



Privacy Notice

Privacy Notice and Personal Data Protection

TECHNICAL SHEET

TITLE:	Privacy Notice
RESPONSIBLE TEAM:	Internal Controls
RESPONSIBLE OFFICER:	Data Protection Officer (DPO) — Contact: dpo@crown-brlv.com
DESCRIPTION:	Privacy Notice explaining to users and data subjects which personal data Crown collects, for which purposes it uses them, with whom it shares them, for how long it retains them, and what rights data subjects hold, under the General Personal Data Protection Law (Law No. 13,709/2018 — LGPD).
SCOPE:	Users and other personal data subjects who use Crown's Platform and Services.
APPROVED BY:	Board of Directors
CONTROLLER:	Crown Sociedade Prestadora de Ativos Virtuais Ltda. (CNPJ: 59.386.340/0001-45)
REGISTERED ADDRESS:	Av. Rebouças 2748, conj. 111, Pinheiros, CEP 05402-500
DPO CONTACT:	dpo@crown-brlv.com
COMPLIANCE CONTACT:	compliance@crown.finance

VERSION CONTROL

VERSION	DATE	CHANGES
1.0	2026-09-23	Initial version.

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General Information

Last Updated: September 2026

CONTROLLER: Crown Sociedade Prestadora de Ativos Virtuais Ltda. (CNPJ: 59.386.340/0001-45) ("Crown")

ADDRESS: Av. Rebouças 2748, conj. 111, Pinheiros, CEP 05402-500

DPO: Name: Amanda Blum Colloca, as per the Appointment Term included as Annex I. dpo@crown-brlv.com

Compliance: compliance@crown.finance

Crown is a Virtual Asset Service Provider (PSAV / SPSAV) under Law No. 14,478/2022, regulated by BCB Resolutions No. 455/2023 and No. 519, 520, and 521/2025. Our platform allows you to buy, sell, custody, and transfer virtual assets, as well as carry out foreign exchange operations ("Services").

Crown cares about the privacy of the personal data it may access in the course of providing the Services, and is committed to protecting this information in accordance with the legislation applicable to its business, in particular the General Personal Data Protection Law (Law No. 13,709/2018, "LGPD"), as well as the best privacy and data protection practices in the market in which it operates.

To provide these services securely and in compliance with the law, we need to collect and process certain personal data about you. This Privacy Notice ("Notice") clearly explains which personal data we collect from you, for which purposes Crown uses this personal data, the third parties with whom personal data may be shared, for how long it is stored, and what your rights are.

Read our Terms of Use and this Notice before accessing or using our Services. If you do not agree with this Notice or the Terms of Use, you should not access our Platform or use our Services.

If, after reading this Notice, you still have any questions or need to contact us regarding personal data matters, you may contact the DPO through the contact channel mentioned above.

What data we collect

Crown, as the controller of personal data, is responsible for determining the purposes and means of processing personal data. This means Crown makes decisions regarding the processing of your personal data, including collection, storage, use, protection, sharing, and elimination, always observing the principles and guidelines established in applicable legislation.

The personal data Crown may process includes, but is not limited to:

Registration and identity verification data (KYC/KYB/KYP)

To open and maintain your account, we collect:

- full name, tax ID (CPF), date of birth, nationality, and address;
- e-mail, telephone, and identity documents (national ID, driver's license, or equivalent);
- professional, corporate, and asset information, as required by anti-money laundering rules; and
- data of legal representatives, officers, and ultimate beneficial owners (UBOs), when applicable.

Biometric data — Sensitive Personal Data

We collect selfies and facial recognition data exclusively for identity verification and fraud prevention purposes during registration and authentication.

Operational data

To execute your orders and maintain your transaction history, we collect:

- transaction data: type, amount, date, asset involved, and counterparties;
- digital wallet addresses (including self-custodied wallets) and on-chain identifiers;
- banking information for deposits and withdrawals in reais; and
- data on the origin and destination of funds, required for AML/CFT and Travel Rule compliance.

Sanctions screening

Crown is required to screen all clients, counterparties, and parties involved in transactions against sanctions lists and international watchlists, under BCB Resolution No. 44/2020 and Law No. 13,810/2019 (which implements, in Brazil, United Nations Security Council resolutions). This processing involves:

- checking names and identifiers against OFAC, UN, European Union, and Brazilian government sanctions lists;
- adverse media and reputational risk screening; and
- ongoing monitoring throughout the client relationship.

