



DATA PROTECTION POLICY

OF

OPTIMIZE INVESTMENT PARTNERS

SGOIC, S.A.

04.09.2025

Optimize Investment Partners – SGOIC, SA

Share capital: € 450,771.71 | NIPC: 508 181 321

Tel: 00 (351) 213 136 2 | Headquarters: Avenida Fontes Pereira de Melo, 21 - 4º I 1050-116 Lisbon, Portugal | Email: info@optimize.pt.

Registered with the CMVM nº 327

 <p>Personal Data Controller</p>	 <p>types / categories of personal data</p>	 <p>How do we obtain your personal data?</p>	 <p>Data processing purposes</p>	 <p>legal grounds for processing</p>
<p>Optimize Investment Partners SGOIC, SA</p>	<p>Personal identification and contact information; Bank details; Data concerning assets, tax and criminal records; Data relating to investment purposes and knowledge and experience; Data relating to interests and experience; Data relating to domicile; Health data and voice records (recorded calls).</p>	<p>Data provided by the data subject or client</p> <p>Data collected through cookies, log, or made available by processors</p>	<p>We use your personal data for the purposes of conducting pre-contractual due diligence and executing the Registration and Deposit of Participation Units contract.</p> <p>Sending marketing emails and other communications; fulfilling legal and tax obligations; and for monitoring the quality of services provided.</p>	<p>Consent; contract execution; conducting pre-contractual due diligence;</p> <p>Compliance with legal obligations; pursuit of Optimize's legitimate interest.</p>
				
<p>Data Storage</p>	<p>Data recipients</p>	<p>Transfers of data</p>	<p>Data subject rights</p>	<p>Supervisory authority</p>
<p>Depending on the specific case, the data may be retained for 120 days, 2 years, 3 years, 6 years, 7 years, 10 years, 20 years, or for the period corresponding to the duration of the contractual relationship with Optimize.</p>	<p>Companies in the Optimize group; banks, institutional recipients and public entities, supervisory entities, market management entities, issuing companies and processors.</p>	<p>Based on the data transfer mechanisms provided for in the GDPR, we might transfer your data to our processors and, where applicable, to other recipients and entities in third countries where the client makes investments.</p>	<p>Right to withdraw consent; right to information; right of access; right to rectification; right to erasure; right to restriction of processing; right to data portability; right to lodge a complaint with a supervisory authority.</p>	<p>The portuguese National Commission for Data Protection: Comissão Nacional de Proteção de Dados (Av. D. Carlos I, 134, 1º 1200-651 Lisboa, Portugal)</p>

DATA PROTECTION POLICY

(“HEREINAFTER “POLICY”)

OPTIMIZE INVESTMENT PARTNERS SGOIC, SA (hereinafter “OPTIMIZE” or “SGOIC”) is committed to protecting the personal data of its Leads, Clients and Users of its website, having, in this context, prepared this Policy, which underlies its commitment to respect legal rules regarding privacy and protection of personal data.

This Policy informs the data subject regarding the processing processes to which personal data are subject. All personal data is collected and processed in strict respect and compliance with the provisions of the protection legislation of personal data in force at each moment, namely, Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016 (“GDPR”) and Law No. 58/2019, of 8 of August 2019 (Implementation Law), as well as Directive 2002/58/EC of the European Parliament and of the Council, of 12 July 2002 (Directive on privacy and electronic communications electronics) and Law No. 41/2004, of August 18.

OPTIMIZE respects the best practices in the field of security and data protection personal data, having for this purpose adopted the technical and organizational measures necessary and taken as adequate in order to guarantee compliance with legislation on the protection of personal data and ensure that the processing of personal data is lawful, fair, transparent and limited to the outlined purposes. Likewise, OPTIMIZE has adopted and, otherwise, regularly updates the measures it deems appropriate to ensure the accuracy, integrity and confidentiality of personal data, and all the rights that belong to the respective holders.

This Policy also applies to all Leads, Clients and Users of applications mobile devices or who have access to OPTIMIZE websites or who interact with OPTIMIZE by any other



means, namely, through social networks, digital communication channels and multiplatform applications for instant messaging and voice calls or others.

This Policy also complements the provisions regarding protection and processing of personal data provided for in the contracts that Clients enter or will enter with OPTIMIZE, as well as the rules provided for in the terms and conditions that regulate the offer of various services, and which are duly advertised on OPTIMIZE websites.

1. Data Controller

In accordance with the provisions of GDPR, the Controller is the natural or legal person, public authority, agency or other body which, individually or jointly with others, determines the purposes and means of processing personal data. For due purposes, and under the terms set out below, the quality of controller is assumed by OPTIMIZE.

Entity designation: OPTIMIZE INVESTMENT PARTNERS SGOIC, SA

Legal form: Collective Investment Management Company in the form of private limited company

NIF: 508 181 321

Main CAE: 66300-R3 (Fund Management Activity)

Corporate purpose: management of investment funds, discretionary management of portfolios and the receipt and transmission of orders on behalf of others. The Company may also market units of participation in collective investment schemes managed by others.

