

PRIVACY NOTICE

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Objectives

For Autonomy Investimentos, consisting of Autonomy Investimentos Ltda. and its affiliates, some of which are domiciled in the European Union ("AI", "we", "us" or "our"), the protection of privacy and personal information (i.e. any information relating to an identified or identifiable individual person, "Personal Data") is an important concern to which we pay special attention within all our business processes. We believe in transparency and are committed to being upfront about our privacy practices, including how we treat Personal Data.

The purpose of this privacy notice ("Privacy Notice") is to inform you (hereinafter: "You", "Your", "Contracting Party", "Client", or "Supplier") about processing of your personal data when you visit and use this website, in the preparation and conclusion of a contract with us, when investing in our funds and in the context of marketing measures by AI. This includes general information regarding which kind of Personal Data we will collect, process and for which purposes we use this Personal Data, how long we will retain or with whom we will share this Personal Data and which rights you as a data subject have in this regard.

General Information

a) Who is responsible for the processing of your personal data?

AI Desenvolvimento Imobiliário Ltda., the asset manager affiliated to AI, is responsible for the processing of Personal Data for own purposes, and for group-wide processing activities with regard to the purposes mentioned below in Section 3.

Moreover, other entities of AI could become responsible for the processing of Personal Data, for example, for the purpose of marketing their own offerings.

In all these cases mentioned above, each of the respective entities is considered a data controller as defined by applicable data protection laws and regulations, i.e. these entities decide about the purposes and means of the processing of your Personal Data (each individually and – as the case may be – all together, "Data Controller(s)").

To the extent two or more AI entities process Personal Data, we kindly ask you to address any queries you may have directly to the contact person whose details are set out in Section 11. The respective contact person will then forward your query to the AI entity that is primarily responsible, if necessary.

b) What types of Personal Data do we process and how do we collect it?

1. PROCESSING OF YOUR DATA WHEN YOU VISIT OUR WEBSITES

When you access our website, we may collect, use, store and transfer different kinds of Personal Data. The information we collect depends on your use of the website. We may process the following types of your Personal Data:

Technical information. We may collect information about your device/device settings and may combine this information across different devices you use for the purposes described in Section

4. The information we obtain from these devices includes the type of your device, online identifiers (your IP address), device IDs, geolocation data (based on your IP address), and other technical information.

Cookie data. We use cookies and similar technology such as pixels or local storage and allow third parties to use cookies and similar technology for the purposes described in Section 4.

Your usage. We may collect information about how you use our website. This information includes your preferences, such as your interests in certain categories of information. Furthermore, we may collect information about the websites that led you to our websites.

2. PROCESSING OF YOUR DATA WHEN YOU ARE A (POTENTIAL) CLIENT, CONTRACTING PARTY OR SUPPLIER

AI may collect and process the following types of Personal Data regarding (potential) Clients, Contracting Parties and Suppliers:

- Names, postal or e-mail addresses, fax numbers, and phone numbers.
- Organizational data (e.g. company, organizational unit, location, position, work schedule).
- Gender, age, nationality, date and place of birth.
- Communication preferences and details (e.g. postal, phone or email).
- Contractual data (e.g. contract information, entry and end date).

As a matter of practice, we will not collect any sensitive Personal Data (for example data concerning health, racial or ethnic origin or political opinions). If there is a need for AI to process such sensitive Personal Data, AI will obtain the Data Subject's prior consent through the relevant

AI entity and only process such data in compliance with applicable data protection laws and regulations.

Generally, we collect the above-mentioned Personal Data directly from you. If Clients/Suppliers provide us with Personal Data of their representatives, they have a legal obligation to inform the representatives about this and obtain their consent, where legally required.

