DIF BROKER

PRECONTRACTUAL INFORMATION

INDEX

I. Definitions

1. "Shares": represent the shares of a company's capital. Their remuneration is uncertain and results in the payment of a dividend, based on the company's profits.

2. "Active NFFE" (Active Non-Financial Foreign Entity): For the purposes of the "FATCA" legislation, the term "Active NFFE" refers to any company that has the following characteristics: (i) was not incorporated or organized in terms of US law or any of the federal states that make up the US; (ii) does not fit the concept of financial institution; and (iii) the percentage of passive income present in gross income earned/generated in the previous fiscal year was less than 50% and the percentage resulting from the weighted average of assets producing or used to produce passive income is also less than 50%.

3. "CMVM": Portuguese Securities Market Commission, the Portuguese financial markets regulator.

4. "CNMV": National Securities Market Commission, the Spanish financial markets regulator.

5. "LEI Code": consists of a 20-digit alphanumeric code that allows the international identification of entities that present themselves as counterparties in commercial transactions. In Portugal, the competence to issue the "LEI Code" belongs to the Institute of Registries and Notaries, I.P. 1 of article 1 of Decree-Law No. 202/2015, of 17 September. Pursuant to a recommendation by the G20 Finance Ministers and Central Bank Governors to the Financial Stability Board, it was established that a unique and universal identifier should be created for legal entities participating in financial transactions, including as counterparties. Under EU Regulation 648/2012 of 4 July 2012 (EMIR) it is provided that, under the obligation to communicate transactions in derivative contracts to the designated Transaction Repositories, the identification of counterparties financial and non-financial transactions subject to this obligation is based on the "LEI Code" in accordance with the provisions of Implementing Regulation 1247/2012 of 19 December 2012. Any transaction of companies that do not have the "LEI Code".

6. Mercantile Commission (*Comissão Mercantil*): the Investment Services Agreement entered between DIF Broker and the Client, which is structured as a mercantile commission contract, by which DIF Broker executes the Client's instructions acting on its own name without mentioning or alluding to a mandate from Client, but on behalf of the Client, pursuant to article 266º and following of the Portuguese Commercial Code.

7. "Common Reporting Standard" (CRS): A scheme developed to define a set of standard lines in the field of automatic and global exchange for tax information. This model proposed and approved by the Organization for Economic Development Cooperation (OECD) has been the subject of numerous international multilateral agreements, and Portugal is on the list of states that have subscribed to the Common Reporting Standard. The European Union also, through the publication of the European Council Directive 2014/10 / EU, endorsed the Common Reporting Standard. Thus, in the light of the rules of Community law, it has become unavoidable to transpose this model into the legal systems of the various Member States, which naturally includes Portugal. The legal regime governing the Common Reporting Standard in Portugal is set out in Decree-Law No. 64/2016 of 11 October. The Common Reporting Standard is a mechanism for combating fraud and cross-border tax evasion and primarily relies on assets, income earned on investments and income from other sources that is obtained outside the State where the tax residence is.

8. "Eligible Counterparty": is a possible Client classification. This category includes entities with extensive knowledge of the financial markets and their products that are traded on these markets, as follows: (i) credit institutions; (ii) Investment Companies; (iii) Insurance Companies; (iv) Pension Funds and their Management Companies (v) Other Authorized Financial Institutions; (vi) National governments and corresponding services.

9. "CVM" – Portuguese Securities Code (legislation that can be consulted through the following web address: https://www.cmvm.pt/en/Legislacao/Legislacaonacional/CodigodosValorMobiliarios/Pages/Code-dos-Valores-Mobiliarios.aspx? pg).

10. "MiFID II": Simplified and informal way used by many market players, including supervisors, to refer to the new Financial Markets Directive - Directive 2014/65 / EU of the European Parliament and of the Council of 15 May 2014 - repealing Directive 2004/39 / EC of the European Parliament and of the Council, known as MiFID I.

11. "Key Information Document": A document intended to facilitate the understanding and comparability by "Retail" Investors of Retail and Insurance-Based Investment Product (PRIIPS) packages.

12. "ECN": a financial institution that only matches the orders of participants in a given market and cannot act as a counterparty to the Client's position.

13. ETF" or Exchange Traded Funds: are open investment funds admitted to trading on the stock exchange and which, as a general rule, aim to obtain a performance dependent on the behavior of a certain reference indicator (index, asset or a strategy of investment);

14. "ETP": Investment funds listed on the Stock Exchange. ETPs have a reference index that replicate markets, sectors or other references, such as sectoral or generic indices, stocks, raw materials, bonds, among others, which means that the price has an intraday fluctuation; include ETF, ETC, ETN and ETO and may have raw materials, debt notes, indices or derivative contracts as underlying assets.

15. Foreign Account Tax Compliance Act (FATCA): Legislation adopted on March 18, 2010, which currently corresponds to Chapter 4 of the Internal Revenue Code in force in the United States of America. The main purpose of this statute is to reinforce the prevention and

combat of tax evasion of non-tax-exempt US taxable persons with respect to income earned and financial assets held outside the territory of the United States of America.

16. “Foreign Financial Institution” (FFI) means any non-US financial entity that: (i) accepts deposits in the ordinary course of business or other similar services, (ii) holds as a substantial part of its business (more than 20%) , financial assets for others; (iii) is an insurer (or a holding company of a group that includes an insurer) in the life business that has cash value policies or lifetime annuities; or (iv) meets the following requirements:

16.1. Your primary business (over 50%) is at least one of the following, for (or on behalf of) clients of:

16.1.1. Trading in money market instruments (checks, notes, certificates of deposit, derivatives, etc.), foreign currency, exchange rates, interest rates, indexed instruments, transferable securities or commodities);

16.1.2. Portfolio management of legal persons; or

16.1.3. Investment, administration or management of funds, money or financial assets for others.

16.2. Its gross income (more than 50%) results mostly from the investment, reinvestment or trading of financial assets and is managed by one of the above-mentioned entities;

16.3. It is constituted as (or appears as) a collective investment undertaking, mutual fund, exchange traded fund, private equity fund, hedge fund, leveraged buyout fund, venture capital fund or other similar investment vehicle intended to invest, reinvest or trade financial assets.

17. “Form W-8BEN”: Form provided by the Internal Revenue Service (IRS) and must be completed by clients who present themselves as natural persons and who do not, under the “FATCA” legislation, under the concept of “US Person”. These clients will be required to complete the form to ensure a reduction in withholding tax on payments or income that originates or links to the US. The withholding tax applicable in such cases shall be less than 30%;

18. “Form W-8BEN E”: Form provided by the Internal Revenue Service (IRS) and must be completed by clients who present themselves as non-FATCA legal persons under the concept of “US Person”. Active NFFE must complete this form to ensure a reduction in withholding tax on US-origin payments or income. The withholding tax applicable in such cases will be less than 30%. Passive NFFE should also complete this form, as they will only benefit from such a reduction in withholding tax if, by completing this form, they ensure that no Substantial US owner exists in their corporate structure or, Alternatively, identify the name, address, and US Tax Identification Number (TIN) of the “Substantial US owners” in your corporate structure.

19. “Form W-9”: Form from the United States Internal Revenue Service (IRS) that must be completed by clients who configure themselves under the “FATCA” legislation as “US Person”. This form is intended to certify the US name, address, and tax ID of these clients.

20. “Financial Instruments”: are financial instruments or similar: (i) “Securities”, including securities; (ii) money market instruments; (iii) derivative instruments for credit risk transfer; (iv) the CFDs; (v) the Options; (vi) the futures; (vii) interest rate forward contracts and any other derivative contracts relating to “Securities”, currencies, interest or yields, or other derivative instruments, financial indices and financial indicators, with physical or financial settlement.

21. "Inverse ETF" is an open-ended investment fund ("ETF") that uses derivative instruments to make a profit against the benchmark position. That is, if the reference indicator goes down, the value of the fund goes up, and vice versa.

22. "Leverage ETF" is an open-ended investment fund ("ETF") admitted to trading that uses derivative instruments and debt to amplify the benchmark's return.

23. "Internal Procedures Manual": is a DIF Broker Internal Control System document for internal use that details, in an orderly and systematic manner, the instructions, responsibilities, and information on the policies, functions, systems, and procedures of the various operations and activities, in all its areas, departments and services.

24. “Market Maker”: financial institution responsible for the permanent quotation of a given "Financial Instrument", as it has an obligation to publish a bid and ask price and agree to trade them in accordance with the rules of supervision to which it is subject. Assumes the risk of payment of the client's net profits, as it assumes the counterparty of the Client.

25. “Close family members of a PEP”: i) The spouse or non-marital partner of a politically exposed person; (ii) Relatives and affines up to the 2nd degree, in the straight line or in the collateral line, of the politically exposed person; iii) The non-marital partners of the politically exposed person's relatives referred to in the previous subparagraph, insofar as they do not benefit from the affinity status; iv) Persons who, in other legal systems, occupy similar positions;

26. “Retail”: All Clients who do not meet the requirements that characterize the categories defined for “Professional” or “Eligible Counterparties” are in this category. Currently, any Client holding an account with financial instruments and / or providing portfolio management or investment services will be classified by default by DIF Broker as a Retail Investor. However, it will be an exception to the provision that the Client requests to be classified as a Professional Investor.

27. “Bonds”: “Securities” representing debt of the issuer (corporations, states or public / private entities), usually with a pre-established maturity for the repayment of capital, with interest being repaid at regular interest rates. or upon expiration of the “Obligation”.

