



Privacy Policy

BRAZIL



This Privacy Policy is an overview of how we collect, use, and process your personal data when you use our website <https://www.sokin.com/> (hereinafter: "Website") and our mobile app (hereinafter: "App"; jointly called: "Services"). If anything, here only applies to one of our services, we'll explicitly point this out to you.

This notice applies to all our products and services. Please read this Policy carefully, as it becomes legally binding when you use our Services. Our terms and conditions will specify which of our businesses is providing the relevant product or service to you.

We take privacy and protection of your data very seriously and are committed to handling the personal information of those we engage with, whether customers, suppliers or colleagues responsibly and in a way that meets the legal requirements of the countries in which we operate.

In order to achieve this, we have created Sokin's Main Privacy Policy, which consists of various category pages, to better assist you in navigating and finding information about how we process your data on our website.

This Privacy Policy is destined to customers who use our services in Brazilian national territory, and it's in accordance with the local regulation in force regarding privacy and protection of personal data.

Responsible Entity

The Services are provided by Plata Capital Brazil Meios De Pagamento Ltda. t/a Sokin ('Sokin', 'us', 'we', 'our'), Sokin is enrolled under the CNPJ nº 37.763.599/0001-25.

Sokin knows the importance of privacy for individuals ('data subjects', 'consumers', 'you') and is committed to protecting your personal data (which may also be referred to as 'the data', 'your data', 'data', 'information', 'personal information'), and ensuring full transparency. Please be aware that references to 'Sokin,' 'us,' 'we,' and 'our' may also include the use of our affiliates and/or service providers and subcontractors inside and outside of the Brazil, EU, and UK.

The "person in charge" is the person responsible for managing a communication channel with you. For the purposes of this policy, Sokin's Data Protection Officer will be the "person in charge" and you can speak to him/her through the following email privacy@sokin.com. If you have any questions about how we protect or process your data, please send an email to the above-mentioned email address.

Sokin is concerned with the security of the information and data it handles, which is why it is constantly seeking to improve its internal processes in order to meet regulatory obligations and adopt best practices. In these cases, especially to comply with the General Law for the Protection of Personal Data Law No. 13.709/2018 (Lei Geral de Proteção de Dados Pessoais / "LGPD"), this document will be updated. Whenever possible, we will communicate in advance, in our communication channels, the content of the changes.

Whenever we refer to 'personal data' throughout our Privacy Policy and its category pages, we may mean either data directly or indirectly related to an individual, or pseudonymised data. Pseudonymised data is where the data has been rendered less identifying through technological measures so that it can no longer be attributed to a specific identifiable person without the use of additional information.



By providing Personal Information, or other information, to us or using our Services, you confirm that you understand and consent to the collection, use, disclosure, and processing of your Personal Information and other information (or the Personal Information or other information of any other individual you provide) in the manner as set forth in this Privacy Policy, and you understand that this Privacy Policy is legally binding when you use our Services.

1. Data we collect about you

We may collect some or all of the following data about you:

1.1. Information you give us. You may give us information about you when you sign up to use our services;

- fill in any forms or online applications;
- correspond with us;
- register to use the Sokin app;
- open a Sokin account or use any of our services;
- take part in online discussions, surveys or promotions;
- speak with a member of our customer support team ;
- contact us for other reasons.

Financial and Transaction Information

1.2. In order to comply with AML Laws, assess creditworthiness, and process payments and transactions when you use of our Services, we may collect the following information:

- bank account details (account number, routing number), credit or debit card numbers; details of your bank account, including the account number, sort code and IBAN;
- details of the transactions you carry out when using our Services, including geographic location from which the transaction originates;
- when transferring funds, we collect Recipients' details that may include recipients name, title, gender, mailing address, phone number, email address, nationality, occupation and social security number or other tax identification number. You confirm that you know the recipient and agree or that you are otherwise allowed to give us this information and will inform the recipients of the contents of this Privacy Policy.
- Compliance information, including fraud prevention, and sanction checks.