In certain scenarios like in anticipation of a prospective Client/Supplier relationship, we may also obtain your Personal Data from other sources such as a Client's/Supplier's website or through background check providers etc., in strict compliance with applicable data protection laws and regulations.

c) [For what purposes do we process your Personal Data?](#)

3. PURPOSES REGARDING YOUR USE OF OUR WEBSITES

Depending on the privacy/cookie settings you have selected, we may process your Personal Data for the following purposes:

- To provide our websites to you and ensure stability (including identification and correction of any bugs/errors) and IT security.
- To understand and improve your online experience.
- To provide technical support and respond to your requests.
- To assess the quality of our services.
- To improve our marketing strategy, for example to provide you with offers more tailored to your interests.

4. PURPOSES IN OTHER CONTEXTS

In the context of AI's relationship with (potential) Clients, Contracting Parties or Suppliers we may use the Personal Data obtained for the following purposes:

- To manage existing and prospective Client/Supplier relationships (e.g. in relation to the conclusion, fulfilment, termination of a contract, advertising and newsletter delivery).
- To communicate with Clients/Suppliers and their representatives (including advertisements).

- To perform accounting, auditing, billing, and collection activities.
- To obtain legal advice or insurance benefits.
- To safeguard and defend AI's interests (for example where it is necessary to investigate, prevent or take action regarding (suspected) illegal activities, situations involving potential threats to the safety of any person or potential harm to AI).
- To meet any legal obligations (e.g. tax, compliance, accounting and administrative obligations, prevention of terrorism financing law, anti-money laundering law) and industry standards.
- To comply with law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities.

d) On which legal basis do we process your Personal Data?

We process your Personal Data for the purposes described in this policy, based on the following legal grounds:

Performance of a contract. We process your Personal Data for the performance of a contract to which you are party, for example, where it is necessary for the creation and administration of your account, the execution of the contract, to process your inquiries and payments or facilitate the delivery of requested services. We also process your Personal Data in order to take steps prior to entering into a contract.

Compliance with legal obligations to which we are subject. We process your Personal Data to comply with legal obligations, for example, where we are legally obliged to retain certain Client-related data.

Legitimate interests. We may also process your Personal Data where the processing is necessary for our legitimate interests unless these are overridden by your own legitimate interests; our legitimate interests include – as the case may be – the following:

- Improvement of the user experience of our websites.
- Marketing purposes, for example to provide you with offers more tailored to your interests.
- Enabling global collaboration and business planning.
- Establishing, exercising or defending against legal claims.

- Protecting AI and/or its employees from harm, by preventing or detecting illegal activities, suspected fraud or situations involving potential threats to the safety of any person or potential harm to AI.

Your consent. To the extent this is required by applicable data protection laws and regulations, we will separately ask you for your consent and provide information as to what happens if you do not give consent. You have the right to withdraw your consent at any time. Please note that this will not affect any processing carried out before you withdraw your consent.

e) With whom do we share Personal Data?

We will not disclose your Personal Data to any party who is not authorized to process them. Only when necessary to fulfil the purposes mentioned above, we may disclose your Personal Data to the following recipients or categories of recipients:

- Entities within the AI Group.
- Service providers that AI has retained to perform services on its behalf, such as IT or payment service providers, fund administrator and auditing companies; these service providers are not permitted to use the Personal Data for their own purposes but are required to solely process the data upon instructions received from AI.
- Law enforcement or other government authorities, if required by law or where reasonably necessary to protect the rights, property, and safety of others or ourselves.
- Other parties in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of AI's business, assets or stock (including in any insolvency or similar proceedings), if applicable.

f) Where do we process Personal Data?

The Personal Data of Representatives will be processed both inside the European Union ("EU") and outside (e.g. USA, Brazil, Canada) by the parties specified in Section "e" above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose such Personal Data to parties who are not authorized to process them.

Please note that EU / EEA Member States and other countries all have different laws regarding the protection of Personal Data. When your Personal Data is transferred from your one country to

another country, the laws and rules that protect your Personal Data in the country to which your information is transferred to can be different (or less protective) from those in the country in which you reside. For example, the circumstances in which law enforcement can access Personal Data may vary from country to country.

