

Lei Geral de Proteção de Dados Pessoais (“LGPD”) Employee’s Privacy Notice

Employee privacy notice

We are committed to protecting your personal information and ensuring we respect your privacy, as provided for by Law No. 13,709/2018 (Lei Geral de Proteção de Dados Pessoais – “LGPD”). This Privacy Notice explains how we will look after and use any personal information that we collect about you.

What is personal data?

The LGPD defines personal data as any information about an identified or identifiable person, i.e., any information about you from which you can be identified. Examples of personal information include your name, home address, personal identification numbers, date of birth, telephone number and e-mail address but it also includes other pieces of information which can be used to identify you, either directly or indirectly, such as cookies.

Who we are

Siguler Guff & Company, LP (“Siguler Guff”) and Siguler Guff Gestora de Investimentos (Asset Management) Brasil Ltda. (“SG Brasil”) and its affiliates (together with Siguler Guff and SG Brasil, the “Firm” ,“we” , “our” , or “us” are controllers of personal information you provide to us. SG Brasil is an affiliate of Siguler Guff and in certain circumstances acts together with Siguler Guff as joint controllers. The LGPD employee’s privacy notice explains how we collect, use, store, and disclose (“Process”) your personal data and how you may exercise your rights, as provided for by the LGPD.

This privacy notice is available on the Firm’s website, <http://www.sigulerguff.com/>. If you have any questions about this Privacy Notice or the information we hold about you please contact SG Brasil’s Data Protection Officer using the details set out below:

Full name of legal entity: Siguler Guff Gestora de Investimentos (Asset Management) Brasil Ltda.

Name of relevant contact: Carla Biasi

Email address: cbiasi@sigulerguff.com

Postal address: 160 Horacio Lafer Avenue, Suite 42 - 4th Floor São Paulo, São Paulo Brazil

Contact telephone numbers: +55 (11) 3476-9992

You have the right to make a complaint at any time to the National Data Protection Authority (*Autoridade Nacional de Proteção de Dados* - “ANPD”), the Brazilian authority for data protection issues. The ANPD’s website can be accessed on the link: <https://www.gov.br/anpd/pt-br>. We would, however, appreciate the chance to deal with your concerns before you approach the ANPD, so please contact us in the first instance.

What types of information do we use?

We Process information about you as part of your employment with us. The information about you which we Process may include:

- Employment or work history/background;
- Payment information (e.g. bank account);
- Educational history;
- Information on trading or other financial activity;
- Contractual/contact information (i.e. our 'history' together – services provided or discussed);
- Financial information (financial position and history);
- Documentary data (e.g. passport, CPF number, or other forms of identification);
- Public records (or openly accessible data);
- Social and or demographic (profession, work, nationality, income or family situation)
- Historical information i.e. previous names and addresses;

We may collect sensitive personal data on occasion. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or information about your health and genetic or biometric data.

To the extent authorized by applicable laws, we may collect information about criminal convictions or offences because of our legal and regulatory obligation to ascertain whether an employee is fit and proper for their role prior to hiring.

Consequences of not providing some types of information

Where we need to collect your personal information by law, or under the terms of your employment contract with us, and you fail to provide that information when requested, we may not be able to hire you as an employee of the Firm.

How do we collect information about you?

Typically, we will collect information from you when you contact us directly or provide information in order for us to consider your application and proceed to hire you as a new employee. We collect information from and about you in the following ways:

Through **direct interactions** when you give us your personal information by filling in forms or during correspondence with us. This includes when you:

- Meet with us in person or talk to us face to face;
- Complete an application for an open position at the Firm;
- Complete questionnaires, for example, to give us feedback or provide additional information;
- Enter into a contract with us

Through **using our website** when we collect information using cookies or similar technologies which tell us about your equipment, browsing actions and patterns.

Through **third parties** such as employee recruitment firms, credit reference agencies and fraud prevention agencies. The third parties which we receive personal information from are as follows:

- Third party data sources such as Experian;
- Third party employee recruitment firms;
- Third party firms which perform background checks;
- Publicly accessible sources, such as databases

How we will use your personal information

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the table below the ways in which we plan to use your personal information. We are only able to use your personal information if we have a proper legal reason or basis for doing so. Regulations require that we have a legal basis so that your privacy is protected. The legal bases on which we rely include:

- We have a **contract** with you. For example, we have entered into an employment agreement with you.
- We have a **legal obligation**. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations.
- We may process your personal data if this is necessary for the **regular exercise of our rights in judicial or administrative legal proceedings**. For example, we may have to process your personal data in a labor lawsuit filed by you after termination of the employment agreement.
- In some circumstances, we may process health information, including physical and mental health conditions, disabilities, sickness absence records and accident reporting notes in order to **protect the life or physical safety** of the data subject or a third party.
- We, or a third party, have a **legitimate interest** in processing the information and your interests and fundamental rights do not override those interests. For example, processing your information to prevent fraud.

