

BRAINID PRIVACY NOTICE

Effective as of 25/09/2025

Hello! We are **BRAINID**, a private legal entity owned by the company **2015 LICENCIAMENTOS LTDA.**, registered with the CNPJ under No. 37.312.928/0001-11, headquartered at Rua Cristiano Viana, 401, cj. 1302, Bairro Cerqueira César, São Paulo, SP ("**BRAINID**" or "**We**").

The protection of your Personal Data is very important to us. In this **Privacy Notice** ("**Notice**"), we bring how we process it when you ("**USER**") access or use our platform and related services. Therefore, we recommend that you read it carefully. If you have any questions, please contact us directly at the email indicated at the end.

1 DEFINITIONS

Below are some definitions that will help you interpret this Notice:

Personal Data	Information related to an identified or identifiable natural person.
Sensitive Personal Data	Personal Data about racial or ethnic origin, religious conviction, political opinion, membership in a union or organization of a religious, philosophical or political nature, data related to health or sex life, genetic or biometric data, when linked to a natural person.
Processing	Any operation carried out with Personal Data, such as collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, dissemination or extraction.
Data Subject	Natural Person whose Personal Data is Processed, including you.
Controller	Natural or legal person who is responsible for decisions regarding the Processing of Personal Data. Except in some specific cases, the Controller of your Personal Data, for the purposes of this Privacy Notice, will be BRAINID .
Incumbent	Natural or legal person appointed by the Controller who acts as a communication channel between the Controller, Data Subjects, employees and authorities regarding Personal Data.
Operator	Person who carries out the Processing of Personal Data on behalf of the Controller.
LGPD	This is the General Data Protection Law (Law 13.709 of August 14, 2018), which establishes rules for the Processing of Personal Data and sensitive Personal Data.
ANPD	Public administration body responsible for ensuring, implementing, and supervising compliance with the LGPD.

2 WHAT PERSONAL DATA DO WE COLLECT?

The collection of some of your Personal Data is essential for us to perform our activities and give you access to our Platform. However, the form and purpose of Personal Data Processing activities vary according to the context for which your information was collected. Below, we have prepared a table so that you can view what personal data we may collect:

Data Subject	Personal Data Collected
Users	Full name or company name, identification document (CPF, CNPJ or passport), email address, telephone number, full address, zip code, financial data (amounts to be paid or received and bank account or credit card details), language preferences, behavioral information (the pages you visited and products you were interested in) and registered files (including details such as title, asset type and description).

We may also collect other personal data, depending on the purpose of the processing. But rest assured, we will only do so when there is a justification to legitimize its use.

3 HOW DO WE COLLECT INFORMATION ABOUT YOU?

We may collect your Personal Data in two ways:

- **Information you provide directly:** every time you inform us of personal data through the available channels, such as registration details, account credentials, means of support or service available on our website or our Platform, or in any other way during our provision of services.
- **Automatically:** such as technical data (IP address, browser type, device information, operating system, referring URLs) and usage data (interactions with the platform, transaction metadata, logs). Some information is related to the use of the website and the Platform and is collected through strictly necessary cookies, which will be explained in a specific section.

You warrant the truthfulness and accuracy of the data and personal information you provide. **BRAINID** has no responsibility in the event of false data entry, inaccuracy or omission of personal data, and it is its responsibility to provide them accurately and update them whenever necessary.

4 WHY DO WE PROCESS YOUR PERSONAL DATA?

We may collect your Personal Data in two ways:

Once you use the website, the **BRAINID** Platform, the Personal Data collected will be for the purpose of giving you access to the Platform, identifying you to respond to requests made in our support channels, and to inform you about news, features and notices that we consider relevant.

In addition, we process your Personal Data to enable our relationship, with previously defined purposes, as follows:

- To improve the functionality of our Platform and to develop new products and services;
- Receive your contact and respond to requests for products, services and features of the Platform;
- Provide support and information, collect your feedback or testimonial;
- Manage our relationship with you and communicate, including about changes to the functionality of the Platform;
- Assist in the diagnosis and solution of technical problems;
- Assist in the detection of content contrary to the purposes of the Platform and the Terms of Use;
- Promote the security of the Platform;
- Comply with legal or regulatory obligations or orders from authorities.

The legal bases are exemplified below:

Legal basis	Treatment examples
Execution of contracts or preliminary procedures	Operate, maintain, and provide our services. Enable account creation, login, and secure authentication. Register and validate works, documents or data using blockchain technology. Licensing of works of art with third parties.
Compliance with legal obligation	Issuance of invoices.
Assent	Email marketing.

Legitimate interest	Improve and develop functionalities and user experience.
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5 SHARING OF PERSONAL DATA

In some situations, in order for us to perform our activities with quality, we will need to rely on the help of business partners and third parties, with whom we may share your Personal Data, for example:

Third	Motive
PicPay	We may share some Personal Data with PicPay to enable payment for registrations made on the platform.
Programmer/Receiver	Personal Data may be accessed by programmers responsible for the development and maintenance of the platform, exclusively for technical and operational purposes, such as correcting errors, updating functionalities or implementing improvements.
Legal and regulatory authorities, courts or enforcement bodies	When required by law or necessary to protect our rights.
Affiliates or subsidiaries	In corporate transactions such as mergers, acquisitions or restructuring.