Records in Portugal: CMVM No. 276

Headquarters: Avenida Fontes Pereira de Melo , 21 - 4º I 1050-116 Lisbon, Portugal

Phone contact: 00 (351) 213 136 2

E-mail: RGPD@Optimize.pt
Website: www.optimize.pt/en

2. Data Protection Officer (“DPO”)

The DPO plays a relevant role in the processing of personal data, guaranteeing, among other aspects, the verification and monitoring of the conformity of data processing with the legislation in force, verifying compliance with this Data Protection Policy and defining clear processing rules of personal data, ensuring that all those who entrust it with the processing of their data personal data, are aware of how OPTIMIZE treats them and what rights that assist them in this domain.

Thus, personal data holders, if they wish, can send a communication to DPO, for matters related to the processing of personal data, using the following contact: RGPD@Optimize.pt

3. Legal principles applicable to the processing of personal data

Within the scope of personal data processing, OPTIMIZE acts in compliance and respect with the following legal principles:

- Principle of Lawfulness, Loyalty and Transparency: personal data is processed in a lawful, fair and transparent manner.
- Principle of Limitation of Processing Purposes: personal data is collected for specific, explicit and legitimate purposes and not being processed in a manner incompatible with these purposes.
- Principle of Data Minimization: personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they will be processed.
- Principle of Accuracy: personal data must be accurate and up to date. Inaccurate data will be updated or deleted.
- Principle of Conservation Limitation: Personal data must be kept in a way that

allows the identification of data subjects only for the period necessary for the fulfillment of the purposes for which they are processed, without prejudice to the application of longer retention periods in compliance with legal obligations.

- Principle of Integrity and Confidentiality: personal data is kept in security through appropriate and effective technical and organizational measures against unauthorized or unlawful processing and against its accidental loss, destruction or damage, through the application of appropriate technical or organizational measures.
- Principle of Responsibility: OPTIMIZE is responsible for compliance with the principles stated and must be able to prove it.

4. Concepts and definitions

For the purposes of this Personal Data Protection Policy, the following are used concepts and definitions:

Clients: “Clients” are all individuals who have established, or are otherwise in the process of establishing, a contractual relationship with OPTIMIZE, including not only current acquirers of its services, but also all individuals who are considered potential acquirers of its services, commonly designated “Leads”.

Personal data: Personal data is all information relating to Clients and users that falls within the definition provided by the provisions in paragraph 1 of article 4 of the GDPR.

Execution Law: Law No. 58/2019, of August 8, 2019, which ensures the execution, in the national legal order, of Regulation (EU) 2016/679 of the Parliament and of the Council, of April 27, 2016.

Controller: Entity that determines the purposes and means of processing data personal data, as defined in paragraph 7 of article 4 of GDPR.

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the

Council, of 27 April 2016, on the protection of individuals regarding the processing of personal data and the free movement of data personal data (General Data Protection Regulation).

Processor: Legal or natural person who processes personal data on behalf of the controller, as defined in the provisions of paragraph 8 of Article 4 of GDPR.

Processing: Any operation performed on personal data or on sets of personal data, whether by automated or non-automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, erasure or destruction, as defined in the provisions of paragraph 2 of Article 4 of GDPR.

Users: All natural persons who visit, or otherwise, access the data controller's website data.

Website: Refers to the OPTIMIZE websites at <https://www.optimize.pt> and its subdomains or others controlled or maintained by OPTIMIZE.

5. Collection and processing of personal data

The personal data processed by OPTIMIZE is obtained in the following ways:

- Directly from the data subject: OPTIMIZE collects personal data from its Clients in person or by telephone (in cases where the Client or potential Client contacts OPTIMIZE to obtain information regarding its services) or by writing (by sending an e-mail or postal mail, by filling in account opening forms on the OPTIMIZE website

or the forms of contact or registration for events via WhatsApp or social networks, namely, Instagram, Facebook or LinkedIn).

- Through cookies: OPTIMIZE collects information through cookies stored on users' devices. Cookies are small files of text that are stored on the disk or in the memory of the device accessing the website. For more information on the use and purposes of cookies, please see our Cookies Policy.
- Through records: OPTIMIZE may use records related to the activity of its website to record and store certain types of information when the user interacts with our services. This information includes the registration of the Internet Protocol (IP) and other information or identification numbers, as well as the type of browser and internet service provider.
- Through Processors: in compliance with legal or contractual obligations to which it is bound.

6. Cases in which our website requests personal data

OPTIMIZE may request personal data through its website in the following situations:

- When the data subject requests information about our products and services.
- When the data subject submits questions or other requests through the form of contact.
- When the data subject contacts OPTIMIZE via Chat, namely, WhatsApp, and through social networks, namely, Instagram, Facebook or LinkedIn.
- When the data subject registers for events or Webinars organized or in which Optimize participates.
- When the data subject enters a financial services contract with OPTIMIZE or determine certain orders to be executed by OPTIMIZE.
- When the data subject requires any services or products that are provided by OPTIMIZE.

