

PRIVACY POLICY

1.0. The protection of your data and your privacy are important to us. This Privacy Policy (the "Policy") describes the personal data we collect, how it is used, stored, shared and your rights in relation to that data are preserved.

1.1. Our objective is to ensure that you ("our user and data subject") are aware of the operations involving the processing of your personal data involved in your relationship with **MCOIN - MILLENNIUM CONCERT INTERNATIONAL CORP SA**

2.0 About Node s.

Your information will be collected, stored, and processed by **MCOIN - MILLENNIUM CONCERT INTERNATIONAL CORP SA**, hereinafter referred to as ("MCOIN or "WE"). MCOIN, directly or indirectly, in whole or in part, by itself and/or through third parties or Affiliates, manages the website <https://www.erwaconcert.com> and the mobile digital wallet application (hereinafter collectively referred to as ("Platform") "controller" responsible for processing operations and the database that contains your Personal Data (as defined below).

a) To protect your privacy, **MCOIN** complies with the regulations in force in the Federative Republic of Brazil - in particular, Law No. Civil da Internet") and Decree No. 8,771/16. And also the Laws and Regulations of Florida, Miami, United States of America.

b) Throughout this Policy, when the terms ("Associate" and/or "Associates") are mentioned, we are referring to any natural civil and/or legal person who is, inside or outside Brazil, directly or indirectly, controlling the affiliate to or controlled by **MCOIN**.

3. The Scope of Politics.

3.1. This Policy applies to all information that you provide to us and that we obtain from you in accordance with this Policy, through **(i)** the Platform and any software applications made available to you for the use and promotion of our products and services, or **(ii)** social media pages and any other pages or websites associated with the use and promotion of our products and services (the two items will hereinafter be referred to together as the "Service"). Any natural person or legal entity that accesses or uses the Service in any way will be considered a user ("you", "your" or the "user") and is aware that their information is collected, used and transferred as set out in this Policy. . Please read it carefully before accessing or using the Service. **do not accept,**

in whole or in part, the terms and conditions of this Policy, stop accessing and using the Service.

4. Types of information we collect.

4.1. Collectively referred to as ("Full Information").

4.2. When accessing or using our Services, you provide us, and we collect, certain personal data relating to you. In some cases, you directly provide this information to us or allow us to access it through data collected by third parties. In others, data is collected directly by us.

4.3. These are the personal data collected and processed by **MCOIN** , divided by categories:

4.4. User-provided Personal Data (collectively, "Personal Information"):

a) Registration data: First name, last name, gender, nationality, date of birth, CPF, address.

b) Contact details: phone number and email.

c) Photo of your face.

d) Photo of your identity document or any other document that allows your identification.

e) Bank data.

5. Platform usage and navigation data (collectively referred to as "Operational Information"):

5.1. Information about all operations and activities carried out through the Service, dates, duration and frequency of user sessions and access by any means to the Service, geo-location of the device and any other data to which we have access through mobile devices, tablets or computers through which the Service is accessed or used.

5.2. Connection IP address, date, time, duration and frequency of access to the Platform.

5.3. General information, of an anonymized statistical nature, which includes technical information about your device, operating system and ID.

6. Personal Data collected by third parties whose sharing with MCOIN is authorized by the user:

6.1. You may choose to give us access to information stored by third parties, such as social networks, including but not limited to Facebook, Twitter, Instagram, linkedin, etc.

6.2. The type of information collected in this way, and the use that may be made of it, will depend on the scope of consent you have provided to that third party and your privacy settings on that site or service, as well as your authorization to associate an account managed by a third party to your account administered by **MCOIN** .

6.3. By associating your account, you agree that **MCOIN** may collect, store and use, in accordance with this Policy, the information contained in the account you have with the third party.

6.4. Information relating to your health, race, ethnic group, sexual orientation, religion, trade union membership, moral or political opinions is excluded from this Policy, as you do not request them under any circumstances.

7. What will MCOIN use your personal data for?

7.1. **MCOIN** and its Affiliates use your Total Information for a variety of purposes.

7.2. Provision and operation of the contracted Services.

7.3. Some personal data is essential for us to provide services to you. When accessing or using our Services for the first time, we ask that you complete forms that specify what information is required to create a user account and use our Services. In this opportunity, we indicate which personal data to be provided by you are mandatory and which are optional.

7.4. Navigational and device data are also essential for the services to be operationally viable. You control our access to location information from your device.

