

PRIVACY POLICY

The privacy policy guidelines of eNor Securities fully adhere to the commitment of the organization's Senior Management to ensure the application of the principles of Personal Data Protection Laws of its clients, partners, professionals, or any institution or person who has a relationship with the organization.

The privacy and security of the user's personal data are of great importance to us at eNor Securities. Therefore, we explain transparently how we collect, store, share, and use the user's personal data.

This document aims to clarify the rights and duties of data subjects regarding the rules for data processing, which include, by way of example, operations such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation, or control of information, modification, communication, transfer, dissemination, or extraction of data collected from USERS, in addition to the recording of their activities, in accordance with applicable laws.

WHEN THE USER ACCEPTS THIS PRIVACY POLICY, HE OR SHE FREELY AND EXPRESSLY AGREES TO THE TERMS STIPULATED HEREIN.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If the user follows a link to any of these websites, they should note that these websites have their own privacy policies and that we have no responsibility for these policies.

By using the eNor Securities Platform, the user expressly warrants that they are fully capable (over 18 years old without any legal impediment) to exercise and enjoy all services.

1. IMPORTANT SETTINGS

For the purposes of this document, the following definitions and descriptions should be considered for better understanding:

USER: a person who accesses or interacts with the features offered by the websites, applications, and services provided by eNor Securities. The USER must have legal capacity to accept and consent to this PRIVACY POLICY and other documents of the organization.

ACCOUNT: it is the means through which the USER is represented when accessing the features of the website, applications, and services offered by eNor Securities, usually corresponding to a set of data that represents the USER (such as registration data) and other relevant data to ensure a more appropriate and complete relationship between eNor Securities and the USER.

COOKIES: small files or data packets sent by eNor Securities to the USER's device to identify them and collect information that will help eNor Securities improve the services provided to the USER.

PERSONAL DATA: information related to an identified or identifiable natural person. It may include, for example, name, address, email, phone number, debit/credit card number, IP address, proof of residence, and income.

DATA PROTECTION OFFICER: a natural or legal person appointed by eNor Securities responsible for acting as a communication channel between the controller, data subjects, and National Data Protection Authorities.

CONTROLLER: a natural or legal person, public or private, who is responsible for making decisions regarding the processing of personal data.

DATABASE: a structured set of personal data located in one or more locations, in electronic or physical support.

CONSENT: it is the free, informed, and unequivocal manifestation by which the USER agrees to the use of their personal data.

PAYMENT GATEWAY: It is the company that provides a service consisting of linking the platforms for selling products, with the Acquirers, Sub-Acquirers, Brands, or Intermediaries, in order to enhance and ensure security in the relationships between "buyer users" and "seller users."

PAYMENT GATEWAY USER: natural or legal persons registered and using the payment gateway.

2. INFORMATION ABOUT DATA COLLECTION

2.1 WHAT TYPES OF INFORMATION DO WE COLLECT?

PERSONAL DATA will be collected when voluntarily entered or submitted by the USER on the website, applications, and services offered by eNor Securities, such as creating an ACCOUNT, browsing, interacting with content, and acquiring services.

Personal data submitted automatically and without the need for any action by the USER will also be collected, such as through Cookies or by partners who have obtained authorization to share personal data with eNor Securities.

eNor Securities processes the PERSONAL DATA of USERS as necessary to fulfill its legal and contractual obligations, operate businesses, and provide the products and services that users use.

The legal basis legitimizing the processing of personal data will be the consent given when signing up and registering on the platform, expressly accepting the provisions herein.

INFORMATION AND CONTENT YOU PROVIDE

We collect the content, communications, and other information you provide when registering to create an account: full name, user's identification document number, date of birth, email address, phone number.

INFORMATION ABOUT TRANSACTIONS CARRIED OUT ON OUR PAYMENT GATEWAY

If you use our payment gateway for purchases or other financial transactions, we collect information about the account or transaction. This includes payment information, other account and authentication information, billing details, and contact information.

ACCESS LOG INFORMATION

We collect information from and about the computers, phones, and other web-connected devices you use when accessing our platform and integrating with our payment gateway, and we combine this information from the different devices you use.

The information we obtain from these devices includes:

- a) **Device attributes:** information such as operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, file and application names and types, and plugins.
- b) **Network and connections:** Information such as the name of your mobile operator or internet service provider, language, time zone, mobile phone number, IP address, connection speed.
- c) **Device signals:** Bluetooth signals and information about nearby Wi-Fi access points, beacons, and cell towers.
- d) **Device configuration data:** Information you allow us to receive through the device settings you enable, such as access to your GPS location, camera, or photos.