Please note that these business partners and third parties are carefully selected and have relevant security standards in place to ensure the protection of your information. Sharing will occur if there is a specific purpose and a legal justification.

We are committed to, under no circumstances, sell your information or misuse it for profit in a way that is not permitted by law.

The data collected and the activities recorded may be shared with competent judicial, administrative or governmental authorities whenever there is a legal determination, request, request or court order. Data will also be shared automatically in case of corporate transactions, such as mergers, spin-offs, acquisitions and incorporation.

6 INTERNATIONAL TRANSFER OF PERSONAL DATA

Personal Data of users is, as a rule, stored and processed on servers located in Brazil, on the Amazon Web Services (AWS) infrastructure, ensuring the operation of the platform and the security of the database.

However, international data transfer may occur, as described below:

- **Payments:** the data of transactions made by users is processed by our partners, on servers located in the United States and/or the European Union. The purpose is to ensure the secure processing of the payment, and the data is kept only for the time necessary for this purpose. After processing, the amounts are transferred to the bank account in Brazil.
- **Corporate e-mail services:** data such as name and e-mail address may be processed by GoDaddy, based in the United States, for the purpose of managing and enabling BRAINID's institutional communication.
- **Interactions with blockchain:** for blockchain registration operations, BRAINID uses Alchemy's infrastructure, with servers abroad. Personal data is not sent directly, only: irreversible cryptographic hash generated from the data entered by the user; ID of the record created by the BRAINID database; and digital wallet public key created and managed by BRAINID.

These records are stored on the Polygon zkEVM public network, accessible globally, in order to ensure transparency and traceability of blockchain operations.

The transferred data is processed exclusively by the partners in the role of data processors, under the supervision of BRAINID. Each agent is responsible for ensuring:

- Safe treatment and in accordance with applicable legislation;
- Use of data only for the contracted purposes;
- Adoption of appropriate technical and organizational security measures, such as encryption, access restriction and formal data processing agreements.

The data subject has, at any time, rights provided for in the LGPD. To exercise their rights, the holder may contact BRAINID through the email at the end of this Notice.

7 RETENTION OF PERSONAL DATA

Data stored off-chain will be kept only for as long as necessary to fulfill the purposes outlined in this Policy or as required by law. On-chain data (including wallet addresses and proof of transactions) is immutable and cannot be changed or deleted after registration. The USER must carefully evaluate the information they decide to register.

Backup and archival copies may be retained for compliance, auditing, or business continuity purposes.

We keep your data with us only for the period necessary to perform the legitimate purposes, including deadlines for complying with legal or regulatory obligations and exercising our rights in judicial, administrative or arbitration proceedings.

8 EXERCISE OF DATA SUBJECT RIGHTS

You may contact us directly to exercise any of your statutory rights, including:

Right	How to exercise it
Treatment Confirmation	You can confirm with us whether or not your data is being Processed.
Data access	You can request a free and facilitated consultation on the form and duration of the Processing of your data.
Correction of Personal Data	You may request correction of Personal Data that has been incomplete, inaccurate, or out of date. To make the correction, we may require the presentation of a document to prove the veracity of the new information and prevent fraud.
Anonymization, blocking, or deletion	If it is proven that your data is being processed in excess for the informed purpose or in non-compliance with the provisions of current legislation, you can request the anonymization, blocking or deletion of this data.
Revocation of consent	If you have provided your consent to any Data Processing activity, you can revoke it at any time. However, this does not necessarily mean that we will no longer be able to process your data if there is another authorizing legal hypothesis that supports the Processing.
Right to information	You may request information about which public and private entities we share your Personal Data with.
Data Erasure	You may request the deletion of your Personal Data processed with your consent

Please contact our Personal Data Processing Officer at privacidade@brainid.com.

All requests for the exercise of these rights will be provided free of charge; subjected to a form of validation of their identity; and evaluated as to the possibility of complying with them, considering that, sometimes, we will have other obligations to fulfill that prevent the fulfillment of these requests.

9 HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

All our information and the Personal Data to which we have access will be stored within strict security standards, which includes:

- Encryption in transit (TLS/HTTPS) and at rest.
- Segregated databases with role-based access control.
- Use of secure modules for private key storage (e.g., AWS KMS, Secret Manager).
- Regular audits and monitoring.

Our commitment to information security is based on the confidentiality, availability, and integrity of information, including your Personal Data.

Attention! Our emails are sent with sender **@brainid.com**

While we make our best efforts to preserve your privacy and protect your Personal Data, we are all subject to a security incident. If this occurs, we will take the necessary measures quickly and effectively to mitigate any risks.

10 COOKIES

We value your privacy and strive to provide safe and transparent browsing. Our website uses only essential cookies to function properly and does not employ unnecessary tracking technologies.

We only use a *strictly necessary cookie* to ensure that the website functions securely and reliably. These types of *cookies* are absolutely necessary for browsing and performing basic functions on the website, such as issuing IDs for an anonymous session to compress various server-related issues. This *cookie* does not collect personal information beyond what is indispensable for its technical purpose.

We do not use preference, statistical or marketing cookies.

11 CONTACT US

If you have any questions regarding the way we process your Personal Data or for questions and requests, you can contact our Personal Data Protection Officer, who will seek to assist you in the shortest possible time:

Person in charge: Itamar de Castro Ribeiro

Contact: **privacidade@brainid.com**