

Data Privacy Policy for Staff and Customers (Brazil)

1. Introduction

[Financial Institution Name] ("we," "us," or "our") is committed to protecting the privacy and security of your personal data, in accordance with the General Data Protection Law (LGPD) – Law No. 13.709/2018. This Data Privacy Policy ("Policy") explains how we collect, use, disclose, secure, and retain your personal data, as well as your rights as a data subject, for staff and customers located in Brazil.

2. Categories of Personal Data We Collect

We may collect and process various categories of personal data about you depending on your relationship with us, including:

- **For Staff:** Name, contact information, employment details, education and professional qualifications, performance data, and other information relevant to your employment.
- **For Customers:** Name, contact information, identification documents, financial information, transaction data, account details, and information related to your interactions with us.

3. Purposes of Data Processing

We process your personal data for legitimate business purposes, including:

- **For Staff:** Processing payroll, managing performance, providing training and development opportunities, maintaining health and safety records, and fulfilling legal and regulatory obligations.
- **For Customers:** Providing and managing financial products and services, processing transactions, conducting know-your-customer (KYC) checks, preventing fraud and money laundering, complying with legal and regulatory requirements, and sending marketing communications (with your consent).

4. Legal Basis for Data Processing

We rely on several legal bases for processing your personal data, including:

- **Contractual necessity:** To fulfill our contractual obligations with you, such as providing employment benefits or financial services.
- **Legal obligations:** To comply with applicable laws and regulations, such as anti-money laundering regulations.
- **Legitimate interests:** To pursue our legitimate interests, such as preventing fraud, managing our workforce, and sending you marketing communications (with your consent).

5. Data Sharing and Transfers

We may share your personal data with third-party service providers who assist us in providing our services or complying with legal obligations. These third parties are contractually obligated to protect your data in accordance with this Policy.

We will not transfer your personal data outside of Brazil without your explicit consent, unless required by law or to fulfill our contractual obligations.

6. Data Retention

We will retain your personal data for as long as it is necessary to fulfill the purposes for which it was collected, and in accordance with applicable legal and regulatory requirements.

7. Your Rights as a Data Subject

Under the LGPD, you have the following rights as a data subject:

- **Right to access:** You have the right to request access to your personal data.
- **Right to rectification:** You have the right to request the rectification of inaccurate or incomplete personal data.
- **Right to erasure:** You have the right to request the erasure of your personal data under certain circumstances.
- **Right to restriction of processing:** You have the right to request the restriction of the processing of your personal data under certain circumstances.
- **Right to data portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller.
- **Right to object:** You have the right to object to the processing of your personal data.

To exercise any of these rights, you can contact our Data Protection Officer (DPO) using the contact information below.

8. Data Security

We have implemented appropriate technical and organizational measures to protect your personal data from unauthorized access, disclosure, alteration, or destruction.

9. Changes to this Policy

We may update this Policy from time to time to reflect changes in applicable law, our practices, or for other legitimate reasons. We will notify you of any changes by posting the revised Policy on our website.

10. Contact Us

If you have any questions regarding this Policy, please contact our Data Protection Officer (DPO) at [DPO email address or other contact information].

Please note: This is an English translation of the Data Privacy Policy for Staff and Customers (Brazil). The Portuguese version of the Policy prevails in case of any discrepancies.

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