



PRIVACY POLICY

Our goal is to end complexity. That's why we've tried to make this Privacy Policy ("Privacy Policy") as simple as possible. However, if you still have questions, our service channels listed below are at your disposal.

The Privacy Policy of Nu Pagamentos S.A., Nu Financeira S.A. - *Sociedade de Crédito, Financiamento e Investimento* and other group companies, covering direct or indirect parent companies and subsidiaries, as well as affiliates and joint ventures in Brazil ("Nubank") was created to show we are committed to always handling your personal data with security, privacy and transparency.

This Privacy Policy describes the personal data we collect, how they are used, stored and shared, and your rights regarding such data. We recommend reading it carefully.

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.

Furthermore, bureaucracy, fine print and asterisks have no part in Nubank's mission. Therefore, we have developed this Privacy Policy to clearly, simply and objectively explain our practices, how your personal data are handled and why we ask for them.

By accepting this Privacy Policy, you are aware that the one controlling your personal data, that is, the company responsible for deciding how to handle your personal data, will be Nu Pagamentos S.A., Corporate Taxpayer's ID (CNPJ) 18.236.120/0001-58, headquartered in the City of São Paulo, State of São Paulo, at Rua Capote Valente, 39, Pinheiros, CEP 05409-000.

Depending on the services hired, the one controlling your data may be the company Nu Financeira S.A. - *Sociedade de Crédito, Financiamento e Investimento*, Corporate Taxpayer's ID (CNPJ) 30.680.829/0001-43 with headquarters in the City of São Paulo, State of São Paulo, at Rua Capote Valente, 120, Pinheiros, CEP 05409-000. This is the Nubank company responsible, for example, for granting credit and offering some of our products, such as personal loans.

After reading this Privacy Policy, if you have questions, complaints, wants to exercise your rights regarding your personal data or talk to Nubank on this matter, you can contact us through our service channels or contact the DPO by emailing dpo@nubank.com.br

1. Application





Whenever you read a capitalized term in this Policy, it means that it has a certain and specific meaning.

Whenever "Nubank", "we" or "our" are mentioned, we are referring to Nubank; likewise, whenever "you" or "yours" we are referring to You.

This Privacy Policy is applicable to all Nubank's customers in Brazil. We collect your personal data whenever you:

Use Nubank's app for smartphones

Hire or use our products or services, either making purchases with your credit card or transactions with your Nubank's account

Browse Nubank's website - <https://nubank.com.br>

Browse Nubank's blogs - <https://blog.nubank.com.br/> and <https://building.nubank.com.br/>

Subscribe to Nubank's newsletter - <https://blog.nubank.com.br/assinar-newsletter/>

Contact us through our service channels

Participate in Nubank's surveys or promotions

This Privacy Policy specifically applies to:

Nubank's Clients: Individuals effectively hiring, using or accessing one or more Nubank's services or products (either for yourself or your legal entity)

Nubank's Prospects: Individuals prospected by Nubank or who already asked to hire services or products, but who have not become Nubank's client for some reason

For Nubank's job applicants, the Privacy Policy can be found at <https://nubank.com.br/carreiras/>.

For members of NuCommunity, Nubank's community, the Privacy Policy can be found at <https://comunidade.nubank.com.br/privacy>.

This Privacy Policy 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 Policy.

The practices in this Privacy Policy only apply when handling your personal data in Brazil and are subject to applicable local laws, mainly Law 13709/2018 (General Personal Data Protection Law or "LGPD") after becoming effective.

2. What Personal Data are Collected by Nubank?

When requesting, hiring or using Nubank's products or services, you provide us with, and we collect, certain personal data. From the time you interact with Nubank, we collect your personal data. In some cases, you provide Nubank with your personal data directly, but we may also collect your data automatically.





We also get some personal data sent by partners hired for specific purposes (such as to strengthen our control against fraud) to comply with legal obligations or applicable regulations and others that will be detailed below.

By accepting this Privacy Policy, you expressly agree to provide only true, current and accurate personal data and not to change your identity or your personal data in any way when accessing and using our products or services. You will be solely responsible for false, outdated or inaccurate information provided directly by you to Nubank.

Below are your personal data handled by Nubank and divided into categories:

Personal Data Provided by the Holder

Registration data such as name, IDs, nationality, address, date of birth, parents, gender, among others.

