

# PRIVACY NOTICE

## ITAÚ EUROPE S.A.

### 1. Introduction

This notice (“**Privacy Notice**”) outlines how Itaú Europe S.A. (together with its Portuguese branch, “**we**,” “**us**,” “**our**”) collects, uses, and protects personal data in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 - General Data Protection Regulation (GDPR), the Act of 1st August 2018 on the organisation of the National Data Protection Commission (the CNPD in Luxembourg), and any other applicable data protections laws (“**Data Protection Laws**”). Itaú Europe S.A. is indirectly owned by Itaú Unibanco Holding S.A. (together with its subsidiaries, the “**Itaú Unibanco Group**”).

This Privacy Notice applies to any personal data our directors, clients, business partners, suppliers, counterparties or other concerned parties (and their shareholders, directors, staff and contacts) provide us or we collect from other sources (“**Personal Data**”). This Privacy Notice is a statement of our practices and the rights of Data Subjects (as defined below) in relation to Personal Data. This is not a contractual document, and it does not create any rights or obligations on either party, beyond those, which already exist under Data Protection Laws.

For the avoidance of doubt, Personal Data is limited to any information relating to an identified or identifiable natural person (“**Data Subjects**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Therefore, any information that goes beyond this limitation is outside the scope of this Privacy Notice, including, but not limited to information on Data Subject’s investment strategy, assets or transactions.

### 2. Data Controller

Itaú Europe S.A. is the data controller responsible for the processing of Personal Data as described in this Privacy Notice. Our registered office is located at 18 Rue Erasme, L-1468 Luxembourg, Grand Duchy of Luxembourg.

Itaú Europe S.A. operates in Portugal through its Portuguese branch - Itaú Europe S.A. – Sucursal em Portugal, with address at Rua Tierno Galvan, Torre 3, 11º andar, Lisboa, 1099-048, Portugal.

Our Data Protection Officer can be reached at: [DPO.IBBAE@itaubba.eu](mailto:DPO.IBBAE@itaubba.eu).

### 3. Types of Personal Data Collected

Given the nature of our business, we may collect and process the following types of Personal Data:

- **Personal Information:** Names, addresses, email addresses, postal address, contact numbers, title, date and place of birth, nationality, occupational information, marital status, identification details, tax number, tax residence, data related to criminal convictions and offences, political opinions, participation in political and/or trade union organisations, and other information, specimen signature, and phone numbers of business contacts and stakeholders.
- **Financial Information:** Bank account details, investment information, transaction records, source of wealth and financial situation
- **Legal and Compliance Information:** Documentation related to regulatory compliance and legal obligations.
- **Other relevant information:** such as knowledge and experience in financial markets and investment objectives and preferences, communications preferences, language, location, and the time zone.

### 4. Forms of collecting Personal Data

We may collect Personal Data through on-line and physical form filling for client onboarding purposes, telephone and electronic recording for compliance with regulatory requirements, use of cookies in our website, and form filling to obtain consent for marketing and event communication purposes, third parties that provide *know your customer* (KYC) and/or *politically exposed persons* (PEP) due diligence-related services, publicly available sources, use of cookies on our website.

### 5. Purposes of data processing

We collect and process Personal Data in the following circumstances and for the following purposes:

- Entering into a business relationship with our clients, counterparties, suppliers or other concerned parties or for considering entering into such a business relationship;
- For the purpose of conducting *know your client*, *know your supplier*, and *politically exposed persons* checks;
- For the purpose of performing services for and proving products to our clients;
- Maintaining and administering our business relationships;

- When you register with or use any of our websites or applications, for the purpose of maintaining our relationship or performing our services;
- When you attend an Itaú Europe S.A. event or visit our offices
- If you contact us with a complaint or query;
- For the purposes of complying with our and other Itaú Unibanco Group entities' legal and regulatory obligations, such as obligations to maintain records of the calls and electronic communications;
- Contacting and engaging in marketing and business development with our clients, prospective clients, counterparties, suppliers or other concerned parties;
- Providing you with information of Itaú Europe S.A. or any Itaú Unibanco Group entity or our and their business and products;
- Establishing, exercising or defending our legal rights or for the purposes of legal proceedings;
- Investigating and responding to a complaint or query;
- Preventing, investigating and responding to actual or alleged fraud or illegal activities
- Compliance with legal obligations, including anti-money laundering (AML) and counter-terrorism financing (CTF) regulations.
- Corporate governance, managing and administering internal operations and governance.
- Financial management, handling financial transactions, including banking, accounting, and auditing.
- Communication with stakeholders, including shareholders, regulatory authorities, and service providers.
- Record keeping, maintaining accurate records of the company's activities and transactions.