7. Purposes of personal data processing

OPTIMIZE processes personal data that is necessary for the management and optimization of its services and its commercial relations with its clients and users. Additionally, OPTIMIZE uses the information generated by clients and users to send and make known the commercial offers that best suit their interests and that relate to its services.

The personal data processed by OPTIMIZE aims to achieve the following set of purposes:

7.1 Purposes of a contractual or pre-contractual nature

Client management

Client management includes the following specific purposes: management of the products and services that are the object of the contract between the client and OPTIMIZE; Client management and service; administrative management; management and control of subscriptions, redemptions and payments; invoicing and compliance with due diligence for events, corporate events occurring within the scope of portfolio management, even after their termination.

If the client chooses to operate in markets outside the European Union (EU) or the European Economic Area (EEA), OPTIMIZE may, within the scope of inquiries or requests directed to it, must transmit to these markets, their representatives and respective supervisors, personal data and other information associated with the client, for the fulfillment of purposes related to the fight against fraud and the investigation of financial crimes.

In this context, the processing of personal data also underlies the following specific purposes: registration of users on the OPTIMIZE website to complete the process of

account opening.

The basis of lawfulness for data processing corresponds to the conclusion of a contract for the provision of Registration and Deposit of Participation Units or portfolio management, in the terms and conditions contained in the contract between OPTIMIZE and the client. The personal data collected is only necessary for the provision of services corresponding and which are indispensable for the services to be provided.

Processing and registration of the user in the OPTIMIZE Client Area

The data processing that occurred in this context aims to conclude the Client's registration process in the Optimize Client Area to allow the user to carry out and monitor their financial operations (subscription and redemption).

The grounds of lawfulness provided for the respective data processing correspond to the conclusion of a contract for Registration and Deposit of Units of participation or management of portfolios, under the terms and conditions contained in the contract between OPTIMIZE and the client.

The personal data collected is only the necessary for the provision of services corresponding and which are indispensable for the services to be provided.

Management of potential Clients

The data processing that occurred in this context aims to present the potential client with the offer of services and products requested by the latter and manage the commercial relationship between the parties. If the potential client accepts the services and products presented by OPTIMIZE, their data personal data will be processed for contractual management purposes, this party assuming the quality of new OPTIMIZE client.

The grounds of lawfulness provided for the respective data processing correspond to the performance of pre-contractual steps, based on the request submitted by the

potential client or, alternatively, the proposal of services presented by OPTIMIZE.

7.2 Purposes based on the data subject's consent

The grounds of lawfulness of the data processing corresponding to the consent given by the data subject is used, without prejudice to its free revocation, to achieve the following set of specific purposes.

- 7.2.1 Respond to requests and inquiries submitted by the data subject via e-mail, telephone, contact form, WhatsApp or any other communication channels of OPTIMIZE;
- 7.2.2 Contact the data subject to publicize the offer of products and services of OPTIMIZE.
- 7.2.3 Manage the sending of written or audiovisual content to the data subject.
- 7.2.4 Manage the data subject's subscription to the OPTIMIZE YouTube channel to notify of new publications, videos, events or any other information relating to OPTIMIZE's activity.

7.3 Purposes of a legal nature

The basis of lawfulness of the data processing corresponding to the fulfillment of the legal obligations applicable to OPTIMIZE aims to allow the following set of purposes to be achieved:

- 7.3.1 Recording of telephone calls, in order to comply with applicable legislation, ensuring, in particular, that it is possible to verify the integrity of the communications made and the interactions carried out with the data subject. The legal basis for this data processing is compliance with the obligations under the European Directive 2014/65/EU (MiFID II) and Delegated Regulation 2017/565 (MiFIR).
- 7.3.2 Conducting due diligence for the prevention of money laundering and financing terrorism under the terms and for the purposes of the provisions of Law 83/2017 and the Regulation CMVM 2/2020.

- 7.3.3 Compliance with due diligence to prevent market abuse within the framework of the Regulation (EU) n. ° 596/2014 of the European Parliament and of the Council of April 16, 2014 – “MAR”).
- 7.3.4 Reporting to the national and international supervisory entities of OPTIMIZE, under the terms and for the purposes of applicable legislation, namely the Asset Management regime and Securities Code).
- 7.3.5 Reporting to tax and administrative authorities.
- 7.3.6 Providing information in legal proceedings.
- 7.3.7 (When applicable) Requesting the respective tax identification number in relation to persons individuals not resident in Portugal.

7.4 Purposes related to the legitimate interest of OPTIMIZE

The basis of lawfulness of the data processing corresponding to the legitimate interest pursued by OPTIMIZE aims to allow the following set of purposes to be achieved:

- 7.4.1 Recording telephone calls to manage and evaluate the quality of its services and ensure the integrity of contacts made by this means. The legitimate interest prevailing is based on the need to guarantee and prove the integrity of the information provided by telephone contact, taking into account that the receipt, transmission and execution of Client orders made by this means imply the need to keep the telephone record in order to guarantee the integrity of the information provided. Similarly, in the event of a dispute between the parties, the record of the calls proves to be essential as a means of proof, allowing to prove the facts and allegations that may be made by OPTIMIZE in the context of the exercise of its right of defense or its right to action.
- 7.4.2 Communication of Clients' personal data to other entities of the group to optimize its internal resources.
- 7.4.3 Management of commercial communications with data subjects with whom there is a contractual relationship through the dissemination of news, publications, events and other information related to the activity of OPTIMIZE, provided that

regarding the products and services contracted or effectively used by them. The processing of personal data for this purpose may be based on the legitimate interest of OPTIMIZE, previously assessed by carrying out a balancing test, to ensure that the fundamental rights and freedom of the data subjects do not prevail.