Contact information such as phone and email

Company where you work

Occupation

Declared income and proof

Biometric data such as pictures of your ID and face

Personal Data Collected from Third Parties

Registration data such as name, parents, date of birth, Individual Taxpayer's ID (CPF), phone number, address, among others

Information on financial restrictions, such as bad credit, balances due, due dates, total queries, among others

Information on credit history

Score from credit bureaus

Information on debts due or overdue, co-obligations and guarantees

If you are a Politically Exposed Person (PPE) or included in a restricted list (such as OFAC, UNSC and other international lists)

Information in the Credit Information System (SCR) database, with consent

Browsing and Device Data

IP address of the mobile device used to access Nubank's services or products

Interactions and use profile in Nubank's websites, blogs and app

Technical data such as URL, network connection, provider, and device information

Cookies

Device's features such as ID, OS, browser and model

Device's geolocation data if you authorize this information to be shared from your device

Personal data from using our products and services

Data on our products and services hired, such as credit card and Rewards





Data on financial transactions and others in Nubank's account, such as debits, withdrawals, payments, investments and transfers, including information on senders and beneficiaries

Data on credit granted, such as personal loan, negotiating balances due from using the credit card and paying the balance on installments

Invitation date to become Nubank's Client

Destination countries reported on trips abroad, including your stay

Credit history

Customer service history

Code from your original bank, if you activate salary portability

Access to your contact list if you voluntarily activate this feature in our app

Public Data

We may collect information publicly available on you or that has been made public by you.

Information on mentions or interactions with Nubank

Testimonials regarding Nubank posted social media profiles and pages, along with your name and image (including profile pictures)

3. How Nubank Uses your Personal Data?

Nubank uses your personal data to provide a high-quality service and offer the best products to you. Below we detail the purposes from using your personal data:

Personal Data Provided by the Holder

Purposes:

Providing services and products contracted

Identifying, authenticating and verifying requirements to hire Nubank's services and products

Authenticating financial transactions

Meeting requests and answering questions

Implementing the salary portability, if required

Making contact by phone, email, SMS, WhatsApp, or other communication methods, including notifications or push to use Nubank's services

Sending your credit card and notices in general

Sending a WOW (a gift, a letter or a treat that may be sent when a client and Nubank's customer service get connected)

Improving Nubank's services, including crossing information on products contracted by individuals and companies to offer new products and services

Marketing, prospecting, market and opinion research, promoting our or our partners' products and services, enabling offers and sending information on products, services, news, features, content, and other relevant events to continue the relationship with you

Queries on your information in the Credit Information System (SCR) database, after you consent to this use





- Periodically reassessing the eligibility to be Nubank's client, 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 fight illegal activities, fraud, financial crimes and ensure the security of Nubank's customers and financial system
- Regularly exercising Nubank's rights, including presenting documents in judicial and administrative proceedings, if necessary
- Helping or complying with a court order, competent authority or supervisory body
- Complying with the legal or regulatory obligation

Biometric Data

Purposes:

- Preventing fraud and ensuring your security when identifying and authenticating the registration or new device

Personal Data Collected from Third Parties

Purposes:

- Improving our products and services
- Marketing, prospecting, market and opinion research
- Periodically reassessing the eligibility to be Nubank's client, 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 fight illegal activities, fraud, financial crimes and ensure the security of Nubank's customers and financial system
- Complying with legal or regulatory obligation obligations, for example, keeping your record up to date or complying with legal and/or regulatory Nubank's obligations, including rules on Know Your Customer, Money Laundering and Terrorism Financing Prevention and others

Browsing and Device Data

Purposes:

- Providing services, offering products hired and improving the use and experience with Nubank's app and websites
- Operationalizing new products and services
- Recommending new services, products or app 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





- Preventing and solving technical or security issues
- Geolocation data for your safety - for example, identifying undue purchases
- 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, including presenting documents in judicial and administrative proceedings, if necessary
- Complying with a court order, competent authority or supervisory body
- Complying with the legal or regulatory obligation

Personal data from using our products and services

Purposes:

- Providing services and products contracted
- Authenticating transactions, providing customer service and support
- Improving Nubank's services, including crossing information on products contracted by individuals and companies to offer new products and services
- Developing new products and services to be offered by Nubank's companies and generating knowledge for innovation or to develop new products
- Testing to improve Nubank's models, services and products
- Marketing, prospecting, market and opinion research, promoting our or our partners' products and services, enabling offers and sending information on products, services, news, features, content, and other relevant events to continue the relationship with you
- Sending a WOW (a gift, a letter or a treat that may be sent when a client and Nubank's customer service get connected)
- Protecting credit, including granting credit and increasing the limit
- Preventing and solving technical or security issues and monitoring the use and performance of Nubank's services and products
- 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, including presenting documents in judicial and administrative proceedings, if necessary
- Helping or complying with a court order, competent authority or supervisory body
- Complying with the legal or regulatory obligation

