

GLOBAL PRIVACY POLICY MONASHEES

Monashees Gestão De Investimentos Ltda, enrolled with the CNPJ under No. 06.130.952/0001-06, headquartered at Rua Samuel Morse, 74, Suite 173, Cidade das Monções, São Paulo – SP, 04576-060 ("**monashees**"), presents its Global Privacy Policy ("**Policy**") so that you can learn about and understand how monashees uses and stores your personal data during any interaction with a "**User**" (you).

In this Policy you will find information on the processing of personal data of: clients in general, investees and other third parties, in-person visitors, monashees' website visitors and potential customers, among other people who may come into contact with monashees and who are not its employees, suppliers or business partners.

Here you will find a short summary of this Policy, but we recommend that you read the entire document:

SUMMARY TABLE

DATA COLLECTED

Analysis Data: Name, e-mail, professional history, telephone number and date of birth;

Contact Data: Name and e-mail;

Investment Tracking Data: Name, e-mail, bank account, equity, number of shares held by investors and founders;

Financial Transactions Data: Name, profile and origin of equity.

Audit Data: Name, RG, CPF, professional history and history of legal proceedings;

Investor Data: Name, (RG, CPF or Passport), e-mail, telephone number, address and profile.

Contract Data: Name, RG, CPF, address, profession, among other data required for contract performance.

Job Applicants Data: Name, e-mail, telephone number, address, *PCD* (disabled person), education, certificates, academic background, among others.

Calendar Data: Name, e-mail, telephone number and address

Data collected automatically (access log): IP address, date and time

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<p>PURPOSES OF PROCESSING</p>	<ul style="list-style-type: none"> • Analysis of investee companies; • monashees portfolio management; • Capital calls by monashees for its investees and fundraising for new funds; • Opening of accounts in International Banks; • Audit of individuals; • Audit of legal entities; • Admission of a new investor; • Reception and analysis of CVs of monashees' job applicants; • Responding to requests made through the website of monashees; • Exercise of monashees rights; and • Compliance with legal obligation to retain access logs;
<p>CONTROLLER</p>	<p>Monashees Gestão De Investimentos Ltda Data Controller Rua Samuel Morse, 74, conjunto 173, Cidade das Monções, São Paulo – SP, 04576-060 E-mail: contact@monashees.com</p>
<p>LEGAL BASIS FOR PROCESSING</p>	<ul style="list-style-type: none"> • Legitimate Interest; • Contract Performance; • Regular exercise of rights; and • Compliance with legal obligations.
<p>RIGHTS OF DATA SUBJECT</p>	<p>Access, rectification, confirmation of processing, elimination, information on sharing, among others.</p>
<p>SECURITY</p>	<p>Appropriate technical and administrative measures, considering the nature of processing and data sensitivity.</p>

By interacting with monashees, you agree to and acknowledge all provisions of this Policy. Therefore, we suggest that you read this document carefully, as well as any updates, before making the decision to take advantage of the services or have any interaction with monashees. If you do not agree to any provision of this Policy, you must refrain from interacting with monashees.

1. DEFINITIONS

1.1. For this Privacy Policy, in addition to the terms defined in other documents and applicable legislation, the following definitions also apply:

- (i) User or you:** means the individual or legal entity that may interact with monashees;
- (ii) Personal Data:** means any information relating to an identified or identifiable natural person, that is, any data that is capable of identifying a person directly or indirectly. Personal Data includes, for example, RG, first and last name, CPF, marital status, address, contact telephone number and e-mail;
- (iii) Data Protection Officer:** means a person responsible to act as a channel of communication between monashees and you;

(iv) Data Subjects: means the natural person to whom Personal Data refers;

(v) Website: means the Website exclusively owned by monashees and all of its underlying hardware and software technical components, including any associated mobile applications, which can be accessed through the Website www.monashees.com.br or any other that may replace it.

1.2. For the interpretation of this Policy, words in the singular must include the plural, and the masculine gender will include the feminine and the neuter or vice versa, and other words written in capital letters shall have the meaning set forth in the Law.

