



## **Privacy Notice and Data Confidentiality**

At WTN Pay, we conceive the protection of personal data as an opportunity to create value for users. By making responsible use of personal data, we not only protect the privacy of those who entrusted their data to us, but also allow them to operate safely and confidently in our ecosystem.

Therefore, your privacy is very important to us and we strive to protect it.

In order to be able to provide you with its services, WTN Pay processes, collects and in some cases discloses information about people who, like you, are users and visitors of the websites and/or mobile apps listed here (the "Platforms" and the "Services", respectively).

This Privacy Notice and Data Confidentiality of WTN Pay (the "Privacy Notice") specifies what data WTN Pay Libre collects from you, how this data is processed and what WTN Pay can do with this data.

This Privacy Notice is an integral part of the General Terms and Conditions of WTN Pay.

Giving your express, voluntary informed consent to this Privacy Notice is an essential requirement for you to be able to contract and/or enter into any type of relationship with WTN Pay, depending on the applicable legislation in each country.

### **How is WTN Pay integrated and how does this Privacy Notice apply?**

WTN Pay goal is to democratize commerce, money, payments, shipping, and credit. In order to do so, it has generated an ecosystem of integrated services through its platforms: **APP WTN Pay, WTN Pay Marketplace**, All these platforms make up a whole and their interfunctionality is both necessary and indispensable for the provision of the services that WTN Pay provides you with.

For this reason, it is important that you bear in mind that when you register on any of these platforms, you are generating a user that will enable you to operate on all the others. For this to happen, we need your data to be shared with every WTN Pay company that comprises the platforms. In section 5. "How do we share Personal Data?" you can find more information regarding the latter.

This Privacy Notice applies to all services and data processing operations of WTN Pay, whether it is WTN Pay, its subsidiaries or affiliates.

We should point out that the services provided by WTN Pay and each of its platforms are intended for users located in those countries where WTN Pay has presence or business operations, for example, through a specific Website for a certain country.

### **2. Who is the controller of Personal Data?**

The controller makes the data processing decisions.

The controller determines which purposes and uses will be given to personal data and which means will be used for the processing of this data.

WTN Pay is the controller of the data collected from users and visitors to its Platforms through its subsidiaries or affiliates.

To find out which company(ies) is/are the controller/s in your country of residence, please consult the Annex corresponding to that country.

### 3. What kind of data do we collect and process?

WTN Pay collects your personal data so that you can enjoy our services and be able to improve them continuously. In some cases, you provide this data yourself, by registering or by providing information when you use any of our services. In other cases, we collect them automatically, like when you browse our pages and use our services. We may also collect data about you from other reliable sources.

We want you to know that you do not have the obligation to provide us with the personal data shown below. However, it is an essential requirement for you to be able to contract and/or have any type of relationship with WTN Pay and, if you do not provide us with this information, we will be unable to provide you with our services or our ability to do so may be significantly impeded.

Providing inaccurate or false personal data may result in the suspension of the Services we provide you with. Likewise, WTN Pay may have to suspend or permanently disable those users who violate this Privacy Notice.

These are the types of data we collect:

Data you provide directly when registering or using our services:

- Mobile number
- Full name
- E-mail address
- Country of residence
- Country currency
- Information on intellectual property rights, ownership of members of the Brand Protection Program (BPP) and information on their activity as claimants.

Information that we collect automatically, whether you are registered or not:

Information from the devices or computers you use to access the WTN Pay platform and other automatically captured data (such as the type or version of the browser you are using, the operating system, settings and parameters).

- IP address that you use when connecting to our services or when browsing our websites.
- Transactional information and movements within WTN Pay platforms (purchases, payments, returns, questions, withdrawals, transfers, pre-paid card movements, credits taken, money advances, claims, billing, tax data, password or access code to your digital account (CVU, CLABE, etc.), bank accounts, internal messaging).