Public Data

Purposes:

- Promoting Nubank's products and services on social media, websites, apps or institutional and advertising materials
- Sending a WOW (a gift, a letter or a treat that may be sent when a client and Nubank's customer service get connected)
- 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 Nubank's obligations, including rules on Know Your Customer, Money Laundering and Terrorism Financing Prevention and others

4. Sharing Personal Data

Nubank may share your data if requested by you. Your data may also be shared with companies from Nubank's economic group, third-party partners and authorities and regulatory bodies for different purposes, when necessary. The data will always be shared within the limits and purposes of our business and as authorized by applicable law.

Below we have prepared a summary divided by categories with the types of suppliers we usually share your personal data:

Other Nubank Group Companies

Shared Data's Purposes:

- Providing services and products contracted for the client
- Operationalizing and offering new services and products
- Marketing, prospecting, market and opinion research, and promoting our products and services
- 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

Such as information technology, customer service, communication, statistical, research, marketing, financial and payment services providers; partners who manufacture, customize and deliver our credit and/or debit cards, recovery, credit and fraud prevention agencies, banks, financial institutions and other third parties.

Shared Data's Purposes:

- 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 card
- Making contact by phone, email, SMS, WhatsApp, push notifications or other communication methods
- Helping develop and offer our financial products
- Debt Recovery
- Checking your identity and eligibility to hire Nubank's services, and periodically reassessing this, making it possible to eventually and proactively invite prospects
- Marketing, prospecting, market and opinion research, and promoting our products and services





- 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 Entities

Shared Data's Purposes:

- 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, 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

Shared Data's Purposes:

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

When using our app or browsing our websites, you may also be redirected to third-party websites or apps. Once redirected to a third-party website or app, their privacy practices will be governed by the third-party's privacy policies and terms of use. We cannot control or be responsible for third party's privacy practices and content. Please read the applicable privacy policies carefully to understand how they collect and process your data.

5. Retaining and Deleting Your Personal Data

If a Nubank's Client or Prospect, while using our products and services and for as long as stored by Nubank, your personal data will be secure in a controlled environment.

When applicable, and even after cancelling Nubank's account, credit card or other services or products, we may store your personal data for an additional period for auditing purposes, to comply with legal or regulatory obligations, to regularly exercise Nubank's rights or for the time legally required and duly justified. For example, we may store your data to comply with obligations from the Brazilian Central Bank and also to preserve our rights in lawsuits.





6. Your Rights as Holder of the Personal Data

After LGPD came into effect, you, as the holder of the personal data, can exercise your rights with those controlling your personal data. We provide the mechanisms detailed below so that you can clearly and transparently understand how to exercise your rights and our team will be ready to meet any requests.

Below we list these rights:

Confirming the personal data is handled

If you are a Nubank's Client, this means we handle your personal data, even if, among others, storing personal data in a secure and controlled environment. You can ask Nubank to confirm if your personal data is handled.

Access to Personal Data

You can ask Nubank to inform and provide your personal data held by us.

Fixing Incomplete, Inaccurate or Outdated Personal Data

If you find that your personal data is incomplete, inaccurate or outdated, you can ask Nubank to fix or add the information. If not possible to change the data through Nubank's app, you must send a document proving the right and current personal data.

Anonymizing, Blocking or Deleting Unnecessary, Excessive or LGPD-Non-Compliant Data

If any personal data is handled unnecessarily, exceeding its intended purpose or not complying with LGPD, you may ask Nubank to anonymize, block or delete this data, if provenly verifying the data is unnecessary, excessive or in non-compliance with the law.

Deleting Personal Data Handled with Consent

If you have consented to processing your personal data for specific purposes (and not necessary to provide our services or deliver our products), you may ask these personal data to be deleted, including personal data on your geolocation with the places where your purchases were made.

Information from Companies with whom Nubank has Shared or Received your Personal Data

You can ask Nubank to inform with whom your personal data was shared or received.

Information on Possibly Not Consenting and the Outcome from Not Consenting

If needing your consent 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 handle your personal data or what is the outcome from not consenting in this case.

Revoking the Consent

If you consented us handling your personal data, you can revoke this authorization. Revoking the consent may make it impossible for you to use some features in the app or even terminate services, but it does not prevent us from using (i) anonymized data; and (ii) data handled in other legal cases set forth in LGPD.

