PRIVACY AND PERSONAL DATA PROTECTION POLICY
MARCUS VINICIUS BARBOSA ADVOGADOS

Version 1.0, approved on November 1, 2026

I. PURPOSE AND SCOPE

1.1. This Policy explains how Marcus Vinicius Barbosa Advogados (the "Firm" or "MVB") processes personal data in the course of its activities, and informs data subjects of their rights and of the means to exercise them. The Firm is located at Rua México, 168, 13º andar, Centro, Rio de Janeiro/RJ, Brazil, CEP 20031-143, and may be contacted by e-mail at contato@mvblaw.com.br or by telephone at +55 21 3982-6360.

1.2. This Policy covers the Firm's website and its relationships with clients, prospective clients, representatives of legal entities, professionals, suppliers and other persons whose data are needed to provide legal services or to administer the Firm. It applies to information in both physical and digital form.

1.3. The Firm's data protection officer (encarregado) is Marcus Vinicius Barbosa. Privacy requests may be sent to contato@mvblaw.com.br, to the attention of the data protection officer.

II. LEGAL FRAMEWORK AND DEFINITIONS

2.1. This Policy observes Law No. 13,709/2018 (the Brazilian General Data Protection Law, "LGPD"), Law No. 8,906/1994 (the Statute of the Legal Profession and of the Brazilian Bar Association, "OAB"), the OAB Code of Ethics and Discipline, and the regulations issued by the National Data Protection Agency (Agência Nacional de Proteção de Dados, "ANPD").

2.2. Personal data means information relating to an identified or identifiable natural person. The data subject is the person to whom the data relate. Processing includes operations such as collection, consultation, use, storage, sharing and deletion.

2.3. Sensitive personal data are data concerning racial or ethnic origin, religious belief, political opinion, membership of a trade union or of a religious, philosophical or political organization, health or sex life, and genetic or biometric data linked to a natural person.

2.4. The controller is the party responsible for decisions regarding the processing, and the processor is the party that carries it out on the controller's behalf. The data protection officer is the person appointed to act as a channel of communication between the controller, data subjects and the ANPD.

III. PRINCIPLES AND RESPONSIBILITIES

3.1. Processing is carried out in good faith and in accordance with the principles of purpose, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination, and accountability. Only data that are relevant and proportionate to the purpose of each activity are used.

3.2. Depending on the activity actually performed, MVB acts as controller in the operations whose purposes and essential elements it determines. When acting as processor, it follows the lawful instructions of the controller and the applicable legal and contractual obligations.

IV. DATA PROCESSED, SOURCES AND PURPOSES

4.1. Contact and relationship. Name, e-mail address, telephone number, organization, position and information provided in messages are processed in order to respond to requests, assess matters, check for conflicts of interest, prepare proposals and manage the professional relationship.

4.2. Legal services. Depending on the matter, identification, professional, contractual, property, financial and procedural data are required, as well as documents, communications and evidence. Processing is carried out for legal advice, the preparation of legal opinions, the negotiation and review of contracts, representation in

judicial, administrative and arbitral proceedings and other forms of dispute resolution, and may involve data of representatives, employees, counterparties, witnesses and other third parties related to the matter.

4.3. Administration and professional obligations. Registration, tax, banking and representation data are processed in order to formalize engagements and powers of attorney, issue invoices, make or receive payments, keep accounting records and comply with legal and regulatory obligations.

4.4. Partners, staff and suppliers. Professional, contact and payment data are used in engaging and managing partnership, employment and service relationships. Résumés received are kept for future opportunities only with the applicant's consent, for the period indicated at the time.

4.5. Institutional communications. Where a person subscribes to receive publications, newsletters or invitations, the data needed to send them are used, and the subscription may be cancelled free of charge at any time. Initial contact and the engagement of services do not imply subscription to these communications.

4.6. Sources of data. Information is provided by the data subject, by clients or their representatives, or by professionals involved in the matter, or is obtained from proceedings, public records and other lawfully accessed sources. Publicly available information is processed with regard to the purpose, good faith and public interest that justified its disclosure (Article 7, paragraph 3, of the LGPD), subject to the applicable access restrictions. Technical browsing data are processed as set out in Section IX.

V. LEGAL BASES

5.1. Contracts and preliminary steps. Where the data subject is a party to the contract, the data needed for its performance or for preliminary steps requested by the data subject are processed on the basis of Article 7, item V, of the LGPD.

