



# PRIVACY AND DATA PROTECTION POLICY

Your privacy and safety are very important to DIF BROKER – SOCIEDADE FINANCEIRA DE CORRETAGEM S.A. (Hereinafter “DIF BROKER”), therefore this policy contains the practices regarding the personal data processing on the websites owned by DIF BROKER, namely the database with the collected data and its processing, use and disclosure.

This policy explains your rights and how and for which purposes your data is collected.

This policy applies to all Clients and Users that use the mobile applications or have access to the DIF BROKER’s website, or interact with DIF BROKER through any other mean, namely, social networks, digital channels, multiplatform instant messaging, voice calls or others.

This policy defines our firm compromise to protect your personal data, thus we recommend the reading and acceptance of our privacy and data protection policy before continuing to navigate on the DIF BROKER’s websites.

This policy was updated on July, 31<sup>st</sup> 2020.

## 1. WHO IS THE ENTITY RESPONSIBLE FOR THE TREATMENT OF YOUR DATA (CONTROLLER)?

According to the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL of 27 April 2016 on the protection of physical individuals regarding the personal data processing and free movement of data (hereinafter “GDPR”), we inform that the personal data collected or sent to DIF BROKER shall be processed by the following Data Controller:

**Name:** DIF BROKER – SOCIEDADE FINANCEIRA DE CORRETAGEM S.A

**Registered office:** Rua António Cardoso, no. 601-613, Lj 8, 4150-083 Porto

**Country:** Portugal

**Telephone:** +(351) 211 201 595

**E-mail:** [RGPD@difbroker.com](mailto:RGPD@difbroker.com)

**Address (office):** Av. da Liberdade No. 244- 4º 1250-149 – Lisbon

**N.C.P.I:** 504.767.640

**Object:** Financial Intermediation and auxiliary services



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Registries in Portugal: **CMVM No. 276; Bank of Portugal No. 225**

Within the scope of DIF BROKER's activity, subcontractors ("Processors") may pursue some of the purposes indicated in this Policy.

## 2. WHO IS THE DATA PROTECTION OFFICER OF DIF BROKER AND HOW IS IT POSSIBLE TO CONTACT HIM?

The Data Protection Officer is the individual responsible for protecting the fundamental right to the personal data protection on DIF BROKER, who undertakes the regulatory compliance of data protection. You may contact the Data Protection Officer of DIF BROKER through the following email address: Contact of the Data Protection Officer: [RGPD@Difbroker.com](mailto:RGPD@Difbroker.com)

## 3. WHICH ARE THE PRIVACY PRINCIPLES THAT DIF BROKER PURSUES?

When we collect and process your personal data, the following practical principles are applied:

- **Principle of Lawfulness, Loyalty and Transparency:** personal data is treated according to lawful, loyal and transparent methods;
- **Principle of Limiting the Purposes of Processing and Minimizing Data:** personal data is collected for specific, explicit and legitimate purposes;
- **Principle of Accuracy and Conservation Limitation:**
  - personal data collection is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
  - Personal data must be accurate and updated. Inaccurate data will be updated or deleted;
  - Personal data will be kept only for the period necessary for the purposes for which they were processed, without prejudice of longer retention periods in compliance within the applicable legal terms;
- **Principle of Integrity and Confidentiality:** personal data is kept safe through appropriate and effective technical and organizational measures against unauthorized or unlawful treatment and against their loss, destruction or accidental damage, through the application of appropriate technical or organizational measures;
- **Principle of Responsibility:** DIF BROKER is responsible for complying with the stated principles.

## 4. WHEN DO WE COLLECT YOUR PERSONAL DATA?

- When you hire our services by phone, email or in person;
- When you access or consult DIF BROKER's social networks sites or pages;
- When you contact DIF BROKER through digital communications channels or multiplatform applications;



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- When you make inquiries through the Contact Form;
- When you carry out consultations through the Chat Service;
- When you attend webinars, seminars, events or courses organized by DIF BROKER or its partners for financial training;
- When you access a demo account.

## 5. HOW DO WE COLLECT YOUR PERSONAL DATA?

**Directly provided by you:** you may visit our website without identifying yourself or revealing any personal data about you. Nevertheless, to offer you a complete service, the most frequent action is to collect personal data. For instance, we collect data about you when you carry out a consultation of information through the contact forms or when we grant you access to an account. This type of data collected may include your email address, name and surnames, address and phone number.

