

PRIVACY AND CYBERSECURITY POLICY

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SECTION 01 – DEFINITIONS

User: all individuals who use the Website, including Gaman Capital's employees.

Website: www.gaman.capital

General Data: any information about the Users relating to (i) browsing activities within the Website, access to pages, keywords used in search engines, IP address, browsing time, cookies information, technical information about their device, the User's browser, operating system, among others; (ii) Personal Data (defined below); and (iii) information eventually provided by third parties to whom the User has authorized to make available, as well as to use, store, process and/or transfer them.

Personal Data: any personal information that the User provides, whether by email or on the Website, for example, through the completion of forms or submission of resumes for a recruitment database, including: public name, full name, corporate name, personal documents (ID, CPF, driver's license, CNPJ), date of birth, contact information (e.g. landline number, cell phone number, residence or domicile, email address, among others) and social media profiles.

Data Protection Officer (DPO): individual designated by Gaman to act as a communication channel between the controller, the holders of Personal Data and the National Data Protection Authority (ANPD).

SECTION 02 – GENERAL INFORMATION

This Privacy Policy contains information on how Gaman Capital may collect, use, store, process, and protect the General Data of Users of the website www.gaman.capital ("Website"), with the purpose of demonstrating absolute transparency on the subject and clarifying to all interested parties about the types of data that may be collected, the reasons for the collection, and how Users can manage or delete their personal data.

This Privacy Policy applies to all Users of the Website and is an integral part of the Terms and Conditions of Gaman Capital. By accessing the Website, the User agrees to the terms and conditions of our Privacy Policy described below, and therefore, we ask the Users to read it carefully.

Our Privacy Policy applies to all features and services contained on the Website, accessed through the worldwide computer network or mobile devices, by individuals or legal entities. However, our Privacy Policy does not apply to services offered by third parties. If any content presented on our Website redirects the User, through an external link, to other websites, we recommend that the User carefully review the content of the privacy policy of these third parties.

This document was developed in accordance with General Personal Data Protection Law (Law 13.709/18), Brazilian Civil Rights Framework for the Internet (Law 12.965/14), and other applicable laws on the subject. Also, the document may be updated to comply with any regulatory changes on the subject, which is why we recommend that the User periodically consult the document.

SECTION 03 – HOW DO WE COLLECT THE USER'S GENERAL DATA?

The User's General Data are collected by the Website as it follows:

- **When a User accesses the pages of the Website:** information regarding User interaction and access are collected by Gaman Capital to ensure an enhanced User experience. These data may include page views, profiles, the origin of the User's URL, the browser used by the Users, their IP address, among other information that may be stored and retained by Gaman Capital.
- **Through a third party:** the Website receives data from third parties, such as Google, when a User accesses the Website while logged into their Google profile. Access to this data is previously authorized by the Users together with the third party in question.
- **When the User sends an email to the available address in the "CONTACT" section (contato@gaman.capital):** Gaman Capital gains access to Personal Data, defined in Section 01 of this document.

If a registration form is implemented on the Website, or an area for submitting resumes for a recruitment database, the User's Personal Data may also be collected through these means.

SECTION 04 – WHAT INFORMATION DO WE COLLECT ABOUT THE USER?

- **Data for Navigation Optimization:** any information related to browsing activities within the Website, access to pages, keywords used in search engines, IP address, browsing time, cookies information, technical information about their device, the User's browser, operating system, among others.
- **User's Personal Data:** as defined in Section 01 of this document.
- **Information from Other Sources:** information eventually provided by third parties to whom the User has authorized to make them available, as well as to use, store, process, and/or transfer them.

The User may choose not to provide us with the requested information, although a good portion of it is necessary to use the features of this Website.

SECTION 05 – FOR WHAT PURPOSES DO WE USE THE USER'S GENERAL DATA?

The General Data of the Users are collected for the following purposes, among others outlined in this Privacy Policy:

- **User's Well-being:** to enhance the product and/or service offered, streamline the performance of the Website, improve User experience, and provide specific and/or customized functionalities according to the characteristics of the User.
- **Website Improvements:** to understand how the User uses the services of the Website, in order to help in the development of techniques.
- **Provision of Services Offered:** to enable the provision of services, including when we have the consent of the User, the sharing of their General Data with affiliated companies, service providers, and business partners of Gaman Capital, who process General Data on behalf of Gaman Capital.
- **Compliance with Law or Governmental Order:** whenever there is a legal determination, request, requisition, or judicial order, on request of sharing data with the Public Administration, law enforcement authorities, judicial, administrative, or competent governmental authorities.