- Certain information about users' and visitors' activity within our website and apps. Such information may include the URL they are coming from (whether they are on our website or not), which URLs they access next (whether they are on our website or not). Also the web pages visited, interactions with said pages, searches carried out, postings, purchases or sales, ratings and replies entered, claims made and received, messages in forums, among others, may be stored and retained.
- Information about your location (geolocation), which can be used to offer you discounts, product recalls, locate shops with QR-enabled payment service, among others.
- Contact lists of mobile devices used by users, to provide different services, such as sending money between accounts.
- Links between accounts and users, due to fraud prevention actions.
- Data for claims and trials management (data for the preparation of documents, background information and strategies).
- If you did not register or access through your Personal Account, WTN Pay will only collect and store, in addition to the information indicated so far, your cell phone numbers, your email address and emails sent.

Information that we collect from other sources:

- Data collected for fraud prevention purposes and compliance with information regimes (PEP and OFAC lists, etc.).
- Credit data that we obtain from credit risk bases and/or public databases, in accordance with the applicable legislation.
- Data that is used for identity validation, obtained from safe and reliable sources, such as public bodies, service providers or business partners we work with.

#### 4. What do we do with Personal Data?

The collection and processing of your Personal Data allows us to provide you with an excellent service so that you can carry out operations quickly and safely and offer you functionalities that best adapt to your needs.

Except in those cases where the applicable regulations prohibit it, WTN Pay may use your Personal Data for the following purposes:

Provide the products, services and/or benefits offered by **APP WTN Pay, WTN Pay Marketplace**, etc.

- Identify and contact you.
- Register you in our systems.
- Verify your identity in compliance with legal requirements.
- Provide you with the products, services and/or benefits that you request or contract with us.
- Enable you to contact the seller or buyer directly for the purposes of the transaction you wish to carry out.
- Prepare and keep a record of the operations you carry out, inform you about them and follow up on them accordingly.
- Put our electronic commerce platform and our online payment system known as WTN Pay at your disposal.

- Manage the services and products provided by WTN Pay, including the payment processing service and the digital account.
- Give you the support of investment solutions for money in your account.
- Address your comments, complaints and suggestions, as well as provide you with support.
- Prepare profiles for credit analysis purposes.
- Offer and manage the credit products that you request or contract with us.
- Judicial and/or extra-judicial debt collection.
- Facilitate the shipment of products advertised on websites, applications and other electronic commerce platforms operated by WTN Pay, or those that use its technologies.
- Offer you services and functionalities that best suit your needs, and customize our services to make your experience with WTN Pay as comfortable as possible.
- Allow you to participate in contests, auctions or raffles, if they are carried out and they are applicable to you, as well as notify you if you are the winner, always in compliance with the regulations applicable to raffles and competitions.
- Contribute to the security of relationships, communications and transactions between users of our platform.
- Develop a user reputation system, for the benefit of consumers.

Improve our services, develop new ones and offer you a better experience with WTN Pay platforms.

- Develop internal studies on your interests and behaviors, to offer you better services and products, as well as carry out statistical studies.
- Prepare profiles by analyzing various variables, such as behavior or interactions within the platform, analysis and prediction of economic capacity, preferences, interests, transaction history, behavior and location, among others, to improve our commercial and promotional initiatives, show advertising or promotions, banners of interest, news about WTN Pay platforms, perfect our offer of contents and articles, personalize said contents, presentation and services.
- Offer you services and functionalities that best suit your needs, and customize our services to make your experience with WTN Pay as comfortable as possible.
- Improve our commercial and promotional initiatives and analyze the visited pages, the searches carried out by users, to improve our offer of contents and articles, personalize said contents, their presentation and services.
- Train independent consultants to improve their service proposal to users of WTN Pay.
- Provide you with information through different channels (by email, short text messages or SMS, push messages, phone calls or any other) about improvements, new functions or services provided by the platform.
- Foster your fidelity through a benefits program.  
Allow third parties, by making use of public APIs, to build applications that use contents from the platform and interact with it to facilitate, improve and/or enhance its use and functionalities and the services generally provided by WTN Pay.

