



ATFX
EDUCATION

PRIVACY POLICY AND PERSONAL DATA

Last updated: August 19, 2025



PRIVACY POLICY AND PERSONAL DATA

Summary

1. Introduction	3
2. Legal basis for data processing	4
3. Purpose of collecting and using Personal and Confidential Data	6
4. Data Sharing	7
5. Data Subject Rights	7
6. Information Security and Data Retention	8
7. Processing of children and adolescents' data	10
8. Cookie and Tracking Technology Policy	10
9. Data Processing Officer	12
10. Updates and Validity of this Policy	12



1. Introduction

This Privacy Policy (hereinafter referred to as the “**Policy**”) governs how **ATFX Education**, a securities analysis firm registered under CNPJ No. 61.046.172/0001-90 and accredited by APIMEC under No. 277, pursuant to CVM Resolution No. 20/2021 (hereinafter referred to as “**ATFX Education**” or the “**Company**”), collects, uses, maintains, and discloses data collected from its current and former users and clients (hereinafter referred to as “**Client/Clients**”) through:

- I. The Company’s website <https://atfxeducation.com/pt/>;
- II. Electronic correspondence, including emails, text messages, and other digital interactions between the Company and Clients;
- III. Phone conversations or interactions via applications with the Company’s representatives (hereinafter referred to as “**Agent(s)**”).

The Company may collect any data capable of identifying the Client, including but not limited to their name, email address, phone number, CPF (Brazilian individual registry), profession, interaction history, information requested in forms, as well as any other personal data voluntarily provided (hereinafter referred to as “**Personal Data**”).

Any sensitive or strategic information obtained from Clients following the submission of questions, complaints, suggestions, or participation in institutional interactions will be treated with confidentiality and good faith (hereinafter referred to as “**Confidential Data**”).

ATFX Education prioritizes the privacy and integrity of Clients’ Personal and Confidential Data, committing to ensure the security and confidentiality of all information obtained, including after the termination of the relationship with the Company. This commitment extends to data collected directly, information provided by Clients themselves, or received from legitimate and authorized sources.

By accessing the Company’s website and using its services, the Client expressly agrees to the collection, storage, use, and possible disclosure of their Personal and Confidential Data by ATFX Education, under the terms and limits of this Privacy Policy, in accordance with applicable Brazilian legislation.



In the event of any inconsistency between the versions of this Policy or the Terms of Use, this version shall prevail.

2. Legal basis for data processing

The processing of personal data by ATFX Education is carried out based on the legal provisions set forth in the General Personal Data Protection Law, observing the principles of necessity, purpose, and transparency. Among the main legal bases used are:

Consent. Whenever necessary or required by law, prior, free, informed, and unequivocal consent will be requested from the data subject, especially in situations involving promotional communications, the use of non-essential cookies, or the collection of sensitive data. The data subject may revoke their consent at any time by expressly stating so.

Execution of contract or preliminary procedures. The collection and use of data may be necessary to enable the provision of securities analysis services, sending of reports and educational content, as well as to fulfill obligations arising from the contractual relationship established with the data subject.

Compliance with legal or regulatory obligations. ATFX Education is subject to rules and requirements established by the CVM, ANPD, the Brazilian Federal Revenue Service, and other competent authorities. Data processing may be necessary, for example, to comply with inspections, registration and retention duties, or to prevent money laundering, where applicable.

Legitimate interest. In certain situations, processing will be carried out based on the legitimate interest of ATFX Education, provided that the fundamental rights and freedoms of the data subject do not prevail. This includes, among other things, improving the user experience, personalizing content, information security, fraud prevention, and protecting the regular exercise of professional activity.

Protection of life or physical safety. In emergency situations, personal data may be processed for the purpose of protecting the life or physical integrity of the data subject or third parties, including by communicating with the competent authorities.

Regular exercise of rights. ATFX Education may process and, when necessary, share personal data for the purpose of regularly exercising rights in judicial, administrative, or



arbitration proceedings, always within legal limits and in accordance with the principle of good faith.



