ZOOMHOLDING

DATA PROTECTION POLICY – LGPD

Zoom Holding S/A, enrolled with the CNPJ under n.. 30.219.013/0001-17, through this Policy defines and sets forth its position regarding the General Data Protection Law (LGPD).

1. What personal data do we collect and for what purposes?

In general, we use the personal data collected for purposes related to:

- Business relationships with our clients, suppliers, partners, and individuals interested in our services;
- Service provision to our clients;
- Interactions with job applicants.

In this context, we usually use personal data to:

- Administer and provide services and fulfill contractual and legal obligations, ensuring operability and continuity of service delivery;
- Define and tailor content formats, including for delivering personalized and targeted materials;
- Identify and authenticate users properly in order to respond to requests and inquiries about our products and services;
- Notify users about news, products, services, features, articles, newsletters, guides, reports, and other content relevant to our offerings;
- Analyze traffic trends and track data on the use of our platforms, measuring marketing effectiveness;
- Build user and transaction profiles to personalize services, products, and benefits, as well as communication with our clients;
- Enhance security and prevent fraud in our services;
- Comply with legal or regulatory obligations and/or exercise rights in judicial, administrative, or arbitration proceedings;
- Consult third parties (e.g., marketing firms) to better tailor the products and/or services offered by ZOOM.

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Additionally, anonymized data (i.e., data that does not lead to individual identification) may be used for generating business intelligence analytics reports.

Depending on the above purposes, we may collect:

Registration and identification data: such as name, email, address, ID documents, phone number, job title, company/organization, role or position, date of birth, location, and areas of interest, usually provided directly by you during interactions with us.

Electronic records and user interaction data: including IP address, mobile device ID, and information gathered through cookies, Google Analytics, web beacons, and other user interaction tools (web and app), such as access dates and times, time spent on pages, visited areas, features used, click records, and cookie identifiers (see our Cookie Policy for details).

Service-related data: data shared by our clients and suppliers, and information obtained from public and third-party sources such as the Central Bank of Brazil, Federal Revenue Service, Judiciary, Commercial Registries, and Securities Commission, as needed.

Geolocation data: to identify and suggest ZOOM offices and facilities closest to you.

Professional data: included in your résumé when you register or apply for a position at ZOOM.

Children's data: our website and services are aimed at adults, and we do not intentionally collect data from children. However, we may occasionally receive information about children involved in specific ZOOM projects, always with explicit consent from parents or legal guardians.

CCTV data: our physical premises may collect visitor recordings (video and audio). These recordings are automatically overwritten after 30 days.

Sensitive personal data: in specific situations (e.g., recruitment, inclusion and diversity initiatives), we may collect sensitive data, always based on your consent or legal requirements. This may include:

- Race or ethnic origin, health information, gender identity, and sexual orientation.

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2. What legal bases do we use for processing personal data?

ZOOM typically relies on the following legal bases to operate its business and provide its products and services:

Contract performance: processing to fulfill our contractual obligations with you.

Consent: use of personal data you have explicitly authorized.

Processing by Public Administration: data may be processed in the execution of contracts governed by public administration entities.

Legitimate interests: based on previously assessed fair, reasonable, and balanced interests, including for:

- Providing services to clients;
- Sharing service offers with website visitors;
- Advertising job opportunities;
- Notifying clients or platform subscribers about business opportunities and sector-related services;
- Fraud prevention, risk management, anti-corruption, anti-money laundering, terrorism financing prevention, Know Your Client/Partner/Employee programs;
- Customizing and improving online user experiences;
- Marketing and promotional initiatives by ZOOM.

Legal and regulatory obligations and defense of rights: for compliance and in legal, administrative, or arbitration proceedings.

