

PRIVACY DIRECTIVE – BRADESCO ORGANIZATION

Purpose:

The Privacy Directive of Bradesco Organization, hereinafter referred to as “Organization”, was created to demonstrate its commitment to the protection of your personal data and privacy. We will show below how your information will be collected, used, protected, and what your rights are and how they can be exercised.

Who we are?

This Directive applies to all companies controlled by the Organization, listed on the website www.bradesco.com.br.

What data do we collect about you?

For us to provide our services, it is essential to collect some information about you. The Organization may collect personal data and sensitive personal data provided directly by you, by third parties or collected automatically, according to the service provided. The ways of collecting personal data is presented below in further details:

Personal data provided directly by you: the Organization will collect all personal data entered or forwarded when accessing our channels (websites or applications) or when contracting products and/or services provided by Organization’s companies.

Personal data supplied by third parties: The Organization’s companies may receive your personal data through third parties, whether partners or service providers, who have a relationship with you. It is also possible for the Organization’s companies to collect: data from public databases, made available by authorities (such as the Brazilian Federal Revenue Service and State Transit Department – DETRANS, for example) or by third parties, or even data made public by you on websites or social networks, always respecting its privacy and the purpose for which this personal data became public data.

Personal data collected automatically: the Organization can also collect a series of information automatically, using some market technologies for that purpose, such as cookies, pixel tags, beacons and local shared objects, aiming to improve your browsing experience in our services, according to your habits and preferences.

For all personal data collection, the Organization will always follow the following core rules:

- only essential information will be collected for the provision of the services offered;

- if necessary, we will ask you for authorization or inform you on the collection of new data, followed by the appropriate justification;
- the personal data collected will only be used to fulfill the purposes informed to you.

What cookies are and how we use them

Cookies are files or information that can be stored on your devices when you visit websites or use the Organization’s online services. Generally, a cookie contains the name of the website that originated it, its lifetime and a value, which is generated randomly.

The Organization uses cookies to facilitate use and better tailor its website and applications to the interests and needs of its Users, as well as to assist and improve its structures and content. Cookies can also be used to speed up your future activities and experiences on our services.

You can check further information below about the types of cookies used on our websites, what they do and what types of data they collect:

Types of Cookies	What do they do?	Type of data collected
Required	They are essential for the correct operation of the website and for the use of the services offered. You can set your browser to block or alert you about these cookies, but parts of the website may not work correctly.	<p>Browsing data: IP address, date and time of access, geographic location, browser type, length of visit and pages visited.</p> <p>Data on the access device: model, manufacturer, operating system, telephone operator, browser type, and connection type and speed.</p>

<p>Performance</p>	<p>They help us understand how visitors interact with the Bradesco Organization’s website; thus, they inform the areas visited, the time they visited and any problems encountered, such as error messages. We use Google Analytics to monitor the traffic and also to measure and improve the website performance.</p> <p>For further information about Google Analytics cookies, please visit: https://policies.google.com/technologies/partner-sites</p>	<p>Browsing data: date and time of access, geographic location, browser type, length of visit and pages visited on our websites.</p> <p>Data on the access device: browser type, connection type and speed, and Customer access/session to the Bank’s social networks for browsing and audience measurement.</p>
<p>Functional aspects</p>	<p>Allow the Bradesco Organization page to remember your choices to offer a customized experience. Moreover, they allow Users to watch videos and use social media, fields for comments, forums, among others.</p>	<p>Preference data: Customer Branch and Account reminder (if they choose to leave this information saved) and menu customization options on our pages.</p>
<p>Marketing</p>	<p>They are used to offer more relevant content that is of interest to the User. They can present advertising with better targeting or to limit the quantity shown on the Bradesco Organization’s pages. They also allow to measure the effectiveness of an advertising campaign.</p>	<p>Browsing data: date and time of access, browser type, length of visit and pages visited on our websites.</p>

Third Party Cookies

Cookies can be primary or from third parties. A primary cookie is the one you receive directly from Bradesco Organization and its subsidiaries when visiting our websites. A third-party cookie is the one that is transferred to the User’s device by authorized third parties. We have no control over the cookies enabled by other websites you visit, even if you are directed to them from our website. However, we may work with certain third-party providers, such as Google or Facebook, to allow their cookies to work through our website, enabling the Organization to provide you with a better experience and customized services on our website.

Cookies Management

It is possible that you, user of our services, use the settings of your preferred browser at any time to disable or remove cookies. However, we warn that when certain of cookies are blocked, certain functionalities of our services may not work as expected, and some aspects of information security and fraud prevention may be impacted.

For further information on how to manage cookies directly in your preferred browser, please refer to the links below:

- Internet Explorer: <https://support.microsoft.com/pt-br/help/17442/windows-internet-explorerdelete-manage-cookies>
- Mozilla Firefox: <https://support.mozilla.org/pt-BR/kb/ative-e-desative-os-cookies-que-os-sitesusam>
- Google Chrome: <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=pt-BR>
- Safari: <https://support.apple.com/pt-br/guide/safari/sfri11471/mac>

Why do we handle your personal data?