3. Purpose of collecting and using Personal and Confidential Data

ATFX Education collects Personal and Confidential Data from its users and visitors in strict compliance with the LGPD, for the purpose of operating effectively, ensuring regulatory compliance, and providing the best experience on its digital platform, including with regard to access to educational, informational, and technical content about the capital markets.

In this context, the Company may collect information through the use of technologies such as cookies, pixels, and other tracking tools, which allow it to assess browsing behavior, preferences, and interactions with the content made available, as well as through automated reports on system errors and usage data.

Data collection and processing may also occur for the purpose of conducting technical studies, statistical surveys, and opinion polls, provided that this is done in an aggregated form and without direct identification of the data subjects, except with specific and explicit consent. Any information obtained through third parties – partners or contracted suppliers – will only be incorporated into ATFX Education's systems if these third parties ensure the prior consent of the data subject or other valid legal basis.

ATFX Education does not collect sensitive personal data, such as information about racial or ethnic origin, religious beliefs, political opinions, health, sex life, genetic or biometric data, except when absolutely necessary and with specific consent. It also does not intentionally collect data from children and adolescents. If it does process data of this nature, it will do so based on the principles of the best interests of the child, in compliance with applicable legal requirements.

All data collected is processed exclusively for the purposes stated at the time of collection or for other compatible purposes, subject to evaluation by the Data Protection Officer, so that when necessary, processing may be carried out regardless of consent, based on legal obligations, legitimate interests, or the regular exercise of rights, always with transparency and in accordance with current legislation.

The data subject may, at any time, express their opposition to the use of their data, request clarification, or exercise any of their rights provided for in the LGPD, by contacting the Data Protection Officer, whose details are included in this Policy.



4. Data Sharing

ATFX Education may share personal data whenever necessary for the regular exercise of its activities, to comply with legal or regulatory obligations, or to protect its legitimate rights and interests, including in judicial, administrative, or arbitration proceedings. This data may be shared with affiliated companies, service providers contracted for technical support, storage, information security, auditing, or customer service, provided that confidentiality and security guidelines are observed. It may also be communicated to regulatory and self-regulatory authorities whenever required in the context of securities analysis activities.

Disclosure may be extended to public entities or competent authorities when required by law or court order, as well as to legal advisors and legal representatives of ATFX Education to defend its interests in any litigation.

In the event of corporate reorganizations, acquisitions, mergers, or similar operations, the data may be transferred to the third parties involved, provided that the safeguards set forth in this Policy are guaranteed. Whenever data is shared with third parties based on the consent of the data subject, ATFX Education will ensure that the data is used in a manner consistent with the authorized purposes, preserving the privacy and rights of users.

5. Data Subject Rights

Under Law No. 13,709/2018, ATFX Education ensures that data subjects can fully exercise their rights, guaranteeing transparency, security, and autonomy in the processing of information. Service will be free, transparent, and timely, within the deadlines set by law. The data subject has the right to:

Confirmation and access to the data processed. At any time, the data subject may request confirmation of the existence of the processing of their personal data, as well as access the information held by ATFX Education, including the origin of the data, the criteria used, the purpose of the processing, and the third parties with whom the data may have been shared.

Correction of incomplete, inaccurate, or outdated data. Whenever the data subject identifies inaccuracies or outdated information in their personal data, they may request the correction or supplementation of the information held, upon providing adequate proof.

Anonymization, blocking, or deletion. The data subject may request the anonymization, blocking, or deletion of data that they consider unnecessary, excessive, or processed in violation of the LGPD, except in legal or regulatory cases that justify its retention.



Data portability. When technically feasible and subject to specific regulations from the National Data Protection Authority (ANPD), the data subject may request the portability of their personal data to another service provider, subject to ATFX Education's commercial and industrial secrets.

Deletion of data processed based on consent. In cases where processing is based on consent, the data subject may request the deletion of their data, except for the possibility of retention to comply with legal, regulatory, or contractual obligations.

