
Brazil

Wells Fargo International Privacy Notice

Effective: 12 December 2023

Part 1. Introduction

What is this document and why should you read it?

Wells Fargo provides this privacy notice ("Notice"), as data controller, to describe our practices regarding the collection, storage, use, disclosure and other processing of Personal Data (defined below) pertaining to Brazilian data subjects. Wells Fargo may collect and process your Personal Data in a variety of situations, including when you or your organization have a relationship with a Wells Fargo entity. This Notice is intended to provide you with information regarding: 1) the types of personal data we collect and process; 2) the specific purpose of our processing activities; 3) the type and duration of the processing; 4) our role as a data controller and contact information; 5) how and why we may share data; 6) responsibilities of our processors and service providers; and 7) your data subject rights.

This privacy notice is in addition to other privacy notices that may apply to your or your organization's relationship with a Wells Fargo entity outside of Brazil. Privacy notices for those Wells Fargo entities and jurisdictions are available at www.wellsfargo.com/privacy-security.

Who are we?

Wells Fargo is one of the largest financial institutions in the world, and we operate globally.

Name of group parent: Wells Fargo & Company

Headquarters location: 420 Montgomery Street; San Francisco, CA 94104 USA

Contact information for our Latin America Privacy Officer is listed below.

What types of Personal Data do we collect?

Wells Fargo collects different types of Personal Data. In order to provide financial products and services, we may collect information about both our consumer customers ("**Customers**") as well as other identifiable persons, including those related to or otherwise connected to our commercial customers (collectively, "**Individuals**"). The information we collect/process may include:

- **Personal Identifiers:** personal unique identifiers, such as full name and government-issued identification numbers.
- **Contact Information:** address, phone number, mobile phone number, email address, and online contact details.
- **Employment Information:** employer, title, position held, and length of employment.
- **Authentication data:** passport or national identification card, driver's license, other governmental identification information, home address and telephone number, documents that verify address, date of birth, country of domicile, and documents that verify employment, and signature authorization.
- **Internet or Online Information:** Internet or online information such as browsing history, and information regarding interaction with our websites, applications, or advertisements.
- **Financial data:** salary and other income, sources of wealth, assets, financial relationships, and financial transactions.
- **Background or credit check data:** credit check information, background check information including credit and criminal checks and screening, but only to the extent required or permitted by local law.

Collectively, the above categories of data constitute "**Personal Data.**" We may collect, to the extent permitted by applicable law, Personal Data directly from Individuals, Customers, private lists, and publicly available sources. Failure to provide this information may result in Wells Fargo being unable to provide or continue to provide the requested services.

Part 2. Our handling of Personal Data

Why do we collect and use Personal Data?

Wells Fargo collects and processes Personal Data for a number of purposes. A primary purpose is to ensure we can provide Customers with the products and services we offer and which they have requested. As described below, we also need to use Personal Data for purposes of carrying out our business operations, including confirming a person's authority as a representative or agent of a Customer, undertaking internal investigations and audits, handling legal claims, responding to requests from supervisory authorities, and complying with applicable laws and regulations on a global basis.

We collect, process, and use Personal Data:

- **To provide products and services.** We collect and process Personal Data to perform obligations under our agreements, carry out related business functions, process data and transactions, perform banking services (including deposit taking and account management), conduct credit checks and due diligence, market products and services, provide investment banking and financial services, and manage Customer relationships and inquires, including when we need to contact Individuals with important information or for other administrative purposes.
- **To comply with legal obligations and regulations.** We collect and process Personal Data to comply with laws, regulations, and legal obligations applicable to Wells Fargo and its Affiliated Entities (defined below) in the United States and/or in other countries, including "know your customer" obligations based on applicable anti-money laundering and anti- terrorism requirements, financial crime and fraud prevention, suspicious activity reporting, responding to requests from public authorities, complying with economic and trade sanction requirements, performing Customer and Individual due diligence, performing audit and risk assessments, conducting foreign

exchange and international trade, preparing tax reports, complying with whistleblowing requirements, and handling legal claims.

- **To confirm a person's authority as a representative or agent of a Customer.** We collect and process Personal Data to confirm a person's authority as a representative or agent of a Customer with which Wells Fargo or its Affiliated Entities have entered or intend to enter into various arrangements, including deposit contracts, loan contracts, contracts for foreign exchange transactions, contracts involving derivative transactions, letters of credit, loan services, account management, commercial banking, commercial real estate, structured lending, corporate and investment banking services, credit card issuance and processing, financial services, and investment management.
- **To conduct recordkeeping.** We collect and process Personal Data to facilitate managing our records in a systematic manner so they can be retrieved when required for legal, regulatory or operational reasons.
- **Information discussed during telephonic or electronic conversations.** Wells Fargo records calls when required by law or to create records of legally-required meetings.