This process aims to ensure that commercial communications are aligned with the interests and preferences expressed by the data subjects in the context of the relationship contract in force. Data subjects may, at any time and without any charge, exercise their right to object to the processing of their data for the purposes of commercial communications, under the terms and within the limits provided for in the GDPR.

8 Personal data subject to processing

8.1 Processing of clients' personal data

OPTIMIZE, within the scope of its activities, and in compliance with the principle of minimization of personal data, processes personal data strictly necessary for the provision of services contracted with its clients. Such data personal data fall into the following categories:

- **Identification data:** this category includes personal data such as name, photograph, address, telephone contact, email address, gender, nationality and place of birth.
- **Data related to the client's economic and financial situation:** this includes personal data relating to income obtained and transactions carried out by holders, as well as their financial and personal assets.
- **Tax data:** this data includes tax data associated with its holder, including the tax identification number, (where applicable) the special tax identification number in relation to persons individuals not resident in Portugal, the Social Security Identification Number (NISS), the tax address and contributions and withholdings for declaration purposes tax.

- **Commercial information:** this category covers all information that is generated by the interaction between the client and OPTIMIZE, namely, information about the client's preferences and types of investment, products and financial assets in which they are interested, and investor profile.
- **Transactions of goods and services:** this category includes data relating to the value in account and the types of financial products traded.
- **Academic and professional data:** this category of data includes personal data such as curriculum, profession/professional category, the entity employer, the sector of activity and the level of education of the holders.
- **Data relating to the household:** this category includes data such as marital status civil, the composition of the household and the identification of the members of the household family as PEP (Politically Exposed Person).
- **Data on interests and preferences:** this category includes data demographics, Client preferences, Webinars attended and communications made.
- **Voice recording:** this data includes call recordings.
- **Criminal data:** this category collects personal data related to criminal convictions and offenses.
- **Bank details:** this category includes the bank, financial and related details of holders of personal data, such as the IBAN (International Bank Account Number).
- **Data to support the legal grounds for redeeming Retirement Savings Plans (“PPR”):** unemployment, serious illness, permanent disability for work and payment of benefits of credit agreements secured by a mortgage on property intended for own permanent housing of the participant.

8.2 Processing of personal data of potential Clients (“Leads”)

OPTIMIZE, within the scope of the activities it develops, and in compliance with the principle of minimization of personal data, processes personal data strictly necessary to carry out pre-contractual due diligence with potential Clients. Such data personal data

fall into the following categories:

- **Identification data:** this category includes personal data such as name, photograph, address, telephone contact, email address, gender, nationality and place of birth.
- **Commercial information:** this category covers all information generated by the interaction between the potential Client and OPTIMIZE, namely, information about the potential Client's preferences and types of investment, financial products and assets in which they are interested and investor profile.
- **Data on interests and preferences:** this category includes data demographics, potential Client preferences, attended Webinars and communications (chat) made.

9. Criteria for storing personal data

The period during which personal data is stored and kept varies depending on the specific purposes for which they are needed. Some of the deadlines for conservation derive directly from the Law, which imposes the obligation to keep the data personal data for a minimum period. Thus, whenever there is no specific legal requirement, the data will be stored and kept only for the minimum period necessary for the pursuit of the purposes that motivated its collection or its subsequent treatment, in the terms defined in the law.

Within the scope of personal data processing activities carried out by OPTIMIZE, it is possible to identify the following periods for the storage of personal data or the criteria that serve as a reference for its materialization:

- **90 days:** messages sent via WhatsApp present on the website opened by Clients, potential Clients or Users will be stored and kept for a maximum period of 90 days after the date of the last interaction.
- **1 year:** even after the termination of the contractual relationship, OPTIMIZE may send, during the maximum period of 12 months, relevant information related to the execution of the contract previously concluded (e.g. administrative

information, legal updates or regulatory, or communications essential to the proper execution of post-contractual). After this period, no communication will be sent, except those that arise from legal obligations.

- **3 years:** for the purpose of sending promotional communications, unless the data subject has given their consent to the continuous sending of these communications, in which case the data will be kept until the withdrawal of said consent.
- **7 years:** the Client's personal data that has been collected in compliance with the legal obligations relating to measures to combat money laundering and the financing of terrorism, will be kept for a period of 7 years after the closing of the client account, as provided for in article 51 of Law no. 83/2017, of 18 of August.
- **10 years:** Clients' data will be kept for a minimum period of 10 years for purposes, among others, of registering accounting transactions, preparing information accounting, and preparing tax reports and reports to other supervisory entities.
- **20 years:** Clients' personal data necessary for the purposes of validity, effectiveness and probative value of the Digital Mobile Key and ID Gov will be kept for a minimum period of 20 years, as provided for in Decree-Law No. 290-D/99, of August 2.
- **20 years:** the Client's personal data, collected in the contractual context, is kept for a maximum period of 20 years, for the purposes of exercising the different rights procedural matters that assist OPTIMIZE.

