

1 Responsible Area

- 1.1. Executive Superintendence of Governance, Risk and Compliance

2 Scope

- 2.1. This Policy guides the behavior of BB Seguridade and its subsidiaries. Investees are expected to define their directions based on these guidelines, considering specific needs and legal and regulatory aspects to which they are subject.

3 Target Audience

- 3.1. This Policy reaches all members of governance bodies, employees and third parties in the exercise of their professional activities related to the Company.

4 Regulations

- 4.1. Law nº 13.709/2018 (General Data Protection Law - GDPL).

5 Review Frequency

- 5.1. This Policy must be revised every three years or, extraordinarily, at any time, in the event of regulatory amendments or relevant process changes, which shall be submitted to the Board of Directors for approval.

6 Executive Summary

- 6.1. This policy aims to clearly and transparently establish the guidelines that govern the organization's processing of personal data. Through it, we seek to demonstrate our commitment to the protection, integrity, and confidentiality of the information entrusted to us, ensuring that all processes of collection, use, storage, sharing, and disposal are conducted in accordance with ethical and secure standards and in compliance with applicable legislation.

7 Concepts

- 7.1. For the purposes of this Policy, the following concepts are considered:
 - 7.1.1. Legal basis: hypotheses foreseen in the Brazilian General Data Protection Law for processing of personal data.
 - 7.1.2. Information life cycle comprises the information life stages, which are: production, handling, reproduction, transportation, transmission, storage and discard.
 - 7.1.3. Confidentiality: property that guarantees that the information is available or revealed to authorized users.
 - 7.1.4. Consent: free, informed and unambiguous statement by which the data subject agrees with the processing of your personal data for a specific purpose.
 - 7.1.5. Cookies: are small text files that are generated when browsing the website with user information that is used for authentication, security and personalization of service.

- 7.1.6. Personal data: we consider personal data, in terms of current regulations, all information that identifies or makes an individual identifiable. Examples of personal data includes: MCI code, CPF, name, e-mail address, content of cookies, phone number or home address.
- 7.1.7. Sensitive personal data: personal data about racial or ethnic origin, religious belief, political opinion, union membership or religious, philosophical or political organization, health or sexual life data, genetic or biometric, when linked to a natural person.
- 7.1.8. Integrity: safeguarding the accuracy and completeness of information and methods of processing so that changes are planned and authorized.
- 7.1.9. Free access: guarantee, to the data subject, free and easy consultation on the form and the duration of the processing, as well as the completeness of your personal data.
- 7.1.10. Request for the elimination of personal data: request by the data subject of deletion of data or data set stored in database, except in cases where said data meets the fulfillment of a legal obligation or regulatory by the controller.
- 7.1.11. Portability of personal data: right of the data subject, through express request that data transferred to one company be transferred to another company, observing commercial and industrial secrets.
- 7.1.12. Data Protection Impact Assessment (DPIA): documentation prepared by the controller containing a description of the personal data processing activities that may pose risks to civil liberties and fundamental rights, as well as the measures, safeguards, and risk mitigation mechanisms.
- 7.1.13. Data subject: natural person to whom the personal data referred to are referred processing.
- 7.1.14. Processing: any operation performed with personal data, such as those referring to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, scoring, modeling, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction.

8 Associated Values

- 8.1. Reliability and Customer-Centered

9 Guidelines

- 9.1. We consider, in the formulation of this Policy, the guidelines established in the Policy Specific Privacy and Protection of Personal Data of our controller, Banco do Brasil.
- 9.2. We process personal data in compliance with legal provisions, legitimate purposes and compatible with the needs of the data subject and in accordance with the purpose declared to the data subject.