1.3. In some cases, such as when you send or receive high value or high volume transactions, or where we need to comply with anti-money laundering regulations, terrorist financing, or any other legal obligation, internal compliance policies or other rules applicable to our services, we may also need more commercial or identification information from you; and

1.4. In providing the personal data of any individual (other than yourself) that receive payments from you during your use of our Services, you promise that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.



Information we collect from you

1.5. With regard to your use of our Services, we may automatically collect the following information:

- details of the transactions you carry out when using our Services, including geographic location from which the transaction originates
- Technical information, including your IP address or device ID, Push ID, information about your device (such as device name, type, model, biometric data (mobile biometric data is not accessible to APP. We just verify biometric identity via mobile built-in feature), operating system software, the date and time you access our websites and the address of the site from which you linked to our website when you visit us.

Information we receive from other sources

1.6. We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working with third parties and may receive information about you from them. For example:

- the banks and other institutions you use to transfer money to us will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;
- business partners may provide us with your name and address, as well as financial information.
- advertising networks, analytics providers and search information providers may provide us with pseudonymous information about you, such as confirming how you found our website;
- credit reference and identity verification agencies do not provide us with any personal information about yourself, but may be used to corroborate the information you have provided to us.

Usage and Preference Information

1.7. We collect information about how you interact with the Websites and Apps and how you use our Online Channels, including your user preferences and other settings selected by you. In some cases, we do this by utilizing cookies and other tracking technologies. Please see further details in our Cookie Policy.

1.8. Please find our Electronic Communication Consent Agreement ("Agreement") at end of this policy. This Agreement applies to any and all communications or disclosures that we are legally required to provide to you in writing in connection with your Card and any related products and services

Aggregated/Anonymized Data

1.9. We may also collect or create aggregated and/or anonymized data about our users that is no longer considered Personal Information. This data is used for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.



Sensitive data

1.10. We process a limited amount of sensitive data when we carry out verification of identity documents that contain biometric data. Where we are relying on the substantial public interest condition in Article 9(2)(g) of the GDPR and condition 14. Preventing fraud in Part 2 of Schedule 1 of the DPA 2018.

Children's data

1.11. Our products and services are directed at adults aged 18 years and over, and not intended for children. We do not knowingly collect data from this age group. Our verification process prevents Sokin collecting this data. If any data is collected from a child without verification of parental consent, it will be deleted

2. How do we protect your personal information?

2.1. We take the safeguarding of your information very seriously, and take a number of steps to ensure it stays secure:

- Information sent over the internet, between you and Sokin, is encrypted with strong encryption
- Your information is encrypted in transit and at rest
- We update and patch our servers in a timely manner
- We run a Responsible Disclosure and bug bounty program to identify any security issues in Sokin services
- Our technical security team and AI technology continuously monitors our systems for abnormal or malicious activity.

2.2. We restrict access to your personal information to those employees of Sokin who have a business reason for knowing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer personal information. We maintain physical, electronic and procedural safeguards that comply with the relevant laws and regulations to protect your personal information from unauthorised access.

2.3. Although we adopt all these measures in order to guarantee the integrity, availability and protection of your personal data, security breaches caused by unlawful acts of third parties may occur. In face of any suspicious event, we encourage you to contact us immediately through privacy@sokin.com.

3. Ways we use your information

3.1. We use your information:

- to carry out our obligations relating to your contract with us and to provide you with the information, products and services;
- to comply with any applicable legal and/or regulatory requirements;



- to notify you about changes to our Services;
- as part of our efforts to keep our Services safe and secure;
- to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Services and to ensure that they are presented in the most effective manner;
- to allow other Sokin customers to add you as a Beneficiary in order to transfer money to you through our services, or vice versa, when providing matching information for your mobile phone number or Sokin ID;
- to measure or understand the effectiveness of advertising we serve and to deliver relevant advertising to you;
- to allow you to participate in interactive features of our Services, when you choose to do so;
- to provide you with information about other similar goods and services we offer;
- to combine information we receive from other sources with the information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

3.2. Automated decision making

As part of our personal data processing relating to the customer onboarding decisions may be made by automated means.

