Webull Technologies (Brazil) Ltda

Webull Privacy Notice

Last updated: 30/09/2026

At Webull, we want you to have a great experience using our services. An important part of your experience is trusting that the personal and financial information we collect about you is protected. We are committed to maintaining the confidentiality and integrity of your personal information, and we have implemented business procedures consistent with this Privacy Notice ("Notice") and in compliance with applicable law.

The Notice describes how Webull Technologies (Brazil) Ltda ("Webull", "we", "us", or "our") processes the information we collect about you through our websites, mobile applications, services, and when you interact with us (the "Services"), starting when you take steps to apply for a Webull account ("Account"). We have the utmost respect for the privacy of your data, so this Notice also explains the steps you can take to control and protect your personal information on our Services. You agree to this Notice by accessing or using our Services. If you do not agree, you may not access or use the Services. The websites and mobile applications you use to interact with us are owned and operated by our affiliates, and their use may have additional privacy guidelines. We will follow these additional guidelines, as well as this Notice, to protect your privacy. If you have any questions about this Notice, please contact us (see HOW TO CONTACT US below).

For the virtual asset product, the controller of your personal data is Webull Sociedade Prestadora de Serviços de Ativos Virtuais Ltda. (CNPJ 58.277.883/0001-61, "Webull SPSAV"), headquartered at Av. Brigadeiro Faria Lima, 1336, salas 101/102, São Paulo/SP, and this Notice applies to it with respect to this product. The person in charge of the processing of personal data (DPO) can be contacted at [e-mail].

If you are under the age of 18, you may not use our Services. We do not knowingly collect, maintain, or sell information from anyone under the age of 18.

This Notice will help you understand the following:

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1. THE INFORMATION WE COLLECT

In the course of providing the Services, Webull collects or receives the following types of information, which include personal information/data.

Data Source	Types of data
From you	• Identity data, such as full name, date of birth, nationality identification number (e.g. social security number, passport number), nationality/citizenship

Data Source	Types of data
	• Contact data, such as email, phone number, home address/mailing information • Financial data, such as bank account and payment card details, fitness information, personal income, account balance, credit score, and tax information • Content such as photos and contacts on your mobile device or email (collected with your consent) • Profile data, such as username and password, purchases or orders, knowledge assessments, interests, preference feedback, survey responses, and inferences about characteristics, psychological tendencies, predispositions, behavior, attitudes, intelligence, skills, and aptitudes • Other information, such as information submitted through focus groups, contests, sweepstakes, job applications, customer support, and/or other interactions with us
Collected automatically through the Services	• Usage information, such as device identifiers, identifier for advertisers ("IDFA"), operating system and version, carrier and network type, internet protocol addresses ("IP address"), browser type and language, referring and exit pages, and uniform resource locators (date and time, amount of time spent on particular pages), which features of the Services you use or visit, purchases, and similar information about your use of the Services • Geolocation data from your mobile device, wireless carrier, or third-party service providers; You can control the

Data Source	Types of data
	collection of precise geolocation data through the user settings on your device • Activity data, such as purchases/sales, amount, transaction type, time and data, and similar activity through the Services • Tracking data collected using first-party and third-party cookies, pixels, web server logs, web beacons, and similar data collection and tracking technologies, such as IP address, browser, type, Internet Service Provider ("ISP"), platform type, device type
Other sources	• Service providers and partners, such as fraud risk assessments and protection, identity verification, credit records, payment processing information, advertising campaign information (e.g., the ads you click on), and other users' data (e.g., you appear in a contact list provided to us) • Social media and connected services, such as information from your interactions with our social media platforms, the Webull Community, and from services you connect to Webull, such as when you link, connect, or log in to your account through social media, Google, or Apple • Third-party analytics services, such as demographics, mobile and internet usage, analysis of performance metrics, reporting on your activity and use of the Services

Data Source	Types of data
	• Publicly available data, such as contact information, public records, and information that you have designated as publicly available on other websites

2. HOW WE USE AND SHARE YOUR INFORMATION

We will use and process your information for the following purposes:

- onboard you as a customer, including identity verification, credit checks, or anti-money laundering or other due diligence efforts;
- provide and personalize the Services for you;
- communicate with you about your Account;
- monitor, support, analyze, and improve the Services;
- carry out marketing and advertising programs, provided that, where required by applicable law, we obtain your prior consent to send you electronic marketing communications;
- provide, maintain, and protect your Account;
- process transactions on your account;
- respond to your inquiries;
- newsletters, product announcements, surveys;
- develop, offer and deliver new products and services;
- facilitate contests, sweepstakes, and promotions;
- protect the security of our Services, business, and customers;
- comply with legal and regulatory requirements;
- protect or exercise our legal rights; e

- as permitted by applicable law or with your consent.