28. “Other relevant political or public office”: Holders of other relevant political or public office for the purposes of applicable legal and regulatory provisions are natural persons who, not being qualified as “PEPs”, have performed or have held in the last twelve months and national territory, the positions listed in articles 2 and 3 of Law no. 52/2019 of the 31st of July.

29. “Passive Income”: For the purposes of the “FATCA” legislation, the term Passive Income covers: (i) Dividends; (ii) Interest, including interest income and certain income from investments under insurance contracts; (iii) Certain rents and royalties, except those resulting from operations carried out under its own business; (iv) Annuities; (v) Net gains from transactions, including forwards contracts and similar transactions associated with certain types of commodity transactions; (vi) Certain income from foreign currency exchange transactions; (vii) Net revenue from swap contracts; (viii) Amounts earned by an insurance company in connection with its reserves for insurance contracts and annuity contracts; and (ix) Net gains from the sale of assets that give rise to some of the above income types. However, there are the following exclusions:

29.1. Any income from interest, dividends, rents or royalties earned or accrued to the extent that such amount is properly allocated to that person's income that is not, under FATCA law, passive income;

29.2. Income generated by certain intermediation companies in the trading of commodities and “Securities”, within the normal operation of their business.

30. “Passive Non-Financial Foreign Entity”: Usually, the concept of Passive NFFE represents, under the “FATCA” legislation, the set of NFFE that do not meet the requirements for a foreign company to present itself as “Enable NFFE ”. If, on the one hand, they are entities that do not pursue the characteristic activities of financial institutions, that is why they do not present themselves as “FFI”. On the other hand, we are dealing with companies that do not fall under the classification of “Active NFFE”, as the percentage of “Passive Income” present in gross income earned in the previous fiscal year was 50% or more or because the percentage resulting from the weighted average of assets producing or serving to produce passive income is 50% or more.

31. “PEP” (Politically Exposed Person): The concept of Politically Exposed Person aims to identify natural persons who have held or have held, in the last twelve months, in any country or jurisdiction, the following positions of a political or public nature: (i) Heads of State, Heads of Government and members of Government, namely ministers, secretaries of state and undersecretaries of state; (ii) Deputies or members of parliamentary chambers; (iii) Members of supreme courts, constitutional courts, tribunals of auditors and other high-level judicial bodies whose decisions are not subject to appeal, save in exceptional circumstances; (iv) Representatives of the Republic and members of the governing bodies of the Autonomous Regions; (v) Ombudsman, Councilors of State and members of other constitutional bodies; (vi) Heads of diplomatic missions and consular posts; (vii) High ranking officers of the Armed Forces; (viii) Mayors and city councilors; (ix) members of central banks' management and supervisory bodies, including the European Central Bank; (x) Members of the administrative and supervisory bodies of public institutes, public foundations, public establishments and independent administrative entities, by whatever means of their appointment; (xi) Members of the administrative and supervisory bodies of entities belonging to the corporate, regional or local public sector; (xii) Relevant officials of political parties, including members of their national or regional governing bodies; Members of senior management positions of the institutions that make up the European Union and other international organizations, including at least the members of the administrative bodies, the directors and deputy directors of those organizations.

32. “Persons recognized as closely associated with PEPs”: (i) any natural person who assumes joint ownership of the property, either over a legal person or over a collective legal center of interest, with a Politically Exposed Person; (ii) any natural person who owns the share capital or voting rights of a legal person, or the assets of a legal center of interest without a beneficial owner of a Politically Exposed Person; (iii) any natural person who has close corporate, commercial or professional relationships with Politically Exposed Person.

33. "Trading Platform": a platform that allows trading of “Securities” and “Financial Instruments” made available by DIF Broker to the Client. The entity responsible for maintenance and technological development is the financial entity “Saxo”.

34. “Best Execution Policy”: refers to the duty of an investment services firm to execute orders on behalf of the Client to ensure the best execution of its orders.

35. “Professional”: is a possible Client classification. This category includes entities providing investment services, entities engaged in investment activities or large companies, provided that, according to their latest individual accounts, they meet two of the following criteria: (i) euros; (ii) Total assets of 20 million euros; (iii) Net turnover of 40 million euros.

36. "Rating": a rating assigned by a credit rating agency to the issuer of a given "Financial Instrument", measured according to the likelihood of its obligations being met.

37. “Central Beneficiary Register”: Law 89/2017 (L89 / 2017) of 21 August, approved the Legal Regime of the Central Beneficiary Register (RCBE), transposing Chapter III of Directive (EU) No 2015/849 of the European Parliament and of the Council of 20 May 2015 on preventing the use of the financial system for the purpose of money laundering or terrorist financing. In this sense, a database is created with information about natural persons who, directly or indirectly, own or effectively control the entities covered by that entity.

38. “US Residency”: US residents are natural persons who have permanent US residence, green card holders, and natural persons who meet two cumulative requirements. To this end, it should be clarified that any natural person remaining in the US for at least 31 days in the current calendar year and in the period covering the current calendar year and the immediately preceding two years will also be considered US resident. has been in the US for a period of 183 days or more. In order to assess compliance with this second cumulative requirement, the total number of days the individual spent in the US in the current calendar year, 1/3 of the total number of days in the US in the previous year and 1/3 of the total number of days spent in the US should be counted and added together. 6 of the total of days spent in the USA two years before the current calendar year. Example: Natural person A, Portuguese citizen, remained in the

US 145 days in 2016, 79 days in 2015 and 96 days in 2014. By accounting for the days when natural person A remained in the US, it will be concluded that it remained 187 days in the US for 2016, 2015 and 2014. Namely, 145 days in 2016, 26 days in 2015 (1/3 of 79 days) and 16 days in 2014 (1/6 of the 96 days). Note that the abovementioned US residence periods refer to either consecutive days or interpolated days of residence.

39. “Saxo”: Saxo Bank A / S, registered and supervised by the Financial Supervisory Authority (FSA) under number 1149, registration number 15731249, headquartered in Philip Heymans Allé 15, DK-2900 Hellerup, Denmark, Financial Institution with DIF Broker has an order execution and supplier agreement from the “Trading Platform”.

40. “SII": Investor Compensation Scheme, a legal entity governed by public law, created by Decree Law No. 222/99, of 22 June, and amended by Decree Law No. 252/2003 of October, with the purpose of to protect small investors and which works through the “CMVM.” Its purpose is briefly to ensure the protection of investors (“Retail” Clients) in the event of financial incapacity of financial intermediaries authorized to operate in Portugal.

41. “Substantial US owner”: Under the “FATCA” legislation, this concept extends to natural persons who hold a percentage of the share capital of 10% or more of a non-US corporation.

42. “Market Order”: an order instructed to be executed quickly at the best market price available. Thus, in highly volatile markets, execution may differ substantially from the price available at the time of instruction.

43. “Stop Order”: Price defined by the Client, which, if activated, forces DIF Broker to transmit a “Market Order”. In the case of a sale price, it is triggered when the market price is equal to or lower than the set price, and the opposite occurs in case of a buy alarm.

44. “U.S. Person ”: For the purposes of“ FATCA ”legislation, clients who have any of the following characteristics will be considered: (i) US citizenship, including dual-national holders, even if they reside outside the US; (ii) “Residence in the United States”; (iii) Place of birth in the United States unless you have renounced US citizenship; (iv) Company or partnership incorporated or organized in the United States of America or under the laws of the United States or any of the federal states that make up the United States; (v) Any inheritance, whenever the successor is a citizen or resident of the United States of America; and (vi) any trust, insofar as it is found that:

    44.1. A US court has jurisdiction under applicable law to make decisions or judgments that, in substance, relate to all matters relating to the administration of the trust; and

    44.2. One or more US Persons have enough power to control all substantive decisions taken in the course of the trust's activity

45. "Investment fund units": represents the investment of each participant in Collective Investment Undertakings. Equity units are autonomous fractions of identical characteristics which together represent at any time the value of the overall assets of an investment fund. Thus, the ownership of the units corresponds to the ownership of the investment fund, in the proportion represented by those units.

46. “Securities”: Securities are (i) “Shares”; (ii) the “Obligations”; (iii) equity securities; (iv) Units of participation in Collective Investment Undertakings; (v) autonomous warrants; (vi) the “Options”, whenever traded in regulated markets; (vii) the detached rights of “Securities” in the “Shares” and Shares in Collective Investment Undertakings, provided that the highlight covers the entire issue or series and is provided for in the act of issue; (viii) other documents representing homogeneous legal situations, provided that they can be transmitted on the market.

II. Signing of Investment Services Agreement

47. The Investment Services Agreement enters into force on the date of the Clients signing of the following contractual documents, which are part of the same:

    a) Investment Services Agreement - Main Document;

    b) Annex I – Client’s identification;

    c) Annex II – General Conditions of the Registration and Deposit Agreement;

    d) Annex III – General Conditions of the Reception and Transmission of Orders Agreement;

    e) Annex IV - Knowledge and Experience Test (Appropriateness Test)

    f) Annex IV.a. - Result of the Appropriateness Test;

    g) Annex V. – Product Governance Test;

    h) Annex V.a – Result of the Product Governance Test;

    i) Annex VI – Pre-Contract Conditions;

    j) Annex XI - Key Information Documents;

    l) DIF Broker Pricing.

III. Financial Services Sscope

48. DIF Broker is authorized to provide investment and ancillary services related to them by the Portuguese Supervisory Authority - "CMVM"".

