



**trace  
finance**

**TRACE FINANCE**

DATA PRIVACY POLICY  
V002

## DOCUMENT CONTROL

### HISTORY OF CHANGES TO THE DOCUMENT

Date	Department	Version	Changes/Inclusion
January/2023	Compliance	002	Policy creation

### EFFECTIVENESS

The data Privacy Policy is permanent.

The content of this document may be changed at any time according to current needs.

Whenever necessary, please check the latest available version.

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## 1. Introduction and Glossary

At Trace Finance, we take the privacy of your information very seriously, as it is our policy to respect the confidentiality of information and the privacy of individuals. This Policy stipulates how Trace Finance's personal data processing operations are conducted in accordance with current laws and regulations.

This Privacy Policy applies to the personal data processing activities of customers, potential customers, job applicants, visitors to Trace Finance offices and our websites and platforms, suppliers, and partners.

To help you understand the policy more easily, we have provided definitions for key terms used in this document:

Term	Concept
<b>LGPD</b>	The LGPD is the Brazilian law equivalent to the General Data Protection Regulation in the EU. The law brings new rules and more protective measures for companies to handle the data of individuals, including your. The aim of the law is to give you greater privacy, freedom, transparency, and control over how your personal information is used by third parties.
<b>Personal Data</b>	This refers to any information that can identify or make an individual identifiable within a given context. Some examples of personal data include name, tax ID, passport number, address, cell phone number, email, IP address, etc.
<b>Sensitive Data</b>	It is any information concerning racial or ethnic origin, religious beliefs, political opinions, union membership or affiliation to a religious, philosophical or political organization, data related to health or sexual life, genetic or biometric data, when linked to an individual.
<b>Processing</b>	These are the ways in which Trace Finance uses Personal Data, including but not limited to the following activities: collecting, storing, accessing, sharing, categorizing, copying, processing, and analyzing such data.
<b>Legal Basis</b>	These are the legal cases that authorize Trace Finance to process Personal Data: obtaining your consent or complying with a legal obligation, for instance.
<b>Data Subject</b>	That's you: the individual to whom the Personal Data refers, who may be a customer, a representative appointed by the customer or a participant in a job selection process.
<b>Platform or Website</b>	These are the websites and apps owned by Trace Finance.

## 2. Information Security

Technical and organizational measures adopted by Trace to ensure the security of your information at all times. As part of these measures, we provide regular training to our employees and raise their awareness on the importance of maintaining, protecting, and respecting your personal information, and we view any violations the privacy of personal data as a serious matter, which is why we continuously monitor our processes and have appropriate disciplinary measures in place in the event of any non-compliance, as well as the establishment of technological safeguards to prevent data breaches.

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### 3. What data does Trace Finance collect?

Data can be provided by filling out forms, questionnaires, e-mail, websites, mail, applications, telephone, contracts, and through the delivery of personal documents. Personal data can be provided through various methods, such as filling out forms, questionnaires, emails, websites, mail, apps, telephone numbers, contracts, and submitting personal documents.

#### Types of Data Collected

Personal data is requested for the purpose of identifying the person according to the purpose.

**Registration data** such as name, email, telephone number, gender, home address, tax ID (CPF), identification document, date of birth.

**Financial data** such as average monthly income and net worth.

**Professional data** such as professional experience, company and position held, education, and languages.

**Sensitive data** such as ethnicity and whether you are a person with a disability.

**Operational data** such as documents that are a part of the operation and the use of our services

#### Purpose

**Registration:** to allow you to register and utilize our Services and Products, such as accessing our global banking platform and exchange services. Some of the information is required for accountability to public authorities, and some is needed to secure your account.

**Work with us:** we use platform disclosure on our website and LinkedIn so that you can apply for one of our currently available job opportunities.

**Contact Us:** We request some of your registration data (such as name and email or telephone number) so that you can reach out to our support team.

### 4. Why does Trace Finance collect and use your personal data?

#### I To create an account

To validate you as a customer, we need to verify your identity and identification data. The use of your personal information is necessary for us to identify who you are, since we are legally required to comply with the "Know Your Customer" and other regulatory obligations for the Fraud Prevention Program.

#### II. To perform the contracted services

After opening an account, we will need to use your personal data in order to carry out our services and comply with our obligations. We will use the information to process orders and buy/sell products and services as requested and in accordance with the contractual relationship with our customers, thus complying with our contractual obligations.