7.5. In addition to the use to provide and operate the contracted services, we use your Total Information:

- a) Identification, authentication and verification of requirements for contracting the Services;
- b) Periodic reassessments of eligibility to be an **MCOIN customer** ;
- c) Execution of the contracted Services;
- d) Communication with you by telephone, email, SMS, WhatsApp, or any other available means, etc.;
- e) Improving, modifying and optimizing our Services;
- f) Evaluating the performance of the Service, facilitating the design, development, generation and delivery of software updates, improving product support and other products and Services offered to users;
- g) Analysis of data trends and evaluation of the performance of the Service;
- h) Prevention and resolution of technical or security problems;
- i) Investigations and measures to prevent and combat money laundering, terrorist financing and fraud;
- j) Regular exercise of MCOIN's rights, including the presentation of documents in administrative and judicial proceedings, if necessary;
- k) Collaboration or compliance with a court order, a competent regulatory authority or a supervisory body;
- l) Compliance with legal or regulatory obligations, such as anti-money laundering rules (Law No. 9,613/98) and retention of application access records (Law No. Rules established by the state of Florida, Miami, United States.
- m) Recommendation of new services, products or features of the Platform;
- n) Display of Advertising on the Platform, pages on social networks and any other websites;

- o)** Marketing, prospecting and market research for the promotion of our Services through the development of advertising and marketing campaigns;
- p)** Queries about your information in the Credit Information System (SCR) database.
- q)** The third parties with whom we share your Total Information may be Authorities; Regulatory bodies; Compliance service providers; Marketing campaign partners; Companies of the **MCOIN** economic group ; Business partners in general;
- r)** Providers of information technology services, customer service, communication, statistical services, research, financial services and payment methods.
- s)** Whenever possible, the sharing of operational data is carried out anonymously.

8. Information security measures. confidentiality

8.1. MCOIN uses a variety of security measures to ensure the confidentiality and integrity of your information, protecting it from loss, misuse and unauthorized access, disclosure, alteration or unauthorized destruction.

8.2. To ensure an adequate level of security for your Personal Information, some of the practices we adopt are as follows:

- a)** Encryption of personal information, where applicable;
- b)** Measures capable of guaranteeing the confidentiality, integrity, availability and treatment of the Services;
- c)** Periodic audits, with regular processes of verification, evaluation and assessment of the effectiveness of technical or organizational measures.
- d)** Periodic assessment of the risk of accidental or unlawful destruction, loss or alteration of Personal Information transmitted, stored or otherwise processed, or of unauthorized communication or access to such information;

e) Measures to ensure that any person acting under the authority of MCO IN who has access to Personal Information can only process it in accordance with MCOIN 's instructions .

9. The communications we send to you

9.1. You may select the types of communications from us that you wish to receive, including promotional information from MC OIN and third parties.

9.2. In any case, as long as you have a user account, MCOIN may send you non-promotional communications, via telephone, email, SMS or other available means, with information about your account, as well as requests and complaints. that may be in progress.

9.3. The Service may transfer cookies to the storage drive of the device through which you access or use the Service. Cookies are alphanumeric identifiers that work with your web browser and that allow our systems to recognize you and improve your experience on the Platform. You can delete cookies or prevent us from sending them. Consult your browser's help section to perform any of these operations. In any case, we recommend that you allow cookies linked to our Service: some functions of the Service may not work correctly or may be completely disabled if cookies are disabled.

9.4. Likewise, you can request the revocation of monitoring of the geographic location of the devices through which you access the service at any time. However, such revocation may disable some functions or directly prevent the provision of the Service.

9.5. The Service may provide links to third party websites. These sites are not operated by us and are beyond our control. Please keep in mind that these sites may collect information about you and that when you visit them, you will be subject to their own privacy policies - please read these and other documents that govern your relationship with the providers of these sites. We are not responsible for the privacy practices of these websites and cannot guarantee the security of the information they collect.

10. Changes to this Privacy Policy

10.1. MCOIN reserves the right to modify this Policy at any time. Whenever the conditions of this Policy are changed, you will receive notification from us, through the means we deem appropriate (including, without limitation, its publication on the website www.erwconcert.com)

10.2. In cases where changes to this Policy result in significant changes in personal data processing practices, you hereby give your consent. Otherwise, we ask that you contact us.

