

Milestones

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PRIVACY POLICY

1. Introduction

A Milestones Administradora de Recursos Ltda. ("Milestones" or "Asset Manager") respects the privacy of information and personal data ("Data") provided by you, the Data owner ("holders of personal data").

Therefore, Milestones prepared this Privacy Policy ("Policy") to describe how it collects, stores and uses your Data, based on the Brazilian Law No. 13.709/18, the General Data Protection Law ("Brazilian Data Protection Law "LGPD").

2. How is your Data Collected?

The Data processed by Milestones may be provided directly or indirectly by the holders of personal data.

Directly: for example, but not exhaustively, by (i) making contact through our e-mail address available on our website; or (ii) contractual, employment or corporate relationship with Milestones.

Indirectly: by (i) receiving the necessary documentation for investment analysis of investment funds managed, such as but not limited to, corporate information of the invested companies, as well as information of their employees, officers, directors, partners, or shareholders, obtain at the companies' website; and in (ii) receiving information from investors, with the respective, as the case may be, for internal registration.

No data will be used in a discriminatory, abusive, unlawful manner or even for a purpose other than that for which it was collected. Milestones will use their best efforts to ensure the integrity and confidentiality of all Data collected.

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2.1. Considerations on sensitive personal data

Milestones collect sensitive data, exclusively when necessary for labor and social security purposes, and to comply with the rules related to the health and life insurance of its Employees and when necessary to achieve the Company's purpose as describe in its Articles and Organization. Such data is kept strictly for legal purposes, with the express consent of the Data holder or its legal representatives, for a pre-determined period and with restricted access for the employees and Third-Parties service providers responsible for its processing.

If any Data of this nature are voluntarily provided by a Holder for purposes other than those previously reported, they will be treated exceptionally and under the terms provided for in the Data Protection Law, and may be immediately excluded if there is no specific purpose for its treatment.

2.2. Considerations on Children and Teenager personal data

Data collecting from children and teenagers will be done only and specifically in order to comply with legal obligations and for the execution of agreements signed between Milestones and its Employees and shareholders. Such Data are provided by its parents or legal representatives upon written consent, as required by the Brazilian Data Protection Law.

3. Where will your data be used?

Depending on the type of relationship you have with Milestones, your Data may be used to (i) comply with legal and/or regulatory requirements; (ii) execution of commercial or business practices related to Milestones activity; (iii) performing know-your-client due to diligence procedures; among other regulatory activities and always related to the regular exercise of Milestones activities, as defined in the Company's purpose description.

Furthermore, to perform their business activities relating to the Fund asset management, it is necessary to share information about the investment funds managed by Milestones, its investments and investors with service providers and counterparties, such as accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products ("Service Providers", see item 5 below).

If you wish to receive more specific information about the use of your Data, please contact us through the Data Protection Law Channel, as per item 7 of this Policy.

4. How do we store your Data?

Your Data is stored on Milestones' own database ("rede Milestones") and kept in an exclusive file directory, according to the controller person/team responsible for its treatment.

In this sense, to protect your Data, internal and external assurance processes are adopted to ensure the effectiveness of technological safety in order to make the best efforts to prevent losses, misuse, unauthorized access, modification, and unwarranted destruction.

5. Data Sharing

Chances of data sharing will depend on the nature of your relationship with Milestones. Data sharing will only take place when strictly necessary for the regular exercise of Milestones activities, as mentioned in this Policy.

5.1. Service Providers

In order to comply with the legislation, your data can eventually be shared with Service Providers, so that Milestones can achieve the purpose for which your Data was collected. Sharing Data with third parties will comply with the provisions of this Policy and with the current legislation.

5.2. Data Sharing or disclosure for legal matters

In certain circumstances, we may be required to disclose your Data. This can occur by court order, compliance with applicable law or regulation, protection of Milestone's rights, compliance with agreements, regulatory investigations, or even for defense in legal proceedings. Depending on the situation, and if legally permitted, this will be communicated to the Holder.

