

## **ANNEX TO THE PRIVACY POLICY – UK GDPR and EU GDPR**

### **Applicable to Data Subjects Located in the United Kingdom and the European Union**

This Annex supplements IMPLY's Privacy Policy and applies exclusively to data subjects located in the United Kingdom and the European Union (EU). It complies with the European Union General Data Protection Regulation 2016/679, United Kingdom General Data Protection Regulation, and the Data Protection Act 2018 (DPA 2018).

#### **1. Application of the GDPR**

This Annex applies when IMPLY offers services to individuals located in the United Kingdom and the European Union and/or carries out behavior monitoring through cookies, analytics, or targeted advertising.

#### **2. Data Controller**

IMPLY, a private legal entity headquartered in Brazil, is the Data Controller responsible for decisions regarding the processing of personal data.

Data Protection Officer (DPO) Contact:

Email: [dpo@imply.com](mailto:dpo@imply.com) | Phone: +55 (51) 2106-8000 | DPO: Geison Rauen

#### **3. Legal Bases (GDPR)**

Processing is carried out based on Article 6 of the UK/EU GDPR:

- a) Explicit consent;
- b) Performance of a contract;
- c) Legal obligation.

#### **4. Data Collected**

Depending on user interaction, the following data may be collected:

- a) Identification data (name, email, phone number);
- b) Browsing data (IP address, cookies, logs, device information);
- c) Customer service and communications data;
- d) Behavioral data for analytical and marketing purposes, subject to consent.

#### **5. Purposes of Processing**

The personal data collected are used for:

- a) Provision and performance of contracted services;
- b) Customer support;
- c) Security, fraud prevention, and prevention of unlawful activities;
- d) Compliance with legal obligations;
- e) Marketing and targeted advertising, when authorized;
- f) Improvement of the user experience.

#### **6. How Cookies Are Used**

Cookies are files or information that may be stored on devices when the User visits IMPLY's website and accepts their use by us. In general, a cookie contains the name of the website from which it originated, its lifespan, and a value generated randomly. IMPLY uses cookies to facilitate use and to adapt the Website to users' interests and needs. Cookies are also used to compile information about the use of our websites and services, contributing to the improvement of our structure and content. The following types of cookies may be used:

- a) Strictly necessary cookies;
- b) Analytical cookies;
- c) Marketing and behavioral advertising cookies.

Consent for non-essential cookies is requested in advance, freely, informedly, and unambiguously and may be withdrawn at any time.

#### **7. Data Sharing**

Data may be shared with other entities within IMPLY Group, service providers and partners, and public authorities, upon legal request. Data sharing always occurs within legal and contractual limits.

#### **8. International Data Transfers**

Personal data may be transferred to other countries, including countries outside Brazil, the United Kingdom, and the European Union, for purposes such as cloud storage (provider: Amazon – United States), processing, or operational support. In such cases, appropriate safeguards are adopted, such as:

- a) Standard Contractual Clauses (SCCs);
- b) Appropriate technical and organizational measures;
- c) Assessment of the level of protection of the destination country.

#### **9. Rights of European Data Subjects**

In addition to the rights described in the main Privacy Policy, data subjects are guaranteed the following rights:

- a) Right of access;
- b) Rectification;
- c) Request restriction of processing;
- d) Erasure of data;
- e) Lodge a complaint with the Data Protection Supervisory Authority of their country of residence.

#### **10. Contact Regarding Data Protection and Other Matters**

If you have any questions, comments, or suggestions regarding this Policy, or if you believe that your information and personal data have been used in a manner inconsistent with this Policy, please contact us via email at [dpo@imply.com](mailto:dpo@imply.com)

#### **11. Precedence**

In the event of any conflict between this Annex and the main Privacy Policy, this Annex shall prevail for data subjects located in the United Kingdom and the European Union.

#### **12. Updates**

This Annex to the Privacy Policy may be updated as necessary. Therefore, we encourage you to visit this page periodically to stay informed of any changes. Last updated: December 30, 2025.