



PRIVACY NOTICE

November, 2025

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This Privacy Notice ("**Notice**") of **Glina Brasil LTDA.**, and other companies of the group, which encompasses its controlling and controlled companies, directly or indirectly, as well as its affiliates and companies under common control in the United States ("**Glina Group**" or "**Glina**"), was created to demonstrate our commitment to always process your personal data with security, observing privacy and transparency, having as reference the General Data Protection Law (Federal Law No. 13.709/2018, or simply "**LGPD**"), and other applicable regulations.

This Notice describes the personal data we collect, how they are used, stored and shared, and your rights in relation to such data. For this reason, we recommend that you read this Notice to the end..

If you do not agree with the processing of your personal data as described in this Notice, we recommend that you do not use our services and our platform..

The controller of your personal data, that is, the company responsible for making decisions about the processing of your personal data, shall be Glina Brasil LTDA., a legal entity under private law, with headquarters at Rua Eduardo de Souza Aranha, 153, 5th floor, Itaim Bibi, São Paulo, SP, 04543-904, registered with the CNPJ under No. 58.113.118/0001-06.

If, after reading this Notice, you have any questions, or for any reason need to communicate with us to address matters involving privacy and personal data, you may contact us through the channel indicated below:

Data Protection Officer("DPO")

legal@glina.us

APPLICATION

This Notice is applicable to all clients, active and inactive, and prospects of Glina in Brazil ("**Data Subjects**")

- **Glina Clients:** natural persons who effectively contract, use or access one or more services or products of Glina (whether for yourself or for your legal entity).
- **Glina Prospects:** natural persons prospected by Glina or who have already requested the contracting of one of the services or products, but who have not become Glina Clients for any reason.

INFORMATION COLLECTED FROM DATA SUBJECT

From where is the data and information of Data Subjects collected?

Glina collects information about Data Subjects: (i) that is provided directly by the Data Subject; (ii) originated from the execution or negotiation of contracts; (iii) generated

during the provision of contracted services; (iv) generated through your use of our platform; or (v) from legitimate sources and in accordance with the law.

What types of data and information may Glina collect?

The data we collect about Data Subjects includes

- Identification data: full name, if applicable, of your representative, contact information (including telephone and email), residential address,
- Registration data: marital status, professional occupation, date of birth, nationality, spouse's data.
- Personal document data: RG or RNE number, CPF, driver's license, and Work Card, passport number.
- Financial data: branch and account number, amount of transactions carried out, income.
- Device data: IP address, geolocation, device brand and model, current application version.
- Other data provided by you: other information voluntarily provided by you, for example, in communications with Glina.

The fact that any personal data is listed above does not mean that such data will necessarily be collected from the Data Subject. Some of the data will only be collected in specific situations and only if applicable to the Data Subject, in the context of their relationship with Glina.

Glina will only collect your personal data based on the legal grounds provided by the LGPD, as set forth in the "Legal Grounds" section below.

USE OF YOUR INFORMATIONS

In general, Glina use Data Subjects' information for the following purposes:

- To carry out your registration and keep it updated;
- To confirm your identity;
- To carry out know your customer processes
- To execute the contracting of our services;
- To provide our services;
- To carry out anti-fraud verification;
- To execute due charges;
- To ensure security in the provision of our services;
- To allow our communication with you;
- To carry out marketing and send offers;
- To prospect our services;
- To comply with contractual obligations established in our contract with you;
- To comply with legal or regulatory obligations to which Glina is subject;
- To comply with judicial decisions or decisions of supervisory authorities;
- To provide support to you in our services;

- To evaluate improvements and updates in our services and platform;
- To improve our platform to optimize its use;
- To defend ourselves in judicial, administrative or arbitration proceedings of which we are a party.

We will always take appropriate measures to ensure that we keep your personal information secure, accurate and up to date.

USE OF COOKIES

Cookies are internet files that temporarily store what you are visiting on the network. Cookies can be used for various purposes, including remembering you and your preferences, storing information related to your activities on the visited website, or collecting information that can be used to offer content in a personalized way. Glina may use cookies or other personal identification technologies to help personalize your browsing experience on our platform.

We emphasize that you may, at any time, block the use of cookies by activating a setting in your internet browser and your ability to limit cookies will be subject to the settings and limitations of your browser. You may also delete existing cookies through the same settings of your internet browser. If you choose to disable cookies, you may continue browsing our platform, but some parts of the pages may stop working.

INFORMATION SHARING

With whom does Glina share the data and information of Data Subjects?

In certain situations, Glina may share the Data Subject's personal data with third parties when reasonably necessary to meet the purposes established in this Notice.

Whenever carried out, data sharing will be performed within the limits and purposes of our business and in accordance with applicable legislation.

We may share your personal data as follows:

1.1 With other companies of the Glina Group, to:

- Execute foreign exchange transactions
- Allow database integration and/or migration
- Ensure the prevention and resolution of technical or security problems
- Conduct investigations and prevention and combat measures against illegal acts, fraud, financial crimes and ensure the security of Data Subjects
- Allow the regular exercise of Glina's rights
- Comply with legal or regulatory obligation

1.2 Business partners, service providers and other third parties

- Allow the improvement of our services and our platform;
- Allow the operationalization of new products or services
- Make contact by telephone, email, SMS, WhatsApp, push notification or other means of communication
- Execute charges
- Verify your identity and eligibility to contract Glina's services
- Execute foreign exchange transactions
- Ensure the prevention and resolution of technical or security problems
- Conduct investigations and prevention and combat measures against illegal acts, fraud, financial crimes and ensure the security of Glina clients
- Allow the regular exercise of Glina's rights
- Comply with legal or regulatory obligations
- Allow the performance of audits
- Allow the contracting of legal services

1.3 Judicial, police or governmental authorities:

- Comply with legal or regulatory obligations
- Comply with judicial, police or governmental authority orders

1.4 Corporate Operations

- If Glina conducts a corporate reorganization, whether through investment, merger, acquisition, spin-off, business transfer or any other form, personal data may be shared with the potential buyer/investor.

