WZ Governance

Governance and compliance to operate in Brazil

Confidentiality and Information Security Policy

WZ Investimentos Ltda, trading as WZ Governance · CNPJ 45.178.990/0001-90

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Confidentiality and Information Security Policy

WZ Governance clients share strategic, financial, corporate and regulatory information so that the work can be done. Protecting this information is a condition for providing the service.

This policy defines how WZ Investimentos Ltda, trading as WZ Governance, classifies, uses, stores, shares and disposes of the information under its responsibility, and the security measures adopted in its systems and devices.

1 Purpose

To establish the rules that ensure the confidentiality, integrity and availability of the information of WZ Governance and its clients.

2 Scope

This policy applies to the partners, employees, contractors and partners of WZ Governance, to all information under its responsibility, in any format, and to the systems, accounts and devices used for work, including personal ones when used for that purpose.

3 References

- Brazilian Law 13,709/2018, the General Personal Data Protection Law (LGPD);
- Brazilian Law 12,965/2014, the Brazilian Civil Rights Framework for the Internet;
- ABNT NBR ISO/IEC 27001, as a reference for good practice;
- The WZ Governance Privacy and Data Protection Policy (POL 001) and Code of Ethics and Conduct (POL 002).

4 Information classification

CLASS	EXAMPLES AND RULE OF USE
Public	Website, publications, newsletter and institutional materials. May be freely disclosed.
Internal	WZ Governance procedures, templates and controls. Use restricted to partners, employees and contractors.
Confidential	Client information, proposals, contracts, corporate documents, financial and personal data. Access only for those working on the engagement.
Restricted	Passwords, access keys, powers of attorney and inside information on relevant transactions. Individual access, logged and for the shortest time necessary.

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5 Guidelines

5.1 Confidentiality

- Client information is used only for the engagement and is not disclosed without written authorization, including after the end of the contract;
- Employees, contractors and partners sign a confidentiality agreement before having access to confidential information;
- Client names and engagement details are not mentioned in promotional materials without written authorization;
- Inside information on client transactions may not be used to trade securities, directly or indirectly.

5.2 Access and accounts

- Each person uses their own account, with a strong password and two-factor authentication on corporate email and on systems that offer it;
- Access is granted only to those who need the information for their work and revoked at the end of the engagement or relationship;
- Passwords are not shared or written down in unprotected places; when needed, they are kept in a password manager.

5.3 Devices

- Computers and phones used for work have password lock, disk encryption enabled, an up-to-date system and malware protection;
- Loss or theft of a device is reported immediately so that accounts can be blocked remotely;
- Confidential information is not stored on removable devices without encryption.

5.4 Storage and sharing

- Documents are stored in the corporate cloud services of WZ Governance, with controlled access;
- Confidential information is shared by link with access restricted to authorized people, rather than as an open attachment, whenever possible;
- The use of artificial intelligence tools with client information follows the confidentiality rules of this policy and only takes place on services that do not use the data submitted to train their models.

5.5 Technology suppliers

WZ Governance engages technology services with recognized security standards and assesses, before engagement, where the data is stored and what guarantees the supplier offers.

5.6 Retention and disposal

Information is kept for the periods set out in contracts, in legislation and in the Privacy and Data Protection Policy (POL 001). At the end of these periods it is securely deleted, and physical documents are destroyed.

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5.7 Security incidents

Any suspicion of unauthorized access, leakage, data loss or account intrusion is reported immediately to the managing partner, who coordinates containment, assesses the impact and, where applicable, notifies the affected clients, the data subjects and the Brazilian National Data Protection Authority (ANPD), within the regulatory deadlines.

6 Responsibilities

RESPONSIBLE	DUTIES
Managing partner	Approve this policy, grant and revoke access, periodically review accounts and permissions and coordinate incident response.
Employees	Comply with this policy, protect the information and devices under their responsibility and immediately report any incident or suspicion.
Contractors and partners	Keep confidential the information received, use it only for the engagement and report any incident without delay.

7 Reporting channel

Questions and incident reports must be sent to the channel below.

- **Channel:** office@wzgovernance.com
- **Address:** Av. Paulista, 1636, 15th floor, Suite 4, Bela Vista, São Paulo/SP, Brazil, CEP 01310-200

8 Consequences of non-compliance

Non-compliance with this policy may lead to a warning, termination of the employment or contract and appropriate legal measures, including compensation for damage caused to WZ Governance or its clients.

9 Review

This policy is reviewed annually or whenever there is a change in legislation, systems or the activities of WZ Governance. The current version is always available at www.wzgovernance.com.

Version control

CODE	POL 004	VERSION	1.0
EFFECTIVE	November 2026	REVIEW	Annual
APPROVAL	Managing partner	CLASSIFICATION	Public

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VERSION	DATE	DESCRIPTION OF CHANGE
1.0	November 2026	Initial issue

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