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## ANNUAL DISCLOSURE NOTICE

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### PRIVACY POLICY

**Your Privacy is Important to Us** - At Banco do Brasil Securities LLC. ("BBS"), we understand that confidentiality and security of the personal information that you share with us is very important. BBS is committed to protecting the privacy of personal information, including personal information related to individuals who may be customers, employees, job applicants or others inside or outside of BBS.

The following disclosure explains what personal information we collect, what we do with that information and the steps we have put in place to protect the nonpublic personal information you have entrusted to us.

**Information We Collect** - BBS collects confidential information from you in a number of ways including information provided on the new account applications and other forms we receive from you, consumer reporting agencies, information obtained through our website, as well as information from other sources. For Example:

- We collect information such as your name, residential and mailing address, telephone number, e-mail address, social security number, passport number, driver's license number, date of birth, net worth, income, financial objectives and investment experience.
- We may access information regarding your account balances, your account(s) activity, transactions and the types of products and services you prefer through your interactions and transactions with us.
- We may obtain information about your credit worthiness and credit history from credit reporting agencies.
- We may collect background information from and through third party vendors to verify representations you have made and to comply with various regulatory requirements.

**Additional Information We collect from the use of our Website** - We may use "cookies" as part of its interaction with your browser, if your computer accepts cookies. Cookies consist of files of information that a website transfers to a site visitor's hard drive to track site and user activity. Cookies can make your use of [www.bancodobrasilsecurities.com](http://www.bancodobrasilsecurities.com) more

pleasing and efficient by, for example, "personalizing" your user interface or identifying which parts of the site you have previously visited. Cookies are commonly used on websites and do not harm your system. By configuring your preferences or options in your browser, you determine if and how a Cookie will be accepted.

**How We Share this Information** - BBS may share all the nonpublic personal information we collect about you with our affiliates. BBS does not share confidential information about our clients with unaffiliated third parties unless such disclosure is necessary to manage and service your account. BBS does not sell your personal information to anyone. For example, we provide access to information about you to unaffiliated third parties in certain limited circumstances, including:

- To help us process transactions for your account(s).
- To help us manage and service your account(s).
- When we contract with third parties to provide account related services such as printing, mailing, and data processing services.
- When it is necessary to comply with a subpoena or other court or regulatory order or is otherwise required or permitted by law.

**Information Protection** - BBS protects your nonpublic information from access by third parties by maintaining physical, electronic and procedural safeguards. We limit access to your information to those employees who are trained in the proper handling of nonpublic client information and who need access to perform their job functions.

**Affiliate Marketing** - You may limit our affiliates from marketing products or services to you based on your personal information that we collect and share with them. This information may include your social security number and/or other tax identification number, income, account history with us and other personal information that you may have provided to us during your transaction history with BBS. If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.

**To prohibit information sharing for marketing purposes, please contact or send a letter to the Compliance Department:**

E-mail: [bbscompliance@bb.com.br](mailto:bbscompliance@bb.com.br)

Phone: (407) 608-1780

2 South Biscayne Blvd - Suite 3150 Miami FL, 33131

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### **CUSTOMER IDENTIFICATION PROGRAM**

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify and record information that identifies each person who opens an account. By gathering this information, BBS is helping law enforcement investigate and prosecute crimes such as terrorist financing, money laundering, tax evasion, corruption and fraud.

**What this means for individuals** - When an individual opens an account or requests credit, BBS will ask for their name, residential address, date of birth, and other information that allows us to identify them. For non-U.S. citizens we will request taxpayer identification number; passport and country of issuance; alien identification card number; or government-issued identification showing nationality, country of residence and a photograph of you. For U.S. citizens we will request taxpayer identification number (Social Security number or employer identification number). You may also need to show your driver's license or other valid identification documents.

**What this means for legal entities** - When a corporation, partnership, trust or other legal entity opens an account or requests credit, we will ask for the entity's name, physical address, tax identification number, and other information that will allow us to identify the entity. We may also ask to see other identifying documents, such as certified articles of incorporation, partnership agreements, a trust instrument or information identifying and clarifying beneficial ownership.

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### **NOTICE TO CALIFORNIA RESIDENTS**

This section provides additional details about the personal information we collect about California residents and the rights afforded to them under the California Consumer Privacy Act ("CCPA"). The CCPA requires business privacy policies to include information on consumers' privacy rights and how to exercise them: the Right to Know, the Right to Delete,

the Right to Opt-Out of Sale and the Right to Non-Discrimination. However, the CCPA doesn't apply to all businesses. Personal information used by financial services firms may be covered under certain exemptions described in the CCPA.

What situations are not covered by the CCPA?

