



Privacy Notice for Third Parties

Prepared by:	Trench Rossi Watanabe
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PRIVACY NOTICE FOR THIRD PARTIES

OPY Healthcare Gestão de Ativos e Investimentos S.A. ("OPY") has prepared this Privacy Notice for Third Parties, including customers, suppliers, and their respective employees. The purpose is to explain to all third parties that maintain a commercial or institutional relationship with OPY or any of its subsidiaries (collectively referred to as "OPY Companies") how the OPY Companies, as controllers of the personal data, will collect, process, store and use information about You, and what are your rights concerning this information.

When we say "We," we are referring to OPY Companies or any of its subsidiaries.

What categories of personal data do the OPY Companies collect about me, and for what purposes do the OPY Companies use these data?

"Personal Data" means any information relating to You. OPY Companies will collect, process, and use the following categories and types of personal data about You, to the extent necessary for the purposes described below:

- **identification data**, such as your name, surname, your picture, identity (ID), professional identity, individual taxpayer identification number (CPF), nationality;
- **personal information**, such as date and place of birth and gender, driver's license (CNH);
- **contact information** including your corporate address, home address, corporate phone, home phone, mobile, and corporate e-mail address and personal e-mail address;
- **information on your professional experience**, such as your profession, position, employer, level of management, name of supervisor, name of subordinates, attributions, your power to represent a corporate client;
- **data about our communication with you;**
- **bank details** including branch, account, copy of bank card, statements, and checks;
- **data for credit analysis and conflict of interest analysis** including individual income tax returns (if applicable), corporate documents containing contact details, information on ownership interests, income statement, data on the property owned, spouse information, and information regarding kinship with any employee of the OPY Companies;



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- **data on your relationship with OPY Companies**, such as contract term, dates and times of your meetings or visits to OPY Companies, your signature,
- **Data from reporting channels or ethical or anti-corruption investigations**, such as irregular practices or practices in violation of the OPY Companies Code of Ethics, reputation reports, data on personal relationships with authorities, news published in the media.

During any investigations or analysis of a conflict of interest, the OPY Companies may process limited **sensitive personal data about You**, especially concerning affiliation to a political party or union organization. However, this will happen only if necessary and in the context of the investigation or determination of a conflict of interest or reputational risks, or temperature data if required to control entry into the premises of OPY Companies, only to protect your own and third parties' health and to comply with a legal obligation.

We may collect your personal data through the information You submit to OPY Companies as part of the formalization of our hiring process and during our business relationship, through consultants or service providers of credit analysis and reputational risk, through complaints, and public sources.

You are under no obligation to send us any information we may request from You. Depending on the type of information, it may not be possible to proceed with the hiring process or business relationship with OPY Companies.

We will collect and use your Personal Data for the following purposes:

- **to manage our business relationship**, provide our services to You or your company, register your company as a customer, approve a credit line (if applicable), and enter into any agreement. In addition, we may collect and use Personal Data to contract products or services from You or your company, register your company as a supplier, and enter into the agreement;
- **to manage our internal processes**, including billing, collection, or payment;
- **to communicate with You**, including communications about our business relationship, our services, events, institutional and marketing communications, and to conduct research;
- **to manage visits and meetings** and to organize events;
- **to analyze business** and customers' expectations, demand, and for internal planning;
- **to investigate complaints in OPY Companies' ethics and anti-corruption channels, and to assess the existence of conflicts of interest** as per our internal policies and applicable legislation; and



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- **complying with the law and defending and exercising the rights** of OPY Companies and third parties, if necessary.

Why do OPY Companies need to collect, process, and use my personal and sensitive personal data?

We will process your data in strict compliance with the provisions of applicable law, especially Law No. 13,709/18 (General Law on Personal Data Protection or "LGPD"). One of the legal bases for our personal data processing activities is provided in the LGPD, which we will explain below.

We will process your personal data mainly to manage our commercial and contractual relationship, both in the execution of preliminary procedures and the implementation of a contract, based on article 7, V of the LGPD.

We will also process your data based on our legitimate interest, according to Article 7, IX of the LGPD. Our legitimate interest in this activity is to ensure business relationships in line with the company's internal policies and support OPY Companies' activities.

We will limit your sensitive personal data processing to the cases necessary to investigate identified reputational risk, ensure compliance with applicable law, and exercise rights pursuant to article 11, item II, (a) and (d).

Finally, if necessary, OPY Companies may process your personal data to comply with the law and exercise rights of OPY Companies or third parties, according to article 7, II, and VI, and article 11, II, (a), and (d).

Got it - but with whom will OPY Companies be able to share my personal data?