The handling of personal data by the Organization has several purposes, depending on its relationship with the Group's companies.

Thus, we present below, in a non-exhaustive list, the main hypotheses in which we will handle your personal information:

- For the performance of services, products and other contracts or preliminary diligences:
 - for the provision of services of the Organization's companies, such as banking services, investments, insurance, financing, consortia, cards, health care plans, private pension plans, among others;
 - for the relationship and provision of information related to the products and services engaged by the Organization's Customers.
- If the Organization's companies must comply with any legal or regulatory obligation:

- compliance with legal obligations, such as, but not limited to, resolutions, circular letters, normative acts, communications from competent bodies (for example: National Monetary Council, Central Bank of Brazil - Bacen, Brazilian Securities and Exchange Commission - CVM, Superintendence of Private Insurance - SUSEP, National Private Insurance Council, National Health Agency, among others) which define, for example: (i) security measures to prevent abuse and fraud; procedures for detecting transactions that deviate from normal standards; (iii) recording, when necessary, of phone calls, emails, chats; (iv) anti-money laundering and terrorism financing.
- For the regular exercise of rights in judicial, administrative or arbitration proceedings:
 - in carrying out complaint receipt processes in the Ombudsman Offices;
 - receiving and preparing responses to complaints submitted to the Brazilian Consumer Protection Agency (Procon);
 - in the storage of information for defense in judicial, administrative or arbitration proceedings.
- In pursuit of the legitimate interest of the companies comprising the Organization, always within the limits of their expectations, and never to the detriment of their fundamental interests, rights and freedoms:
 - in building and evaluating the profile of its Customers, to offer customized products that are compatible with their needs;
 - This can be achieved, for example, by (i) analyzing their habits and preferences in the several channels of interaction with the Organization's companies, (ii) sharing data with other Organization's companies, especially when you are a Customer or prospect of that other entity;
 - in the implementation and development of our products and services;
 - in the implementation of statistics, tests and evaluations for research and development, aiming at the management and assessment of business risks, the improvement and/or creation of new products;
 - in cases of a complaint, when the Organization is mentioned on social networks or specific platforms, with the purpose of resolving the issue claimed, as well as of adopting the necessary measures to resolve the situation in the best possible way.

- To guarantee your security in the processes of identification and registration authentication in our electronic systems and in performing activities aimed at preventing the occurrence of fraud;
- For protecting credit granted or to be granted by any of the Organization's companies:
 - in the calculation of credit scores, being able to share and/or consult scores in credit bureaus to feed and subsidize the analysis of credit risk profile for customers or prospects.
- Through authorization granted by you, such as in the following processes:
 - sending indirect marketing of third party products;
 - in relationship with the Organization's Customers, when the activity involves sensitive personal data.

Minors' data

We may collect and handle personal data of minors in cases where they are dependents, beneficiaries or customers, always in the best interest of these data subjects and in compliance with the guidelines of Federal Law 13,709/2018 (LGPD).

The Personal Data of children (those under the age of 12) are collected and handled with specific and highlighted consent by at least one of the parents or legal guardian, and are used to ensure continuous access to the services and products offered by the Bradesco Organization.

The child's personal data (such as name, date of birth, gender, SSN (CPF), identity card (RG), health data, nationality and address) are processed by the Bradesco Organization in accordance with the purpose agreed by a parent or legal guardian, which may be used for the operationalization of products/services, compliance with and management of regulatory, institutional, legal and fraud prevention demands.

It is also worth highlighting that the Bradesco Organization does not use data from minors for marketing and/or offering products and services.

Children's personal data may be collected without their consent when:

- the collection is necessary to contact the parents or legal guardian, and such data may be used only once and without being stored; or
- when collection is necessary for the protection of the data subject (child).

Moreover, in no case can data be transferred to a third party without the specific and prominent consent given by at least one of the parents or legal guardian.

With whom do we share your personal data?

The Organization will sometimes need to share your personal data with third parties. The situations that will involve sharing your information are the following:

- with partner companies and suppliers, in the development and provision of services made available to you, provided that they are duly approved by the Organization's security processes;
- with government entities or other third parties, including using sensitive personal data, whose purpose is to identify and authenticate registration processes and to prevent fraud;
- with authorities, government entities or other third parties, for the protection of the Organization's interests in any type of conflict, including lawsuits and administrative proceedings;
- in the case of corporate transactions and operations involving the Organization, in which case the transfer of information will be necessary for the continuity of services; or
- by court order or upon the request of administrative authorities that have legal competence for said request.

Personal data may also be shared with some of our partner companies located abroad, whose countries are affiliated with the Central Bank of Brazil.

How do we keep your personal data safe?