2. WHAT PERSONAL DATA IS COLLECTED?

2.1. When you interact with monashees, by any means, whether physical or digital, we may automatically collect certain personal data and may also ask you to provide us with certain personal identifiable information that can be used to contact or identify you. Find below a summary of Personal Data we collect:

Data group	How data is collected/processed	What data is collected and processed
Analysis Data	<ul style="list-style-type: none"> a) Collected when individuals submit their companies for monashees analysis; b) Collected through suggestion of third parties. 	<ul style="list-style-type: none"> o Name; o E-mail; o Professional history; o Telephone number and; o Date of birth of company representatives.
Investor Data	<ul style="list-style-type: none"> a) Collected when individuals or legal entities make investments in our portfolio; b) Collected when investors or investees make referrals. 	<ul style="list-style-type: none"> o Name; o RG, CPF or Passport; o Telephone number; o E-mail; o Address; o Profile.
Investment Tracking Data	<ul style="list-style-type: none"> a) Collected on demand when necessary to update data of our investors or investees. 	<ul style="list-style-type: none"> o Name; o E-mail; o Bank account; o Equity; o Number of shares held by investors and founders.
Financial Transactions Data	<ul style="list-style-type: none"> a) Collected when monashees intermediates the contact of an investor or investee with a foreign bank. 	<ul style="list-style-type: none"> o Name; o Profile; o Origin of equity; o Other data that may eventually be requested by the bank.
Audit Data	<ul style="list-style-type: none"> a) Collected when a background check is 	<ul style="list-style-type: none"> o Name; o RG; o CPF;

	<p>carried out on an individual investor;</p> <p>b) Collected when there is an assessment of a company to be invested in;</p>	<ul style="list-style-type: none"> ○ Professional history ○ Judicial procedural history ○ Among other data required in the scope of the audit.
Contract Data	<p>a) Collected when monashees enters into a contract with an investee company.</p>	<ul style="list-style-type: none"> ○ Name; ○ RG; ○ CPF; ○ Address; ○ Profession; ○ Among other data required for contract performance.
Calendar Data	<p>a) To be collected when a legal entity or natural person becomes an investor or investee;</p> <p>b) To be collected upon supply by a third party interested in holding a meeting with a specific individual or legal entity.</p>	<ul style="list-style-type: none"> ○ Name; ○ E-mail; ○ Telephone number; and ○ Address.
Job Applicants Data	<p>To be collected when an individual interested in working for monashees submits his or her resume.</p>	<ul style="list-style-type: none"> ○ Name; ○ E-mail; ○ Telephone number; ○ Address; ○ PCD (disabled person), if applicable; ○ Education; ○ Academic background; ○ Certificates; and ○ Any other information included in a User resume.
Request Data	<p>To be provided by the User when he or she contacts monashees through the channels provided by the website, email contact@monashees.com or social media (such as LinkedIn)</p>	<ul style="list-style-type: none"> ○ Name; ○ E-mail; and ○ Message and other data present in the message.
Data collected automatically	<p>The following data is collected automatically when a User visits the Website</p>	<ul style="list-style-type: none"> ○ IP Address ○ Date ○ Time

2.2. Responsibility for collecting data from minors. By submitting data of minors for processing by monashees, a User states that he is the parent or legal guardian of such minor and that he consents to the processing of such minor's data, or that he has all the necessary authorizations to do so, and will, whenever requested by monashees, sign the documents necessary to prove such statements and formalize such consent. Personal data of minors will always be processed in accordance with this Policy, for the purposes described below.

3. HOW PERSONAL DATA COLLECTED IS USED?

3.1. monashees will use Personal Data described in the item above for the following purposes and in accordance with the applicable legal basis:

Purpose	Explanation	Set of Processed Personal Data	Legal Basis
Initial analysis of investee companies	monashees analyzes the companies that can integrate its portfolio of investees in two phases. In the first one, it uses Analysis Data for a superficial analysis. In the second, it uses Audit Data for an in-depth analysis.	Analysis Data, Audit Data.	Contract Performance and Legitimate interest (sending of data by third parties).
monashees portfolio management	monashees carries out several actions to manage its investments, which may involve the preparation of reports, documents and contracts, hiring accounting, legal or similar services, conducting audits, holding meetings and any other process necessary to serve its customers and to manage the investments under its management.	Contact Data, Investor Data, Investment Tracking Data	Contract Performance Legitimate Interest
Call for capital for its investees and fundraising for new funds	monashees contacts potential investors interested in doing business with its investees or interested in contributing to one of its funds.	Contact Data	Legitimate Interest
Opening of accounts in International Banks	When there is interest from investors, monashees contacts International Banks to organize transactions and obtain credit.	Financial Transactions Data and other data requested by the Bank.	monashees acts as the processor in these cases, and the International Bank is responsible for indicating the legal basis for processing.
Audit of individuals	monashees can carry out background checks, collect certificates and request documents necessary to prepare a contract.	Audit Data.	Contract Performance Legitimate Interest

Audit of legal entities	monashees will assess a company that will be invested using law firms, accounting firms and other partners hired for the procedure.	Audit Data.	Legitimate interest
Admission of a new investor	In order to formalize an investor's admission to its funds, monashees requests some information.	Investor Data	Contract Performance
Reception and analysis of resumes of monashees job applicants	monashees provides job opportunities and enable applicants to send their resume through various channels, including third-party platforms (such as LinkedIn, for example). Personal data contained in a job applicant resume is collected.	Job Applicants Data	Legitimate interest
Responding to requests made through the website of monashees	If you contact us through our website, monashees may use personal data entered in your request to process and respond to it.	Request Data	Legitimate interest
Exercise of rights and interests of monashees judicially and extrajudicially	monashees may use your Personal Data to defend itself and to exercise its rights, whether in an out-of-court dispute or in the course of legal proceedings.	All data	Regular exercise of rights
Compliance with legal obligations such as tax and retention of access logs	monashees is required by law to keep logs of access to its website, and therefore it will retain such logs for a minimum period of 6 months. monashees may also use any other data that is required by law to fulfill its legal obligations.	Data collected automatically (access logs), and other data required by law	Legal obligation

3.2. Legal Basis. In relation to the processing of data carried out by monashees, these will be based, as applicable in each case, on the following legal grounds: for compliance with legal obligations, defense of monashees rights and interests, performance of contract or based on a legitimate interest of monashees, always considering and respecting the fundamental rights and guarantees ensured to any data subject.

3.3. Data Controller. In the interactions described in this Policy, with the exception of the purpose of **Opening an account in International Banks**, monashees shall act as processing controller in relation to Personal Data, whether common or sensitive.

3.4. Data Processor. When opening an account in International Banks, monashees shall only act as a processor, since the referred bank shall be the controller of the transactions, being responsible for establishing the applicable legal basis for the processing.

4. HOW WE STORE COLLECTED INFORMATION

4.1. Security. monashees shall do everything possible to keep Personal Data safe at all times and shall adopt technical and administrative security and protection measures, compatible with the nature of data collected, used and stored and appropriate market practices.

4.1.1. Exceptions. However, monashees cannot guarantee that such security measures will be error-free or that they will not be subject to interference by third parties (hackers, among others). By its nature, despite the best efforts of monashees, any security measure can fail, and any data can be made public. BY STATING TO BE AWARE OF THIS POLICY AND/OR INTERACTING WITH MONASHEES, YOU EXPRESSLY UNDERSTAND AND TAKE THAT RISK AND AGREE THAT MONASHEES WILL NOT BE LIABLE FOR SUCH DATA BREACH.

4.2. International transfers. All information collected shall be stored with a high standard of security on its own servers or on third-party servers that act as processors and/or contracted by monashees, located in Brazil and abroad. Furthermore, monashees may store your Personal Data on servers outside Brazil and/or use service providers that are not located in Brazilian territory. In these cases, monashees shall comply with the legal requirements for such international transfers, ensuring the same level of security applied to any processing carried out in Brazilian territory.

5. RIGHTS OF DATA SUBJECTS

5.1. monashees provides tools for Data Subjects to exercise their legal rights over Personal Data they own. In this item we shall describe these rights, without prejudice to others provided by law, and how Data Subjects can exercise them.