Comply with legal obligations and requirements from competent authorities.

- Comply with the regulations that are applicable to WTN Pay in general.

- Compliance with regulations on Prevention of Money Laundering and Terrorist Financing (KYC Actions), identity verification against Politically Exposed Persons (PEP), profile and transactional history verification in compliance with the applicable regulation on the prevention of money laundering, verification against OFAC lists and others), as applicable in each country.
- Compliance with information regimes in general, as applicable in each country.
- Compliance with tax regimes of collection, registration, information, auditing and billing, at any level of government (e.g. federal, state and municipal level).
- Compliance with information requirements of competent administrative or judicial authorities.
- Provide user information to government entities with collaboration agreements for the fulfillment of their powers.

Detect and prevent fraud, abuse and related crimes to protect the safety of our users and the sustainability of the platforms.

- Make the platforms grow in a sustainable and secure way by using tools and actions against the commission of fraud and related crimes.
- Train the automated fraud detection and prevention algorithm model.

Protect the rights of users, third parties or WTN Pay.

- Defend the rights, tangible and intangible assets of WTN Pay.
- Enforce the rights of WTN Pay in case of breaches of its TYCs.
- Allow other users or third parties to assert their rights.

Collaborate with the owners of intellectual property in the exercise of their rights.

- Collaborate with the protection of intellectual or industrial property rights, either its own or of third parties, trademark and patent infringement investigations, as well as counterfeiting.
- Share with the members of the Brand Protection Program the personal information of those sellers reported through the program so that they can exercise their rights outside the platform.
- Facilitate the resolution of disputes between sellers and the members of the Brand Protection Program who reported them.
- Collaborate with the entities that intervene in the resolution of disputes.
- Collaborate with private entities representing collective interests with a collaboration agreement to facilitate the resolution of disputes.

Make advertisements and advertising and promotional contacts.

- Contact you through different channels (by email, short text messages (SMS), push messages, phone calls or other means) for advertising and/or promotional purposes of products and services of WTN Pay and/or third parties.
- Carry out all kinds of activities connected to marketing, advertising, commercial prospecting and/or marketing studies.

**Some of the purposes described may not be applicable provided that: a) you do not use the service associated with said purposes, or b) the services linked to those purposes are not offered in your country of residence.**

**The use of your data for any other purpose that is not compatible with those detailed above, will be communicated to you before we proceed to its processing.**

**WTN Pay will keep your Personal Data for as long as necessary to fulfill the purposes for which it was collected.**

## **5. "How do we share Personal Data?"**

Protecting your privacy is very important for WTN Pay.

For this reason, we do not sell or commercialize data that may identify our users.

We neither share nor transfer your Personal Data to third parties in any other way, except as indicated below:

WTN Pay may assign, transmit and/or transfer your Personal Data to:

(i) "Service Providers": Service providers or outsourcing companies are third parties that we contract to act on behalf of WTN Pay to provide a service following our instructions and in accordance with the provisions of this Privacy Notice, to contribute to improve or facilitate operations through our platform, such as: (a) transport, logistics, parcel and courier companies, to deliver the products you purchased, (b) means of payment, intermediaries in the payment or insurance management, to obtain payment for the services or products contracted, as well as to provide you with protection with respect to the products purchased, (c) computer systems providers, cloud service providers, database providers, IT service providers in general, (d) call centers or customer service centers, (e) companies that manage fidelity or loyalty programs, to grant you benefits, (f) advertising or marketing companies, (g) data analysis, (h) collection agencies, (i) government entities or companies specialized in risk management, in order to verify your information.

These Service Providers only access the data that is strictly necessary to provide with the agreed upon services and cannot use them for purposes other than those entrusted to them by WTN Pay.