The achievement of the purposes described in this document may require the involvement of some companies in the processing activities. Accordingly, OPY Companies may share your data with third parties, as indicated below. However, under our internal policies, the access by third parties to personal data is limited to the extent necessary. For the purposes outlined in this document, we may share your personal data:

- with companies providing services to OPY Companies, including IT and support companies, auditors, communication, marketing, and events;
- with other companies in the group, to manage the activities and governance of the group;



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- with customers, to comply with corporate governance rules, protect their safety and that of third parties, and to comply with customer health and safety requirements and fulfill contractual obligations;
- with banks, to make payment and benefits transactions feasible;
- with regulators, authorities, judiciary bodies, government agencies, and other third parties, if necessary to fulfill a legal obligation or to exercise the rights of OPY Companies or third parties;
- with acquiring companies, in the context of a buy-out or other transaction of sale of assets or corporate operation involving the OPY Companies;
- with operators. To the extent necessary for the processing purposes pointed out in this Instrument, OPY Companies may share your personal data with third parties, either from the OPY Companies' economic group or independent third parties, to process personal data according to our specific instructions, on behalf of OPY Companies ("Operators"). Operators may process data for the administration of our recruitment base, support IT systems and the organizational activities of OPY Companies. However, they will be subject to contractual obligations to implement technical and organizational security measures to protect personal data and only to process data under the instructions of the OPY Companies.

Some third parties with access to personal data may be located in other countries or process data outside Brazil. Consequently, the level of data protection in the other country may not be equivalent to the level of protection in Brazil. Therefore, we will only transfer your personal data to countries that the National Data Protection Authority ("ANPD") has decided to have an adequate level of protection, or we will take effective measures to ensure that all recipients of personal data implement a sufficient level of data protection. These measures may include, for example, contracts for the transfer of personal data under standard clauses in compliance with the provisions of the LGPD.

How long will OPY Companies keep my personal data?

We will keep your personal data for as long as necessary for the activities described in this Privacy Notice or the minimum period provided by law. We do not keep personal data for longer than necessary. But we may, for example, keep your personal data until a statute of limitations has elapsed in the event of any litigation, always based on the applicable law. We may also maintain limited historical data on your business relationship with the OPY Companies to the extent permitted by applicable law.



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As to the activities described in this Instrument, do OPY Companies make decisions solely based on automated processing of personal data?

No, OPY Companies do not make decisions solely based on the automated processing of your personal data in the activities described in this Instrument.

What rights do I have regarding my personal data?

Furthermore, every personal data subject has rights, and OPY Companies respect their rights under the LGPD. According to the applicable legislation, users must exercise their rights in such a way as to protect the industrial and commercial secrets of OPY Companies and third parties, as well as the fundamental rights of third parties.

You have the following rights concerning your personal data, which may or may not be applicable or may be limited under applicable laws and regulations, depending on your personal data processing activity:

(i) Right of confirmation of processing and right of access

You have the right to obtain confirmation of the processing activity involving your personal data. If OPY Companies process your personal data, you have the right of access, that is, to obtain a simplified or complete statement on the categories of personal data processed, the origin of the data, and the purposes of the processing. In case your personal data is processed based on your consent or in a contract signed between You and the OPY Companies, You also have the right to obtain a full copy of the personal data processed based on the consent or the contract.

(ii) Right to correction

You have the right to request correction of incomplete, inaccurate, or outdated data about You.

(iii) Right to anonymization, blocking, or deletion

In some instances, when your personal data are unnecessary, excessive, or are treated in disagreement with the LGPD, You have the right to request the anonymization, blocking, or deletion of these data.

(iv) Right to data portability

In some cases, as provided and to the extent required by ANPD, and always respecting the commercial and industrial secrets of OPY Companies, You have the right to the portability of your personal data to another company.



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(v) Right to deletion

Whenever your data is processed based on your consent, You have the right to request the deletion of such personal data. However, exceptions apply to cases in which OPY Companies have the right to retain the data under the terms of the LGPD.

(vi) Right to information about shared use of data

You have the right to obtain information about the public and private entities with which OPY Companies shared your personal data.

(vii) Right to refuse and revoke consent

Every time we ask for your consent to process your personal data, You have the right to refuse consent. We will always inform You of this right and the consequences if You choose not to consent to a processing activity. In addition, You may revoke your consent to processing your personal data for a specific purpose at any time. In this case, all processing activities carried out up to the date of revocation will be validated.

(vii) Right to petition to ANPD

You have the right to report the OPY Companies to the National Data Protection Authority (ANPD) about your personal data.

(ix) Right to object to illegal processing

You have the right to object to any processing of your personal data that violates the provisions of the LGPD.

(x) Right to review decisions solely based on automated processing

You have the right to request a review of decisions made exclusively based on automated processing of personal data that affect your interests, including decisions aimed to define your personal, professional, consumer, and credit profile or aspects of your personality.

To exercise any of these rights, please contact us as indicated in the item below.



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Who can I contact regarding this matter?

If You have any questions, doubts, or concerns regarding this Privacy Notice, or if You wish to exercise Your rights as a rightful claimant, You may contact the OPY Companies Data Protection Officer.

Contact us at the following address:

- e-mail: encarregado@opyhealth.com