
CODE OF CONDUCT ON ANTI- BRIBERY COMPLIANCE AND INFORMATION PRIVACY

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DATEN TECNOLOGIA, in a constant process of evolution, presents to society its code of business conduct, based on the strictest rules of transparency and ethics for its managers, partner employees, suppliers and other interested parties.

A great read,

Silvio Comin

Industrial Director

DATEN

DOCUMENT REVISION CONTROL

REVISION	DATE	DESCRIPTION
00	11/17/2019	Initial Issue
01	01/30/2020	Inclusion of item 7.2 of the standard in item 9 of this document regarding retaliation, discrimination and disciplinary actions.
02	11/24/2020	General review of the document and inclusion of item 9.2.1
03	08/31/2021	Review of the whistleblower channel number
04	09/30/2021	Inclusion of item 17 - General relationship conduct, digital compliance and protection of personal data.
06	03/29/2023	Inclusion of values in item 6.3 regarding sustainability, ethics and transparency.
07	09/29/2023	Mission, vision and values update
08	09/25/2024	General review of the code of conduct – main adjustments to item 17 – General relationship conduct, digital compliance and protection of personal data
09	25/02/2025	Definition of the controller and updating of values, covering compliance and quality, as well as review of the SGPI policy.

1 WHAT IS THIS CODE OF BUSINESS CONDUCT

DATEN TECNOLOGIA LTDA, a company that manufactures, sells, rents and provides technical assistance for microcomputers – Stations, Servers and Notebooks and IT equipment, implements requirements to improve the integrity of its business conduct.

Attitudes must be common, which is why this Code of Business Conduct reflects the way in which professionals from all activities and sectors of DATEN TECNOLOGIA LTDA act in relation to society, as well as how suppliers and other interested parties must act.

All people must act correctly, with integrity and efficiently in the pursuit of results, incorporating the values expressed in this code, complying with internal regulations and standards.

2 OBJECTIVES OF THE BUSINESS CODE OF CONDUCT

The Code of Business Conduct was prepared with the following objectives:

- Make corporate values clear so that all professionals, suppliers and other interested parties can understand, respect and practice them.
- Serve as an individual and collective reference for the attitudes and behavior of each interested party.
- Contribute to ensuring that these values are respected in all locations and that its professionals, suppliers and other interested parties act correctly, fairly and respectfully towards the community and the environment.

3 TO WHOM THIS CODE IS ADDRESSED APPLY

The Code of Business Conduct applies to all professionals working at DATEN TECNOLOGIA LTDA and must regulate the relationships that these professionals maintain inside and outside the company with:

- Other professionals from the company or other companies;
- Suppliers, customers, banks, other partners and competitors;
- Public authorities, at all levels;
- Local community and society in general.

4 TERMS AND EXPRESSIONS EMPLOYEES

DATEN OR COMPANY

This is DATEN TECNOLOGIA LTDA and the activities it develops.

The logo for DATEN, featuring the word "DATEN" in a bold, dark blue, sans-serif font.

CONDUCT

Behavior, collective moral procedure.

CODE

Set of rules, laws or norms.

ETHICS

Set of customs, habits and individual behaviors.

SUPPLIERS

Suppliers are considered to be commercial partners, individuals and legal entities with whom DATEN has a relationship. relates through purchases of either services or products.

CODE OF BUSINESS CONDUCT

Standards and behaviors that govern the organization's performance and define what it expects from its professionals, suppliers and others partners.

PROFESSIONALS

They are all professionals who work at the company, regardless of their position, role, activity or length of service.

VALUES

They express the company's ongoing commitment to society in general, to the people who work there and interact with it.

5 DATEN MISSION, VISION AND VALUES

DATEN's performance and the expected behavior of its professionals and suppliers are guided, respectively, by Aspiration and Behavioral Skills , widely disseminated internally and through this Code of Conduct.

5.1 Mission

Our mission is to be the driving force behind technological progress by providing high-quality IT solutions based on best practices in manufacturing, social welfare, environment,

security, anti-bribery and digital compliance. With over two decades of experience, we are committed to satisfying our customers with innovative products that enhance their efficiency, ensuring our success in all areas.

