

PRIVACY AND PERSONAL DATA PROTECTION POLICY

Last updated: June 2025.

We, at N5, are committed to complying with the guidelines of applicable privacy and data protection laws, and to informing you about the use of your Personal Data while you use our Platform and browse our website. To this end, we have prepared this Privacy Policy to provide information on how we use, store, share, and delete your Personal Data.

The information highlighted here applies to the services provided through the website accessible via electronic devices (mobile phone, tablet, computer) by the N5 Group, composed of: (i) N5 LLC, (ii) Netser Technologies S.R.L, (iii) Hetairoi Consulting LTDA (CNPJ: 28.700.238/0001-49), and (iv) N5 LLC, Sucursal Paraguay, whose main office is located at 80 SW 8th Street, Suite 2000, Miami, FL 33130, United States ("N5").

To better understand what we do, how we protect your Personal Data, and how we ensure your privacy, we recommend reading this document in conjunction with our Terms and Conditions of Use. By using our website and services, you acknowledge and agree to the processing of your data.

If you have any questions or requests, please contact **N5** at contact@n5now.com.

ABOUT US

N5 provides process management services tailored to institutions and companies in the financial sector. These services are delivered through a platform, which involves the management of databases containing data collected from our clients for the provision of the contracted services. As the entity responsible for these databases, we ensure that our internal data handling processes comply with the legal obligations of security and confidentiality imposed by applicable personal data privacy and protection laws, and that the rights of Data Subjects are upheld.

For this reason, we inform you that Personal Data is securely stored on our servers and is subject to this Privacy Policy.

WHO WE ARE?	N5, composed of (i) N5 LLC, (ii) Netser Technologies S.R.L, (iii) Hetairoi Consulting LTDA (CNPJ: 28.700.238/0001-49), and (iv) N5 LLC, Paraguay Branch.
WHERE ARE WE LOCATED?	80 SW, 8th Street, Suite 2000, Miami, FL 33130, USA.
WHAT DATA DO WE USE?	<p>We process Personal Data from different sources, such as:</p> <ul style="list-style-type: none"> • Registration data (name, CPF/RG, email, address); • Browsing data (access history, IP address, timestamp).
FOR WHAT?	<p>We use your Personal Data for various purposes, including:</p> <ul style="list-style-type: none"> • Offering N5's services to those who express interest; • Communication with N5 to address questions via chatbot; • Enabling the "Financial Inclusion" project promoted by N5; • Assisting our client in managing their users' data.
FOR HOW LONG?	<p>As a general rule, Personal Data will be retained until the purpose for which it was collected has been fulfilled. However, the data may also be kept: (i) for the time required by law; (ii) until the end of the Personal Data Processing upon the Data Subject's request; (iii) for the time necessary to preserve our legitimate interest, as applicable; or (iv) for the time necessary to safeguard N5's regular exercise of rights in judicial, administrative, or arbitration proceedings.</p>

WHERE CAN I CONTACT YOU?	contact@n5now.com
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Before we proceed with the information regarding your Personal Data, we have listed and explained below some technical terms you may come across in this document:

- **Client:** any legal entity operating in the financial sector that hires the services offered by N5;
- **Controller:** the party responsible for making decisions regarding the Processing of Personal Data, especially concerning the purposes and means of such Processing;
- **Personal Data:** any information relating to an identified or identifiable natural person, such as name, CPF (Individual Taxpayer Registry), ID, residential or business address, landline or mobile phone number, email address, IP address, location, among others;
- **Sensitive Personal Data:** Personal Data concerning racial or ethnic origin, religious beliefs, political opinions, union membership or membership in a religious, philosophical, or political organization, data related to health or sex life, genetic or biometric data, when linked to a natural person;
- **Data Protection Officer (DPO):** person designated by the Controller and the Processor to act as a communication channel between the Controller, the Data Subjects, and the relevant Data Protection Authority;
- **Incident(s):** any accidental, unlawful, or unauthorized access, acquisition, use, modification, disclosure, loss, destruction, or damage involving Personal Data;
- **Applicable Legislation:** means all privacy and data protection laws that govern N5 in the jurisdictions where it operates;
- **Processor:** a natural or legal person, under public or private law, who processes Personal Data on behalf of the Controller.
- **Third Party:** clients, partners, suppliers, client representatives, or any entity external to N5 whose Personal Data is processed;
- **Data Subject:** the natural person to whom the Personal Data subject to processing refers, which may include any visitor to our website www.n5now.com, a representative of our client who uses the platform, or a user of the services offered by N5's client;
- **Processing:** any operation or set of operations 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, alignment or combination, restriction, erasure or destruction.

1. FROM WHOM DO WE COLLECT YOUR PERSONAL DATA?

Personal Data is processed when necessary to achieve the purposes mentioned in this Privacy Policy, especially to enable the provision of our services and the functionalities of our website. To this end, we may collect your Personal Data:

- directly from You, as the Data Subject;
- from a third party, such as our clients who use N5's online environment to host certain information; or
- automatically, through records stored when You browse our website.