When transferring Personal Data internationally we make sure that we comply with applicable data protection laws and regulations, for example, by entering into agreements which will ensure that the recipients of your Personal Data maintain an adequate level of data protection.

g) How do we protect Personal Data?

AI maintains appropriate technical and organizational security safeguards designed to protect Personal Data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure, or use.

All our employees are bound by data secrecy. Only authorised employees may process your Personal Data based on the "need-to-know" principle.

We update and test our security standards on an ongoing basis. In addition, we take reasonable steps to assure that third parties to whom we transfer your Personal Data provide sufficient protection of Personal Data.

h) How long do we retain Personal Data?

AI stores Personal Data for as long as necessary to fulfil the purposes for which the data was collected or to fulfil legal obligations. If you want to know a specific information and its applicable retention period, you can send an e-mail to:

compliance@autonomyinvestimentos.com.br

i) What are your rights in respect of your Personal Data?

Your rights under applicable data protection laws and regulations may include access to the Personal Data AI processes about you, the right to have such Personal Data corrected, erased or blocked, the right to restrict the processing of Personal Data, or the right to object to certain data processing activities, as well as the right to data portability and the right to withdraw consent at any time where Personal Data is processed with consent (without affecting the lawfulness of processing based on consent before its withdrawal).

Specific information for EU related processing activities can be found in Section "l" and "m".

j) How often do we update this Privacy Notice?

AI may update this Privacy Notice from time to time. All changes shall be effective from the date indicated on the updated Privacy Notice, unless otherwise provided in the notification.

k) How can you contact us?

Comments or inquiries about this Privacy Notice, requests to update information we have about you, or requests to exercise data subject's rights shall be sent to the following email-address:

compliance@autonomyinvestimentos.com.br

Requests can also be sent by postal mail to:

Brazil, São Paulo, Nações Unidas Avenue, nº 14.171, 8th Floor – Marble Tower – Vila Gertrudes – Zip code: 04.794-000.

5. ADDITIONAL INFORMATION REGARDING EUROPEAN DATA PROTECTION LAWS

According to the European General Data Protection regulation (hereinafter "GDPR") you might have special rights relating to your Personal Data.

l) When is the GDPR applicable in my case?

As a rule, the GDPR applies to:

- Companies established in the EU, regardless of whether or not the processing takes place within the EU (this applies, for example, if our Luxembourg entities are involved in a process).
- Companies not established in the EU offering goods or services within the EU or to EU individuals (this applies, for example, if the selling efforts of an AI entity address investors in the European Union, or if you access our websites from the EU).

m) What are your rights in respect of your Personal Data under the GDPR?

To the extent the GDPR is applicable, you have the following rights in relation to your Personal Data:

- Access the Personal Data we hold about you, including information such as, for example, the source and the categories of the data, the purposes of the processing, the recipients (or categories thereof) and the respective retention period.
- Request the update or correction of your Personal Data so that it is always accurate.
- Receive your Personal Data in a structured, commonly used and machine-readable format, including the right to transmit your Personal Data to another controller.
- Request the deletion of your Personal Data if you think that it is no longer needed for the purposes indicated above.
- Restrict the processing of your Personal Data in certain circumstances, for example, where you have contested the accuracy of your Personal Data, for the period enabling us to verify its accuracy.
- Withdraw your consent at any time if your Personal Data is processed with your consent. Please note that this will not affect the lawfulness of the processing based on consent before its withdrawal.

Right to Object

In the event and to the extent that we process your Personal Data based on our legitimate interests, you have the right to object to the processing on specific grounds relating to your particular situation. In such case we will no longer process your Personal Data unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

You also have the right to object where we are processing your Personal Data for direct marketing purposes (including profiling). In such a case, we will stop processing your Personal Data for marketing purposes.

You can exercise these rights by sending a request to the contact details set out in Section “k”, providing your name, your email address as well as a description of your request.

If you believe we have not complied with our obligations under applicable data protection laws and regulations, you can lodge a complaint with a competent data protection authority.