- If your relationship with a company is only for personal financial services (e.g., owning one or more personal brokerage accounts), your personal information falls under the federal Gramm Leach-Bliley Act and is not covered by the CCPA.
- If you have an institutional relationship (e.g., registered investment adviser, broker-dealer, bank, or trust), the information collected about you in the context of that business relationship is not covered by the CCPA.

In the preceding 12 months, BBS collected the following categories of personal information for a business purpose: identifiers, California Customer Records personal information categories, protected classification characteristics under California or federal law, Internet or other electronic network activity information, and professional or employment-related information. There are more details about the personal information we collect at the "Information We Collect" section of this document.

Additionally, as mentioned above in the "How We Share this Information" section, BBS does not sell clients' personal information to third parties.

California residents may make a consumer rights request to access or delete certain personal information under applicable law. A request may be made by sending an email to [bbscompliance@bb.com.br](mailto:bbscompliance@bb.com.br):

- Information and Access: Confirm whether we are processing your personal information and, if so, what information we process and, if requested, provide you with a copy of that personal information.
- Objection: Request that your personal data that you understand as unnecessary, excessive, or processed in non-compliance with the applicable regulations, be anonymized, blocked, or deleted.
- What should you know before making a CCPA request? We are going to verify if you are a California resident and are going to check

your identity (or the identities of those authorized to submit requests on your behalf). You should generally expect to receive a response within 45 days of the date we receive your request.

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## **BUSINESS CONTINUITY**

BBS has developed a Business Continuity Plan detailing how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

If after a significant business disruption, you cannot contact us as you usually do, please call the alternate office location at (407) 608-1780. If you cannot access us through either of those means, you should contact our clearing firm, Pershing LLC (“Pershing”) at [www.pershing.com](http://www.pershing.com) or by phone at (800) 445-4467 for instructions on how you may enter orders and process other trade-related, cash and security transfer transactions.

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business. Significant business disruptions can vary in their scope, such as only our firm, a single building housing one of our offices, the business district where an office is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. BBS

will determine whether it is necessary to transfer our operations to another office or to a site outside of the affected area. In either situation, we plan to continue our business and may transfer operations to our clearing firm if necessary. Should that be the case, you will be notified by telephone or email on how to contact us. If the significant business disruption is so severe that it prevents BBS from remaining in business, we will assure our customers prompt access to their funds and securities.

Our clearing firm, Pershing, maintains a business continuity plan and the capacity to execute that plan. Pershing asserts that it will advise BBS of any material change to its plan that might affect our ability to maintain our business and has presented us with an executive summary of its plan. In the event Pershing executes its plan, they will notify us of such execution. Pershing affirms that it backs up our records at a remote site and that it operates back-up operating facilities in geographically separate areas with the capacity to conduct the same volume of business as its primary site. Pershing has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing and it has verified that it tests its back-up arrangements. A copy of the Pershing executive summary can be provided to you upon request.

**For more information** – If you have questions about our business continuity planning, you can contact us at the numbers identified above.

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## **ORDER ROUTING INFORMATION**

Under U.S. Securities and Exchange Commission (“SEC”) Rule 606 of Regulation NMS, broker-dealers that route client orders in certain equity and option securities are required to make publicly available quarterly reports that identify the venues to which client orders are routed for execution. BBS transmits our customer orders to our clearing firm, Pershing. Pershing may then route these orders to various venues for execution.

SEC Rule 606(b) requires broker-dealers to disclose order routing information to their customers, upon request. Specifically, BBS must disclose orders in NMS stocks that are submitted on a held basis, certain orders in NMS stocks that are submitted on a not held basis and for orders in NMS securities that are options contracts, the identity of the venue to which the customer’s orders were routed for execution in the six

Member: [FINRA](#) / [SIPC](#)

months prior to the request, whether the orders were directed orders or non-directed orders, and the time of the transactions, if any, that resulted from such orders. In accordance with SEC Rule 606 under the Securities Exchange Act of 1934, BBS discloses on a quarterly basis its execution quality and order routing information on its web site at:

[www.bancodobrasilsecurities.com/important-information/](http://www.bancodobrasilsecurities.com/important-information/).

Follow this link to access the BBS Disclosure of order Routing Practices:

<https://www.orderroutingdisclosure.com> - Insert our firm's name (Banco do Brasil Securities LLC) in the space provided and hit enter.

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### **PAYMENT FOR ORDER FLOW**

BBS's policy is not to receive "payment for order flow" from any broker-dealer, national securities exchange, national securities association, or exchange member in return for routing customer orders.