5.2 Vision

Our vision is to lead the market with sophisticated products, global partnerships and sustainable practices, becoming the driving force of technological innovation and inspiring digital transformations throughout the country. Thus, defining new standards of operational excellence and beneficial impact.

5.3 Values

Technological excellence, innovation, customer focus, strategic partnerships, socio-environmental sustainability, employee empowerment, ethics and transparency, privacy and data protection, integrity, confidentiality and secrecy, quality and compliance.

6 CODE OF CONDUCT BUSINESS AND /OR COMPLIANCE RESPONSIBLE

The Code of Business Conduct is an important step towards consolidating values and from the ethics business and he was established the leave from the experience and based on extensive discussion between partners, directors and professionals.

The compliance officer (see specific appointment document) is responsible for improving this work and is open to suggestions from all professionals, suppliers and other interested parties.

7 HOW TO ACT IN DIFFERENT SITUATIONS

The Code indicates what the organization expects from each professional and supplier in the different situations they may face at work or even outside of it.

Whenever you are unsure about how to act, consult this Code of Business Conduct. If you need more information, contact the company's Compliance Officer or use one of our service channels: visit the website <http://www.daten.com.br/canal-integridade>, send an email to compliance@daten.com.br or call (73) 3222-6225.

8 CONDUCT GENERAL FROM DATEN IN RELATIONSHIP TO THE YOUR PROFESSIONALS

The company believes that the diversity of its professionals is one of the main factors for maintaining its success, permanence and growth. For this reason, it seeks to select, hire and retain efficient and talented people and continually invests in their development.

In addition to respecting and valuing social and cultural diversity, following individual differences, combating all forms of discrimination, providing all people with equal treatment and without prejudice based on social, cultural and ethnic origin and/or gender, age, religion, political opinion, sexual orientation, physical, psychological and mental condition.

The company is committed to equal employment opportunities for all, regardless of race, gender, religion, beliefs or nationality.

Discriminatory practices against any professional or job candidate are not tolerated. Therefore, DATEN will only reject a candidate for any type of position if there are strong indications that the hiring has characteristics and/or interests other than those of the employer. those ones solely linked to their professional competence and expertise, as well as their imminent contribution to the organization's growth.

DATEN will not permit retaliation, discrimination or disciplinary action against those who refuse to participate or decline any activity in relation to which it has reasonably judged that there is more than a low risk of bribery that has not been mitigated.

It is part of DATEN's integrated policy to promote the development of its professionals, value and recognize people based on the results achieved and ensure that work in the company is a space for creation and realization.

The organization encourages respect and collaboration among professionals, in order to create an internal environment favorable to business growth.

Moral or sexual harassment are unacceptable practices in a respectful and dignified work environment and will not be tolerated.

Acts of intimidation, offense or aggression committed by professionals, on the organization's premises or in the exercise of their duties, whether against co-workers or people who are not directly linked to the company (clients, suppliers, consumers, authorities, members of the community, etc.) will be punished in accordance with the legislation and internal regulations.

If you or someone you know is the victim of any type of embarrassment, do not hesitate to report it through the available channels.

Carrying drugs or weapons is not permitted under any circumstances in the workplace and is considered a serious offense, subject to administrative, civil, labor and criminal sanctions.

8.1 Fundamental Rights of the Professional

Every professional, regardless of their role, position, job title or salary, will be treated with respect and attention, and will be offered conditions for personal and professional development within the reality and competitive conditions of their unit. work.

Health and safety conditions at work must be the subject of permanent attention and must ensure that professionals experience the lowest possible risk when performing their duties. functions.

For this to happen, everyone involved must comply with general preventive health and safety standards and participate in training and orientation activities.

Activities and personal relationships that conflict with the interests of DATEN TECNOLOGIA LTDA. must be avoided.

If you have any doubts about the existence of conflicts of interest, consult the compliance officer.

Do not accept a position or role in other companies or entities during times that conflict with your working hours at the company. Teaching activities may be accepted outside of working hours, but must be agreed with your management. Exceptions may only be accepted in special cases and must be registered in the unit's Human Resources area.