49. DIF Broker's main activity is the provision of the following services and investment activities:

    a) Reception and transmission of orders on behalf of third parties;

    b) Execution of orders on behalf of others;

    c) Portfolios Management on behalf of others;

    d) Investment advice.

50. DIF Broker also provides the following auxiliary activities:

    a) Preparation of investment studies, financial analysis or other generic recommendations related to operations in financial instruments;

    b) Advice on capital structure, industrial strategy and related issues, as well as on mergers and acquisitions of companies;

    c) Registration and deposit of financial instruments.

51. Currently, DIF Broker`s offer consists only of the services indicated in points 49 a) and b) and 50 c).

52. Under MiFID II, DIF Broker can provide cross-border investment services within the members of the European Union, Iceland, Liechtenstein and Norway.

IV. Language and Communication

53. The Client may communicate with DIF Broker in Polish, English, Portuguese, and Spanish, using only the following communication channels:

    53.1. Telephone, only those indicated on the DIF Broker website and requesting contact with the Front Office;

    53.2. Electronic mail, exclusively to hdesk@difbroker.com / poland@difbroker;

    53.3. Postal mail to the Lisbon office, ((Avenida 24 Julho, nº 74 a 76, 1200-869 Lisboa, Portugal)

    53.4. "Trading Platform" Chat;

54. If the Client does not use the communication channels indicated above, the communication will not be considered valid. Communication over the telephone may require DIF Broker to request personal data in order to ascertain the identity of the Client.

55. DIF Broker has engaged the financial entity "Saxo" to execute all orders instructed by its Clients. Given that this entity uses English in its communications and content production (documents, clarifications, e-mails), the Client confirms that it has enough knowledge of English to understand the communications and contents of the financial entity "Saxo".

56. The Client agrees that DIF Broker records all telephone conversations held between Client and DIF Broker. These recordings are the sole and exclusive property of DIF Broker and constitute proof thereof.

57. If at any time, for any reason, communication between the Client and DIF Broker becomes impossible, the latter will not assume any liability for any losses, opportunity costs or charges associated with a particular transaction, such as opening or closing. a position, which are produced due to the impossibility of said communication.

58. The Client assumes the obligation to inform DIF Broker of any fact or circumstance that partially or totally modifies the data communicated by DIF Broker, in particular, its e-mail address, telephone number, postal address, at the time of signature of any contractual document between DIF Broker and the Client, such as during its term. DIF Broker may require your signature to modify or update all or part of your data.

59. If at any time, for any reason, communication between the Client and DIF Broker becomes impossible, the latter will not assume any liability for any losses, opportunity costs or charges associated with a particular transaction, such as opening or closing. an open position.

60. On a monthly basis, regardless of the service contracted by the Client, DIF Broker will send a statement to the Client through the email address indicated by Client. In addition, whenever the Client remunerates DIF Broker for services rendered, he / she will receive, daily, if applicable, the invoice corresponding to those same services, specifying the rates and taxes applied, also referring to the mailing address. indicated by the Client. In these communications, DIF Broker may include documents that it considers indispensable for the correct information to the Client.

61. Client's classification of the e-mails indicated in paragraphs above as unwanted, will not allow Client to hold DIF Broker responsible for any damage arising from the lack of information.

62. DIF Broker may communicate and / or produce content for submission to Client for the purpose of alerting, informing and / or training about the financial markets. These communications and contents do not in any circumstances constitute financial advice and / or investment advice.

III. Clients' Classification

63. By default, DIF Broker classifies its clients as "Retaill Clients" According to "MiFID II", there are two additional classifications: "Professional" and "Eligible Counterparty".

64. "MiFID II" gives Clients the possibility to request, through a formal procedure, an amendment as to the category in which they have been inserted, due to the classification assigned to them by DIF Broker. At this point, there are two notes to retain. On the one hand, category changes that involve an increase in the level of protection afforded to the Client will not be conditional upon the verification of any requirements. Category changes that result in a reduction in the degree of protection granted to the Client will be subject to compliance with strict requirements and approval of the change by DIF Broker.

65. On the other hand, any change of category will depend on the Client signing a specific form for this purpose. In light of the foregoing, it can be stated that in situations where the change intended by the Client translates into a change from "Eligible Counterparty" to "Professional" Client or a change from "Professional" to "Retail" Client, such change shall not will be subject to the verification of any specific requirements at the outset. Nevertheless, DIF Broker reserves the right to change the category, whenever such change results in greater investor protection by informing it of the change. Likewise, it can be stated that when the change desired and requested by the Client involves the change from the "Retail" Client to the "Professional" Client, at least two of the following assumptions must be met.

    65.1. Client has carried out transactions of significant volume in the relevant market at an average frequency of ten operations per quarter during the past year;

    65.2. The Client has a portfolio of "Financial Instruments", including cash deposits, exceeding € 500,000.00;

    65.3. The Client performs or has worked in the financial sector for at least one year in a position that requires knowledge of the financial services or transactions concerned

66. In addition to the conditions set out in paragraph 68, the Client will be required to have an account with assets over €100,000 or equivalent.

IV. Account ownership and movement

67. The account will be opened in the Client's name or of several holders, whose identification will appear in Annex I – Client's Identification

68. The persons entitled to move the investment services account and its respective financial financial instruments, as well as to order transactions in it, are the Individual Client, the Co-owners of the account (joint accounts) and the persons who are expressly authorized and indicated in writing ("Authorized Persons").

69. In Joint accounts, the solidarity Collective regime applies to the account and equal quotas are assumed for each holder, as follows:

    75.1.1. The account may be moved by any of the holders without prior consent of the others; and

    75.1.2. All holders are liable, in whole or in part, to DIF Broker, which is relieved of any responsibility for the compliance with instructions given by only one holder.

70. Regardless of the type of account, DIF Broker only accepts one Authorized Person per account, with the following limitations:

    70.1.1. The account may be operated by an Authorized Person provided that he is previously and duly identified in accordance with the terms required by DIF Broker. When any of the holders, with powers for the purpose, decides to remove the Authorized from the account, they must immediately inform DIF Broker of this fact. The Authorized Person may waive the use of the account, having to notify DIF Broker by e-mail to hdesk@difbroker.com. DIF Broker only allows the Authorized Person to operate the account for the purpose of buying and selling securities and financial instruments and Clients must be eperfectly awre of this this limitation, which does not cover the transfer of funds.

71. Only account holders (clients) may make deposits or request withdrawal of funds from the account at DIF Broker. Exceptionally and by duly substantiated request, DIF Broker may accept that the Authorized Person also make deposits and withdrawals from the Clients' account, with the following limitations:

    71.1.1. To this end, account holders (Clients) shall issue a power of attorney to the Authorized Person to empower him/her o make deposits and withdrawals from their account with DIF Broker, by means of a notarial instrument or issued by an authority with equivalent certification powers; The Attorney will have powers of make depostis and withdrawal of funds to and from the Clients' original bank account.

77.1.2. The Authorized Person with valid power of attorney under the preceding paragraph shall be named Attorney."

V. General Risks of "Financial Instruments"

72. The Client is aware that trading in "Financial Instruments", exposes him to the following risks:

72.1. Market risk: inherent in trading in "Financial Instruments" which consists in the possibility of an investment not being profitable to the Client, given its expectations, due to market fluctuations. Market risk involves the risk that prices or rates will vary adversely with respect to the interests of each Client, and as a result of uncontrollable and undeterminable economic forces. This type of risk includes changes in the price of "Share", "Bond", interest rate, exchange rate, commodity, and other markets accessible to the Client;

72.2. Credit risk: consists in the possibility that one of the parties fails to fulfill its obligations and that default results in losses. Client exposes itself to the following types of credit risk:

72.2.1. Default by issuers: on repayment of capital, in the case of "Financial Instruments" with maturity dates, payment of dividends or interest;

72.2.2. Due to non-compliance with business settlements: The Client is subject to these risks under the terms and conditions defined by the different business counterparties and at the risks inherent to each trading venue. Settlement procedures seek to eliminate the risk of payments without consideration. However, the risks of consequences of any business cancellations or delays remain;

72.2.3. For failure to comply with depositary obligations: The Client is subject to the risk of default of the depositary institutions with whom DIF Broker must deal directly or indirectly.

72.3. Liquidity risk: Resides in the potential inability to trade and / or execute, in terms of speed and reasonable price, of any financial instrument, which may result in a loss to the Client. In certain situations, the lack of market liquidity may mean that it is not possible to close a position at the desired time or, at the end, that it is only possible to close that position with a significant loss. In these cases, there is a risk that "Stop" orders will not be executed at the desired prices and may lead to differences in the expected result.

72.4. Operational risk: derives from potential difficulties in the treatment and execution of "Securities" services, namely for technological reasons, exposes the Client to losses resulting from the deterioration of the quality of the service, resulting from the reduced ability to execute transactions, delays., inaccuracies, errors, interruptions, relative to usual standards. Accordingly, DIF Broker informs the Client that, for reasons of force majeure, client incurs the risk of loss arising from reasonably unpredictable or difficult to control factors, such as wars, strikes and social unrest, power outages or interruptions. the supply of electricity caused by natural or human factors, computer support, telephone line or data transmission drops, communications and trading or information systems. In the event of such unforeseeable events, DIF Broker will use its best endeavors to minimize the consequences of such occurrences, including, if necessary, decreasing or closing pf positions to avoid predictable escalation of losses.