**From cookies:** We may also collect data from the “cookies” stored on your computer or mobile device. The cookies are small files stored on the hard disk or memory of your electronic device. To learn more about the use and purpose of the cookies we use, you may consult the cookies policy at [www.difbroker.com](http://www.difbroker.com). Nevertheless, you may alter the options on your web browser to stop accepting cookies or to be asked before accepting cookies on the websites you visit. However, if you do not accept cookies, it is possible that you may not use all our services.

**From the Registries:** We may register some data and store it on our registry files when you interact with our Services. This data may include the Internet Protocol (IP) or other device addresses or identification numbers, as well as the type of browser, Internet services supplier, etc.

## 6. FOR WHAT PURPOSES DO WE TREAT YOUR PERSONAL DATA?

At DIF BROKER, we process the data necessary for the management and optimization of our Services as well to ensure the maintenance of a commercial relationship with our Clients and Users. In addition, we also use your data to send you advertising of interest, related to products, news, offers and promotions.

The collected data is treated in pursuance of the following purposes:

### 6.1 Contractual or pre-contractual diligences at the request of data subjects:

The legal basis of the treatment is the signing and / or execution of a contract for the provision of financial intermediation services, which includes: brokerage, non-independent financial advice or portfolio management in accordance with the terms and conditions established in the formalized contract between the parties, as well as pre-contractual steps at the request of Clients.

#### 6.1.1 Pre-contractual arrangements:



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- Responding to requests for information or inquiries from data subjects;
- Digitally signing of contractual documentation (including issuing the respective certificate) and verifying the identity of potential Clients using a Qualified Trusted Service Provider under Regulation (EU) No. 910/2014 of the European Parliament and the Council of July 23, 2014. As part of the online account opening process, DIF BROKER allows potential Clients to digitally sign contractual account opening documents;

## 6.1.2 Client Support - Contractual arrangements:

- Contracting services;
- Execution of the contract:
  - Administrative management of requests and orders;
  - processing and registration of Users on the DIF BROKER website [www.difbroker.com](http://www.difbroker.com), to allow the Users' access to the account, namely to the DIF BROKER trading platform;
  - invoicing;
  - commissions control;
  - sending periodic or sporadic information;
  - request for documentation update requests;
  - other interactions necessary for contractual fulfillment and maintenance of the commercial relationship with Clients;
  - sending newsletters, articles or news reports of a purely informative nature about the markets, products or subjects related to the provision of services.

## 6.2 Consent

The legal basis of the processing is the consent, which can be withdrawn at any time by the data subject with no consequences on the provision of the services contracted or to be contracted.

- Sending promotional or merely informative communications on topics related to DIF BROKER services or products;
- Definition of commercial marketing profiles for promotional or merely informative communications in accordance with the needs and preferences of the Clients;
- share of data with DIF BROKER's business partners.

## 6.3 Fulfilment of Legal obligations

The legal basis of the treatment is to comply with legal obligations imposed on DIF BROKER, in particular, the following:



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- Anti-money laundering and terrorism financing provisions;
- Market abuse prevention provisions;
- Reporting to national and international DIF BROKER's supervisors;
- Reporting to tax and administrative authorities;
- Provision of information in legal proceedings;
- Other legal provisions.

## 6.4 Purpose based on legitimate interest

The legal basis for the processing data is the pursuit of the legitimate interests of DIF BROKER or any third party provided that the fundamental interests or rights and freedoms of data subjects do not prevail.

- Attend and respond to communications or requests of information by the data subjects;
- Record phone calls for the purpose of maintaining quality of service and maintaining a register to identify the integrity of the communications made through this means;
- Send promotional or merely informative communications on topics related to DIF BROKER services or products to Clients;
- Definition of commercial marketing profiles for sending promotional or merely informative communications tailored to the needs and preferences of Clients;
- Communicate Client data to other companies in the DIF BROKER Group.

The legitimate interests of DIF BROKER that underlie the processing of data are, respectively:

- Users' reasonable expectation of receiving a response to their requests;
- DIF BROKER's legitimate interest in processing data and defining profiles for the purposes of direct marketing in order to adapt the promotional material the interests and preferences of the data subjects;
- The prevailing legitimate interest in telephone recordings in order to guarantee and maintain evidence of the veracity and integrity of the information provided by the Users. Since the reception, transmission and execution of Client orders is sometimes established by phone, there is a need to keep the said recordings to maintain the integrity of the information linked to a specific date, avoiding errors and misunderstandings that may harm any of the parties. Even so, the legitimate interest is



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based on the need to have to produce evidence of a conversation in a lawsuit in case of a dispute between the parties;

- DIF BROKER's legitimate interest in attracting Clients for direct marketing purposes;
- DIF BROKER's legitimate interest in transmitting personal data of its Clients within the scope of its business group in order to optimize the resources available within the Group.

