

J.P.Morgan

Brazil Privacy Policy, effective from 16th August 2020

1. This Policy

This Policy is issued by Banco J.P. Morgan S.A., J.P. Morgan Corretora de Câmbio e Valores Mobiliários S.A., J.P. Morgan S.A. - Distribuidora de Títulos e Valores Mobiliários, JPMorgan Chase Bank, National Association (Brazilian branch), and J.P. Morgan Administradora de Carteiras Ltda. on behalf of itself, its branches, its subsidiaries and its affiliates, identified as Controllers in the table in Section 13 below (together, “**J.P. Morgan**”, “**we**”, “**us**” or “**our**”) and is addressed to individuals outside our organization with whom we interact, including visitors to our websites (our “**Sites**”), customers, prospective customers, investors, Personnel of corporate customers, customers’ representatives, customers’ advisors, family, office staff or other associated professional advisors or consultants, vendors and Personnel of vendors, other recipients of our services and anyone who contacts our service centers or Ombudsman (together, “**you**”).

Defined terms used in this Policy are explained in Section 14 below.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

2. Processing your Personal Data

Collection of Personal Data: We collect Personal Data about you from a variety of sources as follows:

- We obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We collect your Personal Data in the ordinary course of our relationship with you (e.g., in the course of managing your transactions or your investment in our funds).
- We collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We receive your Personal Data from third parties who provide it to us (e.g., your employer; our customers; credit reference agencies; and law enforcement authorities).
- We receive your personal data from other third parties, where you purchase any of our products or services through such third parties.
- We collect or obtain Personal Data when you visit any of our Sites or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

Creation of Personal Data: We create Personal Data about you, such as records of your interactions with us, and details of your accounts, subject to applicable law.

Relevant Personal and Sensitive Personal Data: The categories of Personal Data about you that we Process, subject to applicable law, are as follows:

- *Personal details:* given name(s); preferred name(s); nickname(s), gender; date of birth / age; marital status; government issued number(s) such as tax identification number (CPF), RG (national identity card),

passport number(s) and driving license number(s); nationality; lifestyle and social circumstances; images of passports, driving licenses, and signatures; authentication data (including but not limited to, passwords, mother's maiden name, challenge/response questions and answers, identifying number allocated to you and used for validating electronic transactions, such as PINs, facial and voice recognition data); photographs; visual images; and personal appearance and behavior.

- *Family details*: names and contact details of family members and dependents.
- *Contact details*: address; telephone number; email address; and social media profile details.
- *Employment details*: industry; role; business activities; names of current and former employers; work address; work telephone number; work email address; and work-related social media profile details.
- *Education history*: details of your education and qualifications.
- *Financial details*: billing address; bank account numbers; total assets and overall financial position, credit card numbers; cardholder or accountholder name and details; instruction records; transaction details; and counterparty details.
- *Views and opinions*: any views and opinions that you choose to send to us, or publish about us (including on social media platforms).
- *Electronic Identifying Data*: Including but not limited to, IP addresses; cookies; activity logs; online identifiers; unique device identifiers; geolocation data; and data relating to your use of our Sites, such as browsing activity or transaction logs.

Processing your Sensitive Personal Data: We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is necessary for compliance with a legal obligation (e.g., to comply with our diversity related obligations or when we become aware of information that may be deemed as Sensitive Personal Data, such as your political opinions, when we carry out checks required for compliance with a law or regulation);
- the Processing is necessary to protect your life or physical safety or of a third party, as permitted by applicable law;
- the Processing is necessary for ensuring fraud prevention and your safety in the identification and authentication process of registration in electronic systems;
- you have manifestly made those Sensitive Personal Data public;
- the Processing is necessary for our regular exercise of rights in contracts, in court or in administrative or arbitration proceedings;
- we have, in accordance with applicable law, obtained your explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); or
- Processing is necessary for the execution of public policies outlined in laws and regulations.