You have certain rights in relation to automated decision-making processes. To find out more, refer to the 'Your Choices and Transparency' section of this Policy

4. Disclosure of your information

We may share your information with selected third parties including:

Our Corporate Affiliates

4.1. To facilitate or support us in providing our services to you, we may share your Personal Information with other Affiliates under Sokin group.

Our Service Providers

4.2. We engage a variety of service providers to enable us to provide our services to you. For example, service providers may be used to support technology or infrastructure, collect debts, distribute marketing materials, conduct market research, perform audits, provide professional advice or other functions.

4.3. These third party partners use cookies and other technologies to gather information about your activities on our Online Channels, as well as information



from third parties and your activities on other sites or online services on any of your devices, in order to serve you advertising based upon your browsing history and interests. They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use.

Payment Processors

4.4. To payment processing service providers, intermediary banks and financial institutions to process your transactions.

Identity Verification Agencies

4.5. To credit bureaus, credit reporting bodies, credit reference agencies, identity verification agencies and other companies and organisations ("Verification Agencies") to check your details, verify your identity and protect against fraud, money laundering and other crimes and harmful activities.

4.6. In some cases, Verification Agencies may need to access third party databases (including without limitation databases of government issuers of identification documents). You provide your authority for Verification Agencies to act as your agent in accessing these databases. Verification Agencies may disclose to third parties any information provided to them for identity verification purposes.

4.7. We do not have a list of all third parties we share your data with, as this would be dependent on your specific usage of our Services. However, if you would like further information about who we have shared your data with, or to be provided with a list specific to you, you can request this by writing to privacy@sokin.com.

5. International Transfers

5.1. We collect information globally and may transfer, process and store your information outside of your country of residence, to wherever we, our third party service providers or any recipients referred to in section 4 operate for the purpose of providing you our services. Countries to which we are likely to transfer your information are the United States of America, Canada, United Kingdom, countries in the European Union, Australia, New Zealand, India, and Singapore. Whenever we transfer your information, we take required steps to protect it.

6. Sharing and storing your personal data

6.1. We may transfer and store your data at a destination outside of the Brazilian national territory. It may also be processed by staff operating outside of Brazil who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your payment order, the processing of your payment details and the provision of support services. This process is needed so we can perform in accordance with our Customer Agreement. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

6.2. In order to provide our Services to you, it is sometimes necessary for us to transfer your data to the third parties based outside of Brazilian national territory. In these cases, we ensure that both ourselves and our partners take adequate and appropriate technical, physical and organisational security measures to protect your data. We



also ensure we have appropriate contractual protections (e.g. binding corporate rules, Standard Contractual Clauses or other accepted data transfer safeguards) in place with these parties receiving the data outside of Brazil.

7. Sokin's legal grounds for use of your personal data

When we process personal data under the LGPD, we must have a legal basis (a valid legal reason) for using your personal data. Our legal basis will be one of the following.

7.1. Keeping to our contracts and agreements with you;

We need certain personal data to provide our services and cannot provide them without this personal data.

7.2. Legal obligations

In some cases, we have a legal responsibility to collect and store your personal data (for example, under anti-money laundering laws we must hold certain information about our customers).

7.3. Legitimate interests

We sometimes collect and use your personal data, or share it with other organisations, because we have a legitimate reason to use it and this is reasonable when balanced against your right to privacy.

7.4. Consent

Where you've agreed to us collecting your personal data, for example when you have ticked a box to indicate you are happy for us to use your personal data in a certain way.

8. How long we keep Information

8.1. We need to keep your Personal Information so that we can provide our services to you. Under relevant AML/ CTF Laws we need to keep your Personal Information and information about your transactions for up to 7 years from the end of your relationship with us. We may also need to keep it for longer for legitimate business purposes (such as transactional information for our accounting purposes) and for other legal and regulatory reasons. Subject to this, we will destroy, erase, or anonymise your Personal Information when it is no longer needed.

