

# **Nubank Privacy Notice**

At Nubank, our goal is to fight complexity, so we've made this **Privacy Notice** as simple as possible. If you still have any questions, our service channels listed in the "Contact Us" section are at your disposal. Additionally, you can access links to topics within the Privacy Notice that may be of particular interest to you.

This Privacy Notice ("Notice") from Nubank Pagamentos S.A. - Instituição de Pagamento, Nubank Financeira S.A. - Sociedade de Crédito, Financiamento e Investimento, NubankPay For Business Instituição de Pagamento LTDA., Nubank Invest Corretora de Valores S.A. and other group companies, including its direct or indirect controlling and controlled entities, as well as its affiliates and companies under common control in Brazil ("Nubank" or "we"), was created to show we are committed to always handling your personal data with security, privacy, and transparency.

This Privacy Notice describes the personal data we collect, how they are used, stored, and shared, and your rights regarding such data. For this reason, we recommend that you read the Notice until the end.

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#### Introduction

When you hire Nubank's services, you provide us with your personal data so that we may make it possible for you to hire our products and services and we may deliver the best experience possible. At Nubank, privacy, security and transparency are core values, and we will always adopt the best practices to ensure your personal data's confidentiality and integrity.

The Controller of your personal data, that is, the company responsible for deciding how to handle your personal data, will be **Nubank Pagamentos S.A. - Instituição de Pagamento**, CNPJ nº 18.236.120/0001-58, headquartered in the City of São Paulo, State of São Paulo, at Rua Capote Valente, nº 39, Pinheiros, CEP 05409-000.

Depending on the services hired - such as personal loans, for example - the data controller may be the company **Nubank Financeira S.A. - Sociedade de Crédito, Financiamento e Investimento**, CNPJ n° 30.680.829/0001-43, the group company responsible for granting credit; the company **Nubank Invest Corretora de Valores S.A. ("NubankInvest")**, registered with the CNPJ/ME n° 62.169.875/0001-79; or the company **Nubank Distribuidora de Títulos e Valores Mobiliário LTDA**, CNPJ n° 39.544.456/0001-58, the company with which NubankInvest applies the investor profile questionnaire; all headquartered at Rua Capote Valente, n° 120, CEP 05409-000, city of São Paulo, State of São Paulo.

#### **Application**

This Privacy Notice is applicable to all Nubank customers in Brazil, active and inactive, and prospects in Brazil.

- **Nubank Customers**: individuals who effectively contract, use or access one or more Nubank services or products (either for yourself or for your legal entity).
- **Nubank Prospects**: individuals prospected by Nubank or who already applied to hire services or products, but who have not become Nubank customers for some reason.

For Nubank job candidates, the Privacy Notice can be found at https://nubank.com.br/carreiras/.

For members of the **NuCommunity**, the Privacy Notice can be found at https://comunidade.nubank.com.br/privacy. All information posted in the community is public. To avoid any risk to the security of NuCommunity users, we recommend that you **never disclose personal data** (especially card number and password, CVV, CPF, income, address, telephone number, etc).



For products aimed at underage customers, we have the Privacy Notice for Minors.

We collect your personal data whenever you:

- Use the Nubank app on smartphones;
- Request to hire any of our services or products;
- Hire or use any of our products or services (for example, by making purchases with your Nubank credit card or transactions with your Nubank account);
- Browse the Nubank website https://nubank.com.br or NubankInvest's https://www.nuinvest.com.br/;
- Browse Nubank's blogs Fala, Nuban and Building Nubank;
- Subscribe to Nubank's newsletter https://blog.nubank.com.br/assinar-newsletter/;
- Contact us through our service channels;
- Participate in surveys or promotions carried out by Nubank.

In addition to our customers' data, we will have personal data from anyone who:

- Was our customer;
- Carried out any transaction with us or with any of our customers;
- Was or is a representative, attorney, guardian, curator, employee or partner of any customer, company or entity with whom we have a relationship.