(ii) "Commercial allies": Companies with financial or commercial activities with which WTN Pay has a collaborative or an alliance relationship, in order to offer you promotions, products and services of said companies or co-branding. In these cases, WTN Pay always ensures that confidentiality and security standards are met, by signing agreements or conventions whose purpose is the privacy of our users' personal data and compliance with the applicable legislation.

(iii) "WTN Pay Group": Companies that belong to our corporate group, which operate under the same internal processes and policies, whether they are companies that are controlled, controlling or affiliated with WTN Pay, to comply with our internal regulations, prevent fraud, manage risk and facilitate the management of the products and services of WTN Pay.

(iv) "Counterparty to the transaction": Other users of WTN Pay platforms, under the conditions provided, with the purpose to put you in contact with the seller or buyer for the sake of the transaction you wish to carry out.

(v) "Public authorities": The administrative and judicial authorities that, in the exercise of their competence require data, even if there is no order or executive or judicial summon to that effect, with the purposes of: (a) collaborating in the investigation and reporting fraud, piracy, violations of intellectual or industrial property or any other illegal act, as well as any activity or circumstance that could generate legal responsibility to WTN Pay and/or its users; (b) safeguarding a public interest, the procurement or administration of justice, the acknowledgement, exercise or defense of a right in a judicial or administrative process, and/or the resolution of disputes; and (c) complying with any applicable law, regulation or legal provision, or with a duly founded and motivated mandate from the competent authority.

- (vi) "Members of the Brand Protection Program": Participants in the Brand Protection Program (Brand Protection Program, formerly the Intellectual Property Protection Program) of WTN Pay, in order to defend the industrial property rights that are commercialized through WTN Pay.
  - (vii) "Interveners in Disputes": Authorities, amicable compounders, courts or entities that intervene in the resolution of disputes in order to resolve disputes that may arise between users or between these and any of the companies of WTN Pay Group.
  - (viii) "Developers": Within the framework and conditions of WTN Pay Developers Program.
  - (ix) "Users and/or visitors in general": Other users and/or visitors of our platform, with the aim of end user quality service, providing information so that they can make an informed purchase decision.
- The number of sales made by the seller will be published on the platform, as well as seller reputation, customer service, buyers reviews (the content of which is not the responsibility of WTN Pay) and timely delivery of products. Likewise, WTN Pay may disclose your Personal Information at its discretion to other users of the Websites and / or the Services, entities or third parties when there are sufficient reasons to consider that your activity is suspected of trying or committing a crime or trying to harm other people.

If WTN Pay decides to share your Personal Data with third parties other than those mentioned, we will request your prior and express consent, as long as there is no authorization or legal obligation that allows it to be done without that consent. Likewise, you give your express and informed consent for WTN Pay to assign, transmit or transfer your Personal Information to the recipients detailed in this Privacy Notice. Finally, WTN Pay will not be liable for the improper use of your Personal Data by any third party when this third party is the direct collector/processor of your Personal Data.

## 6. International Data Transfers

The services provided by WTN Pay require the support of a technology infrastructure, such as servers and cloud services, which can be owned or provided by third parties.

Part of that infrastructure may be established in a country different from yours.

It is also possible that the data recipients indicated above in the section "How do we share Personal Data?" are in a different country.

The countries receiving the data we transfer may not offer adequate levels of personal data protection, in accordance with applicable laws.

In these cases, WTN Pay adopts measures to protect your data, through contractual clauses or binding corporate rules that impose the same protection measures as those described in this

### Privacy Notice.

## 7. How long are we going to store your Personal Data?

We will only store personal data for no longer than is necessary to fulfill the purpose for which it was collected, to comply with regulatory or legal requirements, or during the statutory limitation period of possible legal or contractual liabilities.

Once the period has ended, the data will be deleted or anonymized in such a way that no person can be individualized, as allowed by the regulations in each country.