When submitting information through open fields, chatbot, or email, we ask that you only send what is necessary. We are not responsible for the accidental submission of incorrect Personal Data or confidential information. You are solely responsible for ensuring the truthfulness, accuracy, validity, and authenticity of the Personal Data provided.

2. WHAT PERSONAL DATA IS COLLECTED?

We are responsible for the Processing of various categories of Personal Data, as shown in the table below:

Category of Personal Data	Who is the Owner?	How Personal Data is Collected?	Which Personal Data is Processed?
Registration Data	You	Data provided directly from the owner	<p>Among the data collected are full name, CPF/RG (Brazilian individual identification numbers), phone number, full address, and email.</p> <p>However, we may also request that you provide additional information or answer further questions that will help us identify you.</p>
Data collected through Cookies and similar technologies	You	Automatically collected by us from the usage of the platform by the owner	We may use Cookies and electronic device identifiers when the User accesses the Platform.

2.1. PROCESSING OF PERSONAL DATA OF MINORS

Our Platform is not designed for the participation of minors. Therefore, we request that a corresponding form be sent, duly signed by the parents or legal guardians, along with a copy of their identification

document, via registered mail and also by email to contact@n5now.com. As a general rule, we do not process data from minors.

3. FOR WHAT PURPOSES ARE PERSONAL DATA USED?

We will use the Personal Data described in the section above for the following purposes and in accordance with the applicable legal basis:

Purposes	Explanation
Access to N5's Platform	We will use your Personal Data to identify, authenticate, and individualize you on the Platform in order to grant you access.
Provide the Services offered by N5	We will process your Personal Data in order to provide the services offered by N5 to its Clients through a digital platform, which includes data processing and analysis for the Client's work teams, the provision of digital channels for interaction between the Client and the end consumer—including the use of artificial intelligence—and operations management.
Client Aquisition	To offer the solutions and services developed by N5 to website visitors who express interest by filling out forms, scheduling meetings, and/or interacting with N5's chatbot.
Exercise of rights related to judicial and administrative proceedings	We may process your Personal Data to exercise our own rights and/or to defend our rights and interests. This may include out-of-court negotiations between the parties, judicial or arbitral proceedings, administrative procedures, among others.

In relation to other activities involving the Processing of Personal Data, the applicable legal bases will be used depending on the case, such as the execution of a contract or preliminary measures, and N5's legitimate interest, always considering and respecting your fundamental rights and guarantees.

Please note that you may unsubscribe from our mailing list if you no longer wish to receive our newsletters or marketing communications. To do so, simply follow the instructions provided at the end of the email sent by N5.

4. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We may share your Personal Data with:

- **Third parties** with whom N5 has partnerships or contracted services and who may process your Personal Data on our behalf for purposes such as data management and maintenance, email distribution, research and analysis, brand management and product promotions, as well as the administration of certain services and features.

In addition to the situations already mentioned in this Privacy Policy, Personal Data may also be shared with third parties in the following cases:

- **Regular exercise of rights through administrative, judicial, or extrajudicial means:** We may share Personal Data with third parties such as law firms, consultancies, collection agencies, accounting firms, and similar entities, with the purpose of exercising our own rights or ensuring compliance with and enforcement of this Privacy Policy and the Terms and Conditions of Use;

- **Judicial or Administrative Request:** We may share Personal Data in response to a judicial or administrative request.

- **Compliance with legal or regulatory obligations:** We may share Personal Data with agencies, authorities, and other government entities, as well as with private individuals or legal entities, to comply with legal or regulatory obligations;

- **Corporate reorganization:** We may share Personal Data in the event that we sell or transfer all or part of our business or assets (including in the case of a reorganization, spin-off, dissolution, or liquidation).

Please note that our website and applications may redirect you to other websites and apps, which are subject to their own terms and conditions, as well as their own privacy policies. For this reason, we recommend that you review such documents for each website or platform you access outside our online environment. We also emphasize that we are not responsible for the content, usage, or internal data processing policies of websites or applications not owned or controlled by us.

4.1. INTERNATIONAL TRANSFER OF PERSONAL DATA

N5 stores Personal Data on servers located in the state of Virginia, United States, in order to enable the provision of its services to clients. Therefore, N5 transfers Personal Data abroad. As such, we adopt appropriate measures to ensure adequate protection in compliance with applicable legal requirements, including entering into proper data transfer agreements with third parties, when necessary.

5. HOW LONG DO WE STORE YOUR DATA?

It is our responsibility to safeguard your Personal Data and use it only for the purposes defined by N5 and outlined in this Policy.

However, we may also retain your Personal Data:

- for the period required by law;
- until the end of the Data Processing;

- for as long as necessary to preserve our legitimate interest, as applicable;
- for the time necessary to safeguard our regular exercise of rights in judicial, administrative, or arbitral proceedings. Accordingly, we will process your data, for example, to comply with legal, regulatory, and contractual obligations, to protect N5's rights, among others.