SECTION 06 – FOR HOW LONG ARE THE GENERAL DATA STORED?

If the User's General Data is stored, Gaman Capital will retain this information for the period necessary for the provision of services, or for the proper fulfillment of the purposes outlined in this Privacy Policy, except if a longer retention period is required to comply with current Brazilian legislation, or due to a judicial order.

Gaman Capital clarifies that the User's Personal Data may be retained after the end of its processing, for transfer to third parties, respecting the requirements of General Personal Data Protection Law and this Privacy Policy, and for exclusive use by Gaman Capital, as long as the data is anonymized.

SECTION 07 – ACCESS AND MODIFICATION OF INFORMATION

The User will have guaranteed rights relating to privacy and protection of their Personal Data. Thus, below are summarized some rights that the User has guaranteed under Brazilian laws:

- **Right to Request Access to Data:** the User may request and receive a copy of all Personal Data provided to Gaman Capital.

- **Right to Request Rectification of Personal Data:** the User, at any time, may request the correction of their Personal Data if they identify that some of them are incorrect.
- **Right to Request Deletion or Cancellation of Personal Data:** the User may request the deletion of their Personal Data from Gaman Capital's database, which will comply with the request, unless there is any other legal reason for its maintenance, such as a potential legal obligation to retain the Personal Data and/or the need to preserve the Personal Data for the protection of Gaman Capital's rights.
- **Right to Withdraw Consent at Any Time:** the User may withdraw their consent to this Privacy Policy at any time. However, this will not affect the legality of any processing carried out before the respective withdrawal.

The aforementioned requests can be made by Users through the email address provided in the "CONTACT" section on our Website, as described in Section 11 of this document.

SECTION 08 – SECURITY OF STORED GENERAL DATA

Technological advancements create conveniences and enable the use of new tools by institutions, resulting in greater agility in the development and provision of services, application of communication means, among other advancements. On the other hand, the increased use of such tools deepens the risk of information leakage and cyber-attacks, threatening the confidentiality, integrity, and availability of data and/or institutional systems.

08.1. Risk Identification

Cyber threats can vary depending on the nature, vulnerability, information, or assets of each organization. In this scenario, the most common methods of cyber-attacks include:

- **Malware** – software developed to corrupt computers and networks.
- **Social Engineering** – manipulation methods to obtain confidential information, such as passwords, personal data, and credit card numbers.

In addition to being susceptible to cyber-attacks, Gaman Capital may also be prone to malfunctions of the systems used, which can lead to the loss and/or alteration of data and confidential information.

08.2. Preventive Actions and Action Plan

Gaman Capital is committed to implementing technical and organizational measures to protect General Data against unauthorized access and situations involving destruction, loss, alteration, communication, or dissemination of such data. Only employees authorized by Gaman Capital will have access to such information while performing their duties.

Stored General Data are treated confidentially within legal limits. However, we may disclose personal information if we are required by law to do so.

The Website will use Wordpress owned security tools, specifically from Solid Security and Wordfence. These systems aim to, respectively, prevent and remedy invasions into User content obtained by the Website.

We use firewalls and third-parties intrusion detection systems to help prevent unauthorized access to your information (hackers).

Gaman Capital commits to notify the User in the event of any security breach regarding their Personal Data.

08.3. External Websites and Third Parties

Gaman Capital is not liable for damages caused solely by others, such as in the case of hacker or cracker attacks, or those caused solely by the User, such as in the case when the User transfers their own data to third parties.

The Website may provide links to external websites, which are not operated by Gaman Capital. Gaman Capital states that it does not control the content and practices of third parties' websites, and therefore cannot be held responsible for the privacy policies adopted or not by these third parties.

Therefore, we encourage Users to carefully read the privacy statements and terms of external partners before disclosing their Personal Data. We advise Users, while accessing the internet, to always search for the privacy policy of the website they are browsing, not to disclose their Personal Data and password to others, including family members, and to use complex passwords, with combinations of letters, numbers, and other characters.