6. Your rights

You can, at any time, request through the DATA PROTECTION LAW Channel:

- (i) confirmation of the existence of Data stored by Milestones and having access to such Data;
- (ii) correction of incomplete, inaccurate or outdated Data request that the Fund Entities rectify your personal data if it is inaccurate or incomplete;
- (iii) blocking or deleting unnecessary, excessive or processed Data that does not comply with the Data Protection Law;
- (iv) information about the possibility of not providing your consent to the processing of any of your Data and what are the negative consequences of this action;
- (v) cancelation of consent to the processing of any Data;
- (vi) deletion of Data processed with the Data holder consent;
- (vii) information on the entities with which Data was shared; and
- (viii) any other acts provided for in the Data Protection Law or that may be granted by law or regulation in force.

Milestones will always endeavor to respond to your requests unless these are not possible for legal, regulatory reasons, or even impossibility due to the nature of the relationship established between you and Milestones. In any case, all responses to requests made, whether positive or negative, will always be clear, well-founded, and free of charge.

7. Contact

You may exercise any of the rights described in item 6 above, or clarify any questions about the treatment of your Data done by Milestones, through the email Encarregado-dados@milestones.com.br

Milestones' Data Officer (DPO) and point of contact is Mr. Dimas Tarcisio Vanin.

Your request, depending on the complexity of the content, will be answered within a maximum period of 15 (fifteen) days, by email or letter, at your discretion.

More information can be found at: www.milestones.com.br

8. Updates

Milestones reserves the right to change the way the Data store and treated, at any time and whenever necessary, to adjust to its activities and to better perform its services. In this case, this Policy will be updated on our website.

9. Review document /version history

Updates		
Date	Version	Point of Contact.
Dec/2020	1st	Dimas Tarcisio Vanin – DPO e Gizelli R. Moreira - Analista

Exhibit I

FORM OF CONSENT AND ACCEPTANCE TO THE PRIVACY POLICY OF MILESTONES ADMINISTRADORA

Applicable to employees, directors, partners, final beneficiaries and investors of the funds managed by Milestones Administradora.

I, _____ (name) registered with CPF/MF number _____, hereby referred to as Data Holder, in its capacity of (please select one):

- () Investor of Milestones Administradora de Recursos Ltda. (“Milestones”) investment funds;
- () Employee of Milestones Administradora de Recursos Ltda. (“Milestones”);
- () Director or members of the investment committee of Milestones Administradora de Recursos Ltda. (“Milestones”);
- () Shareholder or final beneficial owner of Milestones Administradora de Recursos Ltda. (“Milestones”);

By signing this instrument, I confirm that:

I – I am aware of the treatment of my Data, allowed to Milestones through forms and personal documents, in order to comply with general legislation and regulations, including those related to the capital market, as well as I give consent to Milestones for sharing the necessary data with entities, service providers and other counterparties directly involved in Milestones' principal business activity and for the purpose of complying with the applicable law. Examples of data:

- a. Registration data: (Name, ID (RG, CPF, CNH), Proof of Address, photocopies and digital copies of IDs in Brazil and offshore), gender, e-mail address, telephone, etc. etc...
- b. Bank account information, suitability, investor risk profile etc.
- c. Professional data: copies of work record booklet (CTPS), academic background, professional experience, etc.
- d. Full identification of final the beneficial owners of the companies and investment funds (legal structures);

II - I further declare that I consent to the processing of Data of an underage person under my legal responsibility, granted exclusively to meet the regulatory requirements and to the execution of the services, which must be kept confidential and stored for the period restricted to their specific treatment.

III – I have access to the Milestones Privacy Policy available on the website www.milestones.com.br and I agree with its entire content;

Lastly, I declare to be aware of my rights as a Data Holder and about the procedures adopted by Milestones to protect the Data obtained, on which Milestones is responsible for promptly communicate with the Data Holder in the event of any security incident that may cause risk or damage relevant.

_____, _____ de 20__.

-----<--Data Holder’s Signature or legal representative Signature.