Any personal data held by the Organization will be stored in accordance with the strictest security standards adopted by the market, which includes the adoption of measures such as:

- protection against unauthorized access;

- restricted access of people to the place where personal information is stored; and
- adopt procedures so that agents, internal Employees or external partners that handle personal data are committed to maintaining the total confidentiality of information, adopting the best practices for handling this data, as provided for in the corporate policies and procedures.

In addition to technical efforts, the Organization also adopts institutional measures aimed at protecting personal data, so that it maintains a governance and privacy program adopted to its activities and governance structure, which is constantly updated.

No transmission of information is fully secure, as it will always be susceptible to technical failures, malware and/or similar actions. In this sense, the Bradesco Organization endeavors its best efforts to preserve your privacy and protect your personal data.

In any case, in the remote event of incidents of this nature, the Organization guarantees it will endeavor its best efforts to remedy the consequences of the event, always ensuring due transparency to you.

How long will we store your personal data?

Personal data handled by the Organization will be deleted when it is no longer needed for the purposes for which it was collected, or when requested by you, except in the event of the need to comply with a legal or regulatory obligation, transfer to a third party - provided that the data handling requirements - and the Organization's exclusive use, are respected, including for the exercise of its rights in judicial or administrative proceedings.

What are my rights as a personal data subject?

In compliance with the applicable regulations, regarding the personal data handling, the Organization respects and guarantees to the User the possibility of submitting requests based on the following rights:

- confirmation of the existence of handling;
- data access;
- correction of incomplete, inaccurate or outdated data;
- anonymizing, blocking or deleting unnecessary and excessive data, as well as data handled in non-compliance with the law;

- data transfer to another service or product supplier, upon express request by the User;
- deletion of data handled with the consent of the User;
- obtaining information about public or private entities with which Bradesco shared its data;
- information about the possibility of the User not providing consent, as well as being informed about the consequences in case of such refusal;
- revocation of consent;
- review of decisions made solely on the basis of automated processing.

Part of the aforementioned rights may be exercised directly by you, through the management of registration information in our websites or APPs, while another part will depend on the submission of requests through our service channels or directly with those in charge of Data Protection (visit the website www.bradescoseguranca.com.br), for further evaluation and adoption of necessary measures.

By reading this document the User is aware that any request to delete essential information for the management of his or her registration with the Organization, when applicable, will result in the termination of his or her contractual relationship, with the consequent cancellation of services then rendered.

The Organization will make all reasonable efforts to meet the requests made by the Data Subjects, in the shortest possible timeframe. However, justifiable factors may delay or prevent their prompt service, and, in the event of any delay, the Organization will provide the User with the necessary reasons.

Finally, the User must be aware that his or her request may be legally rejected, whether for formal reasons (such as his or her inability to prove his or her identity) or legal reasons (such as the request for deletion of data whose maintenance is a free exercise of rights by the Organization), and, in the event of impossibility of meeting such requests, the Organization will present the User with reasonable justifications.

How can I clarify further doubts?

If you want to clarify any further questions, please kindly contact us through the relationship channels available in the privacy notice.

For further information on security, visit the website <https://www.bradescoseguranca.com.br>.

Applicable legislation and changes

This document was prepared based on applicable legislation on information security, privacy and data protection, including (whenever applicable) the Federal Constitution, the Consumer Protection Code, the Civil Code, the Civil Rights Framework for the Internet (Federal Law No. 12,965/2014), its regulatory decree (Decree No. 8,771/2016) and the General Data Protection Law (Federal Law No. 13,709/2018) and other sectorial and general standards on the theme.

The Organization reserves the right, in its sole discretion, to modify, change, add or delete parts of this document at any time.

Definitions

If you have any questions regarding the terms used in this Privacy Directive, we suggest consulting the glossary below.

Term	Definition
Anonymization	Process through which data loses the possibility of being directly or indirectly linked to an individual, considering the reasonable technical means available upon data handling.
Cookies	Files sent by the website server to the User's computer for the purpose of identifying it and obtaining access data, such as browsed pages or clicked links, thus allowing to customize the browsing of User on the Website, in accordance with their profiles.
Personal data	Any information related to a natural person, directly or indirectly identified or identifiable.
Sensitive personal data	Special category of personal data relating to racial or ethnic origin, religious belief, political opinion, union membership or organization of a religious, philosophical or political nature, relating to health or sexual life, genetic or biometric data relating to the natural person.

IP	Abbreviation for Internet Protocol. It is a set of numbers that identifies the User's computer on the Internet.
Logs	Logs of User's activities made in the Website.
Prospect	Person interested in consuming or with the potential to consume products or services.
Website	Designates the website www.bradesco.com.br and its subdomains.
Handling	Every operation performed with personal data, such as those referring to: the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, disposal, evaluation or control of information, modification, communication, transfer, diffusion or extraction.
User	Individual who accesses the Website and/or interacts with the activities offered on it and to whom personal data refer, such as customers, prospects, employees, contractors, business partners and third parties.

This Privacy Policy was last amended and published on our Portal in September 2021.