Information about sharing. The data subject is guaranteed the right to obtain clear information about the public or private entities with which ATFX Education has shared their personal data, except in cases protected by legal confidentiality or public interest.

Information about the possibility of not providing consent. Whenever the collection or processing of data depends on consent, the data subject will be informed in advance about its optional nature and the possible consequences of refusal.

Withdrawal of consent. The data subject may withdraw the consent provided at any time, by means of an express and free statement, without prejudice to the legality of the processing carried out on the basis of the consent previously granted.

Objection to processing. If the data subject disagrees with the processing carried out on the basis of legitimate interest or in another case of exemption from consent, they may object, and it is up to ATFX Education to demonstrate the legitimacy and necessity of the processing in relation to the specific purpose.

6. Information Security and Data Retention

ATFX Education adopts technical, administrative, and organizational measures compatible with the highest standards of information security, with the aim of protecting the integrity, confidentiality, and availability of personal data processed in its operations. Data protection is an integral part of the institutional commitment to ethics, transparency, and regulatory compliance, in full alignment with the principles of the LGPD, including prevention, accountability, and good faith.

In order to mitigate risks of improper access, leakage, loss, alteration, or any form of unauthorized or unlawful processing, ATFX Education implements robust and continuously reviewed controls, such as:



- I. Identity management and multi-factor authentication for access to internal systems and sensitive databases;
- II. Cryptography of information at rest and in transit, with updated and auditable algorithms;
- III. Continuous monitoring of access and activities in the systems, with anomaly detection tools and security alerts;;
- IV. Clear definition of roles and responsibilities, with segregation of duties and periodic review of permissions;
- V. Enforcement of internal information security and confidentiality policies, mandatory for all employees, service providers, and third-party partners;
- VI. Specific contractual instruments with operators and suppliers, providing for confidentiality, data protection, and accountability clauses.

In the event of a security incident that poses a significant risk or damage to personal data subjects, ATFX Education will immediately implement its incident response plan, which includes:

- I. Timely communication to the National Data Protection Authority (ANPD), in accordance with current regulations;
- II. Direct notification to affected data subjects, with clear and objective information about the nature of the incident, any compromised data, and the containment and mitigation measures adopted;
- III. Preservation of technical evidence, adoption of corrective measures, and analysis of impacts, with a view to preventing recurrence..

Regarding retention, personal data processed by ATFX Education is stored only for the time strictly necessary to fulfill the specific purposes that justified its collection, or as long as legal, regulatory, or contractual obligations remain. The criteria applied are:

- I. Continuation of the legal relationship with the data subject and provision of the contracted services;
- II. Compliance with legal or regulatory deadlines imposed by competent authorities and entities;
- III. Compliance with limitation periods for possible defense in judicial, administrative, or arbitration proceedings;
- IV. Revocation of consent, with secure deletion of data that has no other legal basis for its retention.

It is clarified that ATFX, as provided for in Article 5, VII, and Article 23 of CVM Resolution 20/2021, keeps on file all documents proving compliance with the requirements contained



in said resolution, as well as its analysis reports, for a period of five (5) years, the last one counting from the date on which such reports are distributed.

Discarded data is eliminated through processes that ensure the definitive and irreversible destruction of the information, either electronically or physically, depending on the nature of the storage medium.

7. Processing of children and adolescents' data

The processing of personal data of children and adolescents is carried out with the utmost caution, in strict compliance with the rules of the LGPD and the guidelines of the Child and Adolescent Statute. Recognizing the unique developmental stage and legal vulnerability of these individuals, ATFX Education adopts a preventive policy based on good faith, transparency, and the best interests of the minor.

The ATFX Education website and services are not intended for persons under the age of 18, nor are any of its activities intentionally directed at this age group. The collection of data from unemancipated minors, including their participation in educational activities, occurs only in exceptional, duly justified situations and with the specific, highlighted, and verifiable consent of a parent or legal guardian.

