

Privacy Policy

XP Asset Management, a company of the XP Inc. Group, carries out operations of personal processing data of customers and potential customers as part of its daily business operations, in order to provide them with our products and services, ensuring that we can meet their needs when providing these products and services as well as when providing them with the respective information.

This Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, changes to our business operations and practices are taken into consideration and remains abreast of the changing regulatory environment.

1. Introduction

Our organization respects the privacy of any users who access our website. Therefore, we are committed to taking every reasonable step to safeguard any existing or prospective clients, applicants, and website visitors. Technical and organizational procedures are in place to ensure that your personal information is secure.

XP Asset Management can use different ways to collect personal data, such as:

- When you provide by filling out forms, e-mail, websites or by phone, in these scenarios:
 - provide products or services;
 - order XP Asset Management's products or services;
 - request marketing or institutional materials;
 - provide feedback.
- When you access our websites;
- Through publicly available data sources.

2. Personal information we collect

In order to contact our Investor Relations channels, you may need to provide us the required information. The information that we may collect from you includes the following:

- Full name;
- E-mail address;
- Contact telephone number (optional); and
- Employer's name (optional).

In order to subscribe to our Investor Relations Alerts and Newsletters, you may need to provide the following information:

- Name;
- E-mail address;
- Contact telephone number (optional);
- Employer's name (optional); and
- Interest profile (Analyst, Investor, Journalist, Student or Other).

3. Purposes for processing your personal information

We may process your personal data for the following purposes:

I. To send you institutional materials

If the data is provided through our contact or registration forms in the Investor Relations Alerts, we may use your personal data to submit institutional and informative materials to ensure that you are always up to date on our funds and other relevant information. By sending this type of communication, we are based on your consent.

II. To send you marketing or advertising materials

We may use your personal data to send marketing communications by e-mail, telephone, or other previously agreed ways to offer content aligned with your profile or aligned with our other content in which you have shown interest. When sending you marketing communications, we are based on your consent.

If you would like to revoke your consent so that we no longer send you marketing communications, this action can be done through the preferences link presented in our e-mail messages' footer.

III. Compliance with a legal obligation

There are several legal obligations from relevant laws to which we are subject (e.g., anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing and anti-money laundering controls.

IV. To send you communications and satisfaction surveys

We may send you notices and satisfaction surveys as part of our investor feedback process from time to time. It is in our legitimate interest to obtain such opinions to ensure that our services/products are being provided at the highest level.

V. For data analysis on our websites

Our websites may contain data analysis tools that allow us to analyze behaviors to ensure our platforms' quality and provide the best user experience. The information collected is not considered as personal in accordance with the terms of the Brazilian Data Privacy Regulation, as it is used in such a way that it is not linked to the data subject and this information is anonymized.

VI. For the purposes of safeguarding legitimate interests

We process personal data to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Despite that, it must not unfairly go against what is right and best for you. Examples of such processing activities include the following:

- Initiate legal claims and prepare our defense in litigation cases;
- Implement technical means and processes for preventing potential crime, asset security and anti-trespassing measures (including cyber security measures);
- Analyze and prevent fraud;
- Business management measures, platform performance optimization and product development.

4. Sharing personal data

Considering every information presented in this policy, XP Asset Management will not disclose its customers' personal data to a third party, except:

- to meet the terms of applicable laws, rules or regulations;
- in the face of an obligation to disclose;
- legitimate interest requiring disclosure; or
- when requested by the data subject, with his consent to disclosure.

We require that every organization outside the XP Inc. Group to whom personal information is shared in order to perform the contracted services, must take on all individual privacy rights and must comply with all relevant data protection regulations.

As part of the use of your data for the purposes mentioned above, we may eventually disclose your personal information to:

- a) Other companies of the XP Inc. Group, within the limits of the purposes set forth in this policy;
- b) Third parties such as commercial service providers and specialized consultants hired for administrative, financial, legal, security, research and other services;
- c) Third parties that are carrying out audit work;
- d) Business parties, credit providers, courts, controlling bodies and regulatory authorities;
- e) Payment service providers and/or banking institutions, for payment processing and controlling;
- f) If we disclose your personal data to business parties, such as payment companies, in order to perform the services requested by customers, those parties may store your information in order to comply with their legal obligations;
- g) Any person or company if you have provided your consent;
- h) Customers accept and consent that we may occasionally analyze the data collected when you visit our websites and use our mobile applications or by other means (e.g. questionnaires), for statistical purposes in order to improve and improve our services.

5. International data transfer

We may need to process your personal information outside the Brazilian Area through service providers (i.e. cloud technology providers). We will ensure that these operations are lawful and that providers in third countries are obligated to comply with the Brazilian Data Privacy Regulation or any other equivalent regulation from other countries.

6. Storage of your personal information and retention period

XP Asset Management is committed to protecting your information's privacy, implementing measures to prevent, detect and reduce vulnerabilities and incidents in our environments. We will hold personal information, for as long as we have a business relationship with you and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

XP must retain your personal information for as long as necessary to comply with the purposes for which the information is processed, such as compliance with legal obligations. If you have additional questions, please forward an email to privacidade.dados@xpi.com.br.

7. Know your rights as a data subject

As the data subject, you have certain rights guaranteed, as described in the Brazilian Data Privacy Regulation, which may be exercised at any time through a contact with our DPO through the e-mail address privacidade.dados@xpi.com.br.

We inform you that you have the following rights in relation to your personal information:

- Confirm whether we are processing your personal information and, if so, what information we process and, if requested, provide you with a copy of that personal information;
- Request updating of the personal data we keep about you (including incomplete, inaccurate or outdated data);
- Revocation of consent granted for the processing of your personal data, as well as request its deletion (to the extent that such processing is based on consent);
- Obtain information about which entities we share your data with;
- Request that your personal data that you understand as unnecessary, excessive or processed in non-compliance with the Brazilian Data Privacy Regulation, be anonymized, blocked or deleted.

8. How to contact us

We have a DPO (Data Protection Officer) who inspects matters related to this Privacy Policy. If you have any questions about how to consult your data and exercise your rights as a data subject, please contact us at privacidade.dados@xpi.com.br.

9. Legal Disclaimer

XP Asset Management shall not be liable for misuse or loss of personal information to which it has no access or control. We are also exempt from liability for the unlawful and unauthorized use of this information as a result of misuse or misuse of your access credentials, negligent or malicious conduct as a result of acts or omissions on your part or from someone authorized on your behalf.