Any work or activity carried out on behalf of DATEN or using its name or facilities must have prior approval from the person responsible for the area.

Referring relatives and friends to existing vacancies at DATEN is a traditional practice. It is up to the responsible areas, together with human resources, to decide on selection and hiring, and pressure to influence the admission, promotion or dismissal of professionals is not admissible.

linked by kinship, friendship or any other type of relationship that is not professional.

Direct subordination of relatives will not be permitted.

8.1.1 Social responsibility

DATEN TECNOLOGIA respects and values social and cultural diversity, taking into account individual differences, combating all forms of discrimination, encouraging equal treatment without prejudice based on social, cultural and ethnic origin and/or gender, age, religion, political opinion, sexual orientation, physical, psychological and mental condition.

DATEN encourages suppliers, partners, customers and other interested parties to adopt practices that promote gender and racial equality and respect for diversity in their internal and external relationships, promoting, together with them, the adoption of social responsibility standards compatible with those assumed in this code of conduct and business integrity.

DATEN reserves the right to disagree with personal opinions related to the topics described above, expressed on social media or any other form of communication, by employees or partners, who are fully responsible for the consequences of these opinions. It also advises those who wish to express their personal opinions on these topics to do so by completely disassociating themselves from DATEN's image and requesting that those who do so remove any reference to DATEN from their social media.

8.2 CONDUCT IN RELATION TO GIFTS

8.2.1 DATEN Internal Rewards

The existence of internal events at DATEN TECNOLOGIA LTDA that promote rewards for challenges or draws voluntarily offered to professionals will not be characterized as gifts in the Anti-Bribery relationship.

8.2.2 Rewards provided by DATEN but originating from suppliers

Even if these rewards come from suppliers or other interested parties, delivery to professionals will be intermediated by DATEN and will not constitute a gift.

8.2.3 Gifts

The acceptance of gifts and presents must be limited to **R\$150.00 and the professional must notify the Compliance Officer**. Cases that do not fit this definition must be refused. If refusal or return is not possible, gifts and/or presents outside the value limits established herein will be made available to the Compliance Officer for final disposal.

Invitations to events and trips must be communicated to the Compliance Officer through the respective manager. The assessment will be individual and approval of each professional's expenses must be made, at the very least, by their superior.

DATEN is prohibited from offering gifts, with the exception of customer gifts and motivational gifts for marketing campaigns, **limited to R\$150.00**.

8.3 CONDUCT IN RELATION TO THE MARKET – CUSTOMERS, SUPPLIERS, BANKS, PARTNERS AND COMPETITORS

CUSTOMER SERVICE

In addition to ensuring the quality of the products and services offered, DATEN is committed to always serving its customers and consumers with efficiency, speed, politeness and transparency. When the customer or consumer cannot be served, this must be clearly stated, explaining the reasons clearly and respectfully.

QUALITY AND COMPLIANCE

Only products or services that comply with legislation and sectoral standards will be offered. In the event of any non-compliance being found, explanatory or compensatory measures must be taken.

COMPETITION AND CONSUMER RIGHTS

DATEN understands that fair competition and respect for consumer rights are factors that favor the development of the market on sustainable bases. No customer can be forced to accept conditions that contravene these rules in order to purchase products or services from the company.

DATEN respects its competitors and seeks to outperform them in a healthy manner, offering products and solutions with a differentiated cost-benefit ratio to its customers. Attitudes that may constitute slander or defamation of competitors are not permitted.

PURCHASES AND CONTRACTS

The relationship with suppliers and other partners must always be guided by the search for quality, adequate cost-benefit ratio, reliability technique and financial, integrity in driving from the negotiation, node what if refers the legislation, to the environment and to the rights commercials, social and contractual. With the aiming to expand its sustainable operations, DATEN recommends that its areas of Shopping and Supplies search forms permanent of influence its suppliers of products, services and equipment to adopt responsible actions in the social and environmental areas, and to become signatories of this Code of Conduct and Integrity Business.

9 DATEN'S GENERAL CONDUCT IN RELATION TO YOURS SUPPLIERS

DATEN believes in the solidity of its relationship with its suppliers. To this end, it is essential that suppliers know and act in accordance with the legislation and this Code, and are responsible for disseminating, monitoring and ensuring compliance with this in all of their activities. activities.

