PRIVACY POLICY

This notice describes the privacy policy of XP Investments US, LLC ("XPI") and XP Advisory US Inc. ("XPA") (collectively referred to as "XP").

XP is required by federal law to provide you with notice of its privacy policy ("Policy"). This Policy applies to the personal information of current, as well as former customers. We are providing you with this Policy to describe how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.

Our Policy also explains the steps you may take to limit our sharing of certain information about you with our affiliated companies and discloses how you may limit our affiliates' use of shared information for marketing purposes. XP may revise or update its Policy regularly in accordance with changes to applicable law, technologies, or business operations, and will inform you of any revisions or updates that occur to this document.

If you are a California resident, please also see the "*Notice to California Residents*" section below.

1. XP Respects Your Privacy

We appreciate that you have provided us with your personal information and understand the importance of maintaining the privacy and confidentiality of this information. We are committed to safeguarding the personal information you entrust to us and consider any nonpublic information that personally identifies you, your entity, or your entity's accounts as "personal information." Protecting the confidentiality and security of customer information is a priority at XP.

2. What personal information do we collect about you?

We may collect the following types of personal information about you to properly service your account and fulfill our regulatory obligations as required by law:

Information You Provide

i. Identity data, that we receive from you on applications and other forms, such as your name, data of birth, passport, driver's license, visa information, social security number and identification documents.

ii. Contact data, such as email address, personal phone number, residential address, business email address, business phone number, and company address.

iii. Financial and investments data, such as your assets, account information, beneficiaries, initial investment objectives, income, bank account, bank statement, tax information, and the types of products and services you prefer to receive from us.

Information We Collect

i. Background information from and through third-party vendors to verify representations you have made and to comply with various regulatory requirements.

ii. Transactions information with us, our affiliates, or nonaffiliated third parties.

iii. Information obtained from our websites.

iv. Information obtained from other sources, such as vendors and business partners, connected services, publicly available data, and advertising data.

3. How we use your personal information?

We may process, use, or disclose your personal information for the following business purposes:

- **To conduct our business**, including maintaining and providing our services, processing account applications, authenticating your identity, billing, and account management.
- **To fulfill and respond to your inquiries and requests**, including providing you with support, investigating and addressing your concerns.
- **To help protect the safety and security** of our Services, business, and users, such as to investigate and help prevent fraud or other unlawful activity.
- **To send marketing communications** by email, phone, or other previously agreed ways to offer content aligned with your profile or aligned with our other content in which you have shown interest.
- **To personalize your experience with our business** and to deliver content, product, and service offerings relevant to your interests (with your consent, where required by law).
- **To monitor and improve our services**, including analyzing usage, research, and development.
- **To comply with applicable laws and legal obligations,** such as compliance obligations associated with being a regulated broker-dealer (law enforcement, regulators, court order, or governmental regulations).
- **To safeguard the legitimate interests pursued by us**, when we might have a business or commercial reason to use your information, but not unfairly against what is right and best for you.

4. When do we disclose personal information?

We may disclose personal information we collect about you in each of the categories listed above to affiliated companies and to certain nonaffiliated third parties as required or permitted by law, including but not limited to any obligations of XP under the USA PATRIOT Act.

a) XP will not sell your personal information to anyone

XP will never sell your personal information to anyone under any circumstance.

b) Information we disclose to affiliated companies

We may disclose personal information that we collect about you to our affiliated companies to better service your financial needs, including to manage your account(s) effectively, to service and process your transactions, for marketing purposes to let you know about products and services offered by us and our affiliated companies, to manage our business, and as otherwise required or permitted by law.

c) Information we disclose to nonaffiliated third parties

We may disclose personal information that we collect about you to nonaffiliated third parties with which we have contractual agreements, such as our clearing firm. These contracts require such nonaffiliated third parties to limit their use of personal information about you to the particular purpose for which it was shared, and further obligate them to keep your personal information confidential. We may disclose personal information to other financial professionals if you have specifically asked us to do so in writing. Additionally, we may disclose or report personal information in limited circumstances when we are required to do so under US law, such as when cooperating with a US regulatory agency or law enforcement.