## 7. WHAT PERSONAL DATA DO WE COLLECT?

### ➤ CLIENTS AND USERS:

- Identification data, including image;
- Contact details;
- Economic, financial and insurance data;
- Commercial information;
- Transactions in goods and services;
- Personal, social and family characteristics;
- Academic and professional data;
- Details of profession and employment;
- Interests and preferences;
- Tax information.

### ➤ POTENTIAL CLIENTS (LEADS):

- Identification info;
- Contact details;
- Commercial information;
- Personal characteristics;



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- Interests and preferences.

## 8. FOR HOW LONG WE KEEP YOUR DATA?

The time during which the data is stored and preserved varies according to the purpose for which the information is processed. Whenever there is no specific legal requirement, data is stored and preserved only for the minimum period necessary for the purposes that have motivated the collection or subsequent treatment, after which they will be deleted.

DIF BROKER is obliged to keep data for a longer time with the following purposes:

- Comply with its obligations towards Clients to send documentation to support tax returns in the year of account closure. DIF BROKER will keep the necessary data for the issue and sending of the respective documentation;
- In accordance with the Anti Money Laundering and Terrorism Financing Legislation, namely article 51 of Law 83/2017, DIF BROKER will keep for 7 (seven) years from the identification of the holder or, in the case of Clients, from the account closure, documents, records and electronic data related to the account, within the scope of the identification and diligence procedures that were ensured, as well as the documentation of the processes or files related to it, including, any commercial correspondence sent and any documents, records and analyses which formalize compliance with the provisions of said legislation, including supporting documents and records of operations that allow the reconstitution the same; originals, copies, references or any other durable medium, with identical probative force, supporting documents and transaction records, even if, in the case of entering into a relationship of business, it has already ended;
- In accordance with the legislation regarding the conservation of accounting documents, DL 28/2019, DIF BROKER will keep for up to 10 (ten) years from the respective issuance / reception the receipts, invoices and other fiscally relevant documents and any other documents issued regardless of its designation which make it possible to check the provision of the services rendered;
- Under the legal regime of electronic documents and digital signature, DL 290-D / 99, DIF BROKER will retain (through Digital Sign - Provider of qualified services of Trust) and for a period of 20 (twenty) years from the respective issuance, the certificates of digital signature issued, as well as the information related to them, namely, the videoconferences that support them;
- In addition to the legal obligations mentioned above, DIF BROKER will retain the data collected for the general term of ordinary prescription (20 years) for the purposes of declaration, exercise or defense in judicial proceedings.



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Whenever data must be kept for a specified period established by law, the right to its deletion can only be exercised after the expiry of that period.

The data treated for the purpose of direct marketing will be kept until the Users decides to voluntary exclusion from sending advertising, whenever there is no legitimate interest in its conservation, namely by maintaining the provision of the service.

The website's chat ticket data will be stored automatically for 120 days after which will be marked as closed.

## 9. TO WHICH RECIPIENTS WILL YOUR DATA BE COMMUNICATED TO?

DIF BROKER does not commercialize your personal data.

DIF BROKER, in the scope of its activity and for the rendering of its services, may have to transmit personal data to the following recipients:

### 9.1 Within the EU:

- to other banking or financial institutions: for the provision of services to Clients;
- to its branch in Spain - DIF BROKER SOCIEDAD FINANCIERA DE CORRETAGEM SA, for effects of optimization of resources for the provision of rendering services to clients;
- to Tax administration (TA): for the fulfilment of obligations with AT, including tax agents retention and simple information;
- to Administrative and consulting services of the company: service providers hired by DIF BROKER;
- to Computer Consulting Services: Service providers hired by DIF BROKER;
- To Financial market trading platforms: Service providers hired by DIF BROKER;
- to the Securities Market Commission and Bank of Portugal: in the performance of its inspection and inspection functions;
- to Other companies in the DIF BROKER group located in the EU;
- to Storage services (Housing): Service providers hired by DIF BROKER;





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- In sale, merger, acquisition or similar transactions: if DIF BROKER is involved in a of these processes, the Client or Users will be notified by email and / or a notice posted on our website about said transfer and any decision that may have an impact on your information;
- When exercising or defending claims or when the courts act in their judicial role: in certain circumstances, the disclosure of personal data may be mandatory because it is subject to a court order, order or service;
- Non-identifiable aggregated data: we may share aggregated information or information with third parties another of a non-personal character that does not directly identify the Users to improve his / her general experience related to the provision of our services;
- to the qualified trust service provider in accordance with Regulation (EU) No. 910/2014) for the purpose of digitally signing contractual documentation (including issuing the respective certificate) and verification of the identity of potential Clients undergoing contractual formalization: [Digital Sign](#)
- To DIF BROKER's Business Partners under prior consent of data subjects with the purpose of rendering common or complementary services to the same, under a business partnership agreement.