## **8. Automated decisions and profiling**

At WTN Pay we are committed to providing you with more and better services that simplify your life. For this we resort to tools that help us to improve efficiency through techniques known as "artificial intelligence", "machine learning" or "Big Data" that we use for various purposes, such as fraud prevention, analysis and prediction of economic capacity, personalization services and advertising, automated Cybersecurity mechanisms or identity validation through image recognition.

Automated decisions are those made based on the use of algorithms and computer programs, without any human being involved in the decision-making process.

For its part, profiling is the evaluation of some personal aspects, such as your interests, preferences, behaviors or location, which is carried out by automatically processing personal data with statistical procedures.

As a consequence of this process, we may send you personalized communications, or show them to you within our platforms, when we believe they may be of your interest.

You have the right to request that a decision based on automated data processing be reviewed.

## **9. Confidentiality of Personal Data and Responsibility of Users**

We will do everything in our power to protect the privacy of your Personal Data. The user will be liable for all acts that take place through the use of their nickname and password. If, for any reason, you believe that someone may know your password, you must modify it by entering in My Account > Settings > My details.

## **10. Minors**

WTN Pay Services are only available to those who have the legal capacity to contract them in accordance with applicable laws. Therefore, if you do not meet this condition, you should not supply your Personal Data.

## **11. The use of Personal Data by other Users**

WTN Pay allows users limited access to certain data (such as name, nickname, email, other contact information and billing and shipping information) from the rest of the users to facilitate interaction between them.

Under no circumstances may other users communicate your Personal Data to third parties without your consent and/or the consent of WTN Pay, as appropriate.

When selling users receive personal data from their buyers, they become the controllers of this data and acquire the obligations that this implies.

For this reason, they cannot use the data collected for a purpose other than or incompatible with the one that originated the data collection: completing a transaction on WTN Pay platform.

For this reason, they may only use the Personal Data of other users obtained on the site for:

- (a) purposes related to transactions on the WTN Pay platform,
- (b) using services offered in WTN Pay (for example: deposit, insurance, shipping or logistics and fraud claims), and

(c) any other purpose to which the corresponding user expressly consents once the legally required information has been previously communicated.

WTN Pay does not accept behaviors considered to be "spamming".  
Sending indiscriminate messages of any nature is absolutely prohibited among WTN Pay users.

WTN Pay does not control, store or have access to the messages and content sent by users through means other than the Websites, so it does not assume any liability for any damages that its use may cause.  
Negotiations carried out by users through these means are the sole responsibility of said users.  
WTN Pay is not liable for the use that any user or other person may make of the data published on the Websites.  
Users accept that WTN Pay will not be liable for the loss and damage that may be caused as a result of negotiations between users.  
Consequently, you release WTN Pay from any form of liability in the event that conflict arises with one or more users.

## **12. Links to Other Websites**

Through its Websites, WTN Pay may include links to third-party Websites, which does not indicate that they are owned or operated by WTN Pay.  
The processing of Personal Data made by third parties controlling the aforementioned Websites is not covered by this Privacy Notice.  
Likewise, you acknowledge and accept that WTN Pay has no control over such websites and is not and will not be liable for the content or services provided by such sites, or for the way in which they process your Personal Data, which is why when you access such websites you do it at your own risk.

## **13. How can you exercise your rights to control your Personal Data?**

The applicable regulations give you certain rights over your Personal Data, such as: (i) access; (ii) update; (iii) rectification; (iv) the cessation of unwanted advertisements, offers and promotions; (v) erasure; (vi) withdrawal of consent; and (vii) confidentiality.  
You can make any query, claim and/or request regarding your Personal Data by contacting WTN Pay through this form; or through the contact details provided in the annexes for each country listed below.  
In certain cases, we will keep in our records the Personal Data that you have asked us to delete, to fulfill the purposes described in this Privacy Notice or when there is a contractual or legal duty to maintain your Personal Data. Once this purpose has been fulfilled or contractual or legal duty have been eliminated, we will proceed to delete your Personal Data.