We set out in the table below all the ways we plan to use your personal information and the legal bases we rely on to do so. We also explain what our legitimate interests are where appropriate:

Purpose	Lawful basis for processing including our legitimate interests
To perform background checks	To fulfil our legal obligations to ensure employees are fit and proper to perform their role
To hire you as a new employee	To fulfil our legal obligations; To fulfil our employment contract with you

To provide you with health insurance	To fulfil US and Brazilian legal obligations to provide employees with health insurance; To protect the life or physical safety of the data subject or a third party
To monitor your activity in personal trading, political contributions and other outside business activities that may pose a conflict with our business	To fulfil our legal and regulatory obligations
To conduct ongoing Human Resources administration tasks, such as payroll	To fulfil our employment contract with you
To protect our employees physical and mental health conditions, disabilities, sickness absence records and accident reporting notes	To protect the life or physical safety of the data subject or a third party
Defense in labor law suits	Regular exercise of our rights in judicial or administrative proceedings
Prevention of fraud	To protect the legitimate interests of controller or third parties, as long as your interests or fundamental rights and freedoms are not overridden by such interests

We will only use your personal information for the reason for which we collected it. We will only use it for another reason if we believe that new reason is compatible with the original purpose. If we do need to use your personal information for a non-related purpose, we will tell you about it and explain the legal basis which allows us to do so.

Cookies

We may also automatically Process personal data as you interact with us, such through cookies and similar technologies, including information such as collecting the IP address from which you visited our website. Cookies are small text files placed on your computer (or other device where you access the internet) used to collect information on your activities online. They can also be used as part of website functionality, for example, if you use our online services to complete an employment application form, so you should be careful about accepting, deleting or removing them. Cookies allow us to collect information about the device you are using to access the internet, your IP address and website browser (for example). Cookies can tell us what information you viewed and for how long, the geographic location of your IP address, and your browsing history. We may use this information to analyse the usage of our services in order to improve our services and ensure we are delivering the right services to clients.

If you have concerns about cookies this web site explains how you can delete and control the cookies that are stored on your computer: <https://www.aboutcookies.org/>

Who we share your information with

We may need to provide information to third parties for a variety of reasons; for example, we may need to provide information to assist in the processing of our payroll or the detection or prevention of crime. Please refer to the table in the section ‘How we will use your personal information’ which explains how we use your data. The third parties we share your information with are as follows:

- External legal counsel
- Auditors
- Our outsourced IT consulting firms
- Payroll administrators
- Health insurance providers
- Firms which perform background checks

Sending your information outside of Brazil

We operate globally and may process your personal data in jurisdictions other than the one you are based. In any event, when transferring personal data across borders, we take steps to put in place safeguards to protect your personal data as required by the LGPD. These safeguards may include:

- Transferring Personal Data to recipients located in countries deemed to provide an adequate level of protection for personal data, as provided for by the LGPD and further regulation issued by the data protection authority; and
- Entering into agreements containing contractual safeguards, pursuant to the LGPD and further regulation issued by the data protection authority.

You can obtain further information on the specific mechanism used by us when transferring your personal information outside of Brazil by contacting the Data Protection Officer.

Storing your information

The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. When we decide how long we will retain your personal information, we will take into account the amount, nature, sensitivity of your information and how we want to use it as well as the potential risk of harm being caused from unauthorised use or disclosure. We review our retention periods for personal information on a regular basis and will ensure all records are safely destroyed if we no longer need to retain them or you have contacted us to request so.

Your rights

You are provided with a number of different rights under the LGPD in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information whenever it is not compliant with the LGPD;
- To request a transfer of your information; and
- To withdraw your consent.

If you wish to exercise any of these rights please contact our Data Protection Officer and compliance team, referenced above. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. . We may need to seek further information from you to confirm your identity before we release any personal information. This does not affect your right to make a complaint to the ANPD.

Security

We have put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have a procedure to deal with any suspected personal data breach and will notify you, and other regulators, where we are legally required to do so.

Contact Information

If you have any questions regarding our privacy policies, the ways in which we collect, use, or disclose your personal information, or how to exercise your rights under the LGPD, please do not hesitate to contact us at:

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São Paulo, São Paulo
Brazil 04538-000
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E-mail: cbiasi@sigulerguff.com

Alternative Contact

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