2.2 HOW DO WE USE THIS INFORMATION?

Account creation/Login to devices: The personal data collected when creating your account will be used for your identification and authentication when using our services. This way, you can use the same account information to log in from any location or device.

Improving our products and services: Your personal data will be used to build a profile about you, understand how you use our products and services, develop new, more interesting and relevant products and services, as well as personalize the products and services we already offer you.

Processing your order: We use the relevant personal data described above to process, deliver, and inform you about the status of your operations.

Conducting checks: We will also use your personal data to assess your suitability and prevent fraud.

Customer Service: If you contact our Customer Service Channels (or vice versa), we will use personal data to process your request and provide the best possible service/solution.

For marketing actions: When you sign up to receive eNor Securities' newsletters or "Insights" service, create an account, request or provide feedback on a product or

service online, or use our website, we will use your personal data to create a profile based on the information we have about you. We create your profile according to your preferences to offer the best personalized experience and send personalized marketing messages and newsletters, as well as for opinion research. In order to achieve these objectives, eNor Securities uses your personal data according to how you interact with our brand through all the different channels described above, and the information we collect about it through each of these channels says a lot about your interests and preferences. This insight allows us to offer the best possible experience. If you have allowed us to send marketing communications, we will use the information you provided when interacting with us to send messages with this purpose, but in a personalized way, about the products or services, discounts, gifts, events, and commercial promotions held by eNor Securities. In some circumstances, we also combine your personal information with that of others to create comprehensive reports on how customers use our products and services and experience our brand, but for statistical purposes, we will use your personal data anonymously. Additionally, we will send direct marketing communications through the channel you choose and authorize, such as email, phone, or social media. As mentioned, the messages we forward will be personalized and customized according to your individual preferences and interests. We use analytical data to generate these personalized messages. These direct marketing messages may contain information about products and services, events, gifts or promotions, and news about eNor Securities. In certain circumstances, we will also use the channels for opinion research (to ask if you would like to participate in a survey), as well as to learn more about your experience.

Redirection: Our websites use redirection technologies. This ensures that we show our visitors, who have already shown interest in our store and our products and/or services, our ads on other sites. We believe that presenting personalized ads, based on interests, is more interesting and relevant to our customers than presenting ads that have no personal connection. Redirection technologies analyze the information we collect about your interactions, as described above, regarding marketing actions, including your cookies, and display ads based on your previous web browsing behavior.

Enrichment of our data: By obtaining your information from various sources, we combine this information, in some circumstances, to enrich our understanding of your preferences for our products and services, in order to improve your experience by sending you personalized marketing or preparing more effective marketing campaigns.

Improving our products and services: We use the personal data we hold about you (as well as information in the form of pseudonyms or anonymized generated by your personal information) to carry out our analysis and research, including: data science or analysis, where we combine information (such as personal and/or sensitive information obtained through the use of a Training app or your browsing history, for example) that we maintain on a large scale, in order to learn more about our customers and their preferences, identify their patterns and trends, enhance the user experience on our websites, provide information, content, and offers tailored to individualized needs,

generic research and statistical purposes, or even for aggregate reporting of the eNor Securities group. It may also help us develop new products and services, monitor their performance, and/or improve our technology.

Website: Personal data collected via our website will be used to enable us to evaluate browsing behaviors on our site, understand where improvements can be made, optimize our products and services, as well as to personalize and enhance your experience on our site.

Performance analysis: We will use your personal data (including via anonymization and aggregation with the personal information of other customers) for sales, supply chain, and financial analysis purposes, in order to determine how eNor Securities is performing, where improvements can be made, and, when necessary, inform our controller or group affiliates.

We will request your permission if we want to use your personal data for purposes other than those mentioned in this Privacy Policy.

2.3 IS YOUR INFORMATION SHARED?

eNor Securities operates with the automation of payment routines and financial transactions, thus it may work together with other companies to provide services adequately. The sharing of personal data may involve companies such as payment processors, fraud prevention agents, and agencies. Your information is shared with other parties as follows:

Suppliers and service providers: We work with external partners who help us provide and improve our payment gateway. It is important to note that we impose strong restrictions on how our partners can use and disclose the data we provide. We provide information and content to suppliers and service providers who enable the operation of our business, whether by providing technical infrastructure services, analyzing how our platform is used, providing customer service, facilitating payments, or conducting research.