72.5. Systemic risk: The organization of the global financial system is based on trust, so the failure of a company, particularly a financial company, a settlement system, or other catastrophic event, can have a domino effect, leading to a crisis of confidence. in the financial system. Systemic risk may significantly change the usual liquidity conditions of "Financial Instruments" and / or drastically increase market volatility by changing customary pricing patterns.

VI. General and Specific Risks under Investment Services

73. Each investment service carries specific risks, and these are detailed below, considering DIF Broker's offer of investment services:

73.1. Order reception and transmission service: This service consists of the reception of the order and its subsequent transmission for execution, in the different trading venues provided. The general order execution policy is the direct forwarding to the order books of the various trading venues provided for each financial instrument. Accordingly, by signing Annex III - Order Receipt and Transmission Agreement, the Client authorizes that orders relating to "Financial Instruments" admitted to trading in a particular market are executed in that or other markets, in compliance with the best policy. execution of the financial entity contracted by DIF Broker for this purpose. This service may involve the following risks:

73.1.1. Risk of daily portfolio turnover: the systematic activity of investment rotation in very short periods of time, namely during the day, day trading, in order to obtain benefits from the price variations in the "Securities" or "Financial Instruments", increases market risk compared to a more defensive and long-term investment attitude. DIF Broker also reports that this activity may lead to higher costs of financial intermediation, so the potential benefits of this activity may be lower;

73.1.2. Trading Risks through Electronic Platforms: Trading using electronic platforms has associated risks. The use of such platforms may result in damages to the Client as a result of communication failures caused, for example, but not exclusively, by failure of electricity supply lines or the interruption of the electricity supply caused by human intervention or natural factors, for reasons not attributable to DIF Broker or its employees. In addition to the risks described above, there may be technological risks that may result from Client not having their platform software updated. This could have negative consequences regarding the execution of orders, the presentation of statements and even the accuracy of the information presented.

73.2. Non-Independent Investment Advisory Service: consists of providing personalized advice to the Client in his or her actual or potential capacity, either at his request or at the initiative of DIF Broker regarding transactions in “Securities”, “Financial Instruments” or to a specific portfolio. DIF Broker provides Non-Independent Advisory Consulting, but is not providing “Financial Instruments” in the primary market, as it does not have access to this market, and limits its offer of “Financial Instruments” to those made available by its counterparties for this purpose: Saxo Bank, Inversis Bank, Optimize Investment Partners.

73.2.1. Any investment recommendation made by DIF Broker ensures the good faith of qualified professionals; however, the ultimate responsibility for carrying out the business will always be with the Client and therefore because of his decisions. Neither DIF Broker nor its managers or employees cannot guarantee performance for any of the products for which they have given investment advice. The Client is responsible for gains or losses obtained through the advice given in good faith by DIF Broker. There is a risk that recommendations made by DIF Broker analysts will have a negative impact on Client's assets.

73.2.2. Trading risks through Electronic Platforms: The use of electronic platforms for this service carries the same risks indicated in 73.1.2.

73.2.3. Client risk assessment: In the context of the provision of this investment service and the Discretionary Portfolio Management Service, DIF Broker will carry out a pre-assessment using an adequacy questionnaire to measure its investment objectives and should therefore provide for criteria. / minimum qualitative requirements and risk management rules that will be respected by consultants / managers in the performance of their duties (eg degree of risk exposure, level of diversification, loss absorbing capacity, among others). These criteria act as parameters that delimit the conditions of providing a service, which is intended to meet the interests and real needs of the Client, the definition of which takes into account the results of the Adequacy Questionnaire (see separate section). There is a risk that the criteria / requirements described above may not be met due to abnormalities at the time of negotiation or the occurrence of extreme events such as election results, monetary policy changes, technical failures, among others.

73.3. Discretionary Portfolio Management Service: DIF Broker informs Client that the portfolio management service provided by it is a service that assumes the management of Client's financial wealth under a mandate to the effect, on an individual and discretionary basis, under which DIF Broker undertakes to perform all acts aimed at enhancing the portfolio. The management of DIF Broker is characterized by discretionary management without guarantee of capital or income. Accordingly, DIF Broker informs that the investment decisions will be made by DIF Broker on behalf of the Client and may therefore incur losses arising from an increase in the associated risk as the portfolio management service may imply the investment in “Shares”, “Bonds”, “ETFs” or other instruments traded in the spot market or in the regulated or unregulated (OTC) markets. In particular, the Client was informed of the high degree of leverage of the derivative “Financial Instruments”, which may translate into either large gains or substantial losses, which may exceed the entire initial capital. Given its specificities, the following specific risks of this investment service are identified:

73.3.1. Capital risk: the discretionary portfolio management service may provide zero or negative returns as they are derivative “Financial Instruments” which allow the investor to leverage exposure to the underlying assets; In certain situations, the lack of market liquidity may mean that it is not possible to close a position when intended and it may only be possible to close that position with a significant loss. In these cases, there is a risk that “Stop” orders will not be executed at the desired prices and may lead to differences in the expected result with implications on the Client's capital.

73.3.2. Client's assessment risk: subject to the same risk as explained in 73.1.2.

VII. Specific Risks of “Financial Instruments”

By contracting the “Trading Platform” from “Saxo”, DIF Broker may distribute to its Clients a set of “Financial Instruments”. When you decide to trade a specific financial instrument, you assume a specific set of risks. The following are the same for each financial instrument distributed:

74. DIF Broker informs Client that trading in “Equities” exposes it to the following risks:

74.1. Market Risks: arising from fluctuations in prices and / or insufficient return on invested capital. The Client can perceive the degree of risk of each “Share” by the volatility of price changes. You may lose your investment in the event of company bankruptcy. You are also exposed to market risk arising from price fluctuations in the foreign exchange market when you choose to trade in “Securities” in a currency other than your account's base currency;

74.2. Liquidity risks: The client is informed that he can mitigate this risk by trading in stocks that are part of relevant indices or that are the subject of liquidity contracts with market makers. Orders under “Shares” obey the following rules:

74.2.1. They are transmitted to the most liquid trading venue, if there are several trading venues, for the same "Share";

74.2.2. When valid for more than one day, orders for European markets will be removed at the end of the day and reintroduced in the respective order book at the opening of the following day;

74.2.3. Apart from NASDAQ, trading venues are regulated markets that operate under the central order book method, under the terms and conditions of their respective local regulations;

74.2.4. DIF Broker informs Client that trading in "Shares" is not exclusive to the places offered, and there may be more favorable, momentary or persistent trading conditions elsewhere. This risk is particularly higher in NASDAQ trading. DIF Broker informs Client that in the NASDAQ market, its orders are executed using the "Trading Platform" via "Saxo" which in turn uses "ECNs" and "Market Makers". DIF Broker informs that the Client is subject to the risk described in point 73.2.2 by the rules and conditions of the companies associated with each trading venue, designated by intermediary, and according to the table below:

Country of origin	Tading location	Intermediary
Germany	Deutsche Borse Gruppe, XETRA	Saxo Bank A/S
Spain	SIBE	Saxo Bank A/S
United States	NYSE e NASDAQ	Saxo Bank A/S
Finland	Helsinki Stock Exchange	Saxo Bank A/S
France	Euronext-Paris	Saxo Bank A/S
Holland	Euronext – Holand	Saxo Bank A/S
Italy	Affari – Italian Stock Exchange	Saxo Bank A/S
Portugal	Euronext- Lisbon	Saxo Bank A/S
United Kingdom	SETS	Saxo Bank A/S
Sweden	Stockholm Stock Exchange	Saxo Bank A/S
Switzerland	SWX e Virt-X	Saxo Bank A/S

75. "Bonds" of non-complex nature: Client orders under "Bonds" that do not indicate the place of trading will be sent directly to the market. Thus, DIF Broker informs client that there may be other trading venues with more favorable conditions. The interest rate may be periodically indexed to a benchmark or may have a fixed amount established for the full period of the loan. DIF Broker informs Client that trading in "Bonds" determines exposure to the following risks:

75.1. Credit risk: Failure by the issuer to pay interest and / or principal. The Client may perceive the degree of credit risk of the "Bond" through the "Rating" assigned by independent companies specialized in this service;

75.2. Market risks: on fixed interest rate "Bonds" resulting from fluctuations in interest rates on the money markets. The variation in the price of the bond may also be the result from changes in the rating of the bond. You are also exposed to market risk arising from price fluctuations in the foreign exchange market when you choose to trade in "Bonds" in a currency other than the one considered for your equity base;

75.3. Liquidity risk stems from the difficulty of trading, so "Bonds" with liquidity contracts may mitigate this type of risk.

76. Structured "Bonds" (complex nature): a security that combines a "Bond" with a derivative financial instrument embedded in that "Bond" by virtue of which the existence and / or amount of income of that "Bond" is dependent upon the performance of another asset, instrument, financial contract or index that may leverage that income. The yield on the "Bond" will depend, proportionally or not, on the change in the value of the underlying asset or the index. Trading in structured "Bonds" involves the following risks:

76.1. Risk of total or partial loss of invested capital in the event of early repayment or insolvency of the issuer, or loss of the asset in which the conversion occurs in the case of reverse convertibles;

76.2. Unsecured Compensation Risk;

76.3. Issuer early repayment risk;

76.4. Liquidity risk, if there is no admission to trading on the market (regulated or unregulated), or liquidity is reduced, for example due to the absence of a Market Maker or because no possibility of requesting early repayment by investor option;

76.5. Risk of conflicts of interest, namely by coincidence or links between the issuer, the trader and the calculation agent;

76.6. Legal risks (changes in the legal regime of taxation or transfer, exercise of rights, etc.).

77. Exchange Traded Funds (“ETF”) of a non-complex nature: Investing in an ETF does not guarantee the same performance as the benchmark, so you are exposed to the risks of trading a stock.

