

Privacy Policy

As part of our daily operations, we need to collect personal data from our customers and potential customers to provide our products and services in line with each investor's values, interests and profile.

The privacy of your information is of great importance to us, and it is our policy to respect the confidentiality of information and the privacy of individuals. This Policy stipulates how the personal data processing operations of XP Inc., its subsidiaries, and affiliates ('XP') take place in accordance with applicable laws and regulations.

Our Privacy Policy is regularly reviewed to ensure compliance with laws, regulations and new technologies, reflecting possible changes in our operations and business practices. It is important that you regularly access this policy and observe the update date provided below.

This Privacy Policy applies to the personal data processing activities of clients, potential clients and investment advisors, job applicants, visitors to XP offices and our Sites and Applications.

1. General considerations

XP respects the privacy of all data subjects and is therefore committed to taking all possible measures to reasonably ensure the protection of the personal data collected.

All information is handled in accordance with applicable data protection laws and regulations.

Technical and organizational procedures are in place to ensure that your information is always secure. As part of these procedures, we regularly train and make all our employees aware of the importance of maintaining, safeguarding and respecting their personal information and we consider the violation of the privacy of personal data very serious, so we constantly monitor and provide for appropriate disciplinary measures in case non-compliances.

XP may use different ways to collect personal data, such as:

- When they are provided by filling out forms, questionnaires, email, websites, mail, applications, telephone, contracts, through the delivery of personal documents, in situations that include, for example, you:
 - have or intend to have a working relationship with XP.
 - provide or intend to provide us with products and/or services.
 - request XP products or services.
 - create an account on our Sites or Applications.
 - hire XP services.
 - request the submission of marketing or institutional materials.
 - participate in promotion or survey.
 - contact us for feedback.

- Through access data to our Sites and Applications.
- Through publicly available sources.

2. What access data is collected by the Websites and Applications?

Information collected from users when using the Sites includes, but is not limited to, the user's browser access; Internet Protocol (IP) address; date and time of access; the user's location; and user actions on the site.

Information collected from users when using the Applications includes, but is not limited to, the mobile device model and operating system used for access; Internet Protocol (IP) address; date and time of access, application version; user connection provider; user location (when authorized and enabled by the user); and user actions in Applications.

When authorized and enabled by the user, to change bank details, the user's Facial Biometrics, telephone and email are collected. The Biometrics used for authentication in the App is collected and stored on the mobile device itself, by a method corresponding to the specific technology of each mobile device, not being replicated to other environments.

These collected data are used for the purposes presented in topic 7 of this document.

3. Access to Third Party Service

For a better experience, if you come to use the video chat made available on the XP Investments YouTube channel through the Application, we will additionally ask you to authenticate with a Google account. This authentication is optional and is only used to allow you to send messages in the YouTube chat identified with your Google account, through your OAuth2 credentials. The credentials obtained are only used during the chat session for authentication with the YouTube service. We do not collect, share or store information associated with your Google Account. For details on Google's privacy policies, go to: <https://policies.google.com/privacy>.

4. What information is collected for account creation?

For registration on our Sites and Applications, and subsequent creation of an account, the following data must be informed:

- Full name, E-mail, CPF, Date of Birth, Cell Phone.
- ID number and Issuing Agency; or
- National Driver's License and Security Code; or
- National Registry of Foreigners.

- Issue Date, State.
- Gender, Marital Status.
- Mother's name and father's name (optional)).
- Inform if:
 - He is a person linked to XP Investments.
 - It's a US Person.
 - Has tax residency in other countries.
 - Is a politically exposed person.

- Zip code, address, number, complement, State, City, Neighborhood, Nationality.
- State of birth and city of birth.

For certain investment movements, you must provide the following information:

- Bank, type of account, branch, checking account.
- Monthly income, financial investments, other income.
- Real estate and movable property.
- Inform if you have a private pension plan in your name.
- Inform the origin of the resources you are going to invest (Income from professional occupation, inheritance, donation, sharing of assets (divorce), retirement, property rental or others).
- Inform which resources you intend to acquire at XP (Fixed Income Investments, Variable Income Investments, Derivatives, Investment Funds, Foreign Exchange, Insurance, Private Pension, or others).
- Professional occupation, and if working, inform:
 - Company name, Zip Code, Business Address, Number, Neighborhood, State and City).
- In specific situations, it is necessary to send a face photo with an identification document to continue with the registration process.