## **14. Advertising, Cookies and Other Technologies**

The user expressly acknowledges and accepts that WTN Pay may use a behavior monitoring system through the use of "cookies", "web beacons", and/or other similar tracking technologies.  
These technologies are used in order to know the interests and behavior of those who visit or are users of our website and, in this way, give them a better service or provide related information.  
We also use the data obtained through cookies to analyze the pages browsed by the visitor or user, the searches carried out, improve our commercial and promotional initiatives, show advertising or promotions, banners of

interest, news about WTN Pay, perfect our content offer and articles, personalize said contents, presentation and services, as well as promote and enforce the rules and security of the site.

We also use them so that the user does not have to enter their password so frequently during a browsing session, also to account for and corroborate the registrations, user activity and other concepts for commercial agreements, always aiming at the installation of the Cookies, the benefit of the user who receives it, and which shall not be used for purposes other than WTN Pay.

Likewise, we store cookies in order to offer a more interactive experience on the site, based on the user actions. Your personal data obtained through these technologies will not be transferred to third parties in a different way than those described in this Privacy Notice.

Additionally, "cookies" or other similar systems installed by third parties may be found on certain pages of our Websites or used by advertisers outside WTN Pay.

These Privacy Policies cover the use of "cookies" by WTN Pay and do not include the use of "cookies" installed by third parties.

You must know that the installation, permanence and existence of cookies on your computer or device depend on your exclusive will and can be removed when you wish.

To know how to remove Cookies from the system it is necessary to check the Help section on the browser.

In this respect, you can at any time delete the stored cookies, configure the browser for it to request your approval before storing cookies or directly prevent cookies from being stored.

This procedure is performed differently from browser to browser and it will be necessary for you to do it for each browser that you use.

We are pleased to offer you information on how to set your preferences for the most used web browsers, as follows:

From Internet Explorer (on Windows)

<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Microsoft Edge

<https://support.microsoft.com/en-us/help/4027947/microsoft-edge-delete-cookies>

Firefox

<https://support.mozilla.org/en-US/kb/disable-third-party-cookies>

Google Chrome

<https://support.google.com/chrome/answer/95647?hl=en>

Opera

<https://help.opera.com/en/latest/web-preferences/#cookies>

Safari (on Mac)

<https://www.apple.com/legal/privacy/en-ww/cookies/>

If you disable cookies, you should bear in mind that you may not be able to use and enjoy all the functionalities offered by WTN Pay.

## 15. Security. Storage of Personal Data

WTN Pay complies with the regulations and industry standards regarding security measures applicable to your Personal Data.

WTN Pay is not liable for illegal interceptions or violation of its systems or databases, or for its use by unauthorized persons.

WTN Pay is not liable for the improper use of the data obtained by these means.

## 16. Changes to the Privacy Notice

If WTN Pay makes changes to the way Personal Data is managed, we will notify users through our regular channels, such as email or messages through applications.

In the terms allowed by each country's specific regulations, in the case of users who do not accept these new terms, the contractual bond with WTN Pay will be dissolved and the Personal Data of said user will not be used in any other way than what was reported at the time of collection.

## 17. Governing Law and Jurisdiction

The Privacy Notice will be governed by the applicable laws as detailed in the annexes of each country included below.

In the event of any controversy or divergence related to the interpretation, validity, implementing or compliance of this Privacy Notice, it will be resolved by the competent courts indicated in the annexes for each country included below.

The provisions of this annex are exclusively applicable to users and visitors residing in the Federative Republic of Brazil or any other situation in which Brazilian laws may apply.

In case of contradiction between the body text of the Privacy Policies and this annex, the provisions of this annex shall apply to users and visitors domiciled in the Federative Republic of Brazil.