Whenever the recipients of the data are natural or legal persons hired by DIF BROKER for the provision of any service that requires the transfer and processing of personal data, they assumed the status of subcontractor or co-responsible for data processing, with the inherent consequences under the GDPR.

## 9.2 Outside the EU: International Data Transfers

DIF BROKER only transfers personal data to entities outside the EU:

- Located in third countries for which there is an adequacy decision by the European Commission ensure the adequacy of the level of protection;
- In compliance with a legal obligation imposed on it;
- Group companies located outside the EU to share resources and optimize provision services;
- Outside the previous cases, by means of an agreement that ensures the adoption by those entities of measures that give adequate guarantees for the protection of personal data and the rights of data subjects a, namely through the subscription of standard clauses approved by the Commission European Union.



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At the present, DIF BROKER transfers personal data to entities outside the EU as follows:

1. To its subsidiary in Uruguay, DIF MARKETS, Agente de Valores SA for the purpose of sharing and optimizing resources which, in addition to being part of the same business group, is located in a country covered by suitability decision issued by the European Commission (Commission Decision 2012/484 / EU of 08/21/2012). These transfers take place to address the need to ensure the management and Client service outside the usual days and times in Portugal and Spain and in specific situations where it is necessary to cover our Clients;
2. The Platform for the management of marketing emails, Mailchimp for sending information advertising and promotion of services. This entity belonging to the i Rocket Science Group, with USA headquarters which is covered by the "Privacy Shield" Privacy Agreement between the EU and the USA, ensuring the security of your personal data. For more information [here](#).
3. The Zendesk Company belonging to Organización Zendesk, Inc. under corporate rules (BCR) pursuant to Article 47 of Regulation (EU) 2016/679 of the European Parliament and of the April 27, 2016, approved and known as the Zendesk Corporate Rules Binding ("Zendesk BCR") that establish adequate protection of said personal information and are legally binding for the entire Zendesk Group. For more information [here](#).
4. The Zoho Corporation Organization, with which DIF BROKER contracted the virtual infrastructure that contemplates the management of a technological platform CRM (Client Relationship Management) according to a "Cloud" model for the management of Clients and potential Clients - whose information is available [here](#).

## 10. SECURITY MEASURES ADOPTED IN RELATION TO THE PROCESSING OF PERSONAL DATA

DIF BROKER informs its Users and Clients that it implements and applies mechanisms and measures of technical and organizational security to ensure an adequate level of risk in the processing of personal data.

For this purpose, DIF BROKER is based on an objective assessment having identified, analysed and evaluated the risks, probability and impact for the rights and freedoms of individual persons (phase of risk assessment) and, consequently, DIF BROKER, in the risk treatment phase, applies timely and effective mechanisms and security measures to eliminate or mitigate risks identified in the risk assessment phase. Specifically, technical and organizational measures are adopted to mitigate the risks related to destruction, loss or accidental alteration of data transmitted, stored or otherwise processed, as well to prevent the unauthorized access to the data.



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## 11. RIGHTS OF THE DATA SUBJECTS

The Users may manage and direct their communications and exercise their rights (of access, update, correction, opposition, to be forgotten, limitation and portability) according to the requirements imposed by the regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of individuals, personal data processing and free movement of data.

On all our operational transactions regarding privacy, DIF BROKER endeavours to comply with the current standards. The following table lists the important rights of the concerned party:

My rights	What does it mean?
<b>Right to Information</b>	The Users are entitled to receive clear, concise, transparent and easy to understand information on how their personal data is used.
<b>Right of Access</b>	The Users are entitled to access their personal data (with certain limits). The clearly unfounded, excessive or repetitive requests may be refused. To exercise this right, Users must contact DIF BROKER through any of the means referred to in this policy.
<b>Right to Correction</b>	Users are entitled to correct their personal data when they are inaccurate, no longer valid or incomplete. To exercise this right, Users must contact DIF BROKER through any of the means referred to in this policy. If you already have an account, you may easily alter your data.
<b>Right to be Forgotten</b>	On certain cases, you may request that your personal data is deleted or eliminated. It should be mentioned that this is not an absolute right as, due to legal or legitimate reasons, they may stored. If you want your personal data to be deleted, contact us through any of the mentioned means.



