

Banco HSBC S.A.

Privacy Policy



Summary

1. Definitions:	3
2. When do we collect your personal data?	3
3. What data do we collect from you?	4
4. How we use your personal data?	8
5. Who we share your personal data with?	9
6. How long will we keep your personal data?	10
7. How do we transfer your personal data abroad?	10
8. What are your rights?	10
9. How we keep your personal data secure?	11
10. More details about your personal data	11

Your privacy is important to us. This privacy policy will explain how HSBC Brazil uses the personal data that we collect from you. This policy will be available in its most updated version and free of charge on the website www.hsbc.com.br, under the “Privacy Policy” menu.

For the purposes of this privacy policy, the data controller is Banco HSBC SA (“HSBC Brazil”), which is located at Av. Pres. Juscelino Kubitschek, n° 1909, Vila Olímpia, São Paulo/SP, CEP 04543-907 – Brazil, which is part of the HSBC group, with a presence in more than 86 countries. For more information, you can contact us through our data subject rights support channels available on the website www.hsbc.com.br or email (dpo.br@hsbc.com).

IF YOU DO NOT AGREE WITH ANY OF THE PROVISIONS OF THIS PRIVACY POLICY, PLEASE DO NOT USE OUR WEBSITE, DO NOT CONTRACT OUR PRODUCTS AND/OR SERVICES AND DO NOT PROVIDE (OR ALLOW THE PROVISION) OF YOUR PERSONAL DATA TO HSBC BRAZIL. THE PROCESSING OF YOUR PERSONAL DATA IS ESSENTIAL FOR THE PROVISION OF SERVICES, PRODUCTS AND/OR INFORMATION BY HSBC BRAZIL.

1. Definitions

- a) **Personal data:** all information related to an individual natural person, such as name, surname, National document IDs (RG and CPF), or any other data that could characterize as identifiable information.
- b) **Sensitive personal data:** all information related to an individual natural person that reveal racial or ethnic origin, religious or philosophical beliefs, political opinions, eventual trade union memberships, genetic and biometric data, and information related to health or individual sex life.
- c) **Processing:** all type of procedures that involves the usage of data, such as collecting, storing, using, consulting, altering, deleting, hosting and all the eventual actions that characterizes the usage of data for any reason.

2. When do we collect your personal data?

HSBC Brazil collects your personal data in the following situations:

- a) If you are accessing our website, electronic banking systems, tools, applications and/or digital platforms, then we refer to you as a “User of Electronic Channels”;
- b) If you are a legal representative, attorney, director, partner, employee, contractor, or administrator of potential clients of HSBC Brazil (“Potential Business Client”) or active clients of HSBC (“Business Client”), then we refer to you collectively as a “Person Authorized Customer Service”;
- c) If you are a customer of Corporate Customers, who request the provision of services to HSBC Brazil that involve the processing of their personal data, then we refer to you as a “Customer of HSBC Customers”;

- d) If you had an employment and/or work relationship with HSBC Brazil, then we refer to you as “HSBC Former Employee”;
- e) If you are a spouse and/or dependent of a “HSBC Employee” or “HSBC Former Employee”, we categorize you as a “Relative”;
- f) If you are HSBC Supplier and/or Service Provider, who is an individual, then we refer to you as a “Individual Supplier”;
- g) If you are a legal representative, partner, director, attorney, and/or collaborator of a Supplier and/or Service Provider of HSBC, which is constituted in the form of a legal entity (“Corporate Supplier”), and who is an individual, then we refer to you as a “Representative of Corporate Supplier”;
- h) If you are a candidate for job vacancies offered by HSBC Brazil, then we refer to you as a “Candidate”; or
- i) If you are a guarantor or other guarantor of financial transactions of Potential Corporate Client or Corporate Client, then we refer to you as a “Guarantor”.