The collection of your Personal Data is based not only on your express consent, but also on: (i) compliance with legal or regulatory obligations of WTN Pay; (ii) the regular exercise of rights in judicial, administrative or arbitration proceedings; (iii) the execution of the commercial and contractual relationship between WTN Pay and the users; (iv) the legitimate interests of WTN Pay or third party; and (v) credit protection.

By visiting the Platforms and using the Services if you are 18 years of age or older, you accept the collection, use, transmission, production, reception, classification, access, reproduction, distribution, handling, archiving, storage, erasure, evaluation, and/or control, modification, communication, transfer, dissemination, extraction or any processing activity ("Processing") of your personal data and information as described in this Privacy Notice

## 18. Who is the controller of Personal Data?

In the Federative Republic of Brazil, the Services of WTN Pay are provided by WTN Pay Administradora de Meios de Pagamentos e Benefícios Ltda., registered with the CNPJ/MF under No. CNPJ/MF: 08.097.783/0001-85, both domiciled in Cláudio Soares 72, Pinheiros, São Paulo /SP, Brazil is the controller of the personal data that we collect from you.

## 19. Automated decisions and profiling

Without prejudice to the provisions of clause 16 of the Privacy Notice, you can also exercise your right of access at all times, in order to know the Personal Data that was used as part of the corresponding decision-making and, if applicable, the right to rectification, when you consider that any of the personal data used is inaccurate or incomplete.

## 20. How can you exercise your rights to control your Personal Data?

The applicable regulations give you the following rights over your Personal Data: (i) confirmation of the existence of data processing (ii) access; (iii) correction of incomplete, inaccurate or outdated Personal Data; (iv) anonymization, blocking or erasure of Personal Information that is unnecessary, excessive or processed in breach of applicable legislation; (v) portability of Personal Data; (vi) erasure of Personal Data when it is no longer necessary for the purposes for which it was collected, except in the case of necessary conservation for: (a) the fulfillment of a legal or regulatory obligation; (b) transfer to a third party for any other reason authorized by law or any regulation other than law or regulation that regulates the protection of personal data in Brazil, including the Brazilian Law on Protection of Personal Data - LGPD (Law No. 13,709/18); or (c) exclusive use of the controller anonymously; (vii) information on the public and private entities with which WTN Pay has shared your Personal Data; (viii) information about the possibility of not giving consent and about the consequences of their refusal; (ix) withdrawal of consent; (x) make a claim before the National Authority for the Protection of Personal Data related to the processing of your Personal Data; and (xi) oppose to the processing of your Personal Information due to non-compliance with applicable law.

Without prejudice to the provisions of the Privacy Notice, you may also make inquiries and/or exercise the rights of access, to rectification and erasure of your Personal Data by postal mail to Cláudio Soares 72, Pinheiros, São Paulo /SP, Brazil, Att. WTN Pay Administradora de Meios de Pagamentos e Benefícios Ltda.

## 21. Governing Law and Jurisdiction

The Privacy Policies will be governed by the laws of the Federative Republic of Brazil. In the event of any dispute or divergence related to the interpretation, validity, implementing or compliance thereof, you and WTN Pay declare that you fall under the exclusive jurisdiction of the competent Court of the City of São Paulo-SP, expressly refusing any other jurisdiction and/or jurisdiction that may correspond to you, unless you are included within the legal concept of consumer, in which case you can make claims before the competent Court of your domicile.

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## ANNEX NORTH AMERICA

The provisions of this annex are exclusively applicable to users and visitors domiciled in those countries that do not have a specific annex in this Privacy Notice.

### 2. Who is the controller of Personal Data?

The controller of the personal data that we collect from you is:

**In United States:** WTN Pay United States, 5800 S Eastern Ave, Commerce, CA 90040, [usa@wtnpay.com](mailto:usa@wtnpay.com)

**In México:** WTN Pay México, Av. Baja California 255, Colonia Condesa, CDMX, 06170 [mexico@wtnpay.com](mailto:mexico@wtnpay.com)

## ANNEX LATIN AMERICA

The provisions of this annex are exclusively applicable to users and visitors domiciled in those countries that do not have a specific annex in this Privacy Notice.