5. What information is collected from users who are interested in being an Investment Adviser?

- Full name, age, CPF.
- Mobile, Email.

- Inform if you have had professional experience in the financial market.
- Inform the Profession/Area of activity and Academic Training.
- City and State.
- Describe about your professional trajectory and your plans.
- Select if you would like to visit a nearby office.

We may request additional personal information if we deem it necessary for the accreditation process.

6. What information is collected from people who apply for job openings?

- Full name, ID, CPF.
- Gender, Date of Birth, Marital Status.
- City, State, Country, Zip Code, Address.
- Phone, email.
- LinkedIn, Facebook, Instagram.
- Annual remuneration.
- Inform if you have a child.
- Certifications.
- Describe how you became aware of the opportunity.
- Graduation Information: End date/forecast, institution, course type.
- Institution Information: Name, City, State, Completion Date.
- Inform if you are a person with a disability.
- Information on previous jobs: Company name, start date, end date and position held.
- Education.

We may request additional personal information if we deem it necessary for recruitment.

7. Why XP collects and uses your personal data?

We may use your personal information for the following purposes:

I. To create an account on our platform

We need to verify your identity to validate you as a customer, and this may include credit or identity checks by third parties. The use of your personal information is necessary for

us to identify who you are, as we have a legal obligation to comply with the "Know your customer " and other regulatory obligations.

II. To perform the contracted services

After opening an account on our platform, you will need to use your personal data to perform our services and comply with our obligations. We will use the information to perform order processing and purchase/sale of products (Ex.: Fixed Income, Variable Income, Pension, Insurance, Assets, Investment Funds, etc.) as requested and based on the relationship contractual with our customers, thus complying with our contractual obligations.

III. To fulfill a legal obligation

There are a variety of legal obligations arising from the applicable laws to which we are subject (e.g. financial services legislation, tax laws, etc.). There are also several supervisory authorities whose laws and regulations we are subject to. Such obligations and regulations oblige us to perform personal data processing activities for credit checks, identity verification, compliance with court orders, tax laws and other obligations.

IV. For sending communications and satisfaction surveys

Occasionally, we may send you transactional communications, either for the purpose of continuing the account opening process and registration process that you have already initiated, or for the purposes of daily operations, in addition to satisfaction surveys as part of our feedback process of the customer. It is in our legitimate interest to obtain such opinions to ensure that our services/products are being provided at the highest level.

V. For analysis of behavior on our Sites and Applications

Our Websites and Applications may contain data analysis tools that allow us to analyze behavior to ensure the quality of platforms and provide the best user experience. The information collected is not considered personal in accordance with the terms of the General Data Protection Law, as it is used in a way that does not link to any user, and this information is anonymized.

VI. For advertising

We may use your personal data to ensure that you are always well informed to carry out your investments safely. In this way, XP shares relevant content with data subjects who choose to receive information about products and services offered during the account opening process. Communications are sent by E-mail, SMS, WhatsApp, or another previously agreed channel based on your consent.

VII. To guarantee property security and physical integrity

If you come to visit our facilities, we may record your image through our monitoring system for security reasons. Personal information will also be collected to provide your access credentials to maintain a safe working environment.

VIII. For internal accreditation of Investment Advisers

If you want to be one of our Investment Advisers, we need to collect your personal data so that we can carry out the accreditation process internally and carry out validations required by Regulatory Agencies.

IX. To provide guarantee of fraud prevention and security for holders

We need to process personal data for the purpose of analysis and fraud prevention, in different scenarios. In addition, we may process personal information for the purpose of securing data subjects, preventing potential crimes, measures against invasion, and asset security.

