



PRIVACY POLICY

May 2024

A. Purpose

This Privacy Policy describes how **Plural Markets Gestão de Ativos – Sociedade de Capital de Risco, SA** (Plural GA) (i) processes the personal data of its clients and other holders of personal data; (ii) reflects the commitment to privacy, confidentiality and security of personal data; and (iii) fulfills the duties set out in applicable legislation and regulations regarding the personal data protection.

The document explains what personal data is, the purposes for which Plural GA may use such data, the processing, sharing and preservation of data, and how to contact Plural GA to exercise your rights.

Plural GA may review or change this Privacy Policy at any time, and these reviews or changes will be valid after the latest version is published on the website.

B. Personal data

Personal data is understood to be any information that can identify, either directly or indirectly, an individual (data subject).

For Plural GA to be able to provide its services, offer its products and fulfill its obligations, it may collect personal data expressly provided by the respective subjects, and it also may have to provide its personal data to other entities, always adopting the necessary measures necessary to ensure confidentiality.

Personal data is obtained through the following situations:

- Personal data provided directly by subjects, in writing, by telephone or in person, when opening accounts, contracting products and services, and accessing and interacting with Plural GA's contact media.
- Personal data collected in the process of accessing Plural GA's products and services by subjects, such as: contracts, transactions, payments, investor profile.
- Personal data provided by third party entities that have a relationship with the subjects, such as: government authorities, credit bureaus.
- Personal data collected during the use of Plural GA website and applications, including cookies and information about the equipment used (IP address, geographic location, browser), with the aim of improving your user experience on our products and services in accordance with your habits and preferences, as well as preventing fraud or complying with legal and regulatory obligations to which Plural GA is subject.

Plural GA processes personal data on a restricted basis and with the necessary security measures, for the following main purposes:

- Service: response to client comments, complaints, and requests, including the whistleblowing channel and the complaints book.
- Account opening and management: registration, modification and collection of data and documents from clients or their representatives, including the management of access credentials to electronic channels.
- Management of products and services: execution and processing of operations and transactions requested by the client, such as: fund subscriptions, deposits and payments, agreements, provision of information, response to promotional actions and satisfaction surveys, direct marketing.
- Compliance with legal and regulatory obligations: execution of the internal processes necessary to comply with the various laws and regulations applicable to Plural GA, such as the processes for subscription and redemption of participation shares; preventing money laundering and combating the financing of terrorism; accounting and financial reporting; security of physical installations; fraud prevention; responding to requests from regulators, external auditors and government authorities.
- Internal control: monitoring processes for information systems and technological infrastructure; production and analysis of data under Plural GA's control and management.

C. Cookies

Cookies are small text files stored in the browser or computer, with information that allows the user and their preferences to be identified, with the aim of improving services, guaranteeing and adapting the operation of websites, making their use and browser experience easier.

Plural GA website uses cookies for the following purposes:

- For the proper operation of Plural GA website, namely user authentication and security mechanisms. The user can set up their browser to block, remove or alert about these cookies, but they are strictly necessary and cannot be disabled, as the site may not operate correctly.
- To identify user preferences when navigating the website, with the aim of improving its performance and assigning features and customizations. They will only be enabled with consent of the user, who can refuse or remove these cookies through the privacy and security settings of the browser they use.
- For customizing advertising, according to the identification of the user's interests and browsing habits. They will only be enabled with the user's consent, who can

refuse or remove these cookies through the privacy and security settings of the browser they use.

D. Data Subject Rights

The data subject has the following rights in relation to data processing:

- **Right of Access:** The data subject has the right to obtain from the controller confirmation that personal data concerning them are being processed or not and, if applicable, the right to access their personal data and information about (i) the purpose of the processing; (ii) the categories of personal data in question; (iii) the recipients to whom the data has been or will be disclosed; (iv) the expected retention period; (v) the existence of the right to request rectification, deletion or limitation of the processing of personal data referring to the data subject, or the right to object to such processing; (vi) the right to file a complaint with a supervisory authority; (vii) if the data has not been collected from the subject, the information available about the origin of that data; and (viii) the existence of automated decisions.
- **Right to Rectification:** The data subject has the right to obtain, without undue delay, from the controller the rectification of inaccurate personal data concerning them. Considering the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of an additional statement.
- **Right to Be Forgotten:** The data subject has the right to obtain from the controller the deletion of their personal data, without undue delay, and the data subject has the obligation to delete the personal data, without undue delay, in accordance with the reasons provided for in applicable legislation and regulations.
- **Right to Limitation of Processing:** The data subject has the right to obtain from the controller the limitation of treatment, in situations (i) in which there is inaccuracy of data; (ii) where the processing is unlawful and the data subject opposes the erasure of personal data; (iii) in which Plural GA no longer needs the personal data, but they are required by the subject for the purposes of stating, exercising or defending a right in legal proceedings; and (iv) if he or she has objected to the processing, until it is verified that the legitimate reasons of the controller prevail over those of the data subject.
- **Right to Data Portability:** The data subject has the right to receive the personal data concerning them and which they have provided to a controller, in a structured, commonly used and machine-readable format, and the right to transmit these data to another controller without the first one to whom the personal data was provided being able to prevent it, if the processing is based on consent and is carried out by automated means.