You expressly waive the bank secrecy or confidentiality laws and obligations, if any, of the country or countries where you and any Customer accounts are located but only to the extent permitted by applicable law. To the extent that is required by applicable law, Wells Fargo will obtain your consent directly and thus providing Personal Data to the Wells Fargo Group or authorizing our Customer to provide such information to us shall not be considered as a consent duly given from you. Any change in the purposes or in the circumstances that have legitimated the data subject's consent will be informed to you.

You may revoke consent at any time by notifying us at the address provided below. Prior uses and disclosures will not be affected (unless you directly request the deletion of personal data processed under your consent or when required by applicable law), and we may otherwise continue to process Personal Data as permitted or required by law.

Do we transfer Personal Data to different countries?

Wells Fargo operates across the globe, and we may transfer Personal Data to Wells Fargo entities located in countries other than the country where a Customer opened their account or maintains their relationship with us. This can also happen when we engage third parties to assist us with certain operations and activities, as they also may be established in different countries, including countries located outside Brazil.

We have put in place measures to enable the transfer of Personal Data to another country in accordance with applicable law regardless of the global location of our entities. These measures enable us to transfer and use Personal Data in a secure manner anywhere in the world where we have an establishment, or where we have contracted third parties to provide us with services. We may also transfer Personal Data to other countries where our third party service providers are located.

To whom do we disclose Personal Data?

We may disclose Personal Data, to the extent necessary and on a need-to-know basis, as follows:

- **Affiliated Entities.** Wells Fargo has affiliated entities and subsidiaries operating in the United States and around the world, including the group parent in the United States, Wells Fargo & Company, and Wells Fargo Bank, N.A. We may disclose Personal Data to our Affiliated Entities on a worldwide basis and our affiliates may use the data for the purposes described above to the extent permitted by applicable law.
- **Beneficiaries, counterparties, and other parties related to a transaction; credit reference agencies.** Wells Fargo may disclose Personal Data to beneficiaries, counterparties, or other parties related to a transaction on a worldwide basis to provide the services requested by our Customers and to comply with legal obligations and regulations. We may provide Personal Data to credit reference agencies where allowed by law.
- **Service providers.** Wells Fargo may disclose Personal Data to service providers around the world that act on our behalf and under our instructions regarding the processing of such data (“Data Processors”). All Data Processors we retain are subject to contractual obligations to implement appropriate legal, administrative, physical, and technical measures to safeguard Personal Data.
- **Legal requirements.** Wells Fargo may disclose Personal Data if required or permitted by applicable law or regulation, including laws and regulations of the United States and other countries, or in the good faith belief that such action is necessary to: (a) comply with a legal obligation or in response to a request from law enforcement or other public authorities wherever Wells Fargo may do business; (b) protect and defend the rights or property of any Wells Fargo entity; (c) act in urgent circumstances to protect the personal safety of Individuals, Customers, and contractors/employees of any Wells Fargo entity or others; or (d) protect against any legal liability. In addition, Wells Fargo may share Personal Data with U.S. regulators, and other self-regulatory bodies to which we are subject, wherever Wells Fargo may do business.
- **Business transfers, combinations and related activities.** As we develop our business, Wells Fargo might sell, buy, restructure, or reorganize businesses or assets. In the event of any actual or proposed sale, merger, reorganization, restructuring, dissolution or any similar event involving our business or assets, Personal Data may be shared with the relevant entity or may be part of the transferred assets and will be subject to any necessary contractual obligations to ensure the protection of such Personal Data.

The recipients of Personal Data identified above may be located in the United States or in other countries whose laws may not provide the same level of data protection as Brazil’s data protection law. As needed, we will establish appropriate data transfer agreements with such recipients with respect to Personal Data transferred from Brazil to a third country, or otherwise provide appropriate safeguards regarding transfers of Personal Data to other countries. All of our employees and third party vendors will only use personal data for the purposes set forth in this notice. Under the Brazilian General Data Protection Law (LGPD), we will transfer your Personal Data from Brazil to any foreign country under one the legal bases expressly stated by Article 33 of the LGPD (for the performance of a contract or based on your consent, for instance), until other appropriate steps are available.

How do we keep your Personal Data safe?