## **6. Disclosure**

### ***Within Itaú Unibanco Group***

We may share your Personal Data with other Itaú Unibanco Group entities. We do not rent, sell or otherwise disclose personal information with unaffiliated third parties for their own marketing use. We do not share your Personal Data with third parties except in the circumstances set out below.

## ***Business Partners***

We disclose Personal Data to business partners who provide certain services to us, or who co-operate with us on projects. These business partners operate as separate controllers and are responsible for their own compliance with data protection laws. You should refer to their privacy notices for more information about their practices. Examples include credit and fraud reporting agencies, debt collection agencies, insurers, reinsurers.

## ***Authorised Service Providers***

We may disclose your Personal Data to service providers we have retained to perform services on our behalf (either in relation to services performed for our clients, or information which we use for our own purposes, such as marketing and automation tools).

## ***Legal Requirements and Business Transfers***

We may disclose Personal Data (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request. (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial or reputational loss, (iv) in connection with an investigation of suspected or actual illegal activity or (v) in the event that we are subject to a merger or acquisition to the new owner of the business. Disclosure may also be required for company audits or to investigate a complaint or security threat.

## **7. Transfer**

We are part of a global group and may transfer certain Personal Data across geographical borders to other Itaú Unibanco Group entities, authorised service providers or business partners in other countries, including outside the European Economic Area (“EEA”) working on our behalf in accordance with applicable law. Our affiliates and third parties may be based locally or they may be overseas.

Where we transfer your Personal Data outside the EEA, we will ensure that it is protected in a manner that is compliant with Data Protection Laws. Examples of countries we may transfer Personal Data to include Portugal, Brazil, Switzerland, the United Kingdom, and the United States.

## **8. Legal Basis for Processing**

Our processing of Personal Data is based on the following legal grounds:

- the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract;

- the processing is necessary for us to comply with a relevant legal or regulatory obligation (e.g. where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators or where we are required to record calls and electronic communications);
- the processing is in our or a third party's legitimate commercial interests, subject to your interests and fundamental rights (e.g. where we use Personal Data to deliver our services, and that processing is not necessary in relation to a contract to which you are a party);
- in limited circumstances, where we obtain your consent which consent may be revoked at any time by you; or processing is necessary in the public interest

## **9. Data Retention**

We retain Personal Data for as long as necessary to fulfill the purposes for which it was collected and to comply with legal and regulatory requirements. We will process and keep your Personal Data as long as required for the relevant purposes including to meet our contractual, legal and regulatory obligations. Additionally, laws or regulation may determine a minimum period for which we shall keep your Personal Data.

We have implemented appropriate measures to ensure your Personal Data is securely and regularly destroyed when no longer required. We may store your Personal Data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or for preserving evidence in connection with the relevant statute of limitations. Any Personal Data retained for these purposes is stored securely with restricted access and is deleted or anonymised as soon as it is no longer needed.

## **10. Data Security**

The security of your Personal Data is important to us and we have implemented reasonable physical, technical and administrative security standards to protect Personal Data from loss, misuse, alteration or destruction. We protect your Personal Data against unauthorised access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorised individuals access your Personal Data, and they receive training about the importance of protecting personal information.

## **11. Data Subject Rights**

In accordance with Data Protection Laws, individuals have the following rights regarding their Personal Data:

- **Access and Information:** The right to request access and obtain information regarding the processing of their Personal Data.
- **Rectification:** The right to request correction of inaccurate or incomplete data.
- **Erasure:** The right to request deletion of their Personal Data under certain conditions. The information can only be erased if it is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.
- **Restriction:** The right to request restriction of processing, but only where its accuracy is contested.
- **Portability:** The right to data portability, which requires us to provide Personal Data to the requester or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which the requester is a party.
- **Withdraw:** The right to withdraw consent to the processing of Personal Data at any time. Please note however, that we may still be entitled to process the Personal Data if we have another legitimate reason for doing so.
- **Objection:** The right to object to the processing of their Personal data at any time, but only where that processing has our legitimate interests as its legal basis.

## 12. Contact Information

For any questions or requests regarding this Privacy Notice or the processing of Personal Data, please contact the Data Protection Officer at [DPO.IBBAE@itaubba.eu](mailto:DPO.IBBAE@itaubba.eu).

## 13. Changes to this Privacy Notice

We may update this Privacy Notice from time to time and we will post the current version on this site. We encourage you to periodically review this Privacy Notice. This Notice was last updated on 15 May 2026.