5.2. Legal obligations and exercise of rights. Compliance with legal or regulatory duties, including professional, tax and labor duties, is based on Article 7, item II. Acting in proceedings and retaining the data needed for the regular exercise of rights in judicial, administrative or arbitral proceedings are based on Article 7, item VI.

5.3. Legitimate interest. Relationships with representatives of legal entities, conflict checks and security activities rely on Article 7, item IX, and on Article 10, as applicable, following an assessment of the purpose, the necessity, the data subject's reasonable expectations, the impacts and the appropriate safeguards.

5.4. Consent. Where consent is used, including for the optional communications described in Section IV, it is requested freely, in an informed and unambiguous manner and linked to specific purposes, and it may be withdrawn through a free and simple procedure. Accessing the website and reading this Policy do not constitute consent.

5.5. Sensitive data. Their processing is limited to what the matter requires and depends on one of the specific grounds set out in Article 11 of the LGPD, such as compliance with a legal or regulatory obligation, the regular exercise of rights, including in contracts and proceedings, or specific and highlighted consent, where applicable.

5.6. Children and adolescents. The website is not directed at this audience. Where data of children or adolescents are needed for a legal matter, processing respects their best interests, the relevant legal basis and the specific requirements of the law.

VI. PROFESSIONAL SECRECY

6.1. Data processing in legal practice respects professional secrecy, the prerogatives of the legal profession, ethical duties and the access restrictions applicable to each matter. These duties survive the end of the professional relationship.

6.2. This Policy does not authorize the disclosure of confidential information, the public identification of clients or the publication of case documents and outcomes.

Institutional disclosures require prior review of their lawfulness and of their conformity with professional rules, with the necessary authorizations.

VII. SHARING AND INTERNATIONAL TRANSFERS

7.1. Data are accessed by the Firm's professionals and shared, to the extent necessary for the purpose and on an appropriate legal basis, with partners involved in the work, such as correspondent firms, other lawyers, authors of legal opinions, experts and consultants.

7.2. Data are shared with providers of technology, including artificial intelligence tools, and of hosting, communication, storage, accounting and other support services, in accordance with existing contracts. Access is limited to what is necessary and is subject to confidentiality, security and data protection obligations appropriate to the activity.

7.3. Data are also submitted to courts, public bodies, regulatory agencies, audit courts, arbitral institutions, mediators and other participants in proceedings or negotiations, where necessary for the professional work. Requests from authorities are assessed as to their enforceability and scope, preserving professional secrecy and prerogatives.

7.4. The Firm does not sell personal data. Sharing does not authorize the recipient to use the data for purposes incompatible with those that justified it.

7.5. Technology services and work involving international elements may entail the processing of data outside Brazil. In such cases, the Firm verifies, in addition to the legal basis for the processing, the existence of a valid international transfer mechanism provided for in the LGPD and in ANPD regulations, such as an adequacy decision or standard contractual clauses.

7.6. Where required by regulation, specific information on international transfers is made available prominently on this page or in an easily accessible supplementary notice. Data subjects may request from the data protection officer the information and

contractual instruments to which they are entitled, subject to legal limits and to commercial and industrial secrets.

VIII. SECURITY AND RETENTION

8.1. The Firm adopts technical and administrative measures proportionate to the nature of the data and to the risks of each activity. Access is granted according to professional need, subject to confidentiality duties and guidance for those involved in the processing.

8.2. Security incidents are assessed for containment, mitigation and the adoption of appropriate measures. Where an incident may result in relevant risk or harm to data subjects, notifications to the ANPD and to data subjects follow the applicable legal and regulatory requirements and deadlines.

8.3. Data retention depends on the purpose, the duration of the service or professional relationship, legally required retention periods, ongoing proceedings and the need to preserve information for the regular exercise of rights. The termination of a contract does not, in itself, require the deletion of records, which are retained only for as long as there is a basis for doing so.

8.4. When data are no longer needed and there is no basis for retaining them, they are deleted or anonymized in the environments under the Firm's control, subject to technical limits and legal exceptions. Data subjects may request information on the retention criteria applicable to their case.

IX. WEBSITE, CONTACT FORM AND COOKIES

9.1. The data requested in the contact form and the content of the message are used to review and respond to the request. Users are advised to send only what is needed for the initial contact, without lengthy documents or sensitive data before receiving guidance from the Firm. Sending a message does not constitute acceptance of representation or the conclusion of a contract.