Personal Data will be safely stored in Wells Fargo databases and will be held and maintained by Wells Fargo or on behalf of

Wells Fargo by Wells Fargo service providers. Appropriate measures are taken so that Personal Data can be kept accurate and up-to-date, which will be in accordance with applicable security requirements. In an effort to prevent the loss, misuse, unauthorized access, disclosure, alteration or destruction of Personal Data, we will take appropriate legal, administrative, physical, and technical measures to protect Personal Data and ensure it is accessed by our team members only on a need-to-know basis.

While registering with our website, mobile applications, or social media features, we may provide you with a unique identification and password for accessing our products and services. We encourage you to choose your password wisely such that no intruder or third party can obtain any unauthorized access. We also encourage you to keep your password confidential and not have any written or other record of the password that can be accessible by an intruder or third party.

How long will we retain Personal Data?

We keep Personal Data no longer than necessary to (i) fulfill the purposes outlined in this Privacy Notice; (ii) comply with all the applicable legal and regulatory obligations to which Wells Fargo is subject; or (iii) perform a contract duly established with you; or (iv) take steps at your request prior to entering into a contract. We have implemented appropriate record retention policies to retain your Personal Data only to the extent permitted by applicable laws.

Part 3. Your Rights in Relation to Personal Data

What are your rights?

This Notice provides you with details about your Personal Data rights. If you have questions about your Personal Data rights, please contact the Latin America Privacy Officer using the contact information below.

You have the following rights in relation to your Personal Data:

- **Access:** you can ask us for a description of the Personal Data we hold about you and our purposes for holding it; you can also ask for a paper or electronic copy of this information.
- **Confirmation of Processing:** you can ask us to confirm the existence and scope of our processing of Personal Data.
- **Correction:** you can ask us to correct your Personal Data if you see that it is inaccurate, incomplete, or out-of-date.
- **Anonymization:** you can ask us to anonymize, block, or erase unnecessary or excessive data or data processed in noncompliance with Brazil's laws.
- **Deletion:** you can ask us to delete your Personal Data that we have processed on the basis of your consent, so long as deletion is allowed by law.
- **Sharing:** you can ask us to provide information about public and private entities with which we have shared personal data.
- **Consent:** you may revoke previously-granted consent, as well as obtain information about the consequences of revoking consent.
- **Automated Decision-Making:** you can ask us for information related to automated decision-making and request review by a natural person.
- **Data portability:** you have the right to receive Personal Data you have provided to us in a portable and readily

usable format that can be sent to another service or product provider.

In certain circumstances, we will need to use your Personal Data even though you may have asked us to delete it or restrict our use of it, or when you objected to our use. If this is necessary, we will do so in a lawful, fair, and transparent manner.

All rights expressed herein will be exercised free of charge through a specific request from the Data Subject or his/her legal representative, which must be sent in writing to the address listed below. Our deadline for fulfilling your request will vary depending on the request, which will be duly informed. After we have verified the Data Subject's identity (and the authority of his/her legal representative, if applicable), we will provide the information and take the other actions requested as specified by local law. If permitted by law, we may charge an appropriate fee to cover the costs of responding to the request.

How can you revoke consent to use your Personal Data?

When personal data is processed on the basis of your consent, you may revoke that consent at any time by notifying the Latin America Privacy Officer listed below. Prior uses and disclosures will not be affected (unless required by applicable law), and we may otherwise continue to process Personal Data as permitted or required by law. If you revoke consent, Wells Fargo may be unable to provide or continue to provide the requested services to you. You can also request information about the possibility of denying consent, when applicable, and the consequences of such rejection.

How can you stop Wells Fargo from sending marketing materials to you?

We will only send you marketing and sales materials where, to the extent required by applicable law, you have consented to receive such materials. If you do not want to receive marketing and sales materials from Wells Fargo by direct mail, telephone or email, please follow the unsubscribe or opt-out instructions provided in those communications or submit a written request to the Latin America Privacy Officer using the address shown below. You can also contact the Latin America Privacy Officer to exercise your right to object to the receipt of these communications. We will comply with any such request within a reasonable period of time after receiving it.

How can you exercise your rights?

At Wells Fargo, we have team members who are dedicated to responding to requests in relation to your Personal Data, and to help you with any other questions that you may have. Please contact the Latin America Privacy Officer using the contact information below:

Regional Privacy Officer, Canada and Latin America
MAC O1038-230
22 Adelaide Street West, Suite 2200
Toronto, Ontario, Canada M5H 4E3
Privacy.latinamerica@wellsfargo.com

Can we modify this Notice?

We will modify this Notice as a result of amendments to laws or regulations, or due to other reasons involving our operations. In such case, an amended Notice will be posted on our website at www.wellsfargo.com/privacy_security/. The page providing the Notice will indicate the date when it was last updated.

This notice was last updated 12 December 2023.