This Privacy Notice is also applicable to other methods used by Nubank to collect personal data and allow us to provide or improve our services. For example, we may collect information through partners or linked to our technologies. All collection methods and uses regarding your personal data are detailed in this Privacy Notice.

The activities described in this Privacy Notice only apply to the processing of your personal data in Brazil and are subject to applicable local laws, mainly **Law 13.709/2018** (General Personal Data Protection Law, or "LGPD"), in accordance with its most recent version, and will be adapted accordingly should there be any legal changes.



# What personal data is collected by Nubank and for what purposes

When Nubank collects your personal data, any and all processing to be carried out must be justified based on one or more legitimate purposes. This means that Nubank will never process any data under any unjustified or illegitimate pretext.

## Personal Data Provided by the Data Subject

Here at Nubank, we may use **ARTIFICIAL INTELLIGENCE** tools in the processing of personal data to personalize and improve the offering of services and products and other purposes, always in compliance with legal and regulatory obligations and with the commitments made in this Privacy Notice.

Types of Personal Data Provided by the Data Subject

## Personal Data Provided by the Data Subject

- Here at Nubank, we may use **ARTIFICIAL INTELLIGENCE** tools in the processing of personal data to personalize and improve the offering of services and products, and for other purposes, always in compliance with legal and regulatory obligations and with the commitments made in this Privacy Notice.
  - Registration data, such as: full name, identification documents, nationality, address, date of birth, parentage, gender, declaration of US Person and PPE\* (politically exposed person) - (when applicable), investor profile, among others
  - Contact details, such as phone number and email
  - Employer
  - Occupation
  - Declared income and its respective proof
  - Pix keys and related information Copies of identification documents, such as RG, CNH, CPF, among others.
  - Profile picture
  - Biometric data, such as pictures of your face, your fingerprint and/or facial biometrics to unlock the app via a device (fingerprint, touch ID and face ID), and facial recognition for authentication and fraud protection purposes.



\*PPE is the term used to refer to people who are or who have family or close contact with people who hold political positions, such as parents, uncles, cousins and even boyfriends or girlfriends.

Investor Profile Related Data. To comply with regulatory requirements related to our investment products, we may collect some information about your investor profile through a few questions, such as the period you intend to redeem the investments, your aptitude or aversion to financial risks, the objective of your investments, the frequency with which you invest part of your income, your level of knowledge about investments, among other questions.

- Providing access to and enable the functioning of services and products hired by you
- Identifying, authenticating, and verifying requirements to hire Nubank's services and products
- Validating, authenticating, and other processing of data from parents or legal guardians, necessary for the confirmation of account opening for minors and the provision of related services and products
- Authenticating financial transactions
- Enabling Open Finance operations
- Creation of investor profile for adequacy of financial services
- Providing customer support and answering questions
- Implementing the salary portability, if requested
- Provision of additional credit card
- Making contact by phone, email, SMS, WhatsApp, or other communication methods, including notifications or push notifications from the use of Nubank's services, for marketing purposes and other matters related to your Nubank contract, products, and services
- Sending your credit card and notices in general
- Analysis of customer support interactions and sending of WOW (a gift, a letter, or a treat that can be sent when a client and Nubank's customer service get connected) for marketing purposes
- For the operation of benefits related to the use of the marketplace and other products and services, such as cashback, NubankCoin, among others
- Improving Nubank services, including cross-referencing information on products contracted by individuals and legal entities to offer new products and services
- Auditing for the purpose of corporate transactions, such as merger, acquisition, or sale
  of the assets of NubankInvest, its economic group, or part of each of them, including



the transfer of information to the new owner, in the event of a change in ownership or control of all or part of NubankInvest or its assets