78. Exchange Traded Funds (“ETF”) of a complex nature: are open-ended investment funds admitted to trading on a stock exchange and whose main objective is to achieve performance related to a particular benchmark whether it is an index, a market segment, a asset, a financial instrument or an investment strategy for Actively managed ETFs. The underlying assets of the benchmark are varied and allow exposure to different types of risk, such as “Financial Instruments” (“Shares” / “Bonds”), “Derivative Financial Instruments”, exchange rates, commodities, including precious metals, cereals, oil, among others; Complex ETFs, because they are aimed at more complex strategies compared to simple ETFs, carry broader financial and non-financial risks, which can be identified in their prospectuses and are as follows:

78.1. Market risk of the assets that make up the benchmark. The value of these assets may be reduced by giving rise to the loss of invested capital;

78.2. Risk related to constraints inherent to the reproduction of the reference indicator or its multiple (existence of tracking error);

78.3. Liquidity risk, whether related to trading in equity holdings or assets in the ETF portfolio.

78.4. For Leverage ETF or Inverse ETF there are also the following risks:

78.4.1. Leverage risk, ie increase in the level of loss (or gain) compared to benchmark performance; and, given its structure, in order to replicate the daily yield of the positive or negative multiple of the benchmark;

78.4.2. Risk of divergence (the higher the volatility of the underlying asset) of its behavior in relation to the benchmark when the comparison time horizon is greater than one day;

78.4.3. Risk of conflicts of interest due to coincidence or links between the various entities involved in the creation of the product (eg, the managing body and issuer of the assets in the fund's portfolio) and the respective distributor;

78.4.4. Legal risks (changes in the legal regime of taxation or transmission, exercise of rights). DIF Broker currently only offers complex “ETFs” on its trading platform and has developed Fundamental Information Documents (DIFs), available on its website.

79. Investment fund units: Despite their non-complex nature of “Financial Instruments”, they are not risk-free and therefore may be subject to losses on capital invested. Trading risks in investment fund units are set out in the prospectus of the respective funds, where information related to any redemption restrictions may be obtained.

VIII. Client Asset Safeguarding

80. The safeguarding of assets is intended for institutions such as DIF Broker, which offers certain services, to ensure a clear segregation between their own assets and the assets of each of their clients (Article 306 of the “CVM”).

81. DIF Broker, in compliance with this segregation, has procedures, tools and controls that ensure this segragation so that in the event of insolvency, recovery of the company or reorganization, it has no effect on the assets of its clients.

82. DIF Broker may not, in its own interest or in the interest of third parties, dispose of “Financial Instruments” of its clients or exercise the rights inherent thereto, unless the owners agree.

83. DIF Broker uses third parties to register or deposit “Financial Instruments” of clients in one or more open accounts, committing to:

83.1. Employ high standards of professional diligence in the selection, appointment, and periodic evaluation of the third party, considering their technical ability and reputation in the market; and

83.2. Consider legal or regulatory requirements and market practices relating to the holding, registration, and deposit of “Financial Instruments” by such third parties that may adversely affect clients' rights.

84. DIF Broker is audited annually by an external entity that gives an opinion on the procedures and measures taken under the reactive asset safeguard regulations. This opinion and report, in compliance with art. 306 (d) of the “CVM”, is annually submitted to the “CMVM”.

85. DIF Broker is a member of the Investor Compensation Scheme ("SII" Sistema de Indemnização aos Investidores) which makes it possible to, in the event of DIF Broker`s financial failure, repay or return to investors the cash or "Financial Instruments" that belong to them,

ensuring the coverage of the amount owed to investors related to "Financial Instruments" and cash destined expressively for the purchase of "Financial Instruments". The "SII" guarantees repayment of up to 25,000 euros for each investor, regardless of the number of accounts held.

IX. Conflicts of Interest Policy

86. DIF Broker's Conflict of Interest Policy has the purpose, in accordance with its "Internal Procedures Manual", to establish the mechanisms to effectively prevent any conflict of interest.

87. Clients may consult DIF Broker's Conflict of Interest Policy here.

88. As an Investment Company, DIF Broker acts under the Mercantile Commission on behalf of Clients, so that the risk of potential conflicts of interest relating to the provision of investment services is very low, although DIF BROKER not having its own portfolio, which greatly reduces the inherent risk, however, there may be autonomous interests of employees, directors, administrators, tied agents, subcontracted entities or counterparties, which reveal a conflict of interest to be safeguarded.Conflict of interest situations are likely to jeopardize the impartiality and / or independence of DIF Broker's actions and therefore the definition of procedures to identify, prevent and mitigate such situations in accordance with the rules is a priority in accordance with applicable laws and regulations.

89. Conflict of interest situations are likely to jeopardize the impartiality and / or independence of DIF Broker's actions and therefore the definition of procedures to identify, prevent and mitigate such situations in accordance with the rules is a priority in accordance with applicable laws and regulations.

90. DIF Broker has approved a Policy on Conflicts of Interest which has as general principle, acts with honesty, impartiality and professionalism, always in the best interests of clients. In this sense, the electronic trading system provided to the Client guarantees a fair treatment, in the negotiation of "Financial Instruments".

91. DIF Broker will always give priority to the interests of its Clients over his own interests or the interests of companies over which DIF Broker has financial group control, or the interests of the members of the corporate bodies and employees.

92. DIF Broker employees who work in areas with potential conflict of interest will act with the appropriate degree of independence and when, due to the size of the organization, they cannot be fully independent, DIF Broker will implement the necessary control measures in order to mitigate the impact of a possible conflict-generating situation.

X. Market abuse prevention

93. Under the Market Abuse Prevention Policy, DIF Broker has procedures and alert mechanisms in place to detect potential or actual situations of market abuse.

94. Without prejudice to the right of resolution under the law, DIF Broker reserves the right, under legal terms, to suspend or block any transaction that it suspects or verifies constitutes a market abuse situation as a consequence of the ongoing process of monitoring the movement of accounts. (i) abusive market conduct or use of inside information; (ii) abnormal trading patterns, in accordance with European Market Abuse prevention regulations; adoption of intentional strategies aimed at having an advantage of wrong or misleading quotes; (ii) or any other similar behavior that is generally considered to be in bad faith or abuse of information.

XI. Appropriateness Test

95. For all Clients requesting from DIF Broker the services indicated in point 54 a) and b), DIF Broker carries out a questionnaire prior to the engagement of the investment service, with the purpose of assessing the Client's knowledge and experience in relation to the Financial Instruments.

96. In some cases, it is not applicable to DIF Broker to assess the appropriateness of the transaction, in accordance with Article 314º D of the "CVM".

97. The result of the questionnaire indicated in the previous points will indicate which complex "Financial Instruments" are appropriate or not for the Client. This result is communicated to the client through Attachment IVa – Result of the appropriateness Test that is part of the Investment Services Agreement signed by the Client.

98. In the case of a Collective account, DIF Broker will always consider the worst result obtained by the holder / authorized and the complex "Financial Instrument" assessed, i.e., in all cases, the inappropriate result prevails. The same criteria apply to the accounts held by a company, considering the worst result obtained by the representative of the company and for each complex "Financial Instrument" offered by DIF Broker.

99. Whenever the Client wishes to instruct an order on a particular "Financial Instrument" that is not appropriate according to the result of the appropriateness test performed by DIF Broker, he/she will receive a warning in accordance with article 314, paragraph 2 of the "CVM". This warning will apply to operations opening or reinforcing a position carried out by the Client in that instrument.

XII. Target Market Evaluation and Product Governance

100. DIF Broker, being a distributor of “Financial Instruments” produced by third parties, is required to ensure that they are not promoted to potential Clients whose characteristics are outside of it’s respectives target markets taking into account: (i) type of client; (ii) knowledge and experience; (iii) financial situation, in particular the ability to absorb losses; (iv) risk tolerance; (v) investor objectives; and (vi) investor needs.

101. According to the guidelines given by the producers for each complex “Financial Instruments”, DIF Broker identified its target market according to the following table:

Instrument	Client Type	Knowledge and experience	Financial situation	Risk tolerance	Objectives and needs
• and ETFs - Group A	• Retail • Profissional • Eligible counterparty	• Appropriateness Test passed • Proven experience in negotiating complex financial instruments.	• Open to total loss of the amount invested • Open to a loss equal to total or greater than the amount originally invested.	• Speculative demand and high return investment but with understanding that the associated risks are very high; • High risk tolerance	• Time horizon of investment: short term, always less than one year • Objectives: hedging and speculation.
• Stocks (Rating 1) and Bonds (Rating AAA or AA) - Group B	• Retail • Profissional • Eligible counterparty	• Appropriateness Test not passed	• Open to moderate loss of the amount invested.	• Conservative, low-risk investments.	• Time horizon of investment: long-term or more than 1 year • Objectives: growth and income.
• Stocks and bonds not included in the previous part of the table - Group C	• Retail • Profissional • Eligible counterparty	• Appropriateness Test not passed, but client has higher education at least.	• Open to total loss of the amount invested.	• High risk tolerance.	• Time horizon of investment: long-term or more than 1 year • Objectives: speculation.

