

## ÍNDICE

|   |               |
|---|---------------|
| <b>1. INTRODUCTION.....</b>                     | <b>- 3 -</b>  |
| <b>2. GLOSSARY.....</b>                         | <b>- 3 -</b>  |
| <b>3. ACCEPTANCE.....</b>                       | <b>- 4 -</b>  |
| <b>4. INFORMATION COLLECTED .....</b>           | <b>- 4 -</b>  |
| <b>5. SHARING AND USE OF PERSONAL DATA.....</b> | <b>- 8 -</b>  |
| <b>6. ADVERTISING.....</b>                      | <b>- 10 -</b> |
| <b>7. DATA STORAGE.....</b>                     | <b>- 11 -</b> |
| <b>8. CHANGES TO THE PRIVACY POLICY.....</b>    | <b>- 11 -</b> |
| <b>9. USER RIGHTS.....</b>                      | <b>- 12 -</b> |
| <b>10. DATA PROTECTION OFFICER.....</b>         | <b>- 13 -</b> |
| <b>11. CLARIFICATIONS AND QUESTIONS .....</b>   | <b>- 13 -</b> |

## 1. INTRODUCTION

This document outlines the privacy guidelines of GOWD INSTITUIÇÃO DE PAGAMENTO ("GOWD"). This Policy aims to inform clearly and comprehensively about the Processing of Personal Data of USERS, employees, and partners to which GOWD may have access due to the use of services provided by GOWD within the GOWD System.

This Policy was prepared in accordance with Law No. 13.709/18 ("General Data Protection Law") and Law No. 12.965/14 ("Brazilian Civil Rights Framework for the Internet") and demonstrates GOWD's commitment to data protection and user privacy, ensuring that personal data processing is solely intended to enable the development of activities and the provision of quality services, in accordance with applicable legislation.

If the USER is a legal entity, the terms of this Policy will also apply to individuals who may be identified or identifiable through the processing of data provided by the USER.

For more information and usage rules for GOWD's services, USERS should consult the applicable Agreement.

## 2. GLOSSARY

**"Payment Account"**: A digital account provided now or in the future by GOWD, through which USERS can perform transactions.

**"Agreement"**: The electronic contract that governs the rules, conditions, and limits of the services to be provided by GOWD to the USER through the use of the GOWD System, including opening a Payment Account and handling funds.

**"Technical Usage Data"**: Information processed by GOWD resulting from the use of mobile devices, computers, or other devices used by the USER to access the GOWD System. Includes IP address, browsing data, site visits, page load statistics, and similar.

**"Anonymized Data"**: Information that, individually or combined with other Anonymized Data, does not identify a person using reasonable and available technical means.

**"Device Information"**: Data that may be automatically collected from any device used to access the GOWD System. May include device type, network connections, device name, IP address, browser details, geographic location, and installed applications.

**"Personal Data"**: Any information related to an identified or identifiable individual. May include full name, address, phone number, email, account number, birthdate, parental details, and government-issued IDs (e.g., RG, passport, CPF/ME).

**"Geographic Location"**: Information identifying the USER's location via GPS, Wi-Fi, or cellular triangulation. Permission may be requested to share this data; denial may impair the system's functionality.

**"Processing"**: Any operation performed on the USER's Personal Data, including collection, usage, access, reproduction, transmission, distribution, storage, modification, deletion, and more.

**"USER"**: Legal or natural person providing their own Personal Data or that of authorized representatives for processing by GOWD.

### **3. ACCEPTANCE**

By using GOWD's services and/or agreeing to the Agreement, the USER expressly declares that: (i) they have read this Policy carefully, (ii) are aware of its terms and conditions, and (iii) give their explicit consent to the processing of their Personal Data by GOWD. If the USER disagrees with the processing terms, they must refrain from using the GOWD System.

### **4. INFORMATION COLLECTED**

GOWD processes the minimum necessary Personal Data required for USERS to use its services, open and fund a Payment Account (including via credit or debit card), and perform transfers within the GOWD System.