- Marketing, prospecting, carrying out market research, opinion polls, and promotion of our products and services, or those of our partners, including enabling offers and sending information about products, services, news, features, content, updates, and other events relevant to maintaining the relationship with you
- Queries on your information in the Credit Information System (SCR) database, upon your consent
- Periodically reassessing the eligibility to be a Nubank customer, making it possible to eventually and proactively invite prospects
- Protecting credit, including granting credit and increasing limits
- Preventing and solving technical or security issues
- Investigating and implementing measures to prevent and combat illicit acts, fraud, financial crimes, and guarantee the security of Nubank's customers and the financial system
- Guarantee of accessibility means to ensure fair and equitable service to our customers and other data subjects in need
- Regularly exercising Nubank's rights, including presenting documents in judicial and administrative proceedings, if necessary
- Complying with a court order, competent authority, or supervisory body
- Complying with legal or regulatory obligations, for example, to keep your registration updated or to comply with legal and/or regulatory obligations imposed on Nubank, including Know Your Customer (KYC), Prevention of Money Laundering and Terrorism Financing rules, and others, with emphasis on the requirements of the Brazilian Securities and Exchange Commission (CVM), the Brazilian Central Bank (BACEN), BSM Market Supervision, ANBIMA, and SUSEP.

**BIOMETRIC DATA** is used for the purpose of fraud prevention and to guarantee your security in the identification and authentication processes for registration and new devices.

#### Personal Data Collected from Third Parties

Nubank will collect your personal data for the following purposes from different third parties, which may be marketing partners, cybersecurity companies, bureaus, anti-fraud companies, among others.



#### Types of Personal Data Collected from Third Parties

- Registration data, such as: full name, parents, date of birth, CPF, phone number, address, among others
- Data on financial restrictions, such as: negative entries, amounts owed, due dates, number of inquiries, among others
- Pix keys and related information
- Information on credit history
- Score from credit bureaus
- Information on debts due or overdue, co-obligations and guarantees
- Information regarding your participation in any Politically Exposed Person (PEP)
   list or restriction list (such as OFAC, UNSC and other international lists)
- Credit and fraud history information and scores generated by credit agencies and third parties
- Information contained in the Credit Information System (SCR) database, with your consent
- Data obtained through partnerships established to enable the development of certain NubankInvest services or another broker when you request the portability of the custody of your investments to NubankInvest

- Providing access to and enable the functioning of services and products hired by you
- Improving our products and services
- Marketing, prospecting, market research, and opinion research
- Periodically reassessing the eligibility to be a Nubank customer, making it possible to eventually and proactively invite prospects
- Protecting credit, including granting credit and increasing the limit
- Preventing and solving technical or security issues
- Investigating and implementing measures to prevent and combat illicit acts, fraud, financial crimes, and guarantee the security of Nubank's customers and the financial system
- Guarantee of accessibility means to ensure fair and equitable service to our customers and other data subjects in need
- Complying with legal or regulatory obligations, for example, to keep your registration updated or to comply with legal and/or regulatory obligations imposed on Nubank, including Know Your Customer (KYC), Prevention of Money Laundering and Financing of Terrorism rules, and others.



#### Browsing and Device Data

- IP address of the mobile device used to access Nubank's services or products
- Interactions and usage profile of Nubank's websites, blogs, and app
- Technical data, such as URL, network connection, provider, and device information
- Cookies
- Device features, such as ID, operating system, browser, model, and information linked to interactions with Nubank's app (for example, information on whether or not the microphone is being used, without any recording or collection of data related to the content of any audio or calls)
- Data related to internet consumption
- Geolocation data for your security for example, to identify fraudulent purchases, "Modo Rua" etc.
- Call history and phone numbers, when necessary.

- Providing services, offering products hired, and improving the use and experience with the Nubank app and websites
- Operationalizing new products and services
- Recommending new services, products, or application features, including services from partners that may interest you
- Advertising on our website, social media or third-party websites
- Generating statistics, studies, research, and surveys on the activities and behavior when using products or services
- Protecting credit, including granting credit and increasing the limit
- Advertising on our website, social media or third-party websites
- Generating statistics, studies, research, and surveys on the activities and behavior when using products or services
- Preventing and solving technical or security issues
- Assist in combating scams in phone calls, with your consent, when necessary
- Investigating and implementing measures to prevent and combat illicit acts, fraud, financial crimes, and guarantee the security of Nubank's customers and the financial system
- Regularly exercising Nubank's rights, including presenting documents in judicial and administrative proceedings, if necessary
- Complying with a court order, competent authority or supervisory body
- Complying with legal or regulatory obligations.