In any case, if you supply us with the Personal Data of third parties, you will be responsible for informing those third parties that their personal data has been transferred to us and for informing them that this policy will apply. You are also responsible for the collection and recording of their consent, if consent is required by law and such obligation is legally imposed to you.

Purposes for which we may Process your Personal Data (and Sensitive Personal Data, as permitted), and legal bases for Processing: The purposes for which we may Process Personal Data, subject to applicable law, and the legal bases on which we may perform such Processing, are:

Processing purpose	Legal basis for Processing
<p>AML / KYC : fulfilling our regulatory compliance obligations, including ‘Know Your Client’ checks; and confirming and verifying individuals’ identity (including by using credit reference agencies); and screening against government, supranational bodies and/or law enforcement agency sanctions lists as well as internal sanctions lists and other legal restrictions.</p>	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with any contract that individuals may enter into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purposes of preventing money laundering, sanctions violations and protecting against fraud (to the extent that such legitimate interest is not overridden by individuals’ interests or fundamental rights and freedoms); or • We carry out the Processing for the protection of credit, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or • We may carry out the Processing when necessary to prevent fraud and individual’s safety in the identification and authentication process of registration in electronic systems; or • We have obtained individuals’ prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<p>Client on-boarding: on-boarding new clients; and compliance with our internal compliance requirements, policies and procedures.</p>	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with any contract that individuals may enter into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of on-boarding new clients (to the extent that such legitimate interest is not overridden by individuals’ interests or fundamental rights and freedoms); or • We carry out the Processing for the protection of credit, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or • We may carry out the Processing when necessary to prevent fraud and individual’s safety in the identification and authentication process of registration in electronic systems; or • We have obtained individuals’ prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Credit worthiness: conducting credit reference checks and other financial due diligence.

- The Processing is necessary for **compliance with a legal obligation**; or
- The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of conducting financial due diligence (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or
- We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Provision of products and services to individuals: administering relationships and related services; performance of tasks necessary for the provision of the requested services; communicating with individuals in relation to those services.

- The Processing is necessary for **compliance with a legal obligation**; or
- The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of providing products and services to individuals (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or
- We may carry out the Processing when **necessary to prevent fraud and individual's safety** in the identification and authentication process of registration in electronic systems; or
- We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Marketing / Prospecting: communicating with individuals via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to individuals in compliance with applicable law; and maintaining and updating individuals' contact information where appropriate.

- We have a **legitimate interest** in carrying out the Processing for the purpose of conducting marketing and prospecting (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Operation of our Websites: operation and management of our Websites; providing content to individuals; displaying advertising and other information to individuals; and communicating and interacting with individuals via our Websites.

- The processing is necessary for **compliance with a legal obligation**; or
- The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of operating our Websites (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or
- We may carry out the Processing when **necessary to prevent fraud and individual's safety** in the identification and authentication process of registration in electronic systems; or
- We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

IT operations: management of our communications systems; operation of IT security; and IT security audits.

- The Processing is necessary for **compliance with a legal obligation**; or
- The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
- We may carry out the Processing when **necessary to prevent fraud and individual's safety** in the identification and authentication process of registration in electronic systems; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of managing and operating our IT systems and ensuring the security of those systems (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms).

Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.

- The Processing is necessary for **compliance with a legal obligation**; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- The Processing is necessary to **protect the life or the physical safety** of any individual.

Financial management: sales; finance; corporate audit; and vendor management.

Research: conducting market or customer satisfaction research; and engaging with individuals for the purposes of obtaining individuals' views on our products and services.

Security: physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where individuals access our electronic systems).

- The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
 - We have a **legitimate interest** in carrying out the Processing for the purpose of managing and operating the financial affairs of our business (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
 - We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or
 - We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
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- We have a **legitimate interest** in carrying out the Processing for the purpose of conducting research and producing analysis (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
 - We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
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- The Processing is necessary for **compliance with a legal obligation**; or
 - We have a **legitimate interest** in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business, premises, and assets (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
 - We may carry out the Processing when **necessary to prevent fraud and individual's safety** in the identification and authentication process of registration in electronic systems.

Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.