We make reasonable efforts to ensure that your personal information is sufficiently accurate, complete, and up-to-date. If the personal information you have provided to us changes, please update by logging into your account (see MANAGING YOUR INFORMATION below) or by contacting us.

We may share your information with our affiliates as described below:

- to facilitate the opening of your account with an affiliate;
- to inform you about products and services offered by these affiliated entities; e
- to enable us to provide the Services more effectively to you.

We may share your information with third parties as described below:

- vendors and service providers, such as securities clearing houses, ID verification providers, who provide services at our direction and are instructed to keep your personal information confidential and use it only to provide the services we specify;
- in the virtual asset product, the institutions hired by Webull SPSAV for the execution of orders and the custody of virtual assets (Coinbase, Inc. and Coinbase Custody Trust Company, LLC, in the United States of America), for the conversion of currency ATTRUS INSTITUIÇÃO DE PAGAMENTO S/A and for the offer of the payment account, which receive your registration and transactional data to the extent necessary for the execution of the contract, the fulfillment of legal and regulatory obligations, including the prevention of money laundering, and the fulfillment of requests from the Central Bank of Brazil;
- business partners to administer our promotions, sweepstakes, surveys, and other programs and to provide targeted advertising;
- as part of the sale or other transfer of our business;
- any person or institution with which you have or propose to deal, such as companies whose securities you purchase using the Services;

- as required by applicable law or legal process;
- report suspicious transactions or assist law enforcement in an investigation;
- protect the rights, interests, safety, and security of Webull, our customers, or the public;
- other third parties, to the extent that you request or authorize disclosure, such as implementing, administering, or enforcing a transaction; e
- as permitted by applicable law or with your consent.

We may aggregate or de-identify your personal information so that it does not reasonably identify you and share that information with third parties.

3. COOKIES

Our website may use cookies and similar tracking technology to automatically collect and receive certain technical and usage information, such as your IP address, browser, ISP, and device type when you connect to our Services. Cookies are small packets of data that a website stores on your hard drive so that your device remembers information about your visit. Data collected through cookies and similar tracking technology allows us to personalize your experience with the Services, understand how you use them, maintain a persistent session, improve and further develop the Services, and measure and optimize advertising and promotional effectiveness. We may use both session cookies (which expire when you close your web browser) and persistent cookies (which remain on your computer until you delete them). Most browsers and mobile devices allow you to manage cookies in their settings. If you refuse a cookie or delete cookies from your device, you may lose functionality and/or experience some inconvenience in using our Services. For example, you may not be able to log in and access your Account as quickly, or we may not be able to recognize you, your device, or your online preferences. In addition, if you use a different device, change browsers, or delete opt-out cookies that contain your preferences, you may need to perform the opt-out task again. For more information, see MANAGING YOUR INFORMATION below.

4. ONLINE ANALYTICS, TRACKING, AND ADVERTISING

Webull uses third-party advertising and analytics services (e.g., Google Analytics) to better understand your online activity and provide content relevant to your interests and preferences. These services collect information about your use of our Services and other websites and online services over time through cookies and other tracking technologies. The data collected may include your IP address, web browser, mobile network, pages viewed, time spent, links clicked, and conversion information. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, and deliver targeted advertisements on our Services and other platforms. Analytics companies may also provide advertising-related services to us, such as reporting, attribution, analysis, and market research. By accessing and using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set forth in this Notice. For more information about Google Analytics, including how to opt out of certain data collections, please visit https://support.google.com/analytics/answer/6004245. For more information about interest-based ads, including to learn more about options for opting out of the use of your web browsing information for targeted advertising purposes, please visit https://www.aboutads.info/choices. You should also review your mobile device's settings and controls for features that allow you to opt out or opt-out of having certain information collected for behavioral advertising purposes. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Services. Webull does not advertise on behalf of specific securities or investment options on our Services.