9.1 INTEGRITY

All suppliers are expected to demonstrate high ethical standards and maintain integrity in all interactions with DATEN and public

administration. Therefore, any and all forms of corruption, extortion or fraud are strictly prohibited. prohibited.

DATEN does not condone coercive commercial practices to obtain advantage or any type of harassment (moral, sexual, political and religious).

DATEN periodically carries out assessments and inspections of critical suppliers, including those that are considered critical in relation to the risk of bribery. A DUE DILLIGENCE procedure is also established for these suppliers, when applicable.

10 CONDUCT IN RELATION TO VEHICLES COMMUNICATION

DATEN considers the population's right to be informed about matters of public interest to be legitimate, even when related to a private company, and considers that it is the role of the press to obtain and disseminate this information. Furthermore, it understands that the existence of a free, independent and impartial press contributes to the improvement of the market, the democratic State and citizenship. For this reason, DATEN repudiates the use of economic power to constrain the action of the press or to induce it to disseminate false facts.

DATEN considers the role of the press to be important in shaping the organization's image in the eyes of the public and seeks to provide information or respond to requests, when relevant, considering the right not to express an opinion on issues that are contrary to its interests or to maintain confidentiality regarding information considered to be strategic.

Only professionals and suppliers appointed to act as spokespersons are authorized to speak on behalf of the company. If you are approached to provide information, write articles or give interviews and statements on behalf of the company to any media outlet, inform your superior or the Compliance Officer.

DATEN has internal and external communication procedures to deal with relevant information with its stakeholders. All parties involved must follow the established standard for communication.

11 CONDUCT TOWARDS THE COMPANY AND ITS GOODS

Each professional and supplier is responsible for the correct use and storage of the company's goods and assets that are part of their work, directly or indirectly.

The same applies to the assets of customers, suppliers and partners used in the company's activities. These assets and property must not be used for personal benefit, except when expressly authorized by law. authorized.

These goods and assets include equipment, facilities, business plans, technical and market information, computer programs, models, papers and working documents and others that are part of the company's assets.

The appropriation or improper use of any of these assets, including their copying, sale or distribution to third parties, are serious offenses, which may result in sanctions labor, civil, criminal and/or administrative applicable.

ACCOUNTING AND OTHER RECORDS

Records must be prepared and monitored by both those directly responsible and all area managers, in compliance with the provisions of legislation, tax regulations and internal rules. Entries and records are available to managers, control and audit areas and authorities. legal. DATEN has a document matrix and a master list of records to control the arrangement of your documentation in an organized manner.

PRIVILEGED INFORMATION

Professionals and suppliers who become aware of non-public information have a duty to keep it confidential, even after leaving the company or terminating the contractual relationship. The use of privileged information for personal benefit or that of third parties is a crime, subject to labor, civil and criminal sanctions. criminal.

WORKING PAPERS AND COMPANY DOCUMENTS

The working papers, reports, correspondence and other documents used in the activity of each professional and supplier are the property of the company and cannot be taken or copied when the professional leaves or the contract is terminated.

AIR TICKETS

Purchases of airline tickets required for the company's activities will be requested and quoted by the department designated for this purpose, and may not be issued in the name of third parties who are not directly involved in said activity, in a justified manner.

12 CONDUCT TOWARDS THE NEARBY COMMUNITY AND THE ENVIRONMENT

DATEN always seeks to coexist harmoniously with the communities where its business unit operates, respecting people, their traditions, their values and the environment. At the same time, it seeks to actively collaborate in local development, improving quality of life and reducing social problems and inequalities.

CHILD LABOR

DATEN does not use child labor and must ensure that its suppliers follow the same principle. DATEN supports and carries out activities that help develop children in the communities where it operates and, as far as possible, offers internships and training and apprenticeship programs for young people.

POLITICAL PARTISAN ACTIVITIES

DATEN does not engage in political activities, and each professional who wishes to participate in this process must do so individually, without involving the company's name or resources. No professional is authorized to solicit participation, support, financing or involvement of other professionals or business units with any candidate or party. Political activities carried out by professionals must occur outside the work environment and working hours. file.