9. Your Choices and Transparency

9.1. Subject to applicable laws, you may have the right to access information we hold about you. If you have any questions in relation to our use of your personal information, contact us. You may have the right to require us to:

a) confirm of the existence of treatment, and provide more details about the use we make of your information, within up to 15 (fifteen) days from your request;

b) provide you with a copy of the information that you have provided to us, up to 15 (fifteen) days counting from the day you made the request;



- c) update any inaccurate, incorrect, or out of date personal information we hold;
- d) hide, block or delete any personal information that is no longer necessary, that might be excessive or no longer subject to a legal obligation to which Sokin is subjected to. It may not be possible to delete your data at the time of request, as outlined on the item 8 above, however, once the required time has passed then we will be able to comply with your request;
- e) remove any personal data that has been processed without your consent, unless its preservation is allowed by law, or in the case of item 9 above;
- f) the portability of personal data to another service or product provider, as long as this right is regulated in Brazil.
- g) information from public and private authorities which we share your data with;
- h) when decisions are made solely on the basis of the ADM, you may request that we provide information about the decision making methodology and criteria and ask us to verify that the automated decision was made correctly. We may reject the request, as allowed by applicable law, even when the provision of the information results in the disclosure of a commercial or industrial secret or interferes with the prevention or detection of fraud or other crimes. However, under the circumstances, we usually check if the algorithm and the database are working regularly without error or some kind of bias, in order to adjust the process, if needed;
- i) opposition to any treatment based on one of the hypotheses in which their consent is waived, in case of non-compliance with the provisions of the applicable legislation, safeguarding the public interest that may justify the continuity of the treatment; and
- j) object to any processing based on our legitimate interests ground or a third-party, unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights.

9.2. Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights, we will check whether it is possible to respond. If it is not possible to respond immediately to your request, we will indicate the reasons of fact or law that prevent us from doing so. In most cases, we will respond within one month, unless a shorter period has been outlined in this Privacy Policy or applicable law.

Device Permissions

9.3. Most mobile devices allow you to disable the use of location services, or revoke consent to applications to access your camera and photo library or send you push notifications. Please refer to your device settings to restrict collection of certain information.

Marketing Opt-Out

9.4. You can opt out of receiving our marketing at any time through the unsubscribe function in each marketing communication or by contacting us at privacy@sokin.com. Please note that if you opt out of marketing-related emails from us, we will continue to



send you non-promotional messages that are required to provide our services, such as transactional receipts and messages about your account or our relationship with you.

Advertising Analytics

9.5. We may partner with third parties to display and personalize Sokin advertisements to you and to track and report on the performance of those advertisements. These third-party partners use cookies and other technologies to gather information about your activities on our Online Channels, as well as information from third parties and your activities on other sites or online services on any of your devices, in order to serve you advertising based upon your browsing history and interests. They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use.

We suggest you read our Electronic Communication Consent Agreement ("Agreement") at the end of this policy that applies to any and all communications or disclosures that we are legally required to provide to you in writing in connection with your Card and any related products and services ("Communications").

10. Complaints

10.1. Sokin takes all complaints seriously and will investigate all complaints. For more information on how we manage complaints see our Complaints Policy in the Legal section of our Website or contact Customer Service at privacy@sokin.com.

11. Responsibility and communication in case of security breaches

11.1. Sokin is subject to the liability regime provided for in the applicable legislation.

11.2. In the event that, in compliance with applicable law, we notify the National Data Protection Authority (ANPD) about a security breach that may cause you significant risk or damage, we will also inform you.

12. Updates to This Policy

12.1. We may change this Policy from time to time. Any changes will become effective on the date specified in the revised Policy posted on our Websites.

13. Contact Us

13.1. If you have questions or concerns about this Policy, need it in an alternative format, have a specific request related to your Personal Information or any complaints about our privacy practices, please contact us at privacy@sokin.com.

14. Changes to our privacy policy

14.1 To keep up with changing legislation, best practice and changes in how we process personal information, we may revise this Privacy Policy at any time without notice by posting a revised version on this website. To stay up to date on any changes, check back periodically



Annex 1

Consent to Receive Electronic Communications

We suggest you read this document and print a copy for your reference.

