

Liberty Mutual Surety Brasil Seguros S.A.

Privacy Notice

Liberty Mutual Surety Brasil Seguros S.A. ("Liberty Mutual Surety") takes the protection of your personal data seriously and is committed to protecting your privacy. This Privacy Notice ("Notice") sets out details of the information we may collect from you and how we may use that information.

This Notice applies to data processing activities carried out by us under applicable data protection and privacy laws in Brazil (including Law No. 13,709/2018 Brazilian Data Protection Law or "LGPD"). Please take your time to read this Notice carefully.

1. About Liberty Mutual Surety

Liberty Mutual Surety is a surety business. We offer surety bonds to individuals, companies, and other insurers.

For us to deliver surety bond services, which involve providing you with a quote and then bonds, and also dealing with any claims or complaints that might arise, we need to collect and process data. We also collect your information for recruitment purposes, in our contractual relationships with you and for relationship development, where appropriate. This makes us be considered as a "Data Controller in accordance with LGPD."

2. Our processing of your personal data

This Notice sets out the legal grounds enabling us to process your personal data. If you provide us personal data about other individuals, we may also act as Data Controller for their personal data. You should refer them to this Notice before supplying us data on behalf of others.

We may anonymize the personal data so that you cannot be identified from the data either by itself or when combined with any other data we hold. Provided that the requirements imposed by the LGPD for anonymization are met, that data will then not be subject to this Notice or data protection laws.

2.1. What personal data we may collect?

- **Personal information** such as your name, address, contact phone numbers, email addresses, date of birth, gender, signature, national identification, passport details, and information about your relationship to the policyholder where you are the beneficiary.
- **Financial information and account details** such as bank account number and account details, credit history and credit score, assets, income, and other financial information.
- **Commercial information** such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories and tendencies.
- **Information which we obtain as part of checking sanctions lists.**
- **Internet or other similar network activity**, including browsing history, search history, cookies, information on a consumer's interaction with a website, application, or advertisement.
- **Any other information** passed on from you, your insurance broker or someone else applying on your behalf.

- Each category of the personal data indicated above is necessary for a specific contractual execution, which is why, if you refuse to provide it, we will not be able to provide our services.

2.2. How will we collect your personal data?

We may collect information directly from you:

- When you apply for or renew a bond;
- When we are providing you with a quotation;
- When you pay your bond;
- When you visit our websites or visit our office; and/or
- When you contact us by email, telephone and through other written and verbal communications.

As well as obtaining information directly from you, we may also collect information from:

- The named policyholder where you are a beneficiary or named under a bond;
- Third parties involved in the bond application process (such as our business partners and representatives, brokers or other insurers);
- Publicly available sources such as court judgments, insolvency registers, internet search engines, news articles and social media sites;
- Other Liberty Mutual Group companies;
- Third parties who provide sanctions checking services;
- Financial crimes detection agencies; and/or
- Credit reference agencies in relevant jurisdictions.

2.3. For which purposes we may use your personal data?

Purpose of Processing	Legal Basis for Processing
To manage and handle your application and questions. This includes for example: <ul style="list-style-type: none"> • calculating your premium; • determining your eligibility for a quote; and • confirming your identity and servicing your policy. 	<ul style="list-style-type: none"> • It is necessary to enter into or perform your insurance contract (to assess the insurance application and manage the application process).
To evaluate prospective clients, including carrying out fraud, credit and anti-money laundering checks.	<ul style="list-style-type: none"> • It is necessary to enter into your insurance contract. • We have a legitimate interest (to assess the bond application).
To manage any claims you make under your bond.	<ul style="list-style-type: none"> • It is necessary to enter into or perform your contract (to assess and pay your claim and manage the claims process).
Regulatory and Legal Requirements. This includes for example:	<ul style="list-style-type: none"> • We need to use your information to comply with our legal and regulatory obligations, and also to allow the regular exercise of the company's rights.

<ul style="list-style-type: none"> • controls and access rights management; • to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Liberty Mutual Surety's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Liberty Mutual Surety is among the assets transferred; • exercising and defending our legal rights and positions; • to meet Liberty Mutual Surety's contract obligations; • to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; or • as otherwise permitted by law. 	
To prevent and investigate fraud.	<ul style="list-style-type: none"> • It is necessary to enter into or perform your insurance contract. • We have a legitimate interest (to prevent and detect fraud and other financial crimes).
For insurance administration purposes including analysis of trends, carrying out actuarial work, planning service delivery, risk assessment, and costs and charges.	<ul style="list-style-type: none"> • We have a legitimate interest (to develop and improve the products and services we offer).
For business and management processes and activities including analysis, review, planning, business transaction and IT hosting, support and security.	<ul style="list-style-type: none"> • It is necessary to enter into or perform your insurance contract. • We have a legitimate interest (to develop and improve the products and services we offer).
To provide customer service and technical support.	<ul style="list-style-type: none"> • It is necessary to enter into or perform your insurance contract. • We have a legitimate interest (to effectively manage our business).
To communicate with you and resolve any complaints that you might have.	<ul style="list-style-type: none"> • It is necessary to enter into or perform your insurance contract (to send you communications, record and investigate complaints and ensure that future complaints are handled appropriately).
To improve your customer experience and our products	<ul style="list-style-type: none"> • We have a legitimate interest (to effectively manage our business).