5. How does XP protect your personal information?

- **We restrict access to personal information** to our employees and agents for business purposes only. We train all our employees with respect to the protection of customer personal information.
- **We maintain physical, electronic, and procedural safeguards** to protect your personal information. Such procedures include, but are not limited to, installation of firewalls for our proprietary systems to prevent unauthorized access, user authentication systems (i.e., passwords) and access control mechanisms to control access to systems and data. XP strives to ensure that our systems are secure and that they meet industry standards.
- **We will continue to evaluate our efforts to protect your personal information** in every aspect of our business.

6. How can you limit our sharing of your personal information?

By following the opt-out procedures outlined below, you may limit the extent to which we share your personal information and limit our affiliated companies from marketing their products or services to you based on personal information we disclose to them.

Please note that, even if you direct us not to share your personal information with our affiliated companies, we may still share your personal information with our affiliated companies under circumstances that are permitted under applicable law, such as to process transactions or to service your account.

6.1 How can you send us an opt-out instruction?

If you wish to limit our sharing of information about you, or our affiliated companies' use of personal information for marketing purposes, as described in this Policy, you may request to our Privacy Team (click here or visit the website *https://atendimento.xpi.com.br/#formulario > LGPD > Descadastramento de comunicações de marketing/Opt-out of marketing communications*).

Your request should include your name, e-mail, telephone number and account number(s) to which the opt-out applies. To process your request, it must be provided by you directly and not through a third party. Once you have informed us about your privacy preferences, the opt-out preference will remain in effect with respect to our Policy until you notify us otherwise. If you are a joint account owner, we will accept instructions from any one of you and apply those instructions to the entire account.

Please understand that if you limit our sharing or our affiliated companies' use of personal information, you and any joint account holder(s) may not receive information about our affiliated companies' products and services, including products or services that could help you manage your financial resources and achieve your investment objectives.

7. Notice to California Residents

This section provides additional details about the personal information we collect about California residents and the rights afforded to them under the California Consumer Privacy Act ("CCPA"). However, the CCPA doesn't apply to all businesses. Personal information used by financial services firms may be covered under certain exemptions described in the CCPA.

What situations aren't covered by the CCPA?

- *If your relationship with a company is only for personal financial services (e.g., owning one or more personal brokerage accounts), your personal information falls under the federal Gramm-Leach-Bliley Act and is not covered by the CCPA.*
- *If you have an institutional relationship (e.g., registered investment adviser, broker-dealer, bank, or trust), the information collected about you in the context of that business relationship is not covered by the CCPA.*

In the preceding 12 months, XP collected the following categories of personal information for a business purpose: identifiers, California Customer Records personal information categories, protected classification characteristics under California or federal law, Internet or other electronic network activity information, and professional or employment-related information. There are more details about the personal information we collect at the "*What personal information do we collect about you?*" section of this Policy.

Additionally, as mentioned in the "*When do we disclose personal information?*" section of this Policy, we do not sell personal information to third parties.

California residents may make a consumer rights request to access or delete certain personal information under applicable law. This may be requested to our Privacy Team (click here or visit the website *https://atendimento.xpi.com.br/#formulario > LGPD > Eliminação de dados pessoais/Personal Data Deletion*).

- *Information and Access* – Confirm whether we are processing your personal information and, if so, what information we process and, if requested, provide you with a copy of that personal information.
- *Objection* – Request that your personal data that you understand as unnecessary, excessive, or processed in non-compliance with the applicable regulations, be anonymized, blocked, or deleted.
- *What should you know before making a CCPA request?*
    - We are going to verify if you are a California resident and are going to check your identity (or the identities of those authorized to submit requests on your behalf).
    - You should generally expect to receive a response within 45 days of the date we receive your request.

8. Questions or Concerns

If you have any questions, complaints or suggestions related to the terms of this Privacy Policy or regarding to the use of your personal data, click here to register your request or visit the website https://atendimento.xpi.com.br/#formulario. Then, in the field "What topic do you want assistance on?" select LGPD and the subject you want to discuss.

Your request should include your name, e-mail and social security number. This information is necessary to identify the requester and send the response.

- Data Protection Officer: **Fernanda Rodrigues**
- Acess: https://atendimento.xpi.com.br/#formulario

9. Legal Disclaimer

XP shall not be liable for misuse or loss of personal information to which it has no access or control. We are also exempt from liability for the unlawful and unauthorized use of this information because of the misuse of your access credentials, negligent or malicious conduct as a result of acts or omissions on your part or from someone authorized on your behalf.