10. Data processing by third parties (Processors)

Within the scope of its activity, OPTIMIZE uses third parties to provide certain services. In this context, the provision of services implies access, by these third-party entities, to Client data. Whenever this happens, OPTIMIZE has implemented appropriate measures to ensure that the entities that have access to the data are in compliance with the obligations imposed by the GDPR and offer the highest guarantees of protection for the rights and freedoms of data subjects. In compliance with the provisions of

paragraph 3 of article 28 of the GDPR, the terms and conditions of the treatment data by third parties are objectively defined by means of a data protection agreement binding both Parties.

Thus, any entity subcontracted by OPTIMIZE will process the personal data of its Clients, on behalf of and for OPTIMIZE, adopting the technical and organizational measures necessary to protect personal data against accidental or unlawful destruction, accidental loss, alteration, dissemination or unauthorized access and against any other form of unlawful processing.

In any case, OPTIMIZE remains responsible for the personal data that is made available to these third-party entities.

For the purposes of the provisions of the preceding paragraphs, OPTIMIZE uses the following categories of subcontractors located in the territory of the European Union (EU) or the European Economic Area (EEA):

- **IT consulting services:** service provider contracted for technical and IT support. technical and IT support.
- **Administrative and business advisory services:** service provider contracted for administrative and business support and management.
- **Digital communication services:** service provider contracted for the supply and maintenance of digital communication and interaction platforms with Clients and potential Clients.
- **Human resources management services:** service provider contracted for support in recruitment processes, contractual management, salary processing and other aspects related to people management.
- **Services of professional training:** entities trainers contracted for training actions for employees.
- **Insurance services:** intermediaries or insurance companies contracted for the management of policies and processes related to health, life, work accident insurance or others applicable.

- **Accounting and tax services:** service providers contracted for support in accounting, compliance with tax obligations and financial reporting.
- **Banking and financial institutions:** entities involved in the management of bank accounts, payment operations, transfers and other financial services.
- **Investment management services:** specialized entities contracted to support in the management of investment portfolios or financial consulting.
- **Compliance and audit services:** service providers contracted to ensure compliance with legal, regulatory and normative obligations applicable to the activity of the organization.
- **Employee benefits management platforms:** entities that provide technological solutions for centralized and flexible administration of benefits granted to workers, such as meal allowances, childhood vouchers, insurance, health plans, discounts or other incentives.

OPTIMIZE also uses the following categories of subcontractors that are located outside the territory of the European Union (EU) or the European Economic Area (EEA):

- **Business and IT consulting services:** support service providers technical and IT located in the United States of America, with data transfers under an adequacy decision, pursuant to Article 45 of GDPR (Implementing Decision (EU) 2023/1795 of the Commission of 10 July 2023 in terms of Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequacy of the level of protection of personal data under the Privacy Framework of EU-USA Data) and under the standard data protection clauses adopted by the European Commission and adopted additional and adequate security measures (Article 46 of the GDPR).
- **Digital communication services:** service provider contracted for the supply and maintenance of digital communication and interaction platforms with Clients and potential Clients located in the United States of America, with transfers being made data under an adequacy decision, pursuant to Article 45 of the GDPR

(Implementing Decision (EU) 2023/1795 of the Commission of 10 July 2023 under the terms of Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequacy of the level of protection of personal data under the EU Data Privacy Framework-USA) and under the standard data protection clauses adopted by the Commission European and adopted additional and appropriate security measures (Article 46 of the GDPR).

- **Screening platforms:** used in the context of the application of procedures for prevention of money laundering and terrorist financing, as well as verification of the existence of possible sanctions or legal restrictions. The transfer of personal data to the United States of America is carried out under a decision of adequacy, under the terms of Article 45 of the GDPR (Implementing Decision (EU) 2023/1795).
- **Event management support platforms:** used to manage registrations, invitations and communications in the context of the organization of events, being provided by entities based in the United States of America. Data transfers are carried out under of an adequacy decision, under the terms of Article 45 of the GDPR (Implementing Decision (EU) 2023/1795).

11. Recipients to whom personal data are communicated

OPTIMIZE does not commercialize the personal data of its clients or potential clients, considering that such information is an essential part of its relationship with the respective data subjects. data. However, there are circumstances under which, either by legal imperative or by reasons related to the organizational structure of OPTIMIZE, it is necessary to communicate personal data of clients and potential clients to third-party entities, in accordance with the terms below described.

In this context, the sharing of personal data may occur between companies that are part of the economic group to which OPTIMIZE belongs, for the purposes of coordinating activities commercial, Client relationship management, execution of orders and operations relating the subscription of units in investment funds, as well as for

internal administrative purposes, in legal and regulatory compliance and to ensure consistency and efficiency in the provision of services.