102. In order to determine if the Client fits into the target market, DIF Broker conducts a questionnaire – Annex V – Product Governance Test - at the time of the prospect's request for account opening to know the client's profile and to understand its characteristics and needs.

103. In accordance with the questionnaire replies indicated in previous point102, If the Client does not fit into the target market, he/she may opt out of the account opening process, avoiding subscribing the service. If the Client wishes to proceed with the contract, he must give his consent to a particular alert according to the profile identified by DIF Broker.

104. The alert referred to in the previous point and the Client's consent are refletec in Annex V.a of the Investment Services Agreement. The data may be consulted by producers and supervisors for statistical purposes, in accordance with DIF Broker's compliance regarding the distribution of “Financial Instruments” in accordance with characteristics, needs and objectives of the Client.

XIII. Suitability Test

105. The scope of the services listed in points 54 c) and d) s dependent on the prior completion of a Suitability Test Questionnaire by the Client, which requires information on the financial situation, investment objectives and knowledge and experience in the financial instruments provided by DIF Broker. Regarding the service:
    - 105.1. In case of the services refered to in point 54 c) above, the questionnaire is intended to enable DIF Broker to recommend the investment service or financial instruments that are most suited to the Client;
    - 105.2. In case of the service referred to 54 d), the questionnaire allows DIF Broker to manage assets according to the risk tolerance level shown by the Client.

XIV. Key Information Document

106. In accordance with the new regulation, which requires certain information to be made available to Clients prior to engagement, for each “Financial Instrument” it distributes, DIF Broker has produced a “Key Information Document” based on the guidelines of its producers.

107. The documents indicated in the previous point may be consulted by the Client on the DIF Broker website and they confirm they have read it as well as during the account opening process (Annex XI).

108. During the account opening process, Client will have to confirm the receipt of the DIF Broker’s Key Information Documents by stating the following:

    108.1. “I received a copy of the Key Information Document for this product prior to my subscription or purchase;

108.2. “I have read and understood the characteristics and risks associated with my investment decision.;

108.3. “I understand that in addition to being exposed to the credit risk of the entities referred to in the Fundamental Information Document, I may also lose the full amount invested and may have to make additional payments compared to the amount originally invested.”

XV. Best Execution Policy

109. Regardless of the order receiving channel, all orders are transmitted to “Saxo” for execution as required by Article 328 of the Securities Code, given that DIF Broker cannot execute them. Accordingly, DIF Broker's Client is subject to Saxo's “Best Execution Policy”, as DIF Broker only receives and transmits orders to “Saxo”. For full details, the Client may consult the document published in the web address: https://www.home.saxo/legal/general-business-terms/saxo-general-business-terms.

XVI. Data Protection Policy

110. The Client's personal data are processed in strict compliance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (from now on referred to as GDPR) and Law No. 58/2019, of August 8, 2019 (from now on referred to as the Execution Law).

Responsible or Data Processing Identification:

Taking into consideration the paragraph 7 of Article 4 of the GDPR, DIF Broker -Empresa de Investimento, SA (“DIF Broker”) is qualified as a Controller.

- Designation: DIF Broker – Empresa de Investimento, SA.
- Legal form:
- Tax number: 504767640
- CAE: 66120 - Trading activities on behalf of third parties in securities and other financial instruments
- Object: Exercise of the activities permitted by law to brokerage finance companies, including all ancillary, related or similar operations compatible with this activity and permitted by law.
- Registers in Portugal: CMVM No. 276
- Headquarters: Avenida 24 Julho, nº 74 a 76, 1200 869 LISBOA
- Telephone contact: +351 21 120 1595
- E-mail: support@difbroker.com
- Website: https://www.difbroker.com/en/

Personal Data Categories

Within the scope of its activities and in compliance with the principle of minimizing personal data, DIF Broker only processes the minimum amount of personal data deemed necessary to provide the services contracted with its Clients. Such personal data fall within the following categories:

- Personal Identification and Contacts: this category includes personal data such as name, image, address, telephone contact, e-mail address, gender, nationality, and place of birth.
- Bank Details: this category includes the clients' bank, financial and related details, such as the IBAN (International Bank Account Number).
- Data of a Criminal Nature: personal data relating to criminal convictions and offences are collected under this category.
- Tax-related Data: This type of data includes the financial data associated with its subject, including the tax identification number, the Social Security Identification Number (NISS), the tax address, as well as the contributions and withholdings for tax declaration purposes.
- Data of a Patrimonial Nature: includes personal data referring to the income obtained and transactions made by the subjects and their financial and personal assets.
- Professional Data: this category of personal data includes the Client's curriculum vitae, profession/professional category, employer, sector of activity and level of education.

- Statistical data: this category includes demographic data, customer and user preferences, the value in account, products transacted, pages visited, webinars attended, and the communications (chat) carried out.

- Voice recording data: this data includes call recordings.

- Household data: this category includes marital status, household composition and identification of household members as PEP (Politically Exposed Person).

Collection of Personal Data:

The personal data processed by DIF BROKER are directly obtained from the Client, namely, at the moment of conclusion of the Agreement with DIF Broker; when receiving and transmitting orders from the Client; in the context of the appropriateness tests and other questionnaires done by Clients under the Markets in Financial Instruments Directive and with national legislation ("MiFID Questionnaires"); and also within the scope of interactions with the Clients, namely, in the context of meetings, telephone calls or any other electronic communications.

While carrying out the due diligence procedures established under the anti-money laundering and countering the financing of terrorism legislation, DIF Broker may access the Client's personal data relating to criminal convictions and offences.

Purposes of Data Processing:

DIF Broker processes the Client's personal data with a view to achieving the following set of specific purposes, in relation to which the following legal grounds apply:

Purposes pursued based on the Client's consent

- Management of newsletters, commercial communications and other communications with data subjects, such as the dissemination of news, publications, events and additional information related to the activity of DIF Broker.

- Management of contact requests submitted by the data subject through e-mail, contact form, WhatsApp chat, or other DIF Broker communication channels.

- Management of communications with the Client under the offer of DIF Broker products and services.

Purposes pursued based on the need to perform a contract or carry out pre-contractual steps

- Client management, including the management of products and services subject to the contract between the Client and DIF Broker, as well as the execution or management of related operations and the transmission of information to third-country authorities that exercise regulatory, control or supervisory functions in the financial markets where the Client makes or holds any investments and the the execution of the necessary diligences due to corporate events that took place within the scope of the investment contract, but could only be executed after its termination.

- Client's registration on the trading platform

  Purposes pursued based on the need to fulfill a legal obligation

- Registration of phone calls is to comply with applicable legislation and ensure the integrity of communications made with the Client.

- Carrying out the due diligence procedures required to prevent money laundering and terrorist financing.

- Compliance with legal measures imposed on the prevention of market abuse;

- Reporting to national and international supervisory and control entities.

- Reporting to national and international tax and administrative authorities.

- Provision of information in legal proceedings.

Purposes pursued based on the legitimate interest of the controller

- Registration of phone calls to form to manage and assess the quality of their services and ensure the integrity of contacts made.

- Communication of the Client 's personal data to the other entities of the groups, in order to optimize DIF Broker's internal resources and ensure the support services to the Client;

- Management of the newsletter, commercial communications, and other communications with data subjects, such as the dissemination of news, publications, events, and other information related to the activity of DIF Broker. Likewise, the data processing aims to ensure that the commercial communications initiated with the data subject are adequately tailored to their interests and preferences, particularly for purposes of presentation and dissemination of products and financial instruments, written and audiovisual content, and operations performed on the trading platform. The data subject may at any time withdraw his or her consent if he or she chooses to no longer receive communications and other commercial contacts from DIF Broker.

Data Storage Period:

Within the scope of the personal data processing activities developed by DIF BROKER, the following terms of retention of personal data or the criteria that serve as a reference for its materialization apply:

- 30 days: messages sent via WhatsApp chat will be stored and preserved for 30 days.
- 3 years: the personal data used to send a newsletter or to carry out promotional communications will be kept for three years, or until the holder chooses to withdraw his consent or oppose the processing of your data.
- 7 years: the Client's personal data that have been collected in compliance with legal obligations relating to measures to combat money laundering and the financing of terrorism, will be kept for seven years after the closure of the Client's account, as provided for in article 51 of Law No. 83/2017, of August 18th.
- 10 years: Client data will be kept for a minimum period of ten years for the purposes, among others, of recording accounting operations, preparing accounting information, and preparing tax reports and reports to other supervisory or control entities.
- 20 years: the Client's personal data necessary for the validity, effectiveness and probative value of electronic documents and the digital signature, will be kept for a minimum period of 20 years, as provided for in Decree-Law No. 290-D /99, of August 2nd.
- 20 years: the Client's personal data collected in the contractual context are kept for a maximum period of 20 years for the purposes of exercising the different procedural rights that DIF BROKER enjoys.
- During the period corresponding to the period of the contractual relationship with the Client: in other cases where a minimum period of retention is not defined, the Client's personal data will be kept for the minimum period corresponding to the period of the contractual relationship between DIF BROKER and the Client.

Subcontractors:

To pursue its economic activities, DIF Broker uses several categories of processors located inside and outside the territory of the European Union or the European Economic Area.

