILEIRO S.A.



Version 5.0

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I. Introduction

The Privacy Notice is intended to clarify and inform data subjects who access the website of Banco Sumitomo Mitsui Brasileiro S.A. (“SMBCB”) about how their personal data is processed, especially regarding the collection, use, storage, and sharing operations.

Purpose

The objective of this Privacy Notice is to inform data subjects in an objective, transparent, and accessible manner about how SMBCB collects, uses, stores, shares, and protects their personal data. It outlines the purposes for which personal data is processed, the legal bases for such processing, the rights of data subjects, and how those rights can be exercised in accordance with applicable data protection laws.

Scope

This Privacy Notice applies to any data subjects whose personal data is collected, used, or otherwise processed by SMBCB in connection with its services, operations, or business activities. It explains how we collect, use, disclose, and safeguard your information, as well as your rights under applicable data protection laws.

II. Who is SMBCB?

Banco Sumitomo Mitsui Brasileiro S.A., or simply “SMBCB”, is part of the Americas Division (“SMBCAD”) and is the Brazilian subsidiary of Sumitomo Mitsui Banking Corporation (“SMBC”). The companies within the economic group, located around the world, are identified as part of the “SMBC Group”. As such, SMBCB is subject to the same global operational guidelines, while also complying with local legislation, including privacy-related matters.

SMBCB, severally or jointly with any other company within SMBC, determines the purposes and means of the processing of your Personal Information (“PI”), therefore being the controller of your PI, responsible for ensuring security, respect for the purpose and transparency of the processing of Personal Information. If you have any comments, questions, or concerns about any of the information in this document, or any other issues relating to the processing of your PI by, please contact the SMBCB’s Privacy Officer at:

Banco Sumitomo Mitsui Brasileiro S.A.

Address: Av. Paulista nº 37, 11º e 12º floors, São Paulo/SP

Email: privacidade@smbcgroup.com.br

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III. Why does SMBCB process your PI?

As permitted by law, Personal Information is processed by SMBCB for different purposes, including, but not limited to the ones listed below:

- **Execution of services and/or contracts:** provision of services by SMBCB, including but not limited to, payment processing, guarantee and/or collateral contracts, service agreements, service order execution, financial and securities transactions, financial contracts, business relationship and customer service.
- **Compliance with legal and/or regulatory determinations:** complying with regulations, instructions and sector standards (i.e. Central Bank of Brazil - BACEN, Securities and Exchange Commission - CVM, National Monetary Council - CMN), conducting compliance procedures such as KYC ("Know Your Client", or partners, employees and service providers), and/or sharing information with regulatory agencies when determined by applicable regulations or the regulatory agencies themselves.
- **Regular exercise of SMBCB rights:** processing is necessary for the establishment, exercise or defense of legal claims or whenever SMBCB is acting in its judicial capacity.
- **Legitimate interests of the SMBCB:** when there is a relevant and appropriate business and/or legal relationship between SMBCB and you, provided that your interests or your fundamental rights and freedoms of are not overriding, taking into consideration your reasonable expectations based on your relationship with SMBCB.
- **Credit protection:** credit protection within Brazilian Financial System, such as assessing and managing credit limits and consulting SMBCB's client's credit score.
- **In activities aimed at fraud prevention:** conducting internal investigations, such as to validate claims reports on such matter or identification and authentication processes for access SMBCB platforms.
- **Indirect product marketing:** upon specific consent for such purpose.

IV. How is Personal Information collected?

For the SMBCB to provide its services and offer its products, certain information must be collected. We process Personal Information of persons who has or had a relationship with SMBCB, such as customers, attorneys, employees, people related to entities/companies that had or had a relationship with SMBCB, among others.

Only Personal Information that is strictly necessary for achieving the purposes of PI processing will be collected.

- **Personal Information provided directly by SMBCB's customers:** SMBCB will collect all Personal Information entered or actively forwarded by the user when accessing the website or through SMBCB's Registration Form when hiring a certain product or service. The Personal Information collected varies according to the type of service contracted or as registered in SMBCB's channels. Examples of information collected are:
 - **Registration data:** such as name, email, address, contact information, marital status, date of birth
 - **Financial or economic data:** bank account, branch, income, investments
- **Personal data provided by third parties:** SMBCB may, in good faith, receive Personal Information from third parties, representatives, partners and service providers to be able to provide the services offered, as well as may collect PI available from public sources or PI manifestly made public by you.
- **Data collected automatically:** SMBCB may also collect information automatically, including, but not limited to: access device characteristics, browser, IP address (date and time), origin of the IP, click information and accessed pages.

V. With whom is the PI shared?

It may be necessary to share your PI with public and private institutions when required to fulfill the purposes of the processing of your PI, and/or to support your relationship with SMBCB – for instance, sharing data to provide services and products to you.

The main examples of personal data sharing carried out by SMBCB include:

- With partners, suppliers, and service providers, to offer products and services, enable business operations, and ensure the delivery of services with quality and efficiency.
- With authorities, government entities, regulatory and supervisory bodies, and the Judiciary, when necessary to comply with laws and regulations.
- With credit bureaus, to support risk management in accordance with applicable legislation, and with specialized companies that provide data services, mainly for the validation of registration information.
- With companies within the SMBC Group, as part of an international conglomerate, to ensure the proper functioning of the products and services provided by SMBCB.

- With financial institutions and other entities that are part of the Brazilian National Financial System, in compliance with the regulations of the Central Bank of Brazil and the National Monetary Council.

In case of international transfer of PI, the SMBCB undertakes to adopt PI protection guarantees for such sharing and always respect the purposes set forth in this Notice and/or in the processing itself, provided that applicable laws are duly observed.

When sharing personal data with third parties, SMBCB only discloses the data strictly necessary to fulfill the purposes of the processing, adhering to strict security standards and complying with the requirements of the LGPD.

VI. How does SMBCB keep PI safe?

Any PI held by the SMBCB will be stored with the strictest security standards, which includes the adoption of certain security measures: including but not limited to, protection against unauthorized access to our systems.

Although the SMBCB adopts the best efforts to preserve privacy and protect PI no transmission of information is totally secure, and is always susceptible to technical failures, viruses or similar actions. In the remote possibility of occurrence of such episodes, SMBCB will adopt all appropriate measures to remedy the consequences of the event, always ensuring due transparency to you.

VII. How long is PI stored?

SMBCB will retain PIs in accordance with local regulatory and legal requirements, or in accordance with its records retention schedules, and/or other contractual or legal obligations.

PI will be held for longer between:

- a) the period permitted by applicable law or regulation; or
- b) such other period necessary for the SMBCB to fulfill the purpose of processing your PI; or
- c) when you request the deletion, except in the event where your PI needs to be kept by SMBCB to comply with a legal or regulatory obligation.

VIII. What are the rights of the PI Subjects and how can they be exercised?

SMBCB, in compliance with the applicable laws and regulations, respects and guarantees the following rights established by LGPD, including but not limited to:

- Confirmation of the existence of data processing
- Access to personal data
- Correction of incomplete, inaccurate, or outdated data
- Anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data, when applicable
- Data portability
- Deletion of data processed based on the data subject's consent
- Information about public and private entities with which SMBCB shares the PIs
- Objection to data processing

Rights related to consent, such as revocation and deletion of personal data processed based on consent, subject to the exceptions provided by the LGPD, such as compliance with legal or regulatory obligations

Your legal rights may be exercised by submitting a request to SMBCB via the following contact email: privacidade@smbcgroup.com.br.