To register for the GOWD System, USERS must provide Personal Data as requested in the

registration form, such as: full name, company name, CPF/ME or CNPJ/ME number, phone number, address, parental information, email, and any other data necessary for proper identification.

To prevent fraud and ensure data authenticity, GOWD may request additional Personal Data and supporting documents.

Financial data may include: credit/debit card number, expiry date, security code, bank account details (bank name, agency, account number), transaction information, device data, technical usage data, geographic location, and other identifiers.

Card data is collected at the moment of use, via secure systems, solely to process payments through acquirers, issuers, and brands. GOWD does not store card data.

GOWD may store indefinitely: full name, email, phone, parental info, birthdate, RG, CPF, transaction amounts, last four digits of cards, card brand, and for Pix: Pix key, bank name, agency, account number, and account holder name.

Financial data is collected encrypted via the Platform and may be stored in compliance with applicable regulations, either by GOWD or its authorized payment service provider.

GOWD may collect and store additional Personal Data for (i) compliance with legal obligations or regulatory authorities; (ii) fraud prevention and illegal transaction control; (iii) authenticity validation of information provided; and (iv) for receiving and handling user communications, claims, and rights requests.

Such data processing will always be carried out in good faith, following the principles of purpose limitation, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination, and accountability.

Additional documents and information may be requested as necessary for service delivery or GOWD's operations, and may be retained for the time required to fulfill their purposes, according to legal provisions and this Policy.

GOWD may retain Personal Data and other USER information when it has a legitimate interest or to comply with legal or regulatory requirements.

If the Payment Account is closed, GOWD may continue processing the data as per this Policy, taking steps to anonymize Personal Data whenever possible and in accordance with current legislation.

Anonymized data will be processed in such a way that the data subject cannot be identified, considering reasonable and available technical means.

GOWD's websites and internet services may collect Device Information, Technical Usage Data, and Geographic Location for purposes described in this Policy.

Cookies may also be collected to confirm identity and improve site usability. Users may disable cookies using their browser settings.

## **5. SHARING AND USE OF PERSONAL DATA**

GOWD may use the USER's Personal Data to build a database while preserving confidentiality and the identification of the USER. To improve its services, GOWD may process anonymized Device Information and Technical Usage Data that does not identify the USER. Personal Data may be shared with: (i) third-party service providers offering data storage, cloud computing, or infrastructure, under contracts that ensure the same level of data protection; (ii) GOWD group companies; (iii) outsourced partners such as foreign exchange and payment providers that support GOWD's services; (iv) financial institutions, solely to perform the services agreed under this Policy.

These third parties must comply with PCI DSS standards that apply to all entities involved in payment processing (merchants, processors, issuers, acquirers). PCI DSS is a global security standard that ensures secure handling of cardholder data.

GOWD may also disclose Personal Data if required by law or government authorities.

Aggregated or anonymized transaction data may be used to generate insights, platform statistics, and service performance reports, without identifying the USER. These may be shared publicly at GOWD's discretion.

Personal Data may also be processed to:

- Send or request payments/transfers;
- Authenticate access to the Payment Account;
- Communicate with the USER regarding services;
- Connect accounts with third-party platforms;
- Verify identity;
- Maintain data accuracy and account activity;
- Monitor purchases or potential fraud;
- Manage risks and protect the USER and platform;
- Comply with contract terms or regulations.

GOWD will not sell, disclose, or commercially use USER Personal Data except as provided in this Policy.

## **6. ADVERTISING**

The USER's email provided during registration will be used by GOWD as a communication channel solely for sending information about the GOWD System, document requests, and other registration-related communications. GOWD does not use third-party services to send emails on its behalf. If the USER receives an email believed not to be from GOWD, they should refrain from taking any action and immediately contact GOWD to verify its authenticity.

The USER acknowledges and agrees that to verify any transaction in their Payment Account—as well as to check account balances and transaction history—they must always access the Platform directly. Communications received through other channels (including email, WhatsApp, phone, or SMS) do not serve as proof of transaction.