5.1.1. Confirmation of the existence of processing; Data Subjects can confirm that monashees is processing their Personal Data;

5.1.2. Access to Personal Data: Data Subjects may access their Personal Data, including requesting a copy of processed data;

5.1.3. Correction of incomplete, inaccurate or outdated data: Data Subjects may request change or correction of their Personal Data that is incorrect;

5.1.4. Portability. Data Subjects may request the portability of their data to another service provider through export tools contained in the Website or by request through the service channels indicated in this Policy;

5.1.5. Deletion of Personal Data. Data Subjects may request the deletion of their Personal Data processed by monashees when collected and processed based on their consent, through the Website itself or upon request through service channels indicated in this Policy;

5.1.6. Information on Sharing. Data Subjects may request information about which public and private entities monashees has shared their Personal Data with, under this Policy;

5.1.7. Information about the possibility of not consenting. Data Subjects receive information about the possibility of not consenting to the processing of Personal Data and its potential consequences through this Policy, which may also be requested by service channels, including in relation to the impossibility of providing monashees services;

5.1.8. Withdrawal of consent. Data Subjects, at their criterion, may withdraw the consent previously provided for the processing of Personal Data at any time, and any processing carried out based on it remains valid until such time.

5.2. Exercise of rights. The rights mentioned above and others provided for in applicable legislation can be exercised by means of a request addressed to the email contact@monashees.com. Requests made by e-mail must contain, at least, the name of the data subject, the right to be exercised, details and specifications about the request, CPF or CNPJ and User e-mail address. monashees reserves the right to request additional information or documents to substantiate the applicant's allegations, as well as to confirm his or her identity. Notwithstanding, monashees shall always receive requests from Data Subjects and shall analyze their particularities before fulfilling them or indicating to the Data Subject the reasons for the impossibility of fulfilling them.

6. CONTACT WITH MONASHEES

In case of doubt or request to exercise any of the rights described in item 5, a User may contact the Data Protection Officer, through the e-mail contact@monashees.com.

7. SHARING OF DATA WITH THIRD PARTIES

7.1. Data Processors. monashees may hire third parties to assist it in providing its services, such as cloud storage servers, law firms and accounting services firms. The suppliers eventually contracted, however, may be replaced at any time, as long as adequate standards of data security and confidentiality are maintained. monashees, as data controller, shall require adequate levels of security and confidentiality from such processing partners.

7.2. Other Third Parties. In addition to the cases already mentioned in this Policy, Personal Data may also be shared with third parties, including with controllers, in the following cases:

7.2.1. New Business. There may be the transfer of Personal Data in processes of acquisition, sale, merger, corporate reorganization or any other change of control of monashees. In this case, monashees shall ensure that the individual or legal entity that may access or take control of data processed under this Policy is also linked to it, guaranteeing the continuity of the protection of Personal Data, and informing Users in advance, if this transfer implies any change in the Policy

7.2.2. Regular exercise of rights through administrative or judicial or extrajudicial means. monashees may share Personal Data with third parties such as law firms, consulting firms and the like, for the purpose of exercising its own rights, whatever the means chosen to do so.

7.2.3. Judicial or Administrative Request. monashees may share Personal Data in the event of a judicial or administrative request.

7.2.4. Compliance with legal obligation. monashees may share Personal Data with third parties, competent authorities in compliance with legal obligations to which it may be subject.

7.2.5. Opening of accounts in International Banks. monashees may share Personal Data with International Banks with which investors are interested in obtaining credit. In these cases, monashees shall only act as a processor.

7.3. Legal basis for sharing. The sharing of data with such third parties shall always be carried out (i) for the regular exercise of monashees rights, (ii) to comply with legal obligations, or for (iii) legitimate interest of monashees or third parties (in this case, without including any sensitive data).

8. PRIVACY POLICY UPDATES

8.1. monashees may at any time change this Policy at its sole discretion. Any changes shall be informed at least 30 (thirty) days in advance, through the Website itself and/or the e-mail informed by the User. If such User continues to use the website or to interact with monashees after 30 (thirty) days from the publication of the new version of the Policy, it shall be understood that this User is fully aware of the new terms applicable to the processing of Personal Data. If a User does not agree with the changes to the Policy, he or she must refrain from interacting with monashees or exercise his or her rights as a data subject.

Last update: March 23rd, 2022.