

## 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 and/or carries out behavior monitoring through cookies, analytics, or targeted advertising to individuals located in the United Kingdom and the European Union.

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

#### 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 the contracted services and products sold on our website; 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 example, for purposes such as cloud storage, 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.

**Determination of Applicable Legislation:** The legislation applicable to the processing of personal data will be determined based on the place where IMPLY's services are used or consumed, taking into account contextual and technical information normally used to provide the service, such as browser settings, language, access domain, IP address, or other information provided by the user. The use of this information is exclusively for the proper delivery of services, security, regulatory compliance, and fulfillment of legal obligations, and no automated decision-making is carried out based solely on these data.

#### 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: February 5, 2026.