#### Personal Data Generated from the Use of our Products and Services

Types of Personal Data Generated from the Use of our Products and Services

- Data from the hiring and use of Nubank products and services.
- Data from transactions and financial movements in the Nubank account, such as debits, withdrawals, payments, investments, and transfers, including data from transactions' senders and beneficiaries
- Data on the credit granted, such as personal loans, negotiation of amounts due from the use of the credit card and payment of invoices in installments
- Information related to the invitation to become a Nubank Customer
- Destination countries information for international travel, including length of stay
- Credit history
- Customer service history
- Your home bank code, if you activate salary portability
- Tests for improvement of Nubank's models, services, and products.
- Access to your contact list if you voluntarily activate this feature in Nubank app

- Providing access to and enabling functioning of services and products hired by you
- Authenticating transactions, customer service, and support
- Improving Nubank services, including cross-referencing information on products contracted by individuals and legal entities to offer new products and services
- Developing new products and services to be offered by Nubank companies and generating knowledge for innovation or development of new products and services
- Carrying out tests to improve Nubank's models, services, and products
- Marketing, prospecting, market research, opinion surveys, and promotion of our products and services, or those of our partners, including the provision of offers and sending information about products, services, news, functionalities, content, news, and other relevant events for maintaining the relationship with you
- Protecting credit, including granting credit and increasing the limit
- Preventing and solving technical or security issues and monitoring of the use and performance of Nubank's services and products
- Investigating and implementing measures to prevent and combat illicit acts, fraud, financial crimes, and guarantee the security of Nubank's customers and the financial system
- Guaranteeing accessibility to ensure fair and equitable service to our customers and other data subjects in need



- Auditing for the purpose of corporate transactions, such as merger, acquisition, or sale
  of the assets of NubankInvest, its economic group, or part of each of them, including
  the transfer of information to the new owner, in the event of a change in ownership or
  control of all or part of NubankInvest or its assets
- Regularly exercising Nubank's rights, including presenting documents in judicial and administrative proceedings, if necessary
- Complying with a court order, competent authority or supervisory body
- Complying with legal or regulatory obligations, including Know Your Customer (KYC), Prevention of Money Laundering and Financing of Terrorism rules, and others.

## Publicly Available Data

Types of Public Data We May Collect

- Publicly available information on you or that has been made public by you
- Information on mentions or interactions with Nubank
- Testimonials about Nubank posted on social media profiles and pages, along with your name and image (including profile pictures)

- Promoting Nubank's products and services on social media, websites, applications, or institutional and advertising materials
- Sending WOWs (a gift, a letter, or a treat that can be sent when there is a connection between a customer and Nubank's customer service)
- Protecting credit, including granting credit and increasing the limit
- Investigating and implementing measures to prevent and fight illegal activities, fraud, financial crimes and ensure the security of Nubank's customers and financial system
- Regularly exercising Nubank's rights
- Complying with legal and/or regulatory obligations, including Know Your Customer (KYC), Prevention of Money Laundering and Terrorism Financing rules, and others.



## **Data of Minors**

At Nubank, minors can access some products and services through the authorization of their parents or legal guardians. In these cases, Nubank will need to process the personal data of minors.

In addition, it will be necessary to process data from parents or legal guardians, such as registration data, data on the use of our products and services, and browsing data, in accordance with this Notice.

To understand in detail how the data of minors are processed by Nubank, access the Under18 Privacy Notice.

# Personal Data Sharing

• The data processing purposes presented may also justify the **sharing** of personal data under Nubank's control, whether within companies of Nubank's economic group, with third parties, with partners, and with authorities and regulatory bodies, when necessary. In addition, Nubank may share your data in certain situations if you request such sharing. Whenever carried out, data sharing will be done within the limits and purposes of our business and in accordance with applicable law.

Below we present the main purposes for sharing personal data under Nubank's control.