3. With whom may ZOOM share your personal data?

a. ZOOM HOLDING S/A Group Companies

We share personal data with other independent ZOOM HOLDING companies to provide services, meet legal or regulatory obligations (national/international), and enforce internal policies.

b. Service providers, suppliers, and public authorities

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ZOOM only shares personal data with third parties as needed to conduct business, in compliance with legal requirements, including:

- Business partners/service providers: for executing business activities and services (e.g., tech solutions, data storage, consultants).
- Fraud prevention partners: to detect fraud, which may involve using specific antifraud services.
- Corporate restructuring: in case of merger, split, or acquisition, data may be shared with the new entity.
- Public authorities or regulatory bodies: in compliance with legal obligations, upon request or as required by law.
- Auditors: for audit purposes.
- Insurance providers: for regulatory compliance and client protection through ZOOM's insurance program.

04. Does ZOOM use cookies?

Our websites may use cookies. When cookies are used, a notice is displayed in your browser explaining their use and offering an option to reject non-essential cookies. For more details, refer to our [Cookie Policy].

05. What are your rights and how can you exercise them?

We recognize the importance of data subject rights. To exercise your rights, fill out the form [by clicking here].

To ensure data security, we may request additional information to confirm your identity.

If ZOOM processes your personal data, you have the right to:

Confirmation and Access: confirm if ZOOM holds your data and request access.

Complete Electronic Copy: if processing is based on your consent or a contract, request a full electronic copy in a portable format.

Consent Withdrawal: revoke your consent at any time. You will be informed of potential service impacts.

Correction: request corrections to incomplete, inaccurate, or outdated data.

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Deletion (by consent): withdraw consent and request data deletion.

Anonymization, Blocking, or Erasure: if data is used beyond necessary, request anonymization (unlinking), blocking (usage halt), or deletion.

Portability: subject to regulations by the Brazilian Data Protection Authority (ANPD).

Objection: oppose data processing if you believe there's LGPD noncompliance.

Petition: submit requests directly to ZOOM or the ANPD.

Review of Automated Decisions: request review of automated decisions involving you (currently not applicable at ZOOM).

06. How does ZOOM protect your data?

ZOOM applies market-standard information security practices and internal policies to protect personal data against unauthorized access and accidental or unlawful events such as destruction, loss, alteration, disclosure, or dissemination.

Security mechanisms include: firewalls, encryption, access control via credentials, role-based access management with semiannual reviews, vulnerability management, regular scans, and penetration testing.

Additionally, employees are trained on data protection to ensure alignment with industry best practices.

Despite all efforts, due to the nature of internet infrastructure, absolute security cannot be guaranteed.

How long do we retain your data?

Personal data is retained for the period necessary to:

a. Fulfill the purposes for which it was collected.

b. Comply with legal or regulatory obligations.

c. Exercise ZOOM's rights in legal, administrative, or arbitration proceedings.

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Once these purposes are fulfilled, data is deleted.

07. How can you manage your preferences?

ZOOM generally does not require you to provide personal data. However, to send you service/event information, we may request certain details.

You may unsubscribe from our newsletters at any time using the instructions provided in our communications.

Cookie settings can be changed via your browser. Disabling cookies may affect website functionality.

If you wish to request deletion, retention, or transfer of your data, please contact us via our Ethics Channel:

https://contatoseguro.com.br/zoomholding

Final Provisions

a. Links to Other Sites

ZOOM websites may contain links to other sites, including those operated by ZOOM HOLDING member firms, not governed by this Privacy Policy. Please read the privacy policy of any external site before providing personal data.

b. Policy Updates

ZOOM will update this Privacy Policy regularly to reflect changes in practices or regulations. The latest version date will always appear at the top. Relevant changes will be transparently disclosed.

The data subject is fully responsible for maintaining the confidentiality of their credentials and must not share logins, passwords, or authentication data.

For any further privacy-related inquiries, contact ZOOM's Data Protection Officer (DPO):

Email: rodrigo@zoomholding.com.br

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ZOOMHOLDING

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Zoom Holding S.A.
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In the event of changes, a fully updated version will be published.

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