SECTION 09 – DATA SHARING

General Data provided by Users and/or collected by Gaman Capital will be treated in accordance with the confidentiality standards required by current legislation. The company will only share this information with the parties established below, for the purposes defined in this Policy:

- A member of our group;
- Companies that provide services to assist in our activities, such as data storage, maintenance services, database management, and website analytics; and
- Government authorities, if necessary.

Gaman Capital states that General Data may be disclosed due to legal determination, that is, they will be disclosed for the purpose of complying with a judicial or extrajudicial subpoena made by public entities, especially when disclosure is necessary to protect our rights, protect the User's security, or the safety of others, investigate fraud, or respond to a government request.

Gaman Capital clarifies to Users that it requires all third parties to respect the security of the User's General Data and process them in accordance with the law. We do not allow our third-party service providers to use this information for their own purposes without the User's consent, but only to process these information for the purpose of enabling our services, observing this Privacy Policy.

SECTION 10 – COOKIES OR BROWSING DATA

Automatic collection of certain information about the computer and/or mobile device may occur, through cookies and other network technologies when the User visits the Website. We may use different types of cookies, exemplified in the topics below.

- Preference Cookies: preference cookies enable the Website to remember certain information which can be used to personalize the User's experience on the Website. These cookies can also be used to provide specific information to the User's region. If these cookies are used by the Website and the User block or disable them, the Website may become less functional but should not prevent it from working properly.
- Security Cookies: security cookies are used to authenticate Users, to prevent fraudulent use of login credentials, and to protect User data from unauthorized access. If these cookies are used by the Website and the User block or disable them, the Website will not work properly.
- Processing Cookies: processing cookies help the Website to deliver the functionality that the User expects, by allowing the User to access secure areas of the Website. If these cookies are used by the Website and the User block or disable them, the Website will not work properly.
- Public Session Cookies: public session cookies allow the Website to collect information related to the User's interaction with the Website, including, for example, if there were error messages at any time. These cookies are responsible for improving the functioning of the Website. If these cookies are used by the Website and the User block or disable them, the Website may become less functional but should not prevent it from working properly.
- Analytical Cookies: analytical cookies collect information about the use of the Website. They are used to improve the services provided, for example, by observing the frequency of people's access to certain pages. If these cookies are used by the Website and the User block or disable them, the Website may become less functional but should not prevent it from working properly.

Currently, we use cookies provided by Google Analytics. This is one of the most widespread and reliable web analysis solutions, as it helps us understand how the User uses the Website and how we can improve their browsing experience. These cookies may track items, such as how long the User spends on the Website and the pages visited. For more information about Google Analytics cookies, refer to the official Google Analytics page.

Periodically, we may test new features and make subtle changes to the presentation of the Website. When we are still testing new features, cookies may be used to ensure that the User receives a consistent experience during the testing period, while we understand the best optimizations that may be necessary.

The User can disable the cookies function in the browser settings. However, Gaman Capital emphasizes that, by disabling cookies, access to the Website may be restricted, not being possible the use of all services provided by the Website.

SECTION 11 – CONSENT

By using our Website, the User consents to this Privacy Policy.

In compliance with regulations and market best privacy practices, the User has the right to withdraw their consent for the storage and collection of Personal Data at any time, through the email contato@gaman.capital.

Through this communication channel, the User can request more information about our data practices, as well as rectify, provide, delete, and confirm the processing of Personal Data carried out by the company.

The Data Protection Officer (DPO) responsible for communication with Users is Milena Roale Braga.

SECTION 12 – CHANGES TO THIS PRIVACY POLICY

This Policy has an indefinite term, and its modification will occur if a need to update its content is identified. We reserve the right to modify this Privacy Policy at any time, so it is recommended that the User frequently review the terms of this Privacy Policy.

Changes and clarifications will take effect immediately after their publication on the Website. By using the service or providing personal information after such modifications, the User demonstrates agreement with the new norms.

Furthermore, if Gaman Capital is involved in a merger, acquisition, sale of assets, or if all or a substantial part of its assets are acquired by another company, Users' General Data may be transferred to the new owners. Nonetheless, the confidentiality of the User's information will

remain guaranteed, and affected Users will be notified before their information is transferred or becomes subject to a new privacy policy.