These shares are based on the legitimate interest of the OPTIMIZE group in ensuring coordinated and effective action in relation to data subjects, under the terms of article 6(1)(f) of the GDPR, without prejudice to their fundamental rights and freedoms, namely with regard to information, transparency and the possibility of opposition under the terms legal requirements.

11.1 Recipients located in the territory of the European Union

In compliance with various legal rules applicable to its activity – namely those relating to the prevention of money laundering, compliance with tax obligations, the supervision of financial markets and the execution of contracts with Clients – the data personal data of OPTIMIZE's clients and potential clients may be communicated or transmitted to the following entities or categories of entities:

- **Banking institutions and authorized credit institutions:** for the purpose of collecting the amounts relating to the services provided to the client.
- **Tax and Customs Authority:** for the purpose of complying with the obligations tax and tax matters applicable to OPTIMIZE's activity.
- **Sale, merger or acquisition of operations:** in the event of a merger, acquisition or sale of all or part of OPTIMIZE's assets, the personal data of clients and potential clients may be transmitted to the acquiring entity by virtue of the merger agreement or contract, acquisition or sale.
- **Judicial courts:** OPTIMIZE may, for the purposes of formulating, exercising or defending its legally protected rights and interests, transmit personal data of its clients or potential clients to the courts acting in the exercise of their judicial function, or in the same way, proceed with the transmission of personal data of its clients by virtue of the receipt of a court order or intimidation.
- **Securities Market Commission (CMVM)** in certain legal circumstances, as well as

for the purposes of reporting suspicious transactions;

- **Central Department of Investigation and Criminal Action** for AMLTF purposes, OPTIMIZE may need to transmit personal data of its clients or potential clients to the different criminal police bodies.
- **Supervisory entities, market management entities and/or centralized system, issuing companies and other intermediaries in the intermediation chain:** in the context of securities and financial instruments held by the Client, personal data may be communicated to such entities, including also supervisory authorities of the capital markets of the relevant countries.
- **Tax and regulatory authorities of third countries with which there are legal regimes of information exchange:** whenever this is necessary to comply with obligations legal and regulatory.
- **Financial institutions and information technology service providers and communication (ICT)** contracted by OPTIMIZE, in the context of the provision of services of support to its activity.
- **Institutional partners within the scope of protocols or partnerships established by OPTIMIZE:** when necessary for the execution of the contractual relationship, management of membership to programs or compliance with legal obligations.

11.2 Recipients located outside the territory of the European Union (International Transfers of Personal Data)

OPTIMIZE only transfers personal data to third parties located outside the territory of the European Union or the European Economic Area, in the following cases, and always based on grounds of lawfulness provided for in the GDPR:

- **Supervisory entities of third countries and other market management entities:** the client's personal data may be communicated and transmitted to the authorities of supervision, market management entities and/or centralized system, to issuing companies and other intermediaries in the intermediation chain, regarding any securities and financial instruments held by the Client, including shares of

companies issuing shares admitted to trading on regulated market, and may also be transmitted to the supervisory authorities linked to the capital markets that supervise the aforementioned securities, financial instruments, markets and settlement systems, based, in the absence of an adequacy decision adopted by the European Commission under article 45 of the GDPR, the provisions of subparagraphs b) and d) of paragraph 1 of article 49 of the GDPR, as the case may be.

- **Tax and regulatory authorities of third countries:** Clients' personal data may be transmitted to the tax and regulatory authorities of third countries with which legal information exchange mechanisms are in force.

These include, by way of example, the following authorities and entities in the United States of America:

- Internal Revenue Service (IRS) - within the scope of the legal obligations imposed by the regime FATCA (Foreign Account Tax Compliance Act);
- FINRA (Financial Industry Regulatory Authority) - as a supervisory entity of the financial sector;
- Other regulatory and tax authorities with jurisdiction over instruments financial and services provided under US law.

These transfers are based on the provisions of subparagraph d) of paragraph 1 of article 49 of the GDPR and in article 96 of the same Regulation, respecting the principles of necessity, proportionality and limitation of purpose.

- **Financial and technological service providers (outside the EU/EEA):** In certain situations, it may be necessary to use providers located outside the EU/EEA to ensure the operation of trading platforms or other related services with the execution of contracts entered with Clients. In these cases, and in the absence of adequate guarantees under article 46 of the GDPR, data transfers are also based on the derogations provided for in article 49, paragraph 1, subparagraph b)

(execution of contract) and, where applicable, paragraph d) (defense of rights).

12. Transmission and registration of personal data

The transmission of personal data by the Client or potential Client is mandatory for purposes of complying with the purposes described in point 8 of this Data Protection Policy. Failure to provide the requested personal data makes it impossible to subscribe, register, contract or receive information regarding the products and services provided by OPTIMIZE.

13. Security measures applicable to the processing of personal data

OPTIMIZE has implemented mechanisms and security measures, both technical and organizational, appropriate to ensure an adequate level of risk in the processing of data personal.