- The Processing is necessary for **compliance with a legal obligation**; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations.
- The Processing is necessary to **protect the life or the physical safety** of any individual.

Legal compliance: compliance with our legal and regulatory obligations under applicable law.

- The Processing is necessary for **compliance with a legal obligation**.

Legal proceedings: establishing, exercising and defending legal rights.

- The Processing is necessary for **compliance with a legal obligation**; or
- The Processing is necessary **for the regular exercise of rights in court or in administrative or arbitration proceedings**; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations.

Improving our products and services:

identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services.

Risk Management: Audit, compliance, controls and other risk management.

- The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
 - We have **a legitimate interest** in carrying out the Processing for the purpose of improving our products or services (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
 - We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or
 - We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
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- The Processing is necessary for **compliance with a legal obligation**; or
 - The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
 - We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or
 - We have **a legitimate interest** in carrying out the Processing for the purpose of managing risks to which our business is exposed (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms).

Fraud prevention: Detecting, preventing and investigating fraud.

- The Processing is necessary for **compliance with a legal obligation**; or
- The Processing is **necessary in connection with any contract** that individuals may enter into with us, or to take steps prior to entering into a contract with us; or
- We carry out the Processing for the **protection of credit**, including situations prior to or after granting credit to individuals, as well as for credit limit assessment and management and collection activities, among other situations; or
- We may carry out the Processing when **necessary to prevent fraud and individual's safety** in the identification and authentication process of registration in electronic systems; or
- We have a **legitimate interest** in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by individuals' interests or fundamental rights and freedoms); or
- We have obtained individuals' **prior consent** to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

3. Disclosure of Personal Data to third parties

We may disclose your Personal Data to other entities within the J.P. Morgan group, for legitimate business purposes (including providing services to you and operating our Sites), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- you and, where appropriate, your family, your associates and your representatives, including other parties who hold roles in relation to the same account relationship;
- clients and customers of our businesses;
- credit reference agencies;
- anti-fraud services;
- governmental, legal, regulatory, or similar authorities or agencies, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, financial advisors, lawyers and other outside professional advisors to J.P. Morgan, subject to binding contractual obligations of confidentiality;
- debt-collection agencies;
- data aggregation services;
- accreditation bodies;
- third party Processors (such as payment services providers; shipping companies etc.), located anywhere in the world, subject to the requirements noted below in this Section 3;
- any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights in accordance with applicable law;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law;

- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation);
- the press and the media; and
- voluntary and charitable organizations.

You should be aware that once your data is shared with third parties they may also be under a legal or regulatory duty to share that information, in some cases by making that data public.

Our Sites may use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the third party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

4. International transfer of Personal Data

Because of the international nature of our business, we may need to transfer your Personal Data within the J.P. Morgan group, and to third parties as noted in Section 3 above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements, including data protection laws of a lower standard to those that apply in the country in which you are located.

Where we transfer your Personal Data to other countries, we will do so on the basis of:

- adequacy decisions;
- Binding Corporate Rules;
- suitable Standard Contractual Clauses; or
- other valid transfer mechanisms.

If you want to receive more information about the safeguards applied to international transfers of personal data, please use the contact details provided in Section 12 below.

5. Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Data that you send to us is sent securely.

6. Data Accuracy

We take reasonable steps designed to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

7. Data Minimization

We take reasonable steps designed to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

8. Data Retention

We take reasonable steps designed to ensure that your Personal Data is only processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- (1) we will retain copies of your Personal Data in a form that permits identification only for as long as:
 - a. we maintain an ongoing relationship with you (e.g., where you are a recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or
 - b. your Personal Data are necessary in connection with the lawful purposes set out in this Policy, for which we have a valid legal basis (e.g., where your Personal Data are included in a contract between us and your employer, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data),

plus:

- (2) the duration of:
 - a. any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant); and
 - b. an additional reasonable period of time following the end of such applicable limitation period (so that, if a person bring a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

and:

- (3) in addition, if any relevant legal claims are brought against us, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraphs (2)a and (2)b above, we will restrict our Processing of your Personal Data to storing , and maintaining the security of, the data, except to the extent that the data needs to be Processed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.