2.4. Who might we share your personal data with?

We will keep your personal data confidential, and we may share it where necessary for the purposes set out above with the following parties:

- Liberty Mutual Group Inc. and its subsidiaries and affiliates (both inside and outside the European Economic Area) and their service providers;
- Distribution partners, Intermediary and tied agents, brokers, affinity/business partners and other distributors, reinsurers, administrators, financial institutions and other business partners;
- Public entities and institutions (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, and fraud prevention agencies);
- Professional advisors including law firms, accountants, auditors, and tax advisors;
- Third parties who provide sanctions checking services;
- Third party suppliers, agents and contractors appointed by Liberty Mutual Surety to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers and our subcontractors;
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention);
- Insurers, re-insurers, policy holders, and claimants; and
- As permitted by the LGPD or other laws or regulations that apply to us.

3. What marketing activities do we carry out?

We may send marketing communications directly to you by mail, email, or telephone. In most cases, we will only send you marketing communications for which you have clearly expressed your consent and therefore interest in receiving.

On other occasions, we may process your personal data to provide you with business information based on our legitimate business interests and the relationship we have with you as a customer.

However, if you wish to opt-out of receiving further marketing communications by opting out of our processing your personal data for this purpose or by withdrawing your initial consent, you may do so by contacting us using the details set out in section 9 (Contacting us).

4. Data transfer

Sometimes we (or third parties acting on our behalf) may transfer personal data that we collect about you to countries outside of Brazil.

Where a transfer occurs, we will take steps to ensure that your personal data is protected. We will do this using a number of different methods including putting in place appropriate contracts. Furthermore, we will only transfer your personal data to countries that provide an adequate level of protection for personal data.

5. Retention

We may keep your personal data for as long as reasonably necessary to fulfil the purposes set out in section 2 above and to comply with our legal and regulatory obligations.

6. How do we protect your personal data?

Liberty Mutual Surety maintains physical, electronic, and procedural safeguards to protect your personal information. These safeguards comply with applicable laws. Our employees and agents are authorized to access your data only for legitimate business purposes.

The security measures in place on our website and computer systems are in place to protect all personal data we receive from loss, misuse, or alteration of the information you provide to us. We keep your personal data only for as long as reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

7. Your rights

Under the LGPD, you are entitled to rights in relation to the personal data that we hold about you. These rights are:

- The right to confirm the processing of your personal data.
- The right to access your personal data.
- The right to rectify data that is not complete, precise, or updated.
- The right to restrict data processing.
- The right to withdraw your consent.
- The right to erasure.
- The right to object.
- The right to data portability.
- The right to receive information about the shared use of data.
- The right to receive information about the possibility of not providing consent and the consequences of such refusal (when consent is the appropriate legal basis).
- The right to request a review of automated decision-making.
- The right to lodge a complaint with the Regulator.

8. Cookies

When using our website, Liberty Mutual Surety may send small files, called “cookies,” to your computer.

These files aim to improve your navigation and functionality, storing data about your visits, allowing a more personalized interaction with the tools provided by the website. These “cookies” collect information that is sent from one page to the next page, eliminating the need to enter redundant information.

Most browsers are configured to accept “cookies,” but it is possible to change the settings on your computer so that “cookies” are not accepted or that it is indicated when they are being sent, however, in this case, some pages on the website may not work.

9. Contacting us

For any request or inquire related to this Notice, and also if you would like further information about any of the matters or have any other questions about how we may collect, store or use your personal data, you may contact our DPO (Data Protection Officer) at the following e-mail address.

DPO (Data Protection Officer): Rúben Lemos Menezes

Contact e-mail: Privacidade_LMSBrasil@libertymutual.com.

Please note that we are not responsible for the privacy policies or content of any websites linked to this website (including websites of companies within the Liberty Mutual Group).

10. Updates to this privacy notice

From time to time, we may need to make changes to this Notice, for example, as the result of changes to law, technologies, or other developments. The updated version of this Notice will be effective once it is accessible. You are responsible for reviewing this Notice to stay informed of any changes or updates.

This notice was last updated May 2025.