INTERNATIONAL DATA TRANSFER

Does Glina transfer the data and information of Data Subjects abroad?

In some cases, to fulfill the purposes provided herein, Glina will need to transfer data abroad. In such cases, we will take all necessary and appropriate measures to ensure that the international transfer will occur in accordance with the provisions of the LGPD and applicable regulations.

RETENTION AND DELETION

For how long does Glina retain the data information of Data Subjects?

As a general principle, we do not retain information from Data Subjects (except in anonymized form) for longer than we need, given the purposes for which this information was collected and processed. This means that we will generally retain information about the Data Subject only for the period necessary to fulfill the purposes described in this Notice.

Some information may be retained, even after achieving the purposes, for the period necessary to comply with legal or regulatory obligations by Glina. Other times we may keep the Data Subject's data and information when we have a legitimate interest in doing so, and/or for the protection and regular exercise of our rights in judicial, administrative or arbitration proceedings.

If the Data Subject wants more information about the storage of their personal data and its term, please consult our DPO via email legal@glina.us

RIGHTS OF THE PERSONAL DATA SUBJECT

As a Data Subject whose personal data is processed by Glina, you have the following rights regarding your personal data:

- **Confirmation of the existence of Processing:** If you are a Glina Client, this means that we process your personal data, even if such processing is, among others, the storage of personal data in a secure and controlled environment. In any case, you may request Glina to confirm whether it processes your personal data.
- **Access to Personal Data:** You may request that Glina inform and provide the personal data it has in relation to you.
- **Correction of data:** If you verify that your personal data is incomplete, inaccurate or outdated, you may request correction or completion. For this, if it is not possible to make the change directly through our platform, you will need to send a document proving the correct and current form of the personal data.
- **Anonymization, blocking or deletion of data:** If any personal data is processed unnecessarily, in excess for the purpose for which it is intended or in non-compliance with the LGPD, you may request that Glina anonymize, block or delete such data, provided that it is effectively verified, after internal verification, the excess, lack of necessity or non-compliance with the law.
- **Portability:** When regulated by the National Data Protection Authority (ANPD), you may request Glina to port your personal data to another service provider. In addition, you have the right to petition the ANPD regarding your personal data.
- **Obtain information about with whom we share personal data:** You have the right to request information about with whom we share personal data. Note, however, that such information is already provided in the "Information Sharing" section of this Notice.
- **Obtain information about the possibility of not providing your consent:** Whenever the processing of personal data is based on your consent, you will have the right to receive information about the possibility of not providing your consent and about the consequences of not providing it.
- **Withdrawal of consent:** Whenever Glina processes your personal data based on your consent, you have the right to freely withdraw such consent at any time. All processing carried out under the consent given previously will remain valid.

- **Deletion of data processed based on consent:** You have the right to request the deletion of personal data when the processing of your personal data is based on your consent and there is no other legal ground that allows the processing of the data.
- **Review of automated decisions:** If Glina makes automated decisions based on your personal data, you will have the right to request the review of such decisions.

All the rights above may be exercised free of charge, through an express request to Glina, via our Data Protection Officer (i.e., DPO) by email: legal@glina.us

If it is impossible for any reason for Glina to adopt the requested measure, Glina will inform the Data Subject of the factual and/or legal reasons that prevent the adoption of the requested measure.

SECURITY MEASURES

Glina adopts security measures, technical and administrative, capable of protecting personal data against security incidents (including unauthorized access, modification, destruction or disclosure).

To ensure security and adopt adequate measures, Glina will take into consideration the form of storage, implementation costs and the nature, scope, context and purpose of personal data processing, as well as the probability and severity of risks to the rights and freedoms of the Data Subject.

Personal data under Glina's control will not be shared with third parties, unless such third parties have agreed to comply with certain data security procedures, or demonstrate to Glina the existence and compliance with other adequate measures.

However, Glina disclaims responsibility for the exclusive fault of third parties, such as in case of hacker or cracker attacks, or for the exclusive fault of the Data Subject, such as, for example, when the Data Subject themselves transfers or exposes their personal data to third parties.

LEGAL GROUNDS

Glina may process your personal data in different circumstances according to some of the legal grounds provided in article 7 of the LGPD, being:

1. Consent of the data subject;
2. Legitimate interest of Glina or third parties;
3. Execution of a contract or preliminary procedures related to a contract of which the data subject is a party;
4. Regular exercise of rights, including in judicial, administrative or arbitration proceedings;
5. Protection of the life or physical safety of the data subject or third party;
6. Compliance with legal or regulatory obligation;
7. Credit protection.

If Glina processes sensitive personal data, such data may be processed by Glina according to the following legal grounds provided in article 11 of the LGPD:

1. Specific and highlighted consent of the data subject or their legal guardian;
2. Compliance with legal or regulatory obligation;
3. Regular exercise of rights, including in contract, judicial, administrative or arbitration proceedings;
4. Protection of the life or physical safety of the data subject or third party;
5. Guarantee of fraud prevention and security of the data subject, in identification and authentication processes of registration in electronic systems.

NOTICE UPDATES

We reserve the right to review the content of this Notice from time to time, in particular to adapt it to new legal and regulatory determinations and technical developments, so that we may also safeguard the protection of personal data in the future.

The current version of this Policy was last updated on 19/11/2025