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<b>Right of opposition to direct marketing, included on the profile elaboration</b>	<p>You may request the cancellation of the subscription to our marketing communications at any moment.</p>
<b>Right to withdraw the consent at any moment when the data processing is based on consent</b>	<p>The simplest way to request the cancellation is to click at “unsubscribe” (cancel the subscription). Otherwise, you may send an email to the email address: <a href="mailto:RGPD@difbroker.com">RGPD@difbroker.com</a> or call +351 211 201 595</p>
<b>Right of opposition to the processing based on the satisfaction of legitimate interests</b>	<p>To oppose to the profile elaboration, contact us through any of the mentioned means.</p>
<b>Right to file a claim to a data control authority</b>	<p>If you have given your consent for some of the purposes informed and established on the above-mentioned processes, we inform that you are entitled to withdraw your consent at any moment, without affecting the processing lawfulness, as it was based on a previous consent.</p>
<b>Right to data portability</b>	<p>If you want to withdraw your consent, contact us through any of the mentioned means.</p>
<b>Right to file a claim to a data control authority</b>	<p>The Users may, at any moment, oppose to the processing of their data, when based on the satisfaction of a legitimate interest, provided that their fundamental interests, rights and freedoms prevail. If you want to exercise this right, contact us through any of the mentioned means.</p>
<b>Right to data portability</b>	<p>We inform you that if your rights or way to exercise them were not satisfied, you may file a claim before the Data Control Authority. To learn more about the rights and how to exercise them, you may go to the Portuguese Data Protection Agency and obtain the necessary information on the following website: <a href="http://www.cnpd.pt">www.cnpd.pt</a>.</p>
<b>Right to data portability</b>	<p>Please contact us through the below mentioned means before filing your claim to the competent authority on data protection matters. Our complaints department may assist you.</p>
<b>Right to data portability</b>	<p>The Users is entitled to receive the personal data provided to us, on a structured format of common use and mechanical reading, so that it may be transferred to another entity responsible for the processing, whenever the</p>



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processing is based on the execution of a contract or consent and carried out by automatized means. To get more information, contact us through any of the below mentioned means.

<b>Right of data limitation</b>	<p>The Users are entitled to request the limitation of their data processing. If this right is exercised, the processing of your data are subject to certain limitations, therefore we may store them, but we may not use or process them.</p> <p>This right may only be exercised on specific circumstances, defined by the GDPR, such as:</p> <ul style="list-style-type: none"><li>• That the concerned party contests the accuracy of their personal data, during the term which allows the responsible to check its accuracy;</li><li>• That the processing is illegal or the concerned party opposes to the suppression of personal data and requests its use limitation.</li><li>• Opposes the suppression of personal data and instead requests its use limitation;</li><li>• That the responsible entity does not need the personal data for processing purposes, but the concerned party needs it for the defence of claims.</li><li>• That the concerned party has opposed to the processing due to article 21, paragraph 1), whenever the legitimate reasons of the responsible entity prevail over the concerned party's interests.</li></ul> <p>If you want to exercise this right, contact us through any of the mentioned means.</p>
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At any moment, the Users may deactivate the Cookies. As a rule, the setting of Internet browsers is available, by default, to accept the use of Cookies. Nonetheless, they may be easily deactivated through the alteration of the browser's settings.

## **Right to desactivate cookies**

Most cookies are used to improve the functionality of the websites and, for this reason, if they are deactivated, you may not fully or partially use the



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services offered through our web and may encounter some problems on the website use or login.

If you want to limit or block all the cookies established by our webs (which may prevent you from using certain parts of the web) or by other webs/applications, you may do so through your browser's settings.

## 12. HOW CAN YOU EXERCISE YOUR DATA PROTECTION RIGHTS?

To exercise your rights, you must send your request to DIF BROKER SA, Av. da Liberdade 244-4º 1250-149 – Lisbon – Portugal, or through the following email address: [RGPD@difbroker.com](mailto:RGPD@difbroker.com) where you should indicate the following subject "GPDR DIF BROKER". You should specify about which of the rights you need to be clarified, annexing a copy of the Citizen Card or equivalent identification document. If you are acting as an authorized representative, you shall also annex the document which justifies this quality, as well as the representative's identification document.