The processing of Personal Data will end when:

- the purpose for which your Personal Data was collected has been fulfilled and/or the collected data is no longer necessary or relevant to achieve that purpose;
- you request the deletion of your Personal Data; or
- there is a legal requirement to do so.

When the Processing ends, the Personal Data will be deleted.

6. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

As the Data Subject, you may exercise the following rights:

- **Confirmation of data processing:** Data Subjects may confirm whether N5 is processing their Personal Data;
- **Access to Personal Data:** Data Subjects may access their Personal Data, including requesting a copy of the Personal Data being processed;
- **Correction of incomplete, inaccurate, or outdated data:** Data Subjects may request the correction or update of their Personal Data if it is incorrect;
- **Anonymization, blocking, or deletion:** Data Subjects may request the anonymization, blocking, or deletion of unnecessary, excessive, or unlawfully processed data;
- **Data portability:** Data Subjects may request the portability of their data through the contact channels indicated in this Privacy Policy;
- **Deletion of Personal Data:** Data Subjects may request the deletion of their Personal Data processed by us through the contact channels indicated in this Privacy Policy.
- **Information about sharing:** Data Subjects may request information about which public and private entities N5 has shared their Personal Data with, as described in this Privacy Policy;
- **Information about the possibility of not consenting:** Data Subjects and/or their parents or legal guardians should know that they are not obligated to grant consent for the Processing of Personal Data if requested by N5. This right is ensured through this Privacy Policy;
- **Revocation of Consent:** Data Subjects may, at any time and at their discretion, revoke the previously granted consent for the Processing of Personal Data. All processing carried out up to the moment of revocation will remain valid;

- **Right to petition the National Data Protection Authority (ANPD):** Data Subjects may exercise their rights if their requests are not fulfilled or if the Controller’s response is unsatisfactory, by submitting a petition to the ANPD, which can be accessed [here](#).

Exercising your rights: You may exercise your rights by contacting us at contact@n5now.com. When contacting us, N5 may request additional information or documentation to verify your identity. Please note that in some cases, legal circumstances may limit the exercise of certain rights—such as when providing the information would reveal N5’s trade secrets.

7. HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

We are committed to safeguarding your Personal Data and adopt all reasonable and industry-available technical and organizational measures to maintain that protection. We use security systems and take all necessary precautions to protect your Personal Data and prevent any type of Incident.

However, no method of electronic data transmission or storage is completely secure and immune to potential external attacks. Therefore, N5 cannot guarantee the absolute security of the measures adopted or the absence of interference from third parties (such as hackers). By nature, despite our best efforts, any security measure may fail, resulting in a potential Personal Data Incident. These measures are extended to the Third Parties with whom we share Personal Data, recognizing that although we are not responsible for incidents involving them, we take care to ensure partnerships adhere to minimum best practices in information security.

8. COOKIES: WHAT ARE THEY AND HOW DO WE COLLECT THEM?

Cookies are essentially internet files that may be temporarily stored on your devices. We use cookies to facilitate your navigation on our website, tailoring it to your interests and needs. They are also important to provide us with information about how our site and services are being used, which is essential to improve our relationship with you.

Cookies may store certain information, such as your IP address, details about the content you view, information you provide so that you don’t have to re-enter it each time you visit our website, as well as your preferences and settings, as outlined below:

COOKIES CATEGORIES		DESCRIPTION
Necessity	Necessary	Cookies used to ensure the proper functioning of the website; without them, you and other users would not be able to use the application's core services.
	Not necessary	Cookies that, if disabled, do not prevent the full use and proper functioning of the

		application.
Purposes	Analytics	Cookies that collect information about navigation within the application for statistical purposes. This way, we can understand how you use our platform, the application's error rate with users, among other information.
	Functionality	Cookies that provide the basic functionality of the application and allow us to remember your preferences, such as your username, the last time you visited us, your location, and your language.
	Advertisement/Marketing	Cookies that build your user profile based on data extracted from your browsing habits and, from that, are able to target ads and marketing to you.
Period of Storage	Temporary	Cookies discarded when you leave our application by ending your session.
	Permanent	Cookies that remain stored even after your session ends and may have a defined storage period.

Upon entering our website, you may have seen a pop-up in the lower corner of the page alerting you about the use of this tool during your first visit. Although this notice does not appear on subsequent visits, you can manage the use of cookies at any time by clicking on the “Site Information” icon in your browser, located next to the URL www.n5now.com.

By using our website, you acknowledge the use of cookies in accordance with the terms described here. If you do not agree with the use of these cookies, you may disable them at any time by adjusting your browser settings accordingly.

Browsers are different, so please check your browser’s settings menu for instructions on how to change your cookie preferences. If you choose not to receive cookies, our websites may not function properly and some features may become unavailable.

9. CHANGES TO THIS PRIVACY POLICY

We may revise this Privacy Policy at any time, either due to the use of new technologies or whenever we deem it necessary. When a revision occurs, we will publish the updated version on our website indicating the version.

10. ANY QUESTIONS?

If you have any questions regarding the processing of your Personal Data, you can contact us through the following channel: contact@n5now.com.