UNION ACTIVITIES

DATEN seeks to maintain a respectful relationship with union entities and does not practice any type of discrimination against unionized professionals.

ENVIRONMENT

All company activities must be carried out in compliance with environmental legislation and standards, additionally seeking prior assessment of environmental aspects and impacts, the rational use of natural resources, and the preservation of the environment where we operate.

RELIGIOUS ENTITIES

DATEN seeks to maintain the best relationship with religious entities, respecting all creeds and beliefs, both of its professionals and of the communities where it operates.

13 CONDUCT IN RELATIONSHIP THE ASSOCIATIONS PROFESSIONALS, BUSINESS AND ENTITIES

DATEN's philosophy is to participate in entities and associations representing its sectors of activity, provided that such participation contributes to the development of the sector and does not imply violations of the rules and principles of free competition. The form of participation must be defined on a case-by-case basis by the Board of Directors, taking into account the profile of local associations.

The active participation of professionals in social, cultural or charitable entities that have public recognition, carried out on an individual basis, is seen as an important contribution to society and the country, as long as it does not affect their activity and regular work at DATEN.

14 VOLUNTEERING AND RESPONSIBILITY SOCIAL

These activities are considered part of the responsibility towards the community in which they operate, and must be structured and organized in order to obtain the maximum possible social return in relation to the resources employed and the time of the professionals involved.

15 CONDUCT IN RELATION TO POWER PUBLIC

Relationships with authorities, politicians and public agents must be guided by professional and correct attitudes. DATEN repudiates any and all acts that are harmful to the public assets of any country. It is the duty of each and every DATEN professional and all suppliers to base their activities and relationships with public agencies and agents on the strictest legality and morality.

DATEN does not tolerate practices that involve any undue advantage to/from a public agent, fraud in contracts and/or bidding procedures, Manipulation of the economic-financial balance of contracts, impediment or obstruction of investigative or inspection activities by public bodies, with the obligation of DATEN professionals and suppliers who are aware of such attitudes to report them to the person

responsible for Compliance and/or through the integrity channel, by telephone (73) 3222-6225, website <http://www.daten.com.br/canal-integridade> or email compliance@daten.com.br.

DATEN's philosophy is strict compliance with current legislation and expects the same behavior from its professionals and suppliers.

It considers, however, that it is legitimate to challenge abusive, discriminatory or incorrect legal or tax measures, which will be done through administrative and/or judicial actions in the competent authorities.

16 GENERAL CONDUCT OF THE RELATIONSHIP, DIGITAL COMPLIANCE AND PROTECTION OF PERSONAL DATA

16.1 Information Privacy Policy

DATEN has a management policy on information protection and privacy, for its activities of manufacturing, marketing, leasing and technical assistance of microcomputers – Stations, servers, notebooks and computer equipment:

The protection and privacy of internal data and information and of the respective interested parties, controlling, managing and contributing to best practices in information protection and privacy, keeping interested parties informed, communicated and involved, striving for continuous improvement and compliance with objectives and goals, legal and regulatory requirements inherent to digital law, the civil framework of the internet and the general data protection law, which are relevant to our scope.

- Commitment and protection of data, whether sensitive or not, and information of the holders;
- Provide information protection and privacy to stakeholders' data;
- Carry out consistent communication and information with stakeholders;
- Continuously improve;
- Ensure compliance with applicable legal, regulatory and statutory requirements;
- Fully comply with previously established objectives and goals.

16.2 Controller Definition

DATEN TECNOLOGIA is responsible for the processing of personal data under its management, acting as controller, as established by the General Law on the Protection of Personal

Data (LGPD). In this role, the company is responsible for defining the purposes and means by which the data will be processed, always in full alignment with the applicable legislation.

Furthermore, DATEN undertakes to adopt all necessary measures to ensure the protection of personal data under its responsibility, in accordance with the principles and guidelines established by the LGPD.