Automated Decisions





You can ask for the review of decisions made solely based on personal data handled in an automated manner and affecting your interests. You can also ask the criteria used in these decisions. For trade secrecy, to protect confidential information and preserve competition, Nubank does not inform how these automated systems work. It should be noted that Nubank does not ensure a different decision, but we can ensure that our technological models are consistent and based on legal and ethical principles.

Portability and Right to Petition

When the portability right is regulated by the National Data Protection Authority (ANPD), you may ask Nubank to transfer your personal data to another service provider. Furthermore, with ANPD, you also have the right to petition on your data before a national authority.

If you wish to exercise these rights, please contact us through “Me Ajuda” channel in the app or directly with the DPO by emailing dpo@nubank.com.br. We may request you to prove your identity, as a security and fraud prevention measure, to enforce your rights.

You may exercise the rights in this chapter 6 when LGPD becomes effective.

7. NuCommunity

NuCommunity (<https://comunidade.nubank.com.br/>) is Nubank’s official community, created for stakeholders to connect, answer questions, bring ideas and suggestions and get updated on Nubank’s news.

All information on the community is public. To avoid any risk to the security of NuCommunity users, we recommend never posting personal data (especially card number and password, security code, Individual Taxpayer’s ID, income, address, phone number, etc.).

If you are a NuCommunity user, access the community's Privacy Policy at <https://comunidade.nubank.com.br/privacy> and learn more about the personal data collected, processing purposes and users’ rights.

8. Activity Record

We may record your activities when using our app, website or blogs, creating, when possible and applicable, logs (records of activities on the websites, apps and services) which will include: the IP address, access and actions on the service provided, date and time of each action and information on the device used, such as OS, browser and geolocation.

We may also use certain technologies, our own or third parties, to monitor the activities while accessing our websites and blogs, such as:





Cookies: Internet files that temporarily store what you are visiting on the network. Nubank has cookies on its websites and blogs and also gets information from partners regarding cookies on their websites. Cookies can be used for many purposes, including remembering you and your preferences, persisting information on your activities on the website visited 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. We cannot control or be responsible for 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.

Analytic Tools: These tools may collect information such as how you visit a website, including which pages, when you visit those pages, and other websites you have visited before, among others.

All technologies used by us will always comply with this Privacy Policy.

9. International Transfer of Personal Data

Some or all your personal data may be transferred abroad, for example when they are stored by Nubank on cloud computing servers outside Brazil. For this purpose, Nubank complies with all requirements set by current laws and adopts the best security and privacy practices to ensure your personal data's integrity and confidentiality.

10. Security Measures

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

Personal data may also be stored by cloud computing technology and other technologies that may appear in the future, always seeking to improve and optimize our services and security.

We handle your personal data's security with the utmost care, using market standards and best practices. We have a robust team, highly qualified and responsible for ensuring that Nubank adopts the best security practices, including:

Multiple authentication factors to access information;





Security as code 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 further recommend you never share your password with anyone. The password is personal and non-transferable. Always be careful when posting your personal data on social media or any other public environment. To learn more about digital security, visit our blog.

11. Consent

Throughout this Privacy Policy, we inform you that some personal data will only be collected by Nubank with your consent. Likewise, these personal data may only be processed if authorized and for the purposes described. This information is mainly in Chapters 2 and 3 of the Policy.

By reading this Privacy Policy and clicking, at the end, on "I have read I'm aware of the conditions on handling my personal data and I provide my consent, when applicable, as described in this Privacy Policy.", you consent to us handling your personal data in the manner stated here.

Remember that handling your personal data is necessary for us to provide our services and deliver our products to you. If you have questions on any term explained here, we are available through our service channels to help you.

12. Changes to this Privacy Policy

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

We always value transparency: whenever there is a material change, we will notify you with the current version. By continuing to use our products and services after changing the Privacy Policy, you agree to the new conditions. However, you can always convey your disagreement through our service channels, if applicable.

If the changes to this Privacy Policy alter the practices to handle personal data that need your consent (see item 12 above), we will request your consent with the new Privacy Policy regarding the data handled and purposes stated.

13. Contact Us

According to Law 13709/2018, Nubank is considered the "Controlling Party" of your personal data. After reading this Privacy Policy, if you still have any questions or need





to get in touch with us on issues regarding your personal data, you can contact us through the channels below:

"Me Ajuda" section of the Nubank App by following the following steps:

Open the Nubank app - at the top of the screen, tap your name - click on "Me Ajuda" - choose "LGPD - Privacy" and, after clicking on "Contact", you can chat with us or email us.

DPO: Email: dpo@nubank.com.br

We are always available to answer your questions and put you in control of your personal data.