9. Your legal rights

Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Data, including:

- the right to know whether we Process your Personal Data;
- the right to request access to, or copies of, your Personal Data that we Process or control, together with information regarding the nature, processing and disclosure of that Personal Data;
- the right to request rectification of any inaccuracies in your Personal Data that we Process or control;
- the right to request, on legitimate grounds:
 - erasure of your Personal Data that we Process or control; or

- restriction of Processing of your Personal Data that we Process or control;
- the right to request anonymization, blocking or elimination of Personal data that is unnecessary, excessive, or processed non-compliant with the provisions of the applicable law;
- the right to have your Personal Data that we Process or control transferred to another Controller, to the extent applicable;
- where we Process your Personal Data on the basis of your consent, the right to withdraw that consent or to request elimination of Personal Data, except if we have legitimate grounds to keep such Personal Data;
- the right to know the public and private entities with which we have shared your Personal Data;
- the right to know that you can deny consent, and the consequences of such denial; and
- the right to lodge complaints with the Data Protection Authority regarding the Processing of your Personal Data by us or on our behalf.

This does not affect any other rights that you may have under an agreement or applicable law.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section 12 below.

10. Cookies

A cookie is a small file that is placed on your device when you visit a website (including our Sites). It records information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through cookie technology, in accordance with our [Cookie Policy](#), or any applicable policy that we make available to you.

11. Marketing

We may Process your Personal Data to contact you, primarily by mail and email and also on occasion by telephone, so that we can provide you with information concerning products and services that may be of interest, provided that we have first obtained your consent, to the extent required by, and in accordance with, applicable law.

If you do not wish to receive marketing communications from us you can opt out at any time by contacting your regular J.P. Morgan contact, or by electronically unsubscribing from emails we have sent to you. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested.

12. Contact details

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by J.P. Morgan, please contact your regular J.P. Morgan client service contact, or:

Corporate & Investment Bank / Commercial Banking

Data.Privacy@jpmorgan.com

Asset Management

Latam.am.data.privacy.control@jpmorgan.com

You may also contact J.P. Morgan's Data Protection Officer for Brazil: Camila Ribeiro, at Brasil.DPO@jpmchase.com or via post at Avenida Brigadeiro Faria Lima 3729, Floor 10, Sao Paulo, BR-SP, 04538--905, Brazil

13. Controllers

For the purposes of this Policy, the relevant controllers are:

Controller entity	Contact Details
Banco J.P. Morgan S.A. J.P. Morgan Corretora de Câmbio e Valores Mobiliários S.A. J.P. Morgan S.A. - Distribuidora de Títulos e Valores Mobiliários JPMorgan Chase Bank, National Association (Brazilian branch) J.P. Morgan Administradora de Carteiras Ltda.	Av. Brigadeiro Faria Lima, 3729, Sao Paulo, BR-SP, 04538--905, Brazil

The above list shall also include any other present or future entity of the JPMorgan Chase & Co. group in Brazil.

14. Defined terms

Controller	The entity that decides how and why Personal Data is Processed. The Controller has primary responsibility for complying with the Brazilian Data Protection Law.
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Data Protection Authority	The public authority that is responsible for protecting, supervising and enforcing compliance with the Brazilian Data Protection Law.
Personal Data	Information relating to an identified or identifiable individual
Process or Processed or Processing	Anything that is done with any Personal Data, whether or not by automated means, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or information control, modification, communication, transfer, dissemination, or extraction.
Personnel	Any current, former and prospective directors, executive officers, consultants, employees, temporary staff, individual contractors, interns, secondees and other personnel.
Processor	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
Sensitive Personal Data	Personal Data on racial or ethnic origin, religious belief, political position, membership in a trade union or affiliation to religious, philosophical, or political organization, data concerning health or sexual life, genetic or biometric data, when linked with an individual under the Brazilian Data Protection Law.