## 13. PROCESSING OF SPECIAL PERSONAL DATA CATEGORIES – CONVICTIONS AND LEGAL INFRINGEMENTS

On the filling of free text domains, it is prohibited the insertion of personal data which reveal the ethnical or racial origin, the political opinions, the religious or philosophical beliefs or the syndical affiliation and the generic data processing, biometrical data aimed to clearly identify an individual, data concerning health or sexual life or orientation of an individual, as well as your personal data concerning convictions and legal infringements. If you insert any data concerning the above-mentioned aspects on any of our forms or through email, they shall be immediately deleted for our data systems as they are not necessary nor relevant for the purposes established on the data processing.

## 14. FORWARDING TO OTHER WEBSITES

On certain situations, there are links to other websites, but these websites are not under our control. Therefore, DIF BROKER shall not be responsible for any problem arising from the use of your personal data, the website content or the services that might be offered on those websites. Thus, we recommend you consult the privacy policy as well as the terms and conditions of each website you are sent to, in order to check how that supplier shall process your data.

## 15. DATA QUALITY

Aiming to comply with the privacy principles, specially concerning data quality DIFBROKER informs that you should only provide your own personal data and not from someone else, unless you are their legal



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representative. Therefore, to optimize the data quality, we need you to submit your correct, updated, accurate and true data.

If the data provided are from a third party who you do not represent or if the data provided from you or from a third party you do not represent are deemed false, faulty, not updated or inadequate, you shall be responsible for any direct or indirect damage caused to third parties or to DIF BROKER.

The data provided by the Users indicated with an asterisk (\*) are the ones strictly necessary to constant the Users. The fact you do not provide more data than the strictly necessary never implies a service quality loss.

## 16. DATA OF MINORS OR DISABLED INDIVIDUALS

The use of the Service is not allowed to minors, therefore if you are under 18 years old, we ask you to renounce the use of our web services.

DIF BROKER may also request additional data or documents to verify the potential Client's age or capacity.

## 17. DATA UPDATE

The Users is the only personal data source, therefore DIF BROKER requests that, aiming to maintain your data updated at any moment, accordingly to the GRPD principles, you communicate to the below indicated address, namely for the rights of access, correction, to be forgotten and opposition, any data alteration with its activity purpose on the entity represented in order to cancel and/or process them.

## 18. CONSENT FOR ADVERTISEMENT SENDING

DIF BROKER shall not send advertising or promotional communications by email or other equivalent electronic communication mean, which have not been previously requested or expressly authorised by their recipients with their acceptance consent mentioned on this privacy policy or through the authorization methods used by DIF BROKER.

In the case of Users with a relationship previous to the entry into force of the GPDR, DIF BROKER is authorized to send commercial communications concerning their products and services similar to the initially agreed by the Client. Anyway, the Users may request the voluntary exclusion to not receive commercial information through the Client Service channels, proving their identity and requesting the withdrawal of their email from the database.

Your personal data shall be stored indefinitely on our data systems to carry out trade campaigns of the company's products and services, whenever you do not exercise your right of opposition to advertisement sending.



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## 19. SOCIAL NETWORKS, DIGITAL CHANNELS AND MULTIPLATFORM APPLICATIONS

If the Users is a fan, follower or similar of our company on the different social networks, within the context of this processing, it must be considered that DIF BROKER may only consult or eliminate your data in a restricted way due to a specific profile. Any data correction or limitation shall be carried out through the confirmation of your own Users profile on the social networks. By default, the Users consents the following:

- The processing of their personal data within the context of the social network, digital channels and multiplatform applications accordingly to their Privacy Policies;
- The DIF BROKER's access to the data contained on your profile or biography, depending on its setting and privacy on each social shall be more or less broad.
- That the news published on our events or our commentaries may appear on your wall or biography.
- To receive communication on your products/events.
- If you want to stop following us, on your social network, you must click on the "Unfollow" or "Stop Following" option.

## 20. ALTERATION OF THIS PRIVACY POLICY

DIF BROKER reserves the right to alter this policy due to future legal news or jurisprudence, as well as sector practices.

The continuous use of DIF BROKER services by the Users shall be deemed a ratification of this document, with the modifications and alterations added.

For the above-mentioned reasons, DIF BROKER reserves the right to fully or partially alter or interrupt the Service, regardless the sending of a notification to the Users. DIF BROKER shall not be responsible before the Users of third parties if the right to alter or interrupt the DIF BROKER Service is exercised.