In cases where data from children and adolescents is processed, this will be limited to legitimate purposes, such as: identification of dependents of adult customers, compliance with legal or contractual obligations related to third parties, or participation in institutional actions of an educational nature, without commercial purposes, always respecting the principles of necessity, adequacy, and data minimization.

If it is found that data has been improperly collected from minors without the proper legal or contractual basis, the legal guardian may, at any time, request the deletion of the data by contacting the data protection officer indicated in this Policy. ATFX Education undertakes to respond promptly to such requests, in accordance with the rights of the data subject and due process.

8. Cookie and Tracking Technology Policy

ATFX Education uses cookies and similar tracking technologies on its institutional website in order to ensure the full functioning of the platform, improve the browsing experience, enable technical features, analyze usage patterns, and provide more relevant educational content.



Cookies are small text files stored on the user's device when they access the website. Among other features, these files allow us to recognize browsing preferences, customize the interface, record accesses, optimize page performance, and, eventually, display content aligned with the user's interests.

ATFX Education uses different categories of cookies:

Essential. These are indispensable for the functioning of the website, enabling authentication, security, and session stability. They cannot be disabled.

Performance. These collect statistical and aggregated information about navigation, allowing for the analysis of website usage, the identification of errors, and the continuous improvement of the user experience.

Functionality. They record preferences such as language, location, and visual settings, contributing to a more personalized browsing experience.

Advertising and tracking. Used only with consent, their purpose is to present relevant promotional content, measure the institutional reach of informational campaigns, and monitor interactions with the website.

In addition to cookies, other tracking technologies such as web beacons, pixels, device identifiers, and analytics scripts may be used for purposes consistent with those described above.

Consent for non-essential cookies is collected via a preference management banner displayed when you first access the website. You can accept, decline, or customize cookies, as well as revoke your consent at any time via your browser settings or the website itself.

On certain pages, the ATFX Education website may integrate third-party features such as video platforms, social networks, analytics or authentication tools. These third parties may install their own cookies, and it is recommended that you read their respective privacy policies, as the processing of data in these environments is not under the direct control of ATFX Education.



9. Data Processing Officer

In accordance with the LGPD, ATFX Education appoints a Personal Data Protection Officer, also known as a Data Protection Officer (DPO), responsible for acting as a communication channel between the institution, data subjects, and the National Data Protection Authority (ANPD).

The officer is responsible for ensuring compliance with data protection regulations, guiding employees on best practices, and taking the necessary measures to guarantee the rights of data subjects, performing the following duties:

- I. Receiving communications, requests, and complaints from data subjects, providing clarifications, and taking appropriate action;
- II. Act as a point of contact with the ANPD, including for the purposes of inspection, notifications, and response to security incidents;
- III. Promote awareness and training actions for employees on privacy, information security, and compliance with the LGPD;
- IV. Oversee ATFX Education's personal data governance program, including conducting data protection impact assessments, where applicable;
- V. Ensure compliance with the principles of purpose, necessity, adequacy, security, and transparency in the processing of personal data, including in the flows of collection, storage, and eventual sharing..

The data subject may contact the Data Protection Officer through the communication channel available on the official ATFX Education website for clarification on this Policy, to exercise their rights under the law, or to register suggestions and complaints related to data privacy.

10. Updates and Validity of this Policy

This Privacy and Personal Data Protection Policy may be modified at any time by ATFX Education to reflect legislative or regulatory changes, developments in the services provided, the adoption of new technologies, institutional improvements, or changes in internal data governance processes.

The updated version will be made available on the ATFX Education institutional website and will take effect from the date of its publication, unless expressly stated otherwise. In the event of significant changes in the purposes of the processing or in the way personal data is processed, data subjects will be informed in a timely manner by electronic notice or



other appropriate channel and may review their consent when required by law.

In case of any discrepancy between the English, Spanish, and Portuguese versions, the latter shall prevail.

Data subjects are advised to periodically review this Policy to ensure full knowledge of the rules and conditions applicable to the processing of their personal data.

VERSION: 2025.1