Law enforcement or legal requests: eNor Securities may also share your information with law enforcement authorities, judicial authorities, competent public authorities, or other third parties, both within and outside the country in which you reside, if required by applicable law, court order, or request from authorities, or if necessary to respond to legal proceedings or to participate in any litigation or disputes of any kind.

With eNor Securities Group companies: We may share the data we collect with companies within the Economic Group to which eNor Securities belongs. The same guarantees and care that eNor Securities has with your data will be replicated by eNor Securities Group companies. Sharing data with eNor Securities Group companies will serve the following purposes: development of new products and services, offering products and services that best meet your interests, generating statistical and aggregated data about the use of our products and services, and user profiles.

2.4 DO WE TRANSFER YOUR DATA TO OTHER COUNTRIES?

We may perform international data transfers to other countries in order to carry out some activities involved in the services provided to you, as well as to obtain information that may contribute to the improvement of our services.

In any case of sharing with partners located in other countries, we contractually establish that the partner has the duty to maintain the standard of data protection and information security compatible with this privacy policy, so that your data is always protected accordingly.

3. HOW DO WE PROTECT YOUR INFORMATION?

eNor Securities makes every effort to respect and protect your personal information against loss, theft, or any form of misuse, as well as against unauthorized access, disclosure, alteration, and destruction.

We only handle your data with a high level of security, implementing industry best practices for data protection, such as encryption techniques, monitoring, and regular security testing. However, it is not possible to completely guarantee the non-occurrence of interceptions and breaches of eNor Securities' systems and databases, as the internet's security structure is continuously evolving.

4. HOW LONG IS THE INFORMATION STORED?

eNor Securities stores your information for the period necessary for the purposes outlined in the Terms and Conditions of Use of eNor Securities and in this Privacy Policy, respecting the data retention period determined by applicable law.

If you request the deletion of your account, your personal information provided to eNor Securities during your use of our services will be permanently deleted whenever required by law.

In some cases, we may retain your information even if you delete your account, such as in cases of mandatory record-keeping obligations under applicable law, if there is an unresolved issue related to your account (such as an unresolved complaint or dispute), or if it is necessary for our legitimate business interests, such as fraud prevention and enhancing the security of our users.

5. WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?

The data subject has the right to obtain from the controller, regarding the data processed by the controller, at any time and upon request:

- Right to access: the right of the data subject to obtain from the controller confirmation of the processing of their data and, furthermore, to request access to their personal information.

- Right to rectification: the right of the data subject to ensure that their personal data is accurate and up-to-date as necessary.

- Right to erasure or to be forgotten: the right of the data subject to request from the controller the erasure of their personal data without undue delay.
- Right to object and restrict processing: the right of the data subject to object to the processing of their data and, furthermore, to restrict it if desired.
- Right to data portability: the right of the data subject to obtain their information in a structured, machine-readable format or to have their data transferred to another organization if possible.
- Right to information: the right of the data subject to be informed about how and why their personal data is being processed.
- Right to notification: in case of a data breach, data subjects should be notified within 72 hours of becoming aware of the breach.

Please contact the data protection officer of eNor Securities if you have any questions about how we process your personal data or wish to exercise any of your rights regarding your personal data.

The contact of the data protection officer is the address support@enorsecurities.com

If, despite eNor Securities' commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we advise you to first contact eNor Securities to try to resolve any issues.

6. UPDATING THIS POLICY

eNor Securities may change, at any time, this Privacy Policy, due to changes/updates in its platform or associated technologies, as well as whenever it deems necessary, aiming at its improvement and enhancement of the services provided. Upon updates to this document, eNor Securities will notify the USER through the tools available on the websites, applications, and services provided and/or contact means provided by the USER. The USER will be bound by the new terms of this document from the delivery of the notification about the updates.

The new Privacy Policy will take effect 10 (ten) days after its publication on the website. Within 5 (five) days counted from the publication of the new version, the USER must communicate by email if they do not agree with the altered terms. In this case, the contractual link will cease to exist, provided there are no open accounts or debts. In the absence of a manifestation within the stipulated period, it will be understood that the USER has accepted the new terms of the Privacy Policy, and the contract will continue to bind the parties.

7. HOW TO CONTACT US

If you have any questions or doubts regarding the Privacy Policy of eNor Securities or any practice described herein, please contact us through the "CONTACT" tab on the eNor Securities website. For your request to be properly analyzed by us, it must contain, at least, the following information:

- - Full name;
- - Type and number of identification document;
- - Contact phone number;
- - Email (the same used in the eNor Securities registration)
- - Description of the doubt or reasons for any request.

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