

## Terms of Use and Privacy Policy

### 1. General information

Hash Lab Payment Institution Ltda. ("Hash") has developed these terms and conditions of use and privacy policy ("Terms of Use and Privacy Policy") to govern the use of the dashboard and to explain how we may handle Personal Data when Users use our Services.

The Terms of Use and Privacy Policy are additional and shall be construed in conjunction with the Agreement, as well as any other documents entered into between you and Hash.

These Terms of Use and Privacy Policy apply to Personal Data when using our Services and do not apply to third-party websites, applications or services interoperable with Hash, over which Hash has no control or interference, nor to individuals we do not employ.

The terms defined in these Terms of Use and Privacy Policy shall be understood as singular or plural, in female or male.

### 2. Concepts and definitions

For a better understanding of the information contained in these Terms of Use and Privacy Policy, the following concepts and definitions should be considered:

"Personal Data" means information and/or set of information that can be associated with an identified or identifiable natural person, which may include name, address, telephone number, email, payment card number, financial information, account number, date of birth and government-issued registration numbers (eg national driver's license, RG and passport).

"User" means an individual, individual or legal entity, who uses the Services, whether as a buyer, seller, intermediary or other type of participant in a transaction, including users to whom you are sending or from whom you are receiving resources, products or services.

"Services" means any products, services, content, features, technologies, infrastructure or functions, and all related websites, applications and services offered to Users by Hash.

"Process" or "Process" means any method or manner in which we handle Personal Data, by automated means or not, such as collecting, recording, organizing, structuring, storing, adapting, altering, retrieving, consulting, dissemination by transmission, dissemination,

sharing or otherwise making available, aligning or combining, restricting, deleting or destroying this information.

"Cookies" means computer files in text format that store and recognize browsing data, with the purpose of guaranteeing the correct functioning of the Services and providing a better experience for Users.

### **3. Why do we collect/process Personal Data?**

We collect and process Personal Data to enable the correct provision of the Services, as contracted by You, including, but not limited to, to generate indications of transactions, affiliations, revenues, sales, products, services, intermediaries, buyers; to make payments, send or request payments, add amounts to bills or pay invoices; authenticate access; communicate with Users about the Services; create connection with third-party platform; perform credit checks and other financial reputation checks; manage risks and protect the Services and Users against fraud.

Furthermore, due to legal and/or regulatory obligations that weigh on Hash, we are required to process Personal Data for such purposes, which may even involve the sharing and/or transfer of this information to the competent authorities, among which the Central Bank of Brazil - BCB, the Financial Activities Control Council - COAF, the Federal Revenue Service of Brazil, and the State and Municipal Finance Secretariats.

Given the nature of the Services offered, Hash also handles Personal Data for fraud prevention and constantly monitors such treatment to avoid discriminatory or exclusionary practices.

In the event of termination of the provision of the Services, we may continue to process certain Personal Data, as necessary and for the legal term, in order to comply with regulatory obligations by Hash, especially those related to (i) categorization and classification of risks, (ii) combating money laundering and financing of terrorism, (iii) identification of the final beneficiary of transactions, (iv) identification of the source of funds, (v) prevention of fraud, among others.

Upon exhaustion of the purpose of processing Personal Data, these will be promptly deleted and/or destroyed by Hash.

### **4. What Personal Data do we collect/process?**

Personal Data that may be collected/processed when using our Services include:

Registration and usage information: when the User registers to use the Services, we collect Personal Data provided by him and only those strictly necessary for the operation of the Services.

Transaction and Experience Information: When Users use the Services, for example, to make purchases, sales, receive payments, process payments or send payments, we collect transaction information as well as other information associated with the transaction, such as the amount sent or requested, the amount paid or charged for goods or services, information about the seller, buyer, intermediary, including information about payment methods used to effect the transaction.

Information obtained through our communication channels: We may obtain additional information from Users when they communicate with us, contact our customer service teams or respond to a survey.

Information obtained through third parties: We may obtain public information about Users through third parties, such as data providers and credit bureaus, to the extent permitted by law, for the purpose of performing an independent audit and ensuring compliance with applicable legislation.

## **5. Sharing of Personal Data**

In the context of the provision of the Services and/or the purposes described in these Terms of Use and Privacy Policy and/or other documents governing the provision of the Services, we may share Personal Data with third parties, namely:

- a) With members and/or companies of the Hash group, with the purpose, among others, of providing the requested and/or authorized Services; manage risk; help detect and prevent potentially illegal and/or fraudulent acts and other violations of our policies and contracts; as well as to assist in managing the availability and connectivity of the Services.
- b) With partner companies or companies that provide Services under our guidance or on our behalf. These third parties may, for example, provide Services to Users, verify identity, assist in processing transactions or provide services to Users.
- c) With financial institutions, domicile institutions, brands or acquirers, with whom we have a partnership to jointly create or offer services.
- d) With judicial authorities, government bodies or third parties to comply with a subpoena, court order, for the regular exercise

of rights in judicial, administrative or arbitration proceedings or to comply with other legal requirements.

## **6. Do we use cookies?**

We may use Cookies and other tracking technologies to recognize you as a User, customize the Services, conduct business analysis and research, and mitigate fraud risks. By using the Services offered by Hash, the User agrees to the use of Cookies for these and other purposes set out in these Terms of Use and Privacy Policy.