## **7. DATA STORAGE**

The Personal Data collected by GOWD is stored on secure servers, encrypted, and protected by constantly updated information security measures. The data is kept confidential and every possible measure is taken to prevent loss, theft, misuse, alteration, and unauthorized access.

Personal Data related to USER registration will be stored as long as the USER maintains an active account and uses GOWD's services. This data may also be kept for an additional period of five (5) years for evidentiary purposes, or longer if required by legal or regulatory obligations.

Personal Data related to USER access to GOWD's website and internet services may be stored for up to six (6) months, in accordance with applicable legislation. Anonymized information that does not identify its respective subjects may be stored indefinitely for statistical purposes.

GOWD employs advanced security standards, including firewalls, antivirus software, and other tools to help protect against hacking and data leaks. Although GOWD takes security seriously, the USER is responsible for protecting and maintaining the privacy of their account and Personal Data. GOWD is not responsible for Personal Data that the USER chooses to share with third parties.

To the extent permitted by applicable law, GOWD is not responsible for illegal breaches of its platform that may compromise its database or USER Personal Data, nor for the misuse of Personal Data obtained fraudulently or unlawfully. In the event of a suspected or confirmed breach of the Platform or loss of USER Personal Data, GOWD will make every effort to minimize or eliminate the

- 6 -

risk of damage, notify affected USERS and competent authorities, and inform them of the risks involved and the measures taken to mitigate such damages.

## **8. CHANGES TO THE PRIVACY POLICY**

This Policy will be periodically reviewed by GOWD to align it with the provision of services to the USER, including removal, modification, or addition of new clauses and conditions. Any changes will be communicated to the USER, and the updated version can always be consulted by the USER via the following link: <https://gowd.com/Terms-of-Use-and-Privacy-Police.pdf>

If the USER disagrees with the changes, they may request the cancellation of their registration with GOWD. Completing the registration and/or continuing to use the GOWD Platform and Services will be interpreted as agreement and acceptance of the most current version of the Policy, including any recent amendments, which shall be fully applicable.

## **9. USER RIGHTS**

É The USER is entitled, at any time and within the limits of applicable data protection legislation, to exercise the following rights:

- (i) Confirmation of whether GOWD processes their Personal Data;
- (ii) Access to their Personal Data;
- (iii) Correction of incomplete, inaccurate, or outdated Personal Data;
- (iv) Anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed Personal Data;
- (v) Portability of their Personal Data to another service provider upon express request, in compliance with commercial and industrial confidentiality, as regulated by the competent authority;
- (vi) Deletion of Personal Data processed based on their consent, except in cases of legal or regulatory exceptions;
- (vii) Information about public and private entities with which GOWD has shared the USER's Personal Data;
- (viii) Information about the possibility of denying consent and the consequences of such denial when processing relies on consent;
- (ix) Revocation of consent, under the terms of applicable legislation.

If the USER requests the deletion of their Personal Data as mentioned in item (vi) above, they will no longer be able to use the GOWD System. These rights may be exercised by sending a written request accompanied by proof of identity to the address listed in the preamble of this Policy, addressed to GOWD's Data Protection Officer.

GOWD may contact the USER to verify their identity before processing the request, which will only be approved after identity confirmation. ENCARGADO DE PROTEÇÃO DE DADOS Para todos os fins previstos na legislação aplicável e nesta Política, figura como Encarregado de Proteção de Dados da **GOWD** o Sr. Vinicius Volpato Baltazar, com endereço comercial na sede da **GOWD** e endereço de e-mail: dpo@gowd.com.

## **10. DATA PROTECTION OFFICER**

For all purposes set forth in applicable legislation and in this Policy, the Data Protection Officer at GOWD is Mr. Vinicius Volpato Baltazar, whose business address is GOWD's headquarters and who can be contacted via email at: dpo@gowd.com.

## **11. CLARIFICATIONS AND QUESTIONS**

Any questions regarding this Policy or requests concerning USER rights may be directed to GOWD's Data Protection Officer via email at dpo@gowd.com, through the website gowd.com, or by mail to GOWD's headquarters.