To this end, OPTIMIZE relies on an objective assessment, having identified, analyzed and assessed the risks, probability and impact on the rights and freedoms of individual people (risk assessment phase) and, consequently, OPTIMIZE, in the risk treatment phase, applies timely and effective security mechanisms and measures to eliminate or mitigate the risks identified in the risk assessment phase. Specifically, technical measures are adopted and organizational measures appropriate and effective to mitigate the risks related to destruction, loss or accidental or unlawful alteration of personal data transmitted, stored or otherwise processed form, or unauthorized access to said personal data. Likewise, OPTIMIZE guarantees data subjects' compliance with the duty of professional secrecy, confidentiality and respect for their personal data.

14. Rights of data subjects

Data subjects, Clients and potential Clients, enjoy, under the terms of the GDPR, the following framework of rights:

Rights	Description
<p>Right to withdraw the consent</p>	<p>In cases where consent is used as the legal basis for data processing, the data subject has the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of data processing carried out until then under that consent.</p>
<p>Right to Information</p>	<p>The data subject has the right to receive, among other things, information about the identity of the controller of personal data; of purposes and grounds for processing personal data; the terms and deadlines for storing personal data; the rights they enjoy and the specific way to exercise them; and the existence or non-existence of automated decisions that affect your data.</p>
<p>Right to Access</p>	<p>The data subject has the right to obtain confirmation from OPTIMIZE regarding the occurrence of the processing of personal data, including, among other elements, its purposes, the categories of personal data covered by the processing, the retention periods and respective criteria, and the existence of automated decisions. The right of access also includes the right to directly access such personal data.</p>
<p>Right of Rectification</p>	<p>The data subject has the right to obtain, from the controller, rectification of personal data that is incorrect and to request that incomplete personal data be completed.</p>

<p>Right to Deletion (right to be forgotten)</p>	<p>The data subject has the right to obtain the deletion of personal data, if there are no other valid grounds that justify, under the Law, the retention of this data, and whenever:</p> <ul style="list-style-type: none"> a) personal data is no longer necessary in relation to purposes for which they were collected or otherwise processed. b) the processing of personal data is based on the consent of its holder, and he withdraws it, there being no other legal basis for the processing. c) The data subject exercises his right to object to additional processing of personal data, and no other legal basis justifies the continuation of the processing of personal data. d) personal data has been illegally processed.
<p>Right to limitation of treatment</p>	<p>The data subject has the right to obtain from OPTIMIZE the limitation of the processing of personal data or suspension of processing activities, whenever one of the following situations occurs:</p> <ul style="list-style-type: none"> a) The accuracy and correctness of personal data are contested by its holder, requiring that data processing activities be suspended for the period necessary for OPTIMIZE to confirm the accuracy of such data; b) The processing of personal data is illegal, and its holder requests the restriction of data processing instead of requesting deletion of the same.

<p>Right to data portability</p>	<p>The data subject has the right to receive the personal data that he has provided to DIF BROKER, in digital format of current use and automatic reading, and the right to request the direct transmission of his data to any other data controller.</p>
<p>Right to object</p>	<p>The data subject has the right to object, at any time, for reasons related to his situation, to the processing of personal data concerning him, namely when his data is processed for direct marketing purposes.</p>
<p>Right not to be subject to automated decisions</p>	<p>The data subject has the right not to be subject to any decision taken exclusively based on automated processing of his personal data, including the definition of profiles, which produces effects in his legal sphere or that significantly affects him in a similar way.</p>

Without prejudice to the provisions of the legislation on the protection of personal data, the data subject may exercise any of his / her rights, directly or by written request, to OPTIMIZE, through the following means and contacts:

- By email: RGPD@Optimize.pt
- By post: OPTIMIZE INVESTMENT PARTNERS SGOIC, SA, Avenida Fontes Pereira de Melo 21 - 4º I 1050-116 Lisbon, Portugal
- By phone: 00 (351) 213 136 2

15. Right to lodge a complaint

If the User or the Client considers that the processing of their personal data is carried out in disregard of the legal provisions that regulate matters relating to the treatment of data, he enjoys the right to file a complaint under Articles 77 and 79 of the GDPR.

Without prejudice to being able to submit complaints directly to OPTIMIZE, through the contacts made available for this purpose, the User or the Client may submit a complaint to the Control Authority, the National Data Protection Commission (CNPD), using the contacts provided by this entity for this purpose.

OPTIMIZE contacts:

- By email: RGPD@optimize.pt
- By post: OPTIMIZE INVESTMENT PARTNERS SGOIC, SA, Avenida Fontes Pereira de Melo 21 - 4º I 1050-116 Lisbon, Portugal
- By phone: 00 (351) 213 136 2

16. Processing of special categories of personal data

In the forms made available by OPTIMIZE in which it is possible to fill in the respective fields freely, it is strictly forbidden to insert personal data related to ethnic or racial origin, political opinions, religious or philosophical beliefs or affiliation trade union and the processing of genetic data, biometric data aimed at identifying in a uniquely an individual, data relating to health or data relating to sexual life or sexual orientations of a person (Article 9 of the GDPR), as well as personal data related to criminal convictions and offences (Article 10 of the GDPR). If the User or the potential Client enters any information relating to the aspects mentioned in any of our forms or through email, such data will be immediately deleted from our information systems, as they are not necessary nor relevant for the purposes described in the terms of this data protection Policy data. Nevertheless, in the case of certain financial products (namely, for redemptions or transfer of Retirement Saving Plans (PPR), the management of this product may require the processing of data from special categories, namely data relating to the health of holders. This treatment may occur within the scope of managing the contractual relationship. In addition to the above, within the scope of money laundering prevention procedures and terrorism financing, applicable legislation may require the processing of data relating to

criminal convictions and offenses.