- **Right to Object:** The data subject has the right to object at any time, for reasons related to their particular situation, to the processing of personal data concerning them. The controller ceases processing personal data, unless it presents compelling and legitimate reasons for such processing that prevail over data subject's interests, rights and freedom, or for the purposes of stating, exercising or defending a right in legal proceedings.
- **Right to Withdraw Consent:** The data subject has the right to withdraw their consent at any time. The withdrawal of consent does not jeopardize the lawfulness of the processing conducted based on the consent previously given. Before giving consent, the data subject is informed of this fact. Consent should be as easy to withdraw as it is to give it.
- **Automated Individual Decisions:** The data subject has the right not to be subject to any decision made exclusively on the basis of automated processing, including profiling that produces legal effects or that significantly affects them in an equivalent way.
- **Right to file a complaint with a Supervisory Authority:** Without prejudice to any other administrative or judicial remedy, the data subject has the right to file a complaint with a supervisory authority, if they consider that the processing of personal data concerning them violates the protection of their personal data.

Should there be any questions, comments, or exercise of any of the rights listed above, please contact Plural GA. To exercise rights, Plural GA may request additional information and documents, aiming to avoid fraud, as well as to follow the applicable regulatory provisions and guidelines from the competent authorities.

If Plural GA considers that it cannot respond to a data subject's request regarding the exercise of rights listed above, it will inform the respective reasons, as well as the need to extend the deadline for response, due to its complexity or impacts.

E. Sharing of Personal Data

Within the scope of Plural GA's activities, sharing is necessary to comply with its legal, regulatory, and contractual obligations, so Plural GA may share personal data with other companies in the Group to which Plural GA belongs, government and supervisory authorities, providers of complementary finance services and subcontractors:

- **Service providers and subcontractors:** Plural GA may contract other companies to conduct certain activities, such as data hosting services, auditing, custodians, document management. Such activities may, in the context of conducting the contracted activities, receive personal data. Plural GA includes, in its contracts with third parties, clauses with the aim of protecting the privacy of personal data, and it acts in the management of such clauses.

- Government and supervisory authorities: To comply with legal and regulatory obligations, Plural GA may share clients' personal data with authorities such as Banco de Portugal, Portuguese Securities Market Commission (CMVM), Tax and Customs Authority (AT) and bodies of the European Union.
- Group Companies: Plural GA may share personal data between companies that make up the Group to which it belongs, to perform its activities and provide its services and to comply with legal, regulatory, and contractual obligations.
- Protection of rights: Plural GA reserves the right to access, read, retain, and report any data necessary to comply with a legal or regulatory obligation, or to protect the rights, property, or safety of Plural GA and its clients and employees.

F. Retention of Personal Data

Plural GA processes and retains personal data for the necessary period of time necessary according to the purposes for which they were collected and legal, regulatory, and contractual obligations.

G. International Transmission of Personal Data

Plural GA may transfer personal data collected in Portugal to other countries outside the European Union, for example when they are stored by Plural GA on cloud computing servers located outside Portugal, for the purposes established in this Policy.

Plural GA has its headquarters in Portugal and the data collected is governed by the legislation and regulations of Portugal and the European Union. The data subject, when registering on Plural GA's platforms or signing a service agreement with Plural GA, agrees to the transfer of their data to other countries that may have data protection laws and requirements different from those that apply to Portugal and the European Union. Plural GA will contractually ensure that entities contracted in third countries comply with all necessary practices for proper data protection.

H. Personal Data Security

Plural GA adopts all security standards that it considers necessary to preserve the confidentiality and integrity of personal data and build a relationship of trust with its clients, employees, authorities, and service providers.

In line with the scope of this Policy, Plural GA adopts personal data security measures, which include mechanisms: (i) to control access to information in physical or electronic format and respective records of actions performed; (ii) against destruction, change and unauthorized access; (iii) anonymization; (iv) access control and physical security; and (v) training employees in information and cyber security matters.

I. Contact with Plural GA

For any clarification, comments or suggestions related to this Policy, or suspected misuse of personal data, the data subject may contact Plural GA through the service channels provided on its website.

May 2024.