## Other Companies in the Nubank Group

- Providing access to and enabling the functioning of services and products hired by y ou
- Operationalizing and offering new services and products
- Marketing, prospecting, carrying out market research, opinion polls, and promotion of our products and services
- Foreign exchange transactions
- Benefits programs
- Database integration and/or migration
- Protecting credit, including granting credit and increasing the limit
- Preventing and solving technical or security issues
- Investigating and implementing measures to prevent and fight illegal activities, fraud, financial crimes and ensure the security of Nubank's customers and financial system
- Regularly exercising Nubank's rights



• Complying with the legal or regulatory obligation.

## Business Partners, Service Providers, and Other Third Parties

- Improving our services, website and app, and operating new products or services
- Helping provide the services we deliver to you, for example, making and delivering your
   Nubank card
- For hiring, using, and responding to requests and inquiries involving insurance hired through Nubank, such as Cell Phone Insurance, Nubank Joint Lives, Nubank Auto, etc.
- Enabling Open Finance operations
- For benefits related to the use of marketplaces and other products and services, such as cashback, NubankCoin, among others
- Contacting you by phone, email, SMS, WhatsApp, push notification, or other communication methods
- Assisting in the development and offering of our financial products
- Collecting debt
- Checking your identity and eligibility to hire Nubank's services, and periodically reassessing this, enabling possible proactive invitations to prospects
- Marketing, prospecting, carrying out market research, opinion surveys, and promotion of our products and services
- Foreign exchange transactions
- Securities and stock market operations
- Benefits programs
- Protecting credit, including granting credit and increasing the limit
- Preventing and solving technical or security issues
- Investigating and implementing measures to prevent and fight illegal activities, fraud, financial crimes and ensure the security of Nubank's customers and financial system
- Regularly exercising Nubank's rights
- Complying with a court order, competent authority or supervisory body
- Complying with the legal or regulatory obligation.

## Authorities and Regulatory Bodies

- Investigating and implementing measures to prevent and fight illegal activities, fraud, financial crimes and ensure the security of Nubank's customers and financial system
- Securities and stock market operations
- Regularly exercising Nubank's rights, including presenting documents in judicial and administrative proceedings, if necessary



- Complying with a court order, meeting a request from a competent authority or supervisory body
- Complying with the legal or regulatory obligation.

#### **Upon Your Request**

- Ensuring transparency in our relationship with you
- Sending non-mandatory notifications by email, push, WhatsApp, and SMS.

In addition, when using our app or browsing our websites, you may be redirected to third-party websites or applications. Once redirected to a third-party website or application, privacy practices will be governed by their privacy notices and terms of use. We cannot control or be responsible for the privacy practices and content of third parties. Please read the applicable privacy notices carefully to understand how they collect and process your data.

# Your Rights as a Data Subject

# Confirmation of the Existence of Personal Data Processing

If you are a Nubank customer, this means we process your personal data, including, by storing personal data in a secure and controlled environment, among other processing means. You can request that Nubank confirms if your personal data is processed by Nubank.

#### Access to Personal Data

You can request access to your personal data processed by Nubank.

# Correction of Incomplete, Inaccurate, or Outdated Personal Data

If you find that your personal data is incomplete, inaccurate, or outdated, you can request that Nubank fixes or complements the information. If it is not possible to change the data through



the Nubank app itself, you must send a document that proves the correct and updated personal data.

Anonymization, Blocking, or Elimination of Unnecessary or Excessive Data or Data Processed in Non-Compliance with the LGPD

If any personal data is processed unnecessarily, excessively for its intended purpose, or in non-compliance with the LGPD, you can request that Nubank anonymizes, blocks, or deletes this data, provided that it is effectively verified, after internal checks, that the data is unnecessary, excessive or in non-compliant with the law.

#### Elimination of Personal Data Processed with Consent

If you have given your consent for the processing of your personal data for specific purposes (and not necessary for the provision of our services or delivery of our products), you may request the deletion of this personal data.