Technical access data

We automatically collect technical browsing and access data:

- IP address, device identifiers, and browser type;
- access date and time, pages visited, and authentication logs; and
- security events and audit trails.

The personal data mentioned above may be provided directly by you, obtained from third parties, collected from public or publicly available sources for identity verification and fraud prevention purposes, or collected automatically through cookies or similar technologies.

Purposes for using personal data

We collect and process the personal data necessary and essential to provide our Services, comply with legal or regulatory obligations, fulfill contractual obligations, and satisfy the legitimate interests of the controller or third parties. In this context, the personal data listed in the item above may be processed for the following purposes:

- Carrying out and validating user registration and identification;
- Enabling access to and use of the Platform, through identity authentication;
- Carrying out registration procedures, client identification (KYC), suitability, and prevention of money laundering and terrorist financing;
- Providing Crown's Services;
- Assessing Users' profiles and their suitability for the products, strategies, and Services offered;
- Performing financial analyses, portfolio monitoring, investment recommendations, and allocation suggestions, including through technological tools and artificial intelligence models;
- Managing communication channels with the User, including for handling questions, complaints, and requests, addressing requests related to this Notice and to the LGPD, sending communications, and disclosing news, reports, and other information;
- Complying with legal and regulatory obligations and determinations of competent authorities;
- Entering into and fulfilling obligations undertaken by Crown with the User or third parties in contracts of various natures;
- Preventing fraud and security incidents, ensuring the security of our internal processes, environments, and Services;
- Conducting internal audits and compliance controls;
- Regularly exercising rights in judicial, administrative, arbitration, and extrajudicial proceedings;
- Improving the browsing experience on the Platform, personalizing features, content, and communications;
- Enhancing the Services and the Platform;
- Developing statistics, metrics, and reports related to the use of the Services and the Platform;
- Sending and tracking marketing e-mails.

The personal data collected under this Notice may also be processed for other purposes that are not conflicting with or excessive in relation to the purposes listed above, always in accordance with applicable Brazilian legislation in force, based on the legitimate interests of Crown or third parties, except in cases where the data subject's legal rights and guarantees prevail.

Who we share your personal data with

We share your data only when strictly necessary and always on a legal basis. The categories of recipients are:

- Infrastructure and Security Providers: Cloud companies (AWS/GCP) and MPC custody specialists.
- Companies within the same Economic Group.
- Auditors, accountants, and consultants.
- Law firms and legal advisors.
- Any other providers of essential services that strictly require access on a lawful and necessary basis.
- Financial Partners: Institutions involved in settlement and foreign exchange operations and/or the settlement of financial transactions, solely and exclusively when strictly necessary.
- Regulated Counterparties (Travel Rule): Sharing of originator and beneficiary data with other PSAVs in transfers, pursuant to BCB Resolution No. 455/2023.
- Authorities: Central Bank of Brazil, Federal Revenue Service, COAF, and judicial bodies when required by law.

Personal data retention

As a Virtual Asset Service Provider regulated by the Central Bank of Brazil, Crown is subject to legal obligations regarding the retention of personal data.

The table below details the minimum retention periods per data category and the rules on which they are based:

Data category	Minimum period	Legal basis (legal obligation)
Registration and KYC/KYB/KYP	10 years after termination of the relationship	BCB Circular No. 3,978/2020; Civil Code art. 205 (subsidiary)
Virtual asset transaction records	10 years	BCB Circular No. 3,978/2020
Foreign exchange transaction data	10 years	BCB Circular No. 3,978/2020
Biometric data (Sensitive Data)	Period necessary for the purpose; deleted after termination of the relationship	LGPD art. 11 and 16
Authentication and security logs	5 years	

Data category	Minimum period	Legal basis (legal obligation)
		BCB Res. No. 85/2021 and No. 538/2025; Brazilian Internet Civil Rights Framework, arts. 13 and 15
Security incident records	5 years from the record date	CD/ANPD Res. No. 15/2024, art. 10
Marketing data (with consent)	Until consent is revoked or 24 months	LGPD art. 7, I and art. 8, §5

After the applicable periods have elapsed and there is no legal basis for retention, your data is deleted, anonymized, or blocked, depending on the nature of the information.

Your Rights (LGPD)

Under the LGPD, you have the following rights. To exercise them, contact us at dpo@crown-brlv.com.