- 9.3.** We guarantee the integrity and confidentiality of personal data, adopting protection mechanisms against misuse, unauthorized access attempts, fraud, damage, sabotage, theft.
- 9.4.** We are committed to the protection of the data we collect and care for the processing of personal data, throughout their life cycle, in an ethical, transparent and responsible.
- 9.5.** We adopt transparency in the processing of personal data.
- 9.5.1. We provide the data subject with free access to the processing performed.
- 9.5.2. We offer the possibility of correction of personal data.
- 9.5.3. We consider possible oppositions by the data subject regarding the processing performed.
- 9.5.4. We receive, evaluate and process requests for portability and for the elimination of personal data, responding in a timely manner to the data subject.
- 9.5.5. We inform the data subject about the public and private entities with which we share their personal data.
- 9.5.6. We respect the decision on the data subject on the use of the data that requires his consent, informing about the possibility of not providing it and the consequences of the refusal.
- 9.5.6.1. We make it possible to revoke consent at any time.
- 9.6.** We adopt measures and processes that ensure compliance with current regulations and good practices regarding the protection of personal data that are under our control.
- 9.6.1. We identify, analyze and evaluate the uses of personal data, defining at least one manager responsible for the use of this data throughout its life cycle.
- 9.6.2. We keep an updated inventory of the uses of personal data, with a description of the purpose of the processing we perform and identification of the most appropriate legal basis.
- 9.7.** We are committed to the continuous improvement of measures and processes related to the protection of personal data under our control through their continuous monitoring and improvement.
- 9.8.** We collect and use public data, respecting the purpose for which it was disclosed, and we safeguard the rights of its owner.
- 9.9.** We share with business partners and suppliers only the personal data necessary for them to perform the contracted activities.
- 9.9.1. We establish a confidentiality agreement with our partners to guarantee the confidentiality of the personal data entrusted, not admitting the improper use.
- 9.9.2. We require that our business partners and suppliers have policies in line with current data protection legislation.

- 9.9.3. We require, where relevant, that our business and strategic partners, suppliers and service providers maintain a comprehensive personal data governance and security program, that we establish appropriate technical and administrative controls to ensure the confidentiality, integrity and availability of personal data.
- 9.10. We adopt adequate control mechanisms to monitor compliance with our privacy guidelines when we share personal data with business partners and suppliers.
- 9.11. We process sensitive personal data only in the legal circumstances set forth in Article 11 of the GDPL. We apply additional safeguards, including data minimization, restricted access, encryption/segregation, recordkeeping and traceability, prohibition of discriminatory use, and the preparation of a Data Protection Impact Assessment (DPIA) when necessary.
- 9.12. We process children's and adolescents' personal data in accordance with Article 14 of the GDPL, ensuring the best interests of the child as a primary consideration. We apply specific safeguards, limit data collection to what is strictly necessary, maintain enhanced access controls, and obtain specific, explicit, and prominent consent from the holder of parental responsibility whenever a lawful basis so requires. We do not carry out processing for discriminatory purposes, targeted marketing, profiling, or solely automated decision-making that produces legal or similarly significant effects on minors, except where expressly authorized by law.
- 9.13. We repudiate and do not authorize processing for illicit or abusive discriminatory purposes.
- 9.14. We disseminate the culture of privacy and data protection through a permanent awareness and training program.
- 9.15. We continuously monitor the use of personal data, including those shared with partners, with application of incident response and remediation plans, constantly updated, based on information obtained and periodic evaluations.
- 9.16. We analyze the suspicions of undue processing under the legal and disciplinary aspects, imputing accountability.
- 9.17. We adopt safe and appropriate procedures when we perform the international transfer of the personal data in custody, we require contracted parties to transfer data outward comply with applicable legislation to the adoption of a data protection regime compatible with the Brazilian legislation.
- 9.18. We disclose to the data subjects the pertinent statements of this policy with accessible language in our communication channels.

10 Date of Last approval by the Board of Directors

10.1. 04/22/2026

11 Final Provisions

11.1. Omissions in this Policy shall be referred to the Board of Directors for resolution.

12 Versioning Control Table

12.1.

Validity	04/22/2026 to 04/22/2029
Version	3
Change History	V3- Included guidelines on the processing of children's and adolescents' personal data.
	V2 - Included guidelines on international data processing and new guidelines on requirements for parties
	V1 - Policy Development