## **7. How do we protect Personal Data?**

We maintain technical, physical and administrative security measures designed to provide the necessary protection for Personal Data against incidents such as loss, misuse, unauthorized access, disclosure and alteration. We comply with the Payment Card Industry Data Security Standard (PCI DSS) and the PIN Security Standard (PCI PIN Security Standard), as well as cyber security rules issued by the relevant authorities.

Security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls.

While we are dedicated to protecting our systems and Services, Users are responsible for protecting and maintaining the privacy of their passwords and information and for ensuring that the Personal Data we hold about Users is accurate and current.

Where legally permitted, we may take steps to anonymize the Personal Data you provide.

## **8. What are the Users' rights?**

We at Hash care about the privacy and intimacy of our Users. Therefore, we are prepared to comply with the rights provided for in Brazilian legislation, as long as the interested User makes an express request through the means of communication disclosed in these Terms of Use and Privacy Policy.

Among the rights guaranteed to all Users, the following stand out:

Right of access: every User has the right to know if Hash processes Personal Data owned by him and, if so, to have access to the set of processed information, except in the case of applicable legal secrecy. It is worth reiterating that this information is available for consultation at any time, upon request.

Right of correction: every User has the right to request and obtain correction of incomplete, inaccurate and/or outdated Personal Data.

Right to anonymization, blocking or deletion: every User is guaranteed the right to request the anonymization, blocking or deletion of Personal Data owned by him/her, when deemed unnecessary, excessive or treated in violation of Brazilian law, subject to the legal hypotheses that allow treatment for specific and specific purposes.

Right to portability: the User is guaranteed the right to the portability of their Personal Data to another service or product provider, upon express request, under the terms of current legislation and observing commercial and industrial secrets.

Right to information: the User may request information about the public and private entities with which Hash has shared its Personal Data, as well as about the possibility of not providing consent, when applicable.

Right to revoke consent: in case of processing of Personal Data based on consent, the User may request the revocation of such agreement at any time, subject to legal requirements.

## **9. Responsible for the Processing of Personal Data and Exercise of Rights**

Pursuant to the legislation in force, **Mr. Fábio Juliano Dapper** is the person in charge of the processing of personal data and, therefore, responsible for overseeing the rights and duties described herein and for Hash's adherence to the General Data Protection Law.

In case of any doubt, complaint or information, including about the exercise of rights related to Personal Data, such as requests for access to information and/or deletion of data, you can contact us through traditional communication channels or directly contact the Person in Charge by the Treatment of Personal Data using the e-mail [privacidade@hash.com.br](mailto:privacidade@hash.com.br).

## **10. Transfers of Personal Data to other countries**

Our operations are supported by computer network, cloud-based servers and other infrastructure and information technologies, owned or provided by third-party service providers. In this context, the Personal Data processed by Hash may be processed, including stored, in other countries with an adequate level of protection, among which the United States of America, always respecting the applicable

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legislation in force, including that issued by the Central Bank of Brazil.

By using the Services, Users declare that they are aware that, for the purposes described in these Terms of Use and Privacy Policy, Personal Data may be transferred to other countries, including countries that have data protection rules different from Brazil.

## **11. Intellectual property and copyright**

Nothing in these Terms of Use and Privacy Policy shall be construed as an assignment of intellectual property rights or copyrights to Users or third parties, which are reserved to Hash, including, but not limited to, trademarks, patents, logos, names, websites, software, numbers, codes, etc. Any copy or breach of this provision will subject the infringer to indemnify Hash for any damages, including termination, court costs, loss of suit and attorney's fees.

If any User's dashboard or page has been customized for it by Hash, it means that User has ceded the intellectual property rights to the brand, name and logo for this purpose exclusively.

## **12. Changes to these Terms of Use and Privacy Policy**

We may revise these Terms of Use and Privacy Policy from time to time to reflect changes in our business, Services or applicable law.

If relevant updates or changes are made, we will notify Users, in accordance with applicable law, of such changes, through our communication channels, such as email or advertisement on our website.

The revised Terms of Use and Privacy Policy will come into effect on the date of their publication, safeguarding the rights of Users described in item 8 above.

## **13. Disclaimer**

Under no circumstances will Hash be held responsible for the misuse of the Services and for incorrect or outdated information provided by Users, who are solely responsible for the information provided and/or entered on the platforms.

## **14. Applicable law and jurisdiction**

These Terms of Use and Privacy Policy are subject to Brazilian law and any dispute not resolved amicably must be submitted to the

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court of the capital of the State of São Paulo, excluding any other, however privileged.

## **15. CONSENT**

**BY CLICKING "I AGREE", THE USER CONFIRM THAT YOUR INFORMATION IS TRUE, COMPLETE AND NOT MISCELLANEOUS AND THAT YOU ARE AWARE OF AND AGREE WITH THE PROVISIONS OF THESE TERMS OF USE AND PRIVACY POLICY IN ITS COMPLETENESS, INCLUDING, BUT NOT LIMITED TO, WITH THE TRANSFER OF PERSONAL DATA TO THIRD PARTIES AND OTHER JURISDICTIONS AND WITH THE USE OF COOKIES. AT ANY TIME, THE USER MAY CONTACT HASH THROUGH THE MADE AVAILABLE CHANNELS IN ORDER TO EXERCISE THEIR RIGHTS GUARANTEED BY THE APPLICABLE LEGISLATION IN WHICH AS DESCRIBED IN ITEM 8 OF THESE TERMS OF USE AND PRIVACY POLICY.**