3. What data do we collect from you?

Depending on the nature of our relationship and/or our form of interaction, we may process the following information about you:

a) Electronic Channel Users:

- Information you provide to us when you fill out a contact field or web form, or if you register to receive alerts or updates about our website, electronic banking systems, tools, applications and/or digital platforms (“Electronic Channels”). The personal data that you are giving to us are referred to as Registration data.
- Information we collect through cookies, such as information about the browser or device you use to access our Electronic Channels, how you use said Electronic Channel and the pages you visit, traffic and location data, including IP address registration, geolocation, the type and version of your operating systems and your browser, as well as your phone's unique device ID and similar data from your mobile device, where applicable.
- We may also ask for information if you have problems using our Electronic Channel, such as name, email, and phone number for direct contact.
- We may also ask you to complete satisfaction surveys for the purpose of improving our Electronic Channel and service (such as name, email, and phone number for direct contact), although this is optional.

b) Authorized Customer Service Persons:

- HSBC Brazil will process your registration data (such as name, ID, CPF, CNH, date of birth, place of birth, gender, nationality, passport number which are referred as identification data and we may collect as well your marital status, address, profession, registration number with professional representation entities, signature, and any additional data necessary for your registration) that you, our Potential Corporate Client and/or our Corporate Client provide to us as part of the credit analysis, negotiation, registration and relationship between the Potential Corporate Client or Corporate Client (as applicable) and HSBC Brazil.
- HSBC Brazil will process your registration data (such as email or telephone) used to register a PIX key for our Corporate Client.
- HSBC Brazil will process your registration data (such as ID, CPF, registration number, and any additional data necessary for your registration) used to enable access to the Electronic Channels.
- HSBC Brazil will use your email and/or telephone number to contact you about activities that are of interest and/or related to our relationship with the Potential Corporate Client or Corporate Client, as applicable.
- Sensitive Personal Data: HSBC Brazil may collect your data on political opinion and/or political affiliation, exclusively for the purposes of verifying and confirming whether you are a “politically exposed person”, in accordance with applicable legislation and banking regulations.
- In addition to the information above, HSBC may collect information about your academic and professional history and other financial information (for example, current account and income tax), exclusively for the purposes of defining the risk profile of the Potential Business Client or Corporate Client (as per the case), in accordance with applicable banking legislation and regulations.

c) **Customer of HSBC Customers:** HSBC Brazil will process your registration data (name, CPF and address) and contact information (telephone and email) exclusively for the purpose of providing services requested by the Corporate Client that involve the processing of your personal data (for purposes of issuing billing slips, for example).

d) **HSBC Former Employee:** HSBC Brazil will process the personal data that you voluntarily provide and/or HSBC Brazil collects as part of your work or employment relationship with HSBC. HSBC Brazil will store such data in the manner and for the period required by applicable labor and social security legislation, as well as permitted by the LGPD (see section below “How long will we keep your personal data and information”). Such data may include: registration data (such as name, ID, CPF, date of birth, sex, marital status, address, place of birth, nationality, other CTPS information as applicable, etc.), contact details (e-mail email or telephone), professional data (date of admission, date of dismissal, position, sector, enrollment, salary, information contained in the professional CV, information on performance and career progression, behavioral information, information for payroll processing, etc.), your image for the purposes of

managing your access to HSBC Brazil facilities and your voice (the latter captured in recorded calls).

- e) **Relative:** HSBC Brazil will process the personal data it receives from HSBC Employees or Former HSBC Employees (such as name, CPF, gender, date of birth and dependency relationship, which may include the name of children or adolescents), exclusively for the purposes management of benefits granted to HSBC Employees or that have already been granted to Former HSBC Employees, benefits that may be extended to Family Members.

f) **Individual Suppliers or Corporate Supplier Representatives:**

- HSBC Brazil will process your registration data (such as name, ID, CPF, gender, marital status, address, etc.) that you provide to us as part of the provision of the service and/or supply of products by you (in the case of an Individual Supplier) or by the company to which you are linked (in the case of Corporate Supplier Representatives).
- HSBC Brazil will use your email and/or telephone number to contact you about activities that are strictly related to the provision of the service and/or the supply of products by you (in the case of an Individual Supplier) or by the company to which you are linked (in case of Corporate Supplier Representatives).
- HSBC Brazil may collect your data on political opinion and/or political affiliation, exclusively for the purposes of verifying and confirming whether you are a “politically exposed person”, in accordance with applicable banking legislation and regulations (in the case of individual Supplier).
- In addition to the above information, HSBC Brazil may collect professional data (e.g. HSBC ID, username, department, user profile, etc.) and your photo for the purposes of managing IT equipment provided to you, as well as for managing your access to HSBC facilities (in the case of Individual Supplier).

g) **Candidates:**

- HSBC Brazil will process your registration data (such as name, ID, CPF, date of birth, gender, address, place of birth, nationality, other CTPS information as applicable, etc.) that you provide to us for identification purposes in the selection process and registration formation with HSBC Brazil.
- HSBC Brazil will use your email and/or telephone number to contact you about the progress of the selection process.
- HSBC Brazil will process information about your professional and academic trajectory and experience, as well as skills indicated in the professional CV that you share with HSBC Brazil or that you voluntarily make available on professional social networks.