#### III. To comply with a legal obligation

There are a number of legal obligations arising from applicable laws to which we and our partners are subject (e.g. financial services laws, tax laws, etc.). There are also several supervisory authorities' laws and regulations to which require us to conduct personal data processing activities for purposes such as identity verification, compliance with court orders, tax laws, and other obligations.

#### IV. To send communications and customer satisfaction surveys

We may send you communications and satisfaction surveys from time to time, as part

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of our customer feedback process. It is in our legitimate interest to obtain such opinions to ensure that our services/products are being provided at the highest level.

#### V. For behavior analysis on our Sites

Our Sites may contain data analysis tools that allow us to analyze behavior to ensure quality and provide the best user experience. The information collected is not considered personal in accordance with the terms of the LGPD, as this information is used in a way that is not linked to any user and is anonymized.

#### VI. For advertising purposes

We may use your personal data to send marketing communications by email, phone, or other previously agreed-upon forms (including social media campaigns) to ensure that you are always updated on our products and services. When we send marketing communications, they will be based on your consent. If you do not wish to receive communications from Trace Finance, please notify us and we will promptly remove your email from our advertising database.

#### VII. To guarantee property security and physical integrity

If you visit our facilities, we may record your image through our monitoring system for security purposes. Personal information will also be collected to provide your access credentials and so maintain a safe work environment.

#### IX. To provide fraud prevention assurance and security for data subjects

We need to process personal data for the purpose of analysis and prevention against fraud, in various scenarios. In addition, we may handle personal information for the security of data subjects, preventing potential crimes, measures against intrusions, and asset security.

#### X. To safeguard legitimate interests

We process personal data to safeguard our legitimate interests. Below are some examples of these activities:

- To initiate legal claims and prepare our defense in cases of litigation;
- To establish monitoring systems for our facilities, for security reasons;
- For business management measures, platform performance optimization, and product and service development;
- To analyze your personal data in order to update/verify your personal information in accordance with the money laundering framework.

#### XI. For third-party relationships

We need to verify your identity and identification data in order to validate you as a third party. The use of your personal information is necessary for us to identify who you are, as we have best practices in accordance with the "Know Your Employee and Know Your Supplier" procedure and with the best practices of the Integrity Program.

## 5. Legal Basis used by Trace Finance

Legal Basis	Concept
Consent	It is the case that authorizes the processing of Personal Data based on the free, informed, and unequivocal manifestation of the Data Subject when agreeing to the processing of their Personal Data for a specific purpose and informed by Trace Finance. When processing sensitive data, consent must be indicated as specific purposes.
Legitimate Interest	It is the legal basis that authorizes the processing of your data (even without your consent), whenever the use of such data is required to meet the legitimate interests of Trace or third parties. The Law defines that interests will only be considered legitimate if the way in which their data is used does not violate Brazilian laws, and provided that the actual transparency of such uses is given, and that their rights are respected.
Contract Performance	The LGPD authorizes the processing of personal data when necessary for the performance of a contract or of preliminary procedures relating to a contract to which the data subject is a party, at the request of the data subject, that is, the data may be processed in the context of supplying products and services when the contracting initiative arises from the data subject, and the processing is necessary for the performance of the contract or for carrying out preliminary procedures related to the contract to which the data subject is a party.
Compliance with legal or regulatory obligation	The processing of various personal data carried out by certain sectors of the economy is a statutory or regulatory obligation, particularly in regulated sectors such as finance, supplementary health, insurance, among others.

## 6. Sharing of Persona Data

Subject to the criteria defined in this Policy, Trace Finance will not disclose its customers' personal data to a third party, except:

- to meet the required measure within the terms of the applicable laws, rules or regulations;
- in the even of a disclosure obligation;
- for legitimate interest that requires disclosure; or
- at the customer's request, with their consent.

Third parties with which personal information is shared in order to perform the contracted services must carry out the processing to guarantee compliance with legal obligations. Nevertheless, we require organizations outside Trace Finance that handle

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or obtain this personal data, to recognize the criticality of this information, agree to respect all individual privacy rights and comply with all relevant data protection laws.

Below we describe some situations in which Trace we may share your Personal Data:

a) Third parties such as business service providers and consultants; Trace operates as an intermediary for opening a global account and as a foreign exchange correspondent, for this reason we share the registration and operational data with the partners that execute the services. Depending on the contracted product and service, when opening a global account, the information is sent to another jurisdiction for the performance of the contract entered into between the parties. Therefore, the laws on the processing of this shared data may be different from that provided for in the LGPD.

b) specialized contractors for administrative, financial, legal, security, research, and other services;

c) Third parties carrying out Audit work;

d) Business parties, credit providers, courts, controlling bodies, and regulatory authorities;

e) Payment service providers and/or banking institutions, for the purpose of generating and managing payments.

f) In the event that we disclose your personal data to business parties, such as payment companies, to perform the services requested by customers, those parties may store your information in order to comply with their legal obligations;

g) Any person or company, provided we have their consent;

It is worth clarifying that Trace Finance is not responsible for the use of cookies by third parties. Please be aware that third-party cookies may continue to track your online activities even after you have exited our website, so it is advisable to manually delete them.