When using a processor implies the need to transfer personal data to third countries, DIF Broker ensures that such transfers are subject to the appropriate guarantees provided for in Article 46 of the GDPR, if it is not possible to carry out data transfers under an adequacy decision, as provided for in Article 45 of the GDPR

For the purposes mentioned above, DIF Broker uses the following categories of subcontractors:

- IT consulting services: service provider contracted for technical and IT support.
- Administrative and business advisory services: service provider hired for administrative and business support and management.
- Trading platforms in financial markets: service provider hired to provide Clients with access to different financial markets.
- Digital communication services: service provider hired to supply and maintain digital platforms for communication and interaction with Clients and potential Clients.

Sharing Personal Data:

Recipients located in the territory of the European Union:

In Iorder to fulfil its legal obligations, namely, the procedures required in the context of the prevention, detection and reporting of money laundering or suspicious transactions operations, the Client's personal data are shared with the following entities or categories of recipients:

- Authorized banking institutions and credit institutions: to collect amounts related to services provided to the Client.
- Portuguese Tax and Customs Authority and Agencia Tributaria (Spain): to comply with fiscal and tax obligations applicable to the activity of DIF Broker.
- Sale, merger or acquisition of operations: in the event of a merger, acquisition or sale of all or part of DIF Broker's assets, the Client's ersonal data may be transmitted to the acquiring entity for the merger, acquisition or sale agreement or contract.
- Courts: the DIF Broker may, for the purpose of formulation, exercise or defence of their legally protected rights and interests, transmit personal data of its Client s to courts acting in the exercise of its judicial function, or equally proceed to transmission the personal data of its Clients as a result of receiving a court order or intimidation.
- Securities Market Commission (CMVM) and Comisión Nacional del Mercado de Valores (CNMV): in certain legal circumstances, and to report suspicious transactions, DIF Broker may need to transmit its clients' personal data or potential Clients to the CMVM and CNMV.

- Central Department of Investigation and Penal Action, Judicial Police or Financial Intelligence Unit (FIU): to combat money laundering and financing of terrorism, DIF Broker may need to transmit the Client's personal data to the different criminal police bodies.

  Recipients located outside the territory of the European Union:

  DIF BROKER only transfers personal data to third parties located outside the territory of the European Union or the European Economic Area, in the following cases:

- Entities of the DIF Broker group: Clients' personal data are transmitted to entities of the DIF Broker group, located in third countries in relation to which it is verified that the European Commission has adopted an adequacy decision under the terms of article 45 of the GDPR;

- Regulatory and supervisory entities of third countries: The Client's personal data may be communicated and transmitted to supervisory authorities, market and/or centralized system management entities, issuing companies and other intermediaries in the intermediation chain, in relation to any securities and financial instruments held by the Client, including shares of companies issuing shares admitted to trading on a regulated market, and may also be transmitted to the supervisory authorities linked to the capital markets that oversee the said securities, financial instruments, markets and settlement systems, as well as to the authorities third country tax authorities with which information exchange schemes are in place and to other financial institutions and entities that manage or provide services related to the online trading platform, pursuant to article 45 of the GDPR, or, in its absence, on the provisions laid down in article 40(1)(b) and (d) of the GDPR.

- US tax entity (US IRS): As a qualified intermediary (Qualified Intermediary), DIF Broker may transmit the personal data of the Clients who have received dividends from holding securities of entities submitted to the market American or that have made investments or hold shares of entities operating in that market to the Internal Tax Service (IRS), based on articles 49(1)(d) and 96 of the GDPR.

Holders' Rights:

Under GDPR, the Client has the following rights:

- The right to withdraw her consent;
- The right of access to personal data;
- The right to rectification;
- The right to erasure;
- The right to restrict the processing;
- The right to data portability;
- The right to object ;
- The right not to be subject to any decision made solely on the basis of automated processing.

Without prejudice to the provisions of personal data protection legislation, the Client may exercise any of these rights, directly or upon written request, to DIF BROKER, through the following means and contacts:

- By email: RGPD@difbroker.com
- By post: DIF BROKER – Empresa de Investimento, SA, Avenida 24 julho, nº 74 a 76, 1200-869 Lisboa, Portugal
- By phone: +351 211 201 595

Right to present a Complaint:

If the Client considers that the processing of his personal data is carried out in disregard of the legal provisions governing matters relating to the processing of data, the Client has the right to lodge a complaint under the terms of articles 77 and 79 of the GDPR.

Despite client may present a complaint directly to DIF BROKER through the contacts made available for thats purpose, Client may also present a complaint to the Control Authority, the National Data Protection Commission (CNPD) using the contacts provided by this entity for this purpose.

More Information:

Client may, at any time, consult the DIF Data Protection Policy Broker, available on DIF Broker's website, at https://www.difbroker.com/en/ and https://www.difbroker.com/pl or require a copy of it.

XVII. FATCA

111. "FATCA" requires foreign financial entities ("FFI") such as DIF Broker to make a formal commitment to the Internal Revenue Service (IRS) to identify and report annually on all their accounts, the ownership of which is "US Persons".

112. If evidence is found that a Client may be a "US Person", the Client must complete one of the following forms: "Form W-9"; "Form W-8BEN"; and "Form W-8BEN E".

113. In order to obtain tax benefits, including reduced taxation on the distribution of US corporate income, typically in the form of dividends, DIF Broker requires clients to complete "Form W-8BEN" and "Form W-8BEN E"

XVIII. Common Reporting Standard (CRS)

114. What are the main obligations deriving from the Common Reporting Standard for DIF Broker?

    114.1. As a reporting financial institution, DIF Broker is obliged from 2017 to report to the Tax Authority certain accounts, configured as accounts subject to communication, which will be transmitted by the Tax Authority to its counterpart which performs similar functions. in the State where the Client's tax residence is established

115. What types of accounts should DIF Broker report to the Tax Authority?

    115.1. Under the Common Reporting Standard, as regards individuals, DIF Broker will report to the Tax Authority two types of accounts: lower value accounts and high value accounts. The lowest value accounts translate into a set of financial accounts maintained by the reporting financial institution as of December 31, 2015, whose balance or aggregate amount at that date was USD 1,000,000 or less. High value accounts consist of a set of financial accounts maintained by the reporting financial institution at December 31, 2015, whose balance or value added at that date was greater than USD 1,000,000. For financial accounts held by legal persons, the above-described distinction does not apply, and as financial reporting is held any financial accounts held by the reporting financial institution as at 31 December 2015, whose balance or aggregate amount corresponded to greater than USD 250,000.

116. What information should DIF Broker report to the Tax Authority regarding the accounts identified as accounts subject to reporting?

    116.1. Reporting financial institutions, including DIF Broker, shall, under the Common Reporting Standard, report to the Tax Authority, for each account subject to reporting, the following information:

        116.1.1. The name, address, Member State (s) of residence, taxpayer number (s) and, in the case of a natural person also date and place of birth, of each person subject to the communication holding the account;
        116.1.2. If the account holder is a legal person and it is found, after the necessary due diligence procedures have been applied, that it is controlled by one or more persons subject to reporting, the DIF shall notify the Tax Authority: name, address, Member State (s) and, if applicable, other jurisdiction (es) of residence and TIN (s) of the entity and the name, address, Member State (s) or jurisdiction (s) of residence, TIN (s) and date and place of birth of each person subject to communication;
        116.1.3. The account number, or in its absence, the functional equivalent;
        116.1.4. The name and, if any, the identifying number of the reporting financial institution;
        116.1.5. The balance or value of the account or, if the account was closed during that year, its closure;
        116.1.6. The total gross amount of interest paid or credited to the account during the relevant calendar year.

XIX. Ultimate Beneficial Owner ("UBO")

117. Pursuant to the legal regulations applicable to it in connection with the prevention of money laundering and terrorist financing, DIF Broker is bound by a specific duty of diligence which requires it to identify its clients and, in certain situations, the (s) beneficial owner (s) of his clients. Whenever this happens, the client will be asked to complete the Ultimate Beneficiary Owner Identification Form.

118. How can the concept of Beneficiary (s) of a business relationship be defined?

    118.1. Firstly, it should be noted that in the accounts of legal persons, the final beneficial owner is the natural person or persons who ultimately has direct or indirect ownership or control. In the field of personal accounts, there will only be a need to identify the beneficial owner in situations where there is a suspicion that the account holder is not acting on their own. In such cases, the actual final beneficiary to be identified will be the natural person on whose behalf the Client is acting. In any of the aforementioned cases, Client must complete and submit the Effective Final Beneficiary Identification Form provided by DIF Broker for this purpose.

119. For the purpose of assessing the status of beneficial owner in the accounts of legal persons, consideration shall be given to natural persons having the following characteristics:
    119.1. Individual holding a representative interest in excess of 25% of the Client's share capital or voting rights, insofar as this is an indication of direct ownership of the Client;

119.2. Natural person (s) who, through a single or several commercial companies, hold a representative interest of more than 25% of the Client's share capital or voting rights, as this is an indication of ownership indirect about the Client;

119.3. Natural person (s) exercising, by any other means, control over the Client's management or administrative bodies at the general meetings of shareholders of that legal person

120. Supplementary regime to be applied in case of non-compliance with any of the characteristics that identify the Ultimate Beneficiary in corporate accounts.

120.1. In situations where, having exhausted all possible means and there is no reason to suspect a particular person (s), none of the circumstances listed in the previous point is met, they will be considered as Ultimate Beneficiary. Effective for the purposes of applicable legal and regulatory provisions, the natural person (s) who appear as senior management of the legal person.