9.2. Accessing the website generates technical records, such as IP address, date and time, browser and resource accessed, depending on the infrastructure used. These records are processed solely for the operation and security of the website, on an appropriate legal basis.

9.3. Cookies are files associated with browsing that enable website features or the measurement of its audience. The technologies actually used, their purposes, providers and duration are described in the website's cookie notice.

9.4. Strictly necessary cookies are limited to their technical purpose. Non-essential cookies, such as audience measurement cookies, are activated only with the visitor's prior consent, and the visitor may refuse them or review their preferences at any time through the cookie notice. Merely continuing to browse is not considered acceptance. Browser settings offer additional controls.

9.5. External pages accessed through links have their own privacy terms. The inclusion of a link does not make MVB responsible for the processing of data carried out on those pages.

X. RIGHTS OF DATA SUBJECTS

10.1. Under the LGPD and subject to the conditions applicable to each right, data subjects may request:

(a) confirmation of the existence of processing and access to their data;

(b) correction of incomplete, inaccurate or outdated data;

(c) anonymization, blocking or deletion of unnecessary or excessive data, or of data processed in breach of the LGPD;

(d) portability to another provider, upon express request, in accordance with the regulations and safeguarding commercial and industrial secrets;

(e) deletion of data processed on the basis of consent, except where retention is permitted by law;

(f) information on the public and private entities with which their data have been shared;

(g) information on the possibility of not giving consent and on the consequences of refusal;

(h) withdrawal of consent;

(i) objection to processing carried out on a legal basis that does not require consent, in the event of non-compliance with the LGPD;

(j) review of decisions made solely on the basis of automated processing that affect their interests, where applicable, and information on the criteria and procedures used, within the limits of Article 20 of the LGPD.

10.2. Data subjects may also file a petition with the ANPD (gov.br/anpd) and use the other available administrative and judicial remedies.

XI. HANDLING OF REQUESTS

11.1. Requests may be submitted free of charge to the data protection officer's channel, by the data subject or by a duly authorized representative. To protect the data and prevent improper disclosure, it may be necessary to confirm the requester's identity or powers of representation, with information proportionate to the request.

11.2. Confirmation of the existence of processing and access are provided in simplified form, immediately, or by means of a clear and complete statement within fifteen days of the date of the request, as set out in Article 19 of the LGPD, without prejudice to different time limits provided by law. Other requests follow the legal and regulatory time limits. Where the requested action cannot be taken immediately, the Firm provides a reasoned response stating the reasons and, where appropriate, the steps needed to complete the request.

11.3. Responses take into account the rights of the requester, professional secrecy, third-party data, commercial and industrial secrets and retention obligations.

Limitations and impediments are explained to the data subject, with partial fulfilment where possible.

11.4. Where a request concerns processing in which MVB acts as processor, the Firm informs the data subject of that fact and assists in referring the request to the relevant controller, without prejudice to its own obligations.

11.5. When it corrects, deletes, anonymizes or blocks data that it has shared, MVB notifies the processing agents that received the data so that they may take the corresponding action, except where this proves impossible or involves disproportionate effort, as provided in the LGPD.

XII. DATA PROTECTION OFFICER

12.1. The Firm's data protection officer is Marcus Vinicius Barbosa, who is responsible for the channel of communication on data protection with data subjects and the ANPD.

E-mail: contato@mvblaw.com.br, to the attention of the data protection officer.

Address: Rua México, 168, 13º andar, Centro, Rio de Janeiro/RJ, Brazil, CEP 20031-143.

Telephone: +55 21 3982-6360.

12.2. The data protection officer is responsible for receiving requests and communications, providing clarifications, taking or referring measures and advising the Firm on data protection. In the officer's absence or unavailability, the channel is handled by a partner designated as substitute.

XIII. UPDATES AND EFFECTIVENESS

13.1. This Policy is updated whenever changes in the law or in the Firm's activities so require. The current version is made available on the website, identifying the version and the date of approval. Material changes are communicated prominently and, where necessary, directly to data subjects.

13.2. Changes to this Policy do not authorize new purposes incompatible with the original ones. Where required, new consent is requested.

13.3. This version enters into force on the date of its approval by the partners, indicated above, and is published on the Firm's website. The Portuguese, English and Spanish versions are updated jointly and, in the event of any discrepancy, the Portuguese version prevails.