If you wish to remove cookies installed on your computer, you can delete them manually through the settings available in your browser, as, for example, the instructions on Google Chrome, Mozilla Firefox, Microsoft Edge or Safari. Please note, however, that some of the website's functionalities may become unavailable after certain cookies have been removed.

Trace Finance has a relationship with Atomic Invest, LLC, an SEC-registered investment adviser, to bring you the opportunity to open an investment advisory account. Investment advisory services are provided by Atomic Invest. Trace Finance receives compensation of 0% to 0.85% annualized, payable monthly, based upon assets under management for each referred client who establishes an account with Atomic Invest (i.e., exact payment will differ). Trace Finance is not a client of Atomic Invest, but our relationship with Atomic invest gives us an incentive to refer you to Atomic Invest instead of another investment adviser. This conflict of interest affects our ability to provide you with unbiased, objective information about the services of Atomic Invest. This could mean that the services of another investment adviser with whom we



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do not have a relationship could be more appropriate for you than Atomic invest. Neither Atomic Invest nor Atomic Brokerage, LLC (FINRA registered broker-dealer and member of SIPC), nor any of their affiliates is a bank. Investments in securities are Not FDIC insured, Not Bank Guaranteed, and May Lose Value. Investing involves risk, including the possible loss of principal.

## **7. Data Storage Time**

Your Personal Data is stored only for as long as necessary to fulfill the purposes for which it was collected, unless there is any other reason for its maintenance, such as, for example, compliance with any legal, regulatory or contractual obligations, among other obligations, provided there is a Legal Basis for such. For example, we must store data referring to financial transactions carried out in the National Financial System for a period of 10 (ten) years, as determined by the Central Bank.

## **8. What are your rights as a Data Subject?**

The Personal Data is yours and Brazilian law ensures that you have a number of rights related to it. We are committed to complying with these rights and, in this section, we will explain how you can exercise them with Trace Finance. Brazilian law guarantees you the following rights:

Confirmation and Access	Allows you to check whether Trace processes Personal Data about you and, if so, request a copy of the Personal Data that we have on you.
Correction	Allows you to request a correction of your incomplete, inaccurate, or outdated personal data.
Anonymization, blocking or deletion	Allows you to request that we (a) anonymize your data so that it can no longer be related to you and therefore ceases to be Personal Data; (b) block your Data, temporarily suspending your ability to process it; and (c) delete your Data, in which case we will delete all of your Data without the possibility of reversal, except in cases provided by law.
Portability	You have the right to request, upon written request, that Trace Finance provide you, or a third party of your choice, with your Personal Data in a structured and interoperable format, for transfer to another service or product provider, as long as it does not violate the company's intellectual property or trade secret.
Information on sharing data	You have the right to know the public and private entities with which Trace shares data. If you have any questions or would like further details on this, you have the right to request us this information.
Information about the possibility of no consent	Allows you to obtain clear and complete information about the possibility and consequences of not providing consent. Your consent, when necessary, must be freely given and informed. Therefore, whenever we ask for your consent, you are free to refuse it – even though, in such cases, we may have to limit our Services.
Consent revocation	You have the right to withdraw your consent for processing activities that are based on consent. However, this will not affect the legality of any processing carried out previously. If you withdraw your consent, we may not be able to provide you with certain Services, but we will let you know when this occurs.
Opposition	The law authorizes the processing of Personal Data even without your consent. If you do not agree with such processing, you may, in some cases, object to it, requesting its interruption.

## 9. Contact information

Data Protection Officer: We have a DPO who oversees issues related to this Privacy Policy. If you have any questions about how to check your data and exercise your data subject rights, please contact us through the LGPD Channel: <https://forms.gle/kQAay2uZujyyWmADZ>

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## 10. Disclaimer

Trace Finance is not responsible for the misuse or loss of personal data over which it has no access or control. We are also exempt from liability for illegal and unauthorized use of this information as a result of misuse or misuse of your access credentials, negligent or malicious conduct due to acts or omissions on your part or someone authorized on your behalf.