121. The Registo Central do Beneficiario Efectivo (Central Registry of Ultimate Beneficial Owners): Act 89/2017 (L89 / 2017) of 21 August, approved the Legal Regime of the Central Beneficiary Register, transposing Chapter III of Directive (EU) 2015 / 849 of the European Parliament and of the Council of 20 May 2015 on preventing the use of the financial system for the purpose of money laundering or terrorist financing and amending several acts.

121.1. Purpose: Law 89/2017 arises from a growing concern for transparency and legal certainty, as well as the fulfillment of the duties of preventing money laundering and terrorist financing. Additionally, by establishing an register for certain entities, allowing access and exchange of information between Tax Administrations, L89 / 2017 is a measure to combat aggressive tax planning, establishing means that lead to greater transparency and exchange of information for the purpose. tax.

121.2. What is the RCBE: The RCBE is a partially publicly accessible database of information about natural persons who directly or indirectly own or effectively control the entities covered by it and will be managed by the Institute. of Registries and Notaries, IP

121.3. Who is the Ultimate Beneficial Owner (UBO): Under L89 / 2017, UBO are the natural persons on whose behalf an operation or activity is performed, ie those who ultimately own or effectively control the entities listed below.

121.4. Entities that need to comply, including:

121.4.1. Associations, cooperatives, foundations, civil and commercial societies, as well as any other personalized collective entities, subject to Portuguese or foreign law, which carry on activity or practice a legal act or business in the national territory that determines to obtain a tax identification number (TIN) in Portugal;

121.4.2. Representations of international or foreign legal persons operating in Portugal;

121.4.3. Other entities that, pursuing their own objectives and activities different from those of their associates, do not have legal personality;

121.4.4. Fiduciary management instruments registered in the Madeira Free Zone (trusts);

121.4.5. Foreign financial branches registered in the Madeira Free Zone;

121.4.6. When not covered in the above situations, trust funds and other collective legal interests with a similar structure or function.

121.5. Fall outside the scope of the RCBE, among others.:

121.5.1. Companies with shares admitted to trading on a regulated market subject to disclosure requirements consistent with European Union law or equivalent international standards;

121.5.2. Consortia and Complementary Groupings of Companies;

121.5.3. Condominiums provided that their overall asset value does not exceed EUR 2,000,000.00 and provided that no more than 50% rent is held by a sole proprietor, joint owners or persons individuals who are to be considered beneficial owners in accordance with the criteria provided for in the new Money Laundering Law (Law 83/2017, of 18 August).

121.6. Obligations. Entities subject to the RCBE are required to:

121.6.1. Maintain an updated BE record;

121.6.2. Declare information about your BE for RCBE purposes: The first initial declaration regarding the beneficial owner shall be made, as to the entities to be constituted, with the incorporation registration or the first entry in the Central Legal Entity File, depending on whether or not not an entity subject to commercial registration; as for the entities already constituted, within a period to be defined by ordinance;

121.6.3. Update as necessary the information provided to RCBE; this update shall be made as soon as possible, not later than 30 days from the date of the event determining the change;

121.6.4. Confirm the validity of the BE information by means of an annual declaration by the 15th of July; In the case of entities obliged to submit the Simplified Business Information, this annual declaration will be presented together with it;

121.6.5. Verify the registration and updates on BE in all circumstances where the law requires proof of regularized tax situation.

121.7. Data to be provided at the time of opening of a subject entity's account, see 122.4., Will be requested a code consisting of alphanumeric characters whose combination of numbers and letters is 8-4-4-4-12

XX. Politically Exposed Person / High Public Office

122. In the light of applicable legal and regulatory requirements, DIF Broker, in line with its identification and due diligence obligations, assesses the status of "PEP" or the holding of other relevant political or public office of all its potential. prior to the beginning of the business relationship.

123. In the same vein, DIF Broker also detects the quality of acquired "PEP" or the ownership of "Other relevant political or public positions" by its clients, reporting such quality or ownership, either in the period prior to establishment of the business relationship, such as the period following its establishment.

124. With a view to complying with the reinforced due diligence obligation to which it is bound, DIF Broker focuses attention on the origin of the assets and funds involved in the business relationships whose clients or beneficial owners involved are identified as "PEP" or as holders of "Other relevant political or public office".

125. However, the adoption of the necessary procedures to know and prove the provenance of the assets and funds involved is not limited to the business relations previously described. Business relationships involving persons recognized as "close family members of a PEP" or "persons recognized as closely associated with a PEP", whether as clients or as beneficial owners, will also be subject to such procedures, due to the risk of money laundering or terrorist financing that the law attaches to this type of business relationship.

XXI. LEI Code

126. Which clients will be subject to the submission of the "LEI Code" when establishing a business relationship with DIF Broker?

    126.1. When a business relationship with DIF Broker is established, they will have to present their "LEI Code" as part of the mandatory account opening documentation, and in accordance with Article 4 of Decree-Law No. 202 / 2015 of 17 September, the following entities:

    126.1.1. Entities subject to commercial registration, based in Portugal;

    126.1.2. Entities subject to registration in the Central Bank of Portugal (FCPC).

    126.2. Funds, identified pursuant to Article 11 (2) (b) of Decree-Law 14/2013 of 28 January, whose management company or other legal representative, if applicable, is headquartered in Portugal;

    126.3. Other entities not foreseen in the previous paragraphs, namely entities with headquarters abroad, legally or regularly required to use the "LEI Code".

XXII. Incentive Management

127. In the framework of the services rendered by DIF Broker, in particular the distribution of investment funds, DIF Broker may receive a retrocession as a distributor. DIF Broker may only earn these commissions when it does not charge the Client specific commissions for this service and advises the Client. These retractions are equivalent to a percentage of the management fee charged by the fund to Clients as well as a percentage of performance, subscription or redemption fees. This fee may represent up to 60% of the fees earned by the fund management company. You may request additional information about these retrocessions or alternatively check the fund's prospectus.

128. The retrocessions indicated in the previous point contribute to the enhancement of the quality of service pursued by DIF Broker and in his duty to act in order to protect the legitimate interests of the client as provided by law. In order to reinforce the service, the following factors are distinguished among others: (i) Execution of the knowledge and adequacy test; (ii) Clarifications about information contained in investment fund prospectuses; (iii) Possibility of portfolio diversification through the provision of a multi-product platform; (iv) Market room support; (v) Submission of reports and production of client support content; (vi) Ongoing client training, in particular free online events.

129. Within the scope of the service of Prtfolio Management, DIF Broker cannot receive incentives when it charges fixed and / or variable commission for the portfolio management service. The commission is waived by the management service.

XXIII. Market Information Services - Real Time

130. In the area of subscription to information services that allow him to consult, in real time, the value of financial instruments traded in a given market, the Client should inquire as to whether, in the light of the criteria adopted in the market in question, qualified as a professional investor rather than a private investor. Such qualification is of particular importance to the Client as it may entail, in certain markets, the charging of a significantly higher subscription amount than that applicable to private investors.

XXIV. Commissions and costs

131. You may find out in detail the maximum costs associated with each service through the DIF Broker website here. Alternatively you can consult the maximum price applicable on the "CMVM" page here. At the time of the termination of the investment service

agreement, Client will be sent a pdf to his / her email containing all the conditions that apply. In addition, the Client may analyze all costs that have been applied through the "Trading Platform" using the Portfolio Report> Consolidated Rate Table option available online.

132. In order to help the Client to understand in a structured way all the costs of each service, the following is a list of them:

132.1. Registration and deposit service:

132.1.1. Costs associated with account maintenance
132.1.2. Costs associated with custody and registration of "Financial Instruments"
132.1.3. Costs associated with currency translation of settlement in account base currency
132.1.4. Costs associated with the transfer of "Securities"
132.1.5. Funds transfer costs
132.1.6. Other costs (tax certificates, 2nd copy of statements, letters to attend shareholders' meeting)

132.2. Reception and transmission of orders service:

132.2.1. Trading costs: commission or spread for buying and selling "Financial Instruments";
132.2.2. Financing costs: financing costs associated with holding open positions in "Financial instruments;
132.2.3. Other services (technical analysis or fundamentals service).
132.2.4.

132.3. Non-Independent Investment Advisory Service:

132.3.1. Cost associated with providing services, charged based on the value of the account (includes "Securities", funds, potential losses or gains on derivative instruments, equity events pending settlement and costs associated with position closing).

132.4. Portfolio Management Service:

132.4.1. Cost associated with providing services, charged based on the value of the account (includes "Securities", funds, potential losses or gains on derivative instruments, equity events pending settlement and costs associated with position closing);
132.4.2. Cost associated with portfolio performance representing a fraction of it.

132.5. Other costs: DIF Broker may charge the Client costs that are not directly attributable to the entity. To know all the costs and commissions click here.

XXV. Supervisory Authorities

133. DIF Broker is subject to the supervision of the Securities Market Commission, headquartered at Laura Alves, 4, 1050-138 Lisbon.

XXVI. Digital Signature

134. DIF Broker makes available to its Clients, Authorized Persons and Attorneys the possibility of remote account opening and identity verification through a Qualified Trusted Service Provider, from the DIF Broker website (www.difbroker.com). Should they choose to do so, Clients, Authorized Persons and Attorneys will agree to electronically sign their inherent documentation by issuing a digital signature certificate issued by "DigitalSign - Certificadora Digital, SA" with NIPC: 507015851, the Qualified Trusted Service Provider that provides these services to Dif Broker.

Date: _____/_____/_____ Client: ____