- In addition to the information above, if you advance in the selection process and HSBC Brazil invites you to participate in face-to-face or remote interviews, HSBC Brazil will process any personal data you provide in such interviews, which may include: details about your personal life and habits, additional information about your last jobs and the role you performed, expected remuneration and benefits, etc.
 - As a mandatory part of the selection process in the final stage and to better understand the Candidates, we may request additional information for confirmatory purposes and to carry out a *background check*, which includes the possibility of receiving information about you from third parties. The processing of information from third parties is strictly limited to the purposes described in this Policy and is intended to evaluate your profile for the open position at HSBC Brazil.
- h) **Guarantors (or other guarantors of financial transactions)** : HSBC Brazil will process your registration data (name, CPF, address, date of birth, voter ID, etc.), contact information (email and telephone) and other financial information (for example, income tax), exclusively for the purposes of evaluating and preparing a credit proposal to the Potential Corporate Client or Business Client (as applicable), based on their credit analysis, in accordance with applicable legislation and banking regulations.

Regardless of the nature of our relationship and/or our form of interaction, HSBC Brazil may collect details about the computer or other mobile device that was used to access our Electronic Channels, including recording the IP address used to connect your computer or device to the internet, your geographic location, your operating system type and version, and your web browser type and version.

4. How we use your personal data?

We will only process your personal data when we rely on a legal basis established by applicable data protection legislation to justify the data processing activity. We may process personal data for the following purposes:

- Operate and maintain the Electronic Channels, as well as provide you with the various functionalities and resources of the Electronic Channels.
- Internal analyzes such as: know your client, prevention of money laundering, analysis of the powers of representation of a legal representative and/or attorney, analysis of registration forms and corporate documentation, analysis of the risk profile of the Corporate Client, credit analysis of the Corporate Client and Guarantor, etc.
- Respond to requests for financial services or respond to requests from our customers.
- Registration of Corporate Customers (and their respective representatives), Individual Suppliers, Corporate Suppliers (and their respective representatives), HSBC Employees, Family Members, Candidates on HSBC Brazil bases and systems.
- Formalization of main or accessory contracts between HSBC Brazil and Corporate Customers, Individual Suppliers, Corporate Suppliers or Guarantors (or other guarantors of operations).
- To conduct the HSBC Brazil recruitment and selection process (in the case of processing Candidates' personal data).
- For management of benefits to be granted to Family Members (in case of processing the personal data of the Relatives personal data).
- To manage the contract for the provision of services and/or products with the Individual Supplier or Corporate Supplier (in case of processing personal data of the Individual Supplier or Corporate Supplier Representative).
- Respond to requests from regulatory bodies or other competent authorities.
- Compliance with applicable legislation and/or regulations (for example, issued by the following authorities: National Monetary Council, Central Bank of Brazil, Securities and Exchange Commission and Federal Revenue).
- Management of access to our facilities, including restricted access areas.
- Investment financial processes, once requested as an HSBC Brazil service by the client.
- Respond to your questions and comments (for example, if you asked a question or sent feedback through Electronic Channels).
- Provide you with information that you have requested from us or that we realize may interest you unless you instruct us otherwise.
- Allow you to take advantage of any interactive features of the Electronic Channels.
- Notify you about privacy changes on the Electronic Channels, as required by applicable law.
- Send alerts or updates on our Electronic Channels if you have registered to receive such alerts or updates.

- Ensure that content on Electronic Channels is presented in the most effective way for the device you are accessing.
- Perform data analysis to learn more about how you and others interact with Electronic Channels.
- Recognize your visit and collect information about your experience on our Electronic Channels for security analysis or interface improvements.
- Detect or prevent crimes (including terrorist financing, money laundering and other financial crimes).
- Detect and prevent misuse or abuse of Electronic Channels or our services.