Information on the Companies with Which Nubank Has Shared or from Which It Has Received Your Personal Data

You can request that Nubank informs with whom your personal data was shared or from whom it was received.

Information on the Possibility of Not Providing Consent and the Consequences of Refusal

If your consent is necessary to access or use a certain product or service, you can ask Nubank to clarify if the product or service may be provided without your consent to process your personal data, or what is the outcome from not consenting in this case.



## **Revoking Consent**

If you gave consent for us to process your personal data for a specific purpose, you can revoke this authorization. Revocation of consent may result in the impossibility of using some features in the app, or even in the termination of the services provided, but it does not prevent the use of (i) anonymized data; and (ii) data whose processing is based on another legal basis provided for in LGPD.

#### **Automated Decisions**

You may request a review of decisions made solely based on automated processing of personal data that affect your interests and an indication of the criteria used for these decisions. Due to protection of business secrecy and confidential information, and preservation of competition, Nubank does not provide information on how these automated systems work. It is important to highlight that Nubank does not guarantee a result different from the first decision, but we can guarantee that our technological models are consistent and based on legal and ethical principles.

# Portability and Right to Petition

When the right to portability is regulated by the Brazilian National Data Protection Authority (ANPD - Autoridade Nacional de Proteção de Dados), you may request Nubank to port your personal data to another service provider. In addition, you have the right to petition the ANPD regarding your personal data.

If you wish to exercise any of these rights, please contact us through the "Help Me" channel in the app or directly with our Data Protection Officer (DPO) by email at dpo@nubank.com.br. In order to enable the exercise of your rights, we may request you to verify your identity, as a security and fraud prevention measure.

## International Transfer of Personal Data

Some or all of your personal data may be transferred abroad, for example, when it is stored by Nubank on cloud computing servers located outside of Brazil. To this end, Nubank complies



with all the requirements established by current legislation and adopts the best security and privacy practices to ensure the integrity and confidentiality of your personal data.

# **Activity Log**

We may record the activities you perform when using our application, website, or blogs, creating, when possible and applicable, logs (records of activities carried out on the websites and applications and services) that will contain: the IP address, access and actions performed by you in the service provided, date and time of each action performed, and information about the device used, such as the operating system version, browser, and geolocation.

We may also use certain technologies, our own or those of third parties, to monitor the activities while accessing our websites and blogs, such as cookies, web beacons, and analytics tools.

## Cookies

Internet files that temporarily store what you are browsing on the web. Nubank has cookies on its websites and blogs and also receives information from partners regarding cookies on their websites. Cookies can be used for many purposes, including remembering you and your preferences, persisting information related to your activities on the visited website, or collecting information that can be used to deliver personalized content. Our websites may also use locally stored objects to provide certain content, such as video on demand, video clips, or animation.

We have third-party cookies enabled on our website. Privacy practices will be governed by the privacy policies and terms of use of these third parties, so we cannot control or be responsible for the third party's privacy practices and content. Therefore, we highlight that **you can, at any time, block cookies by activating a setting in your browser and your ability to limit cookies will be subject to your browser's settings and limits. You can also delete existing cookies in the same settings of your browser. If you choose to disable cookies, you may continue browsing websites and blogs, but some parts of the pages may no longer work.** 

## Web Beacon



Web beacon is a technique that allows mapping those visiting a certain web page, identifying their behavior in different websites or web servers.

# **Analytics Tools**

These tools can collect information such as how you visit a website, including which pages and when you visit those pages, and other websites that were visited before, among others.

# **Security Measures**

Nubank uses various types of security measures to ensure the integrity of your personal data, such as information security standards practiced by the industry when collecting and storing personal data.

Personal data may also be stored by means of cloud computing technology and other potential future technologies, always seeking to improve and enhance our services and security.

We have a robust, highly qualified team responsible for ensuring that Nubank adopts the best security practices, including:

- Multiple authentication factors for accessing information;
- Security as code, in order to automate and quickly and efficiently respond to security events in the technological environment;
- Encrypting data at rest, in transit and in use to ensure the information's integrity;
- Continuously monitoring the environment;
- Continuously assessing and testing the information security in our systems by internal and external teams;
- Periodically auditing.