10.3. Subject to the provisions regarding Personal Information, MCOIN also reserves the right to allow access to and/or transfer the Total Information to third parties or in the event of a total or partial divestiture, merger, spin-off or change of control of the company.

11. MCOIN Responsibilities.

11.1. MCOIN takes all measures within its power to protect the security, integrity and confidentiality of your personal information. However, the User is responsible for the transmission of personal information when using the Service. MCOIN will not be held liable for any damages that user errors or carelessness in this transmission may cause.

12. Your rights as a personal data subject

12.1. Below we list your rights as the holder of personal data and how to exercise them. We may need to confirm your identity to enable them to exercise.

13. Confirmation of the existence of processing of personal data

13.1. If you are our user, this means that we process your personal data. If you have doubts about whether you are our user or about the processing operations we carry out, you can ask ERW AGENCY to confirm the existence of the processing of your personal data.

14. Access to personal data.

14.1. You can request access to the data we hold about you at any time.

15. Correction of incomplete, inaccurate or outdated personal data

15.1. If you find that your personal data is incomplete, inaccurate or out of date, you can request the correction or completion of this information from MCOIN.

16. Anonymization, blocking or deletion of unnecessary, excessive or non-GDPR treated data

16.1. If you consider that your personal data is being processed unnecessarily, in excess in relation to the purpose for which it is intended or in breach of the provisions of the General Data Protection Law, you can ask ERW AGENCY to anonymize, block or delete this data. .

16.2. The effective anonymization, blocking or elimination will depend on proof of excess, lack of need and non-compliance with the provisions of the General Data Protection Law.

17. Information regarding data sharing carried out by MCOIN .

17.1. You may ask MCOIN to inform which public and private entities it has shared or from whom it has received your personal data.

17.2. In no event will we transfer your personal data to third parties without obtaining your prior consent, unless it is necessary to maintain our relationship with you, to continue to provide the Service, to comply with legal or regulatory obligations, including those of protection of personal data, as well as those cases that have been mentioned in this Policy.

18. Portability.

18.1. You can request the portability of your data to another service or product provider, based on the guidelines to be defined by the National Data Protection Authority.

19. Deletion of personal data

19.1. You may request, at any time, the deletion of your personal data.

19.2. The effective elimination of this data will depend on the existence of technical means capable of processing your request and on the absence of retention of this information for the execution of the Service contract with you, the fulfillment of legal or regulatory obligations or the regular exercise of rights in legal proceedings, administrative or arbitration. We may also subject the data to an anonymization process.

20. Information about the possibility of not providing consent and about the consequences of denial

20.1. You can specifically revoke your consent to the processing of data for certain marketing purposes, under the terms of this Policy, as well as prevent the collection of certain data - such as location data. However, the refusal to consent to this Policy in general implies the impossibility of providing the Services, since the processing of your personal data is essential for the viability of our operation.

21. Revocation of Consent

21.1. You can request, at any time, the revocation of this authorization. Revocation of consent may imply the impossibility of providing the Services, but does not prevent MCOIN from continuing to process your personal data, provided that there is another legal basis that justifies the treatment in this case or that the data is anonymized.

21.2. After the end of providing our Services, we may store your Personal Information for a minimum period of two consecutive years for the purpose of complying with legal or regulatory obligations, for the

regular exercise of the rights of MCOIN and its Affiliates or for any period longer. that is necessary depending on the legal basis that justifies the retention of the data.

22. If you wish to exercise any of these rights, please contact support@mcoin.com

22.1. If you understand that there is a need, you have the right to submit a petition to the National Authority for the Protection of Personal Data or to consumer protection bodies.

23. International Data Transfer.

23.1. **Your personal data is transferred internationally to Argentina** , where MCOIN observes the same level of protection provided by the General Data Protection Law (Law No. those established by the State of Florida, Miami, United States.

23.2. By agreeing to this Policy, you consent that the processing of your personal data can take place at all the Company's official offices open in the world.

24. Jurisdiction and applicable law

24.1. This Policy is governed, without exception and in all its points, by the laws of the Federative Republic of Brazil and the United States. will be interpreted accordingly.

24.2. Without limiting the foregoing, in the face of any difference, disagreement or conflict arising from the application, interpretation, validity and/or scope of this Policy, the User should primarily try to communicate with MCOIN, sending him his complaint so that the parties can try to reach an agreement in the email.

25. Contact information

25.1. **ERW AGENCY Data Protection Officer (DPO) details.**

25.2. Contact: support@mcoin.com