5. Who we share your personal data with?

We may share your personal data with other institutions, including:

- **Other HSBC Group companies:** For the purposes of storing and processing data, credit analysis (and respective approval), compliance analysis.
- **Service providers:** Third parties who provide services to HSBC Brazil and/or assist in the processing of personal data, such as system providers involved in the management of activities related to the financial market (credit, receivables, collection, etc.), outsourcing, registration corporate, billing, financial, identification document fraud prevention, etc.
- **Any other entity whose products and services were requested by the Corporate Client (in the case of processing personal data of Customer of HSBC Customers):** Once a service has been requested, where it is necessary to provide your personal data, the same may occur, for example: Transfer banking.
- **Regulators:** In situations where we are under a legal or regulatory obligation to disclose information, upon requests from the regulator (or any other competent authority) for the benefit of the public interest (e.g. to prevent or detect fraud, abuse of our website or services).
- **External entities:** Fulfillment of service requests, such as sharing data with the Post Office.
- **New business:** In the continuous development of our business, acquisition and merger processes of companies, subsidiaries and other businesses may occur. In this business transfer, personal data and other information are also transferred, but the provisions of this Privacy Policy will still be maintained.
- **Potential Investors:** for the purpose of evaluating and concluding deals, provide and share contractual data with a possible investor interested in acquiring credit arising from products offered by HSBC Brazil.

- **Judicial request.** HSBC Brazil may share personal data in the event of a court request or upon determination by a competent authority, in accordance with the law.

6. How long will we keep your personal data?

We may retain personal data for the period required by law, until the processing of personal data has ended (as described below) or for as long as necessary to preserve our legitimate interests, such as responding to inquiries. When we no longer need to retain them, we can delete, destroy or anonymize them sooner.

The processing of personal data will be terminated when:

- The purpose for which the data subject's consent, if any, was achieved, and that the personal data collected are no longer necessary or relevant to achieving the specific purpose sought. Once the purpose or the purposes of the treatment have been fulfilled, and when there is no legal or regulatory provision that establishes otherwise, we proceed to delete the data in our possession.
- A statement from the data subject in this regard, upon termination of the relationship between HSBC Brazil and the data subject, if no legal or regulatory provision establishes otherwise; or
- By legal determination.

7. How do we transfer your personal data abroad?

Your data may be transferred and stored in locations outside Brazilian territory, and the transfer of this data can only occur when there are adequate security mechanisms for such transfer, whether to a company in the HSBC group or to a third party.

In the case of international transfer of personal data to third parties, HSBC Brazil undertakes to carry out the transfer only if the country in which the third party is located has an adequate degree of data protection as provided for in applicable data protection legislation, or if it is another mechanism is adopted that allows said transfer in accordance with applicable data protection legislation.

You can obtain more details about the countries to which your personal data is transferred through our service channels at the following address: [Get in touch | HSBC Brazil](#).

8. What are your rights?

You have a series of rights in relation to your personal data. These rights include:

- The right to have access to the personal data and information that we process about you, including the right to confirm the existence of data processing.
- The right to revoke your consent;
- The right to request the portability of such data to third parties;
- The right to request the correction of your incomplete, inaccurate or outdated data;

- The right to request the anonymization, blocking or deletion of unnecessary, excessive or processed data that does not comply with the provisions of applicable data protection legislation;
- The right to request the deletion of personal data processed with the holder's consent, except in cases provided for in applicable data protection legislation;
- The right to object to processing carried out based on one of the hypotheses of waiver of consent, in case of non-compliance with the provisions of applicable data protection legislation;
- The right to information about public and private entities with which HSBC Brazil shared data;
- The right to information about the possibility of not providing consent and the consequences of refusal;
- The right to petition in relation to your data against the controller the national before data protection authority (ANPD);
- The right to request the review of decisions made solely based on automated processing of personal data that affect your interests, including decisions intended to define your personal, professional, consumer and credit profile or aspects of your personality.

You can exercise your rights by contacting us using the electronic form “Request from Holders” available on the website www.hsbc.com.br under the “Privacy Policy” menu.

9. How we keep your personal data secure?

We use a range of technical and organizational measures to keep your information secure, which may include encryption and other forms of security. We make our employees aware of the importance of data protection through periodic training, keeping them up to date with best market practices and internal procedures such as access controls and confidentiality obligations. We require our employees and any third parties who perform services for us to comply with appropriate compliance standards, including obligations to protect any information and applying appropriate measures for the use and transfer of information. Also consult our Information Security and Cybersecurity Policy, available on our website.

10. More details about your personal data

If you want more information about any item mentioned in this privacy policy, or to contact our (DPO), use our customer service channels or email (dpo.br@hsbc.com).

This Privacy Policy may be updated periodically, and you can always find the most recent version on this website.

This policy was last updated on April 17th, 2024.