OPTIMIZE processes this data for the purposes indicated above, based on compliance with legal or regulatory obligations applicable to the financial sector, including rules for preventing money laundering and terrorism financing, reporting to the competent authorities or the execution of the contract itself (Law 83/2017, of August 18 and CMVM Regulation 2/2020).

17. Redirecting to other websites

The redirection and hyperlinks that, from the OPTIMIZE website, redirect the User or potential Client to websites belonging to third-party entities are not under our control. Therefore, OPTIMIZE will not be responsible for any problem that may arise from the use of third-party websites, namely, for the purposes of processing personal data. OPTIMIZE therefore recommends that you consult the Policy of privacy as well as the terms and conditions of each website to which the User or potential Client are redirected to.

18. Personal data quality

The personal data provided by the User and the potential Client must be correct, current, accurate and truthful, corresponding only to their person, except when a third party is lawfully and regularly authorized to legally represent the User or the potential Client. If there is a Client relationship with OPTIMIZE, it is the Client's responsibility to keep their data updated through the Client Area. If false, fictitious or non-existent personal data is provided, OPTIMIZE reserves the right not to proceed with the respective processing, eliminating them or, in any other way, destroying them.

In compliance with the principle of minimization of personal data, provided for in subparagraph c) of paragraph 1 of article 5 of the GDPR, the personal data

requested from the User or potential Client, indicated with an asterisk (*), will be strictly those necessary for compliance with the respective purposes. Under no circumstances will the fact that the User or potential Client does not provide more data than strictly necessary to fulfill the respective purposes will have any type of consequence, nor will it affect the quality of the service provided.

19. Minors and/or Disabled persons' data

OPTIMIZE processes personal data of minors only when strictly necessary and in compliance with GDPR.

In the context of OPTIMIZE's activities, it may be necessary to process data of minors in specific situations, such as opening accounts for minors, identifying minor heirs in the event of a client's death and designation of minor beneficiaries in Retirement Savings Plans (PPR).

In addition, in cases where the data subject is a minor or legally disabled person, the processing of their personal data must be carried out through their legal representative, such as parents, guardians or curators, duly authorized to act on their behalf. For certain operations, the presentation of representation documents may be required, such as legal proxies or judicial representatives. In these cases, data processing is carried out exclusively for the indicated purposes, ensuring the adoption of adequate protection measures and compliance with the standards applicable laws.

20. Social networks, digital channels and multiplatform applications

OPTIMIZE operates different accounts on social networks operated by different providers. This use of social networks may give rise to international transfers of personal data to a third country or an international organization, without an adequate level of protection regarding the rules advocated in the GDPR. In this way, OPTIMIZE has a limited influence in the processing of data carried out by these platform operators of social networks social: the social network platform's provider

operates the entire IT infrastructure of the service, defines their own data protection rules and maintains their own relationship with users. In addition, the operator is solely responsible for all matters relating to data from your user profile, to which OPTIMIZE has no access.

For more information about the data processing carried out by the operator of the social network platforms OPTIMIZE uses, see the respective privacy policies as follows:

- Instagram: <https://help.instagram.com/519522125107875>
- Facebook: <https://www.facebook.com/privacy/explanation>
- LinkedIn: <https://www.linkedin.com/legal/privacy-Policy>
- Youtube: <https://www.youtube.com/howyoutubeworks/our-commitments/protecting-user-data/>
- X: <https://x.com/en/privacy>

In this sense, within the scope of using the platform, your personal data will, generally, also be processed and stored on servers located in third countries, under the terms better defined by the aforementioned policies, which are of the sole responsibility of the respective platform providers.

21. Main control authority

The Portuguese Data Protection Commission (CNPD) is the national control authority with powers to oversee compliance with existing legal provisions on protection of personal data to protect and enforce the rights, freedom and guarantees of individuals in the context of the processing of personal data.

Any data subject has the right to lodge a complaint with the CNPD regarding the data processing to which they are subject to.

National Data Protection Commission (CNPD)

Av. D. Carlos I, 134 - 1.º, 1200-651 Lisbon

Tel.: +351 213928400 - Fax: +351 213976832



E-mail: geral@cnpd.pt

Website: www.cnpd.pt

22. Amendments to this Data Protection Policy

OPTIMIZE reserves the right to adjust or amend this Personal Data Protection Policy at any time and those adjustments or amendments will be duly publicized through OPTIMIZE's regular communication channels, namely in OPTIMIZE's sites.

Lisbon, September 04, 2025