We also recommend you never share your password with anyone; it is personal and non-transferable, and always be careful when posting your personal data on social networks or any other public environment. To learn more about digital security, please visit our blog.



# Legal Bases

Nubank may process your personal data under different circumstances in accordance with some of the legal bases provided for in Article 7 of the LGPD, which are:

- Consent of the data subject;
- Legitimate interests of Nubank, the data subjects or third parties;
- Execution of a contract or preliminary procedures related to a contract to which the data subject is a party;
- Regular exercise of rights, including in judicial, administrative, or arbitration proceedings;
- Protection of the life or physical safety of the data subject or a third party;
- Compliance with a legal or regulatory obligation;
- Credit protection.

Your sensitive data, when collected, will be processed by Nubank in accordance with the following legal bases provided for in Article 11 of the LGPD:

- Specific and distinct consent of the data subject or their legal guardian;
- Compliance with a legal or regulatory obligation;
- Regular exercise of rights, including in judicial, administrative, or arbitration proceedings;
- Protection of the life or physical safety of the data subject or a third party;
- Ensuring the prevention of fraud and the security of the data subject in processes of identification and authentication of registration in electronic systems.

# Consent

Throughout this Privacy Notice, we inform you that some of your data that is used to enable Open Finance operations and the data resulting from the consultation of the Credit Information System (SCR) will only be processed by Nubank with your consent and for the purposes described.

By reading this Privacy Notice and clicking, at the end, on "I have read, I am aware of the conditions for processing my personal data and I provide my consent, when applicable, as described in this Privacy Notice", you consent to the processing of personal data in the ways indicated above.



In cases where changes to this Privacy Notice result in changes to personal data processing practices that depend on your consent, we will request your consent to the new terms of the Privacy Notice in relation to the data processing and purposes indicated.

# Legitimate Interests

Throughout this Privacy Notice, we inform you that some personal data may be processed to fulfill the legitimate interests of Nubank, or of third parties. But don't worry! In these cases, we carry out a complex and careful assessment in order to weigh whether the interests in question are legitimate, whether the processing and personal data are necessary to achieve these interests, and also considering your fundamental freedoms and rights as the data subject.

It is important to emphasize that the legitimate interest can be that of the controller or of third parties and, thus, may include commercial, individual interests, or even interests of the community and society at large.

## Retention and Deletion of Your Personal Data

When applicable, and even after the cancellation of the Nubank account, credit card, or other services or products, we may store your personal data for an additional period for auditing purposes, compliance with legal or regulatory obligations, for the regular exercise of Nubank's rights, or also for the necessary period in accordance with the legal basis that justifies the retention of the data.

For example, we may store your data to comply with obligations imposed by the Brazilian Central Bank (BCB), the Brazilian Securities and Exchange Commission (CVM), BSM Market Supervision, ANBIMA, and SUSEP, and other regulatory entities, and also to preserve our rights in lawsuits. But don't worry, as your data will always be kept in a secure and controlled environment and will be deleted or anonymized as soon as its maintenance is no longer necessary or justifiable in accordance with the legal bases of the LGPD.

# Changes to this Privacy Notice



Nubank may change this Privacy Notice at any time. When any relevant condition of this Privacy Notice is changed, these changes will be valid, effective, and binding after the new version is published on our website or sent to you by email.

We always value transparency: whenever a relevant change is made, we will send you a notice indicating the new version in effect. By continuing to use our products and services after a change in the Privacy Notice, you will be agreeing to the new conditions - but you can always express your disagreement through our service channels, if applicable.

## Contact Us

According to the LGPD (Lei Geral de Proteção de Dados - Brazilian Data Protection Law), Nubank is the "Controller" of your personal data. If, after reading this Privacy Notice, you still have any questions or, for any reason, need to contact us for matters involving your personal data, you can contact us through the email below

Data Protection Office: dpo@nubank.com.br

We are always available to answer your questions.