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### **SIPC NOTIFICATION**

All customers are advised that information about [SIPC](#), including the SIPC brochure, may be obtained by contacting SIPC. SIPC may be contacted by phone, email or regular mail:

#### **Securities Investor Protection Corporation**

805 15th Street, N.W. Suite 800  
Washington, D.C. 20005-2215  
Tel: (202) 371-8300 | Fax: (202)371-6728 | E-mail: [asksipc@sipc.org](mailto:asksipc@sipc.org)

For more detailed information please visit the SIPC website at: <https://www.sipc.org>

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### **FINRA NOTIFICATION**

FINRA's public disclosure program toll free hotline number is 1(800)289-9999 and FINRA's website address is: [www.finra.org](http://www.finra.org).

Information regarding your Registered Representative and BBS can be found through the following website: <https://brokercheck.finra.org>

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### **NOT FDIC INSURED**

BBS is a broker-dealer registered with the [SEC](#) and member of [FINRA](#) and [SIPC](#). BBS is an introducing

broker clearing through Pershing LLC on a fully disclosed basis. BBS is a wholly owned subsidiary of Banco do Brasil S.A. BBS is not FDIC (Federal Deposit Insurance Corporation) member. BBS is a wholly owned subsidiary of Banco do Brasil S.A. ("the Bank"). Securities are not bank products and are distinct from your banking accounts, including those with our affiliate entities. Securities services are provided by BBS.

**Investment products are NOT BANK GUARANTEED, Not FDIC Insured, and May Lose Value.** Securities are not bank products and are distinct from your banking accounts, including those with our affiliate entities.

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### **TRUSTED CONTACT PERSON**

There may be some circumstances which BBS is unable to reach you for a period of time and may have questions or concerns about your whereabouts, health or account activity. You have the opportunity to provide the name of a contact person(s) age 18 or older, and by doing so you are authorizing BBS to contact the aforementioned trusted contact person and disclose certain information about your account in order to address possible financial exploitation, to confirm the specifics of your current contact information, health status, or the identity of any legal guardian, executor, trustee or holder of a power of attorney, or as otherwise permitted by FINRA Rule 2165.

If you wish to name a trusted contact person(s) for your account(s), please contact your Financial Executive. Providing a trusted contact will not enable the person to make investment decisions on your behalf or provide them with access to your account information. If you want to authorize someone with that authority, you will need to take other steps to do so.

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### **MARGIN DISCLOSURE**

Securities purchased on margin are the firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and, as a result, the firm can take action, such as issue a margin call and/or sell securities or other assets in any of your accounts held with the member, in order to maintain the required equity in the account. It is important that you fully understand the risks involved in trading

securities on margin. These risks include the following:

- You can lose more funds than you deposit in the margin account.
- The firm can force the sale of securities or other assets in your account(s).
- The firm can sell your securities or other assets without contacting you.
- You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.
- The firm can increase its "house" maintenance margin requirements at any time and is not required to provide you advance written notice.
- You are not entitled to an extension of time on a margin call.

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### CONFLICT OF INTEREST

BBS is a wholly owned subsidiary of Banco do Brasil S.A. The bank is a publicly owned company listed in the Brazilian Stock Exchange. However, the Brazilian Federal Government controls the Bank with slightly more than 50% of the total shares. Additional information about the ownership structure can be found at the Bank's website:

<https://ri.bb.com.br/en/banco-do-rasil/ownership-structure/>

BBS may recommend and sell proprietary products that are issued by our affiliate. The Bank and BBS are each indirectly controlled by the Brazilian Federal Government as are many of the BBS' affiliates. For more information about conflict of interests can be found on BBS **Regulation Best Interest Disclosures** posted on our website.

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### FEES

Please make sure you understand what fees and costs you are paying. BBS can, at its discretion, charge other fees in connection to the services rendered. Also, please be informed that any fees charged by custodians and/or agents related to the securities held in your account, will be passed thru to you.

BBS's complete **Fee Schedule & Explanation of Fees** can be found at:

[www.bancodobrasilsecurities.com/important-information/](http://www.bancodobrasilsecurities.com/important-information/).

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### CONTACT INFORMATION

BBS takes your satisfaction seriously. For any inquiry, suggestion, or grievance you may have, we ask you to please contact us so that we can address your concerns. If your Financial Executive has not addressed your concerns to your satisfaction, please do not hesitate to contact Management directly at [bbsm@bb.com.br](mailto:bbsm@bb.com.br) or via telephone at (407) 608-1780 and ask for the OSJ Supervisor or the Branch Office Manager. You may also request to speak with Compliance at any time via e-mail at [bbscompliance@bb.com.br](mailto:bbscompliance@bb.com.br) or via telephone at (407) 608-1780.

For additional information about our services, visit our website [www.bancodobrasilsecurities.com](http://www.bancodobrasilsecurities.com). You may also review our **Form CRS** ("Client Relationship Summary") and the **Regulation Best Interest Disclosures** found on our website, along with other important disclosures. <https://www.bancodobrasilsecurities.com/important-information>

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### Banco do Brasil Securities LLC

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