- confirmation that we process your Personal Data;
- access to your Personal Data;
- correction of Personal Data that is incomplete, inaccurate, or outdated;
- anonymization, blocking, or elimination of unnecessary or excessive Personal Data, or data processed in noncompliance with the LGPD;
- portability of your Personal Data to another service or product provider, subject to our trade and industrial secrets, when applicable;
- elimination of Personal Data processed based on your consent, except in the cases of data retention provided for in the LGPD;
- information about with whom we share your Personal Data;
- information about the possibility of not providing your consent and the consequences thereof;
- revocation of your consent to the processing of your Personal Data, when applicable;
- objection to processing that violates the LGPD;
- review of decisions made solely on the basis of automated processing of your Personal Data, when applicable.

Security Measures

We adopt technical and organizational measures to protect your personal data against unauthorized or unlawful processing, as well as against accidental loss, destruction, or damage. Your personal data is stored securely on protected devices, accessed only by a restricted number of people with a legitimate reason for access, including:

- asset custody using MPC (Multi-Party Computation) technology, fragmenting private keys so that no single agent has complete access to the assets;
- encryption in transit and at rest;
- multi-factor authentication (MFA) for access to the platform and internal systems;
- access controls with segregation of duties; and
- continuous, real-time monitoring of threats and security events.

Even though we make our best efforts to preserve your privacy and protect your personal data, it is important that you know that no information transmission is completely secure. For this reason, we cannot fully guarantee that all information we receive and/or send will not be the target of unauthorized access carried out through methods developed to improperly obtain information, such as viruses or database intrusions.

In the event of security incidents involving personal data, Crown will take the appropriate measures under applicable legislation.

Personal data of minors

Crown's Services are not directed at individuals under 18 years of age. If Crown identifies the processing of personal data of minors that is inconsistent with its purposes and internal policies, it will take the appropriate measures to regularize or delete such data, subject to the legal grounds for data retention.

International transfers of personal data

Some of our technology infrastructure providers (such as AWS and GCP) have servers located outside Brazil. This may involve the international transfer of your personal data.

In all international transfers, we ensure the adoption of the Standard Contractual Clauses (SCCs) approved by the ANPD under CD/ANPD Resolution No. 19/2024, as required since August 2025. Foreign exchange operations with counterparties abroad also observe the requirements of BCB Resolution No. 277/2022 and BCB Resolution No. 521/2025.

Cookies and Tracking Technologies

Crown uses cookies and similar technologies to improve your experience, ensure account security, and analyze platform traffic. The cookies we use fall into the following categories:

- **Strictly Necessary Cookies:** Essential for the platform to function (such as login, security, and authentication). These cannot be disabled, as the service would not work properly without them.
- **Performance and Analytics Cookies:** Allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us know which pages are most popular.
- **Functionality Cookies:** Allow the platform to provide enhanced functionality and personalization (such as remembering your preferred language).
- **Marketing Cookies:** May be set through our website by our advertising partners to build a profile of your interests and show you relevant ads on other sites.

Changes to this Notice

This Notice may be updated whenever there are relevant changes to legislation, regulation, or our services. The date of the most recent update will always be indicated at the top of this document.

If changes affect processing based on consent, we will notify you in advance by e-mail and display a notice on the platform before the changes take effect, so that you may decide whether to keep or withdraw your consent.

Contact

To exercise your rights, ask questions, or report a privacy-related concern:

Channel	Contact
Compliance	compliance@crown.finance
Data Protection Officer (DPO)	dpo@crown-brlv.com

Annex I — DPO Appointment Term

Formal Act for the Appointment of a Natural Person as Data Protection Officer

Crown Sociedade Prestadora de Ativos Virtuais Ltda. appointed, on September 23, 2026, Amanda Blum Colloca as Data Protection Officer ("Encarregado"), in compliance with art. 41 of Law No. 13,709 of August 14, 2018 (General Personal Data Protection Law – LGPD).

As such, the Data Protection Officer will be responsible for:

- accepting complaints and communications from data subjects, providing clarifications, and taking appropriate action;
- receiving communications from the ANPD and taking appropriate action;
- guiding the employees and contractors of the processing agent regarding the practices to be adopted with respect to personal data protection; and
- performing any other duties determined by the controller or established by ANPD rules, in particular the activities described in art. 16 of the Regulation approved by CD/ANPD Resolution No. 18 of July 16, 2024.

In the absence, impediment, or vacancy of the Data Protection Officer, the role will be performed by her substitute, Lívia Almeida.

São Paulo, September 23, 2026

Crown Sociedade Prestadora de Ativos Virtuais Ltda.