X. To safeguard legitimate interests

We process personal data to safeguard our legitimate interests. Some examples of such activities include:

- Initiating legal claims and preparing our defense in litigation cases; ○ Perform analysis of financial transactions to prepare strategic reports.
- Establish monitoring systems for our facilities, for security reasons.
- Business management measures, platform performance optimization, and product and service development.
- Sharing your personal data with XP Inc. companies to update/verify your personal information in accordance with the money laundering framework.

7.1 Getting your consent

If the purpose of collection for any processing of personal data requires your consent, this will be provided through our Sites and Applications.

If you wish to revoke your consent so that we no longer send communications and marketing emails, this can be done through the cancellation option present at the bottom of the emails.

8. Sharing personal data

Subject to the criteria defined in this Policy, XP will not disclose personal data of its customers to a third party, except:

- to meet the required extent within the terms of applicable laws, rules or regulations.
- given the existence of an obligation to disclose.
- for legitimate interest that requires disclosure; or
- at the customer's request, with his consent.

Third parties to which personal information is shared to perform the contracted services must carry out the processing to ensure compliance with legal obligations. Still, we demand that organizations outside the XP Group that handle or obtain this personal data acknowledge the criticality of this information, assume respect for all individual privacy rights and comply with all relevant data protection laws.

As part of the use of your data for the purposes, we may from time to time disclose your personal information to:

- a) Other companies of the XP Inc. Group, within the limits of the purposes established in this policy.
- b) Third parties such as commercial service providers and specialized consultants hired for administrative, financial, legal, security, research, and other services.
- c) Third-party entities that are carrying out audit work.
- d) Business parties, credit providers, courts, controlling bodies and regulatory authorities.
- e) Payment service providers and/or banking institutions for payment generation and control.
- f) In the event that we disclose your personal data to business parties, such as payment companies, in order to perform the services requested by customers, these parties may store your information in order to comply with their legal obligations.
- g) Any person or company as long as we have your consent.
- h) Customers accept and consent that we may from time to time analyze the data collected when visiting our Sites and Applications or by other means, such as questionnaires, for statistical purposes to improve and improve our services.

9. International data transfer

XP handles your personal information in the national territory and in countries that have similar and equivalent legislation. In addition, it maintains specific clauses to ensure correct treatment, in line with Brazilian laws and regulations.

10. Security and privacy of personal data

XP is committed to looking after and treating the information of our customers and other data holders using measures that aim to ensure the protection, maintenance of privacy, integrity, availability, and confidentiality of personal data processed in our environment. In addition to implementing measures to prevent, detect and reduce vulnerability to incidents in our technological environments. For example, we encrypt or anonymize certain sensitive personal information, we also require our suppliers to protect such information from unauthorized access, use and disclosure. For more information, visit our Cyber Security Policy available on our website.

11. Personal information storage and retention period

XP shall retain your personal information for as long as necessary to comply with the purposes for which the information is handled or for other valid reasons to retain your personal information, such as complying with legal obligations.

If you want XP to no longer use your personal data, contact us via the portal, in the "Registration Data" section.

12. Consult your Personal Data

If you wish to consult your personal data that are processed in our environment, access the Help Center available in the logged and unlogged area of the XP Portal (lower right corner or in the service menu) and click on the "LGPD" icon to perform your request. After processing the information, your report will be sent directly to the email that is registered in our system.

13. Change your Personal Data

If you wish to change your personal data, it can be done by accessing the logged in area of the website.

14. Request the cancellation of the treatment of your Personal Data

If you wish that we no longer carry out the processing of your personal information, access the logged in area of the website and request the closure of your account.

15. Contacts

Data Protection Handling: We have a data protection officer who oversees issues related to this Privacy Policy. If you have any questions about how to consult your data and exercise your rights as a holder, please contact us by e-mail: privacy.dados@xpi.com.br.

16. Legal notice

XP is not responsible for the misuse or loss of personal data to which it has no access or control. We are also exempt from liability for illegal and unauthorized use of this information because of misuse or deviation of your access credentials, negligent or malicious conduct because of acts or omissions on your part or someone authorized on your behalf.