Note: This Electronic Communication Consent Agreement ("Agreement") applies to any and all communications or disclosures that we are legally required to provide to you in writing in connection with your Card and any related products and services ("Communications").

When you acknowledge your agreement to this Electronic Communication Consent Agreement, you are indicating your consent to all of the terms and conditions set out below.

In this Agreement, "we," "us," and "our" refer to the Peoples Trust Company, and "you" and "your" refer to the person to whom the Card is issued. "Card" means the Sokin Card.

1. Scope of Communications to Be Provided in Electronic Form.

When you acknowledge your agreement to this consent to receive electronic communication, you are agreeing to receive all Communications in electronic format, and that we may discontinue sending paper Communications to you, unless and until you withdraw your consent as described below. Your consent to receive electronic communications includes:

- the Cardholder Agreement and any related supplements or addendum to the Cardholder Agreement;
- notices of any changes to the terms of the Cardholder Agreement;
- the privacy policies and any notices of updates and changes to the privacy policies;
- notices regarding insufficient funds or negative balances on your Card;
- response to claims filed in connection with your Card;
- any other information relating to your use of the Card and any related products and services, including any legal and regulatory disclosures and communications; and

2. Method of Providing Communications to You in Electronic Form.

All Communications that we provide to you in electronic form will be provided:

- via email to the email address, you have provided to us which may contain the Communication or a link through which you may view the Communication; or
- will be posted on the website.

You must provide us with a current email address to receive electronic Communications. Even if you have consented to receive electronic Communications, in our discretion we may from time to time send paper copies of certain



Communications to any mailing address we have for you in our records, either in addition to or in lieu of providing electronic versions.

If you give us an incorrect email address or fail to keep it updated, you agree that any Communications we may make available or attempt to send through any of the methods described above will be deemed to have been provided to you in a timely manner.

Communications that we post on the website will remain accessible for a period of time which we may establish in our discretion and which may vary with the type of Communication.

3. How to Withdraw Consent.

You may withdraw your consent to receive Communications in electronic form at any time by providing notification of your withdrawal in writing by email to privacy@sokin.com. If you do, we will send subsequent paper Communications to you in writing to the most current mailing address we have for you in our records. We will not impose any fee to process the withdrawal of your consent to receive electronic Communications.

Any withdrawal of your consent to receive electronic Communications will be effective only after we have a reasonable period of time to process your withdrawal. While we process your withdrawal, you will continue to receive Communications in electronic form. We will send you a paper Communication to confirm that your withdrawal has been processed, and you will receive paper Communications after receiving such confirmation. If you withdraw your consent, the legal validity and enforceability of prior Communications delivered in electronic form will not be affected.

4. How to Update Your Records.

It is your responsibility to provide us with a true, accurate and complete e-mail address, your contact information, and other information related to this Agreement and your Card, and to maintain and update promptly any changes to this information. You can update your information by emailing us at privacy@sokin.com.

5. System Requirements. To receive, access or retain electronic Communications, you will need a computer or other device with internet access, a compatible web browser and, for some types of Communications, a PDF file reader. Compatible browsers include the most current version (and typically one or more prior versions) of all major browsers in widespread use. You will also need access to a printer or the ability to download information to keep copies for your records. When you agree to receive electronic Communications, you are indicating that you have the capability to access the Communications electronically and to download or print copies for your records.

6. Communications in Writing. All Communications in either electronic or paper format from us to you will be considered "in writing". You should print or download for your records a copy of this Agreement and any other Communication that is important to you.

7. Communications from You. This Agreement applies only to Communications you



receive from us. Any notices or communications which you are required to send to us in writing, whether pursuant to our agreements with you or under applicable law, must still be sent in accordance with the instructions in those agreements.

8. Termination/Changes. We reserve the right, in our sole discretion, to discontinue the provision of your electronic Communications, or to terminate or change the terms and conditions on which we provide electronic Communications. We will provide you with notice of any such termination or change as required by law.

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