### 2. Who is the controller of Personal Data?

The controller of the personal data that we collect from you is:

**In Argentina:** WTN Pay Argentina, Sarmiento 640, CABA, C1041AAN [argentina@wtnpay.com](mailto:argentina@wtnpay.com)

**In Bolivia:** WTN Pay Bolivia Cuarto Anillo, Equipetrol, Manzana 40, Torre 2, SCS [bolivia@wtnpay.com](mailto:bolivia@wtnpay.com)

**In Chile:** WTN Pay Chile Avenida Del Valle Sur 577, Ciudad Empresarial, Santiago [chile@wtnpay.com](mailto:chile@wtnpay.com)

**In Colombia:** WTN Pay Colombia CR16#97-94, Bogotá [colombia@wtnpay.com](mailto:colombia@wtnpay.com)

**In Costa Rica:** WTN Pay Costa Rica Edificio Alvmor, Barrio Dent, San José [costarica@wtnpay.com](mailto:costarica@wtnpay.com)

**In Ecuador:** WTN Pay Ecuador, Av. Amazonas N39-61 y Pereira, Quito, DP 170514 [ecuador@wtnpay.com](mailto:ecuador@wtnpay.com)

**In El Salvador:** WTN Pay El Salvador, La Reforma 209, Colonia San Benito, San Salvador, [elsalvador@wtnpay.com](mailto:elsalvador@wtnpay.com)

**In Honduras:** WTN Pay Honduras, Bv. Morazán, Centro Morazán, Torre I, Tegucigalpa [honduras@wtnpay.com](mailto:honduras@wtnpay.com)

**In Panamá:** WTN Pay Panamá, Blvd Costa del Este, PH Financial Park Tower, Panamá City [panama@wtnpay.com](mailto:panama@wtnpay.com)

**In Paraguay:** WTN Pay Paraguay, Av. Francisco Solano Lopez 3794, Asunción, 001207 [paraguay@wtnpay.com](mailto:paraguay@wtnpay.com)

**In Perú:** WTN Pay Perú, Germán Schreiber 276, San Isidro, Lima, 15047 [peru@wtnpay.com](mailto:peru@wtnpay.com)

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**In Uruguay:** WTN Pay Uruguay Pje. Paseo de las Carretas 2580, Montevideo [uruguay@wtnpay.com](mailto:uruguay@wtnpay.com)

## ANNEX UNIÓN EUROPEA

The provisions of this annex are exclusively applicable to users and visitors domiciled in those countries that do not have a specific annex in this Privacy Notice.

### 2. Who is the controller of Personal Data?

The controller of the personal data that we collect from you is:

**In Portugal:** WTN Pay UE Rua Entre Freguesias, 2 R/c, Serra, Freguesia de Serra e Junceira, Concelho de Tomar, [portugal@wtnpay.com](mailto:portugal@wtnpay.com)

## **ANNEX AFRICA**

The provisions of this annex are exclusively applicable to users and visitors domiciled in those countries that do not have a specific annex in this Privacy Notice.

### **2. Who is the controller of Personal Data?**

The controller of the personal data that we collect from you is:

**In Angola:** WTN Pay Angola, Rua N'dunduma 33/43, Miramar, Luanda, Angola, [angola@wtnpay.com](mailto:angola@wtnpay.com)

**In Cabo Verde:** WTN Pay Cabo Verde, Rua Infante D. Henrique, Ed. Império, Palmarejo, Praia, [caboverde@wtnpay.com](mailto:caboverde@wtnpay.com)

**In Mozambique:** WTN Pay Mozambique, Av. Paulo Samuel Kankhomba 1063, Bairro Central, Maputo [mozambique@wtnpay.com](mailto:mozambique@wtnpay.com)

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