5. HOW WE PROTECT YOUR INFORMATION

Webull uses reasonable, industry-standard security measures to protect the information under our control from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We maintain appropriate physical, electronic, and procedural safeguards, including restricting access to personal information on a need-to-know basis and limiting the amount and type of information available for download or transmission. We also conduct audits on a regular basis to

ensure the effectiveness of our system. Please understand, however, that no security system is impenetrable. We cannot guarantee that our security measures will prevent hackers from illegally obtaining this information or that our database and/or systems will not be subject to a cyberattack. Webull retains your personal information for as long as necessary to fulfill the purpose for which it was collected, to comply with our legal and regulatory obligations, including compliance with our records retention practices, and as otherwise permitted to meet our legitimate interests.

6. MANAGING YOUR INFORMATION

There are several ways to manage the information collected and processed by Webull, including the following:

Access and change your information.

If you have an Account, you may access, review, delete, and make changes to your information using our Services. You may also request that we rectify any inaccuracies or incomplete information in your personal data. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify the information in our subscription databases. In such a case, we will provide you with the reason why the modification or removal was not possible.

Withdraw consent.

If you have an Account, you may withdraw your consent to the processing of your personal information at any time by contacting us (see HOW TO CONTACT US below). If you withdraw your consent to any or all uses, collections, disclosures, transfers, and/or processing of your personal information or do not consent to the collection of your personal information by us, we may not be able to provide or continue to provide you with all features or aspects of our existing Services. Please note that withdrawing consent does not affect our right to collect, use, transfer, process, and disclose personal data where such collection, use, and disclosure without consent is permitted or required by applicable laws in any jurisdiction.

Delete your account and/or your personal information.

You can delete your account at any time through the Webull app, and your personal information will be deleted in the normal course of business in accordance with our current data retention practices. You can also request that we delete all of your personal information by contacting us. We will comply with deletion requests within a reasonable timeframe, to the extent permitted by law; However, we will not delete data that we are legally required to keep, such as the information that regulators require for audit or evidence purposes.

Limit access to your device's data.
You can disconnect our mobile app's access to certain stored device information through your device's settings. For example, you can withdraw permission for the app to access your contact list or photo gallery.

Manage communication preferences.
You can stop receiving promotional emails from us by clicking on the "unsubscribe" link in those emails. We may still send you service-related communications or other non-promotional communications, such as account notifications, receipts, security notices, and other transactional or relationship messages.

Limit mobile ad tracking.
You can set your mobile device to limit ad tracking, in which case we will not be able to see your advertising ID or IDFA. However, we will still share other personal information with our advertising partners as described in this Notice.

Disabling certain data sharing.
You can limit how we share your data with our marketing partners to market our Services more effectively across websites and apps by contacting us. When opted out, we will no longer share personal information with these partners for these purposes.

Post information.
Posting personal information in public areas will make it publicly available. Personal information that you post or share with others may in turn be shared by them with other users and may also appear when someone uses a public search engine (even if that person is not a user of our Service). Do not post personal information in public areas of our Service that you want to keep private.

7. TRANSFER OF YOUR INFORMATION

Our Services are hosted in the United States, and your information is stored in the United States in the cloud. In providing our Services, your personal information may be accessed by our affiliates in jurisdictions other than the United States. You may receive a copy of these safeguards by contacting us (see HOW TO CONTACT US below).

In the virtual asset product, the international transfer of your data to Coinbase, Inc. and Coinbase Custody Trust Company, LLC, in the United States of America, is necessary for the execution of the contract entered into with you and the fulfillment of Webull SPSAV's regulatory obligations, and is carried out based on article 33, items II, VII and VIII, of Law No. 13,709/2018 (LGPD) and Resolution CD/ANPD No. 19/2024, through contractual clauses that ensure a level of protection

equivalent to that of Brazilian law, including confidentiality, security, secrecy of transactions and access by the Central Bank of Brazil to records. Your data on transactions with virtual assets are kept for the minimum period required by regulation, of [5] years from the termination of the relationship or transaction, whichever is later.

8. THIRD-PARTY WEBSITES

This Privacy Notice does not apply to the privacy practices of companies that we do not own or control, such as companies that advertise on our Services or partner with for certain services. We are not responsible for the content or privacy policies of these third-party websites. You should check the privacy policy and terms of use of the applicable third party when visiting any other website.

9. CHANGES TO THIS NOTICE

We may update or revise this Notice at any time, with or without notice. We will post the most recent version of this Notice on our website. Your continued use of our Services is deemed your consent to the revised version.

10. HOW TO CONTACT US

If you have any questions, comments, or suggestions about this Notice or your personal information, please contact us at ajuda@webull.com.br.