It is worth noting that, when the processing of personal data is carried out by other companies, which assume responsibility for such data, DATEN is not responsible for such operations. In such cases, the controller must ensure full compliance with the obligations set forth in the LGPD, being responsible for the actions and decisions that are its responsibility.

16.3 Declaration of Legitimate Interest

DATEN declares that for the purposes of using the personal data of its interested parties, in compliance with the LGPD, it uses this data legitimately to execute its business scope in the following processes and for the following purposes:

1. **Human Resources** - Registration of selection, admission, dismissal, training and competence activities of employees to compose the dossier;
2. **Integrated Management System** – Carrying out retail customer satisfaction survey, applying confidentiality terms, executing Due Diligence Diligence on employees and suppliers, in addition to control, management and monitoring during the continuous improvement of DATEN management systems, in internal and external systems and software;
3. **Commercial bidding** – To participate in bidding processes, data registration such as name, CPF and address are collected when necessary for signing contracts and minutes, integrated with the finance, logistics, purchasing and warehouse departments;
4. **Retail sales** – For customer registration, sending the sales order, issuing the invoice and delivering the product to the customer;
5. **PDI / Projects** – Accountability to government and state entities and bodies;
6. **Website/E-Commerce** – Use of cookies to improve user experience and data collection to complete purchases made on the website;
7. **Shipping / RMA** - To check and validate shipping actions, shipping registration requires access to the name, address and order data and invoice to effectively identify and deliver the product to the customer, invoicing, opening a warranty service order, sending materials to technical assistance, sending materials for transfer between warehouses.

8. **Marketing** - Basic customer registration to maintain contact methods, control and payment methods through the card administrators' Gateway; Collection of information via cookies and social media management.
9. **Stock** - So that the requested parts are delivered to the current address of the service centers, if they have not updated their address with SIGEP or SEFAZ after changing address;
10. **Production** – Customer registration for launching sales orders and creating production orders;
11. **Logistics** - Reports for decision making (Business Opportunities), and an overview of freight costs spent by the company during the month and year and employee transportation planning, on normal and extra days.
12. **Purchases** – To carry out registration, qualification, due diligence, evaluation and payments of suppliers, individuals and those who provide digital services and products;
13. **Billing / Accounts payable and receivable, taxation and accounting** - To register customers and suppliers, billing, tax calculation, payments and financial consolidations with interested parties, individuals;
14. **Human Resources Department / OHS** – Payroll calculation, granting of benefits, vacations, overtime, time bank, termination, admission and assignment; preparation and completion of documentation related to the health and safety of workers, including examinations and controls of deliveries of protective equipment;
15. **Call Center** – To open Service Orders under warranty in after-sales service;
16. **Surveillance / Asset Security** – Registration and control of physical access of any interested party and control of entry and exit of materials;

16.4 Types of data collected

DATEN collects the following data:

- Full name;
- Individual Taxpayer Registry (CPF) number and image;
- Identity card number and image;
- Admission, periodic and dismissal medical examinations;
- National Driver's License (CNH) number and image;
- Phone numbers, WhatsApp addresses and email.
- Proof of complete address;
- Marital status;

- Union data;
- Educational documentation;
- Passport

16.4.1 The method used to collect data

The data owner provides DATEN TECNOLOGIA with most of the information collected. We collect and process this information when the data owner:

- Register online or place an order for any of our products or services;
- Voluntarily complete a satisfaction survey or provide feedback on our communication channels, such as message boards or email;
- Use or view our website, through your browser's cookies;
- Participates in the internal process of selecting and hiring employees and/or suppliers;
- Opens a call in the client's system, integrated with the Daten system, website or by telephone, providing data;
- Access the organization's facilities in person;
- In relationships with suppliers and partners, it is possible to collect business information and personal data, all of which are processed in accordance with the declaration of legitimate interest and consent for the data provided.

DATEN may also receive your data indirectly from the following sources:

- SESI/Senai/
- IEL/CIEE
- Occupational Medicine

16.4.2 How data is used

DATEN TECNOLOGIA collects data from interested parties so that it can:

- Process your order and manage your account.
- Send an email with special offers about other products and services we think the data subject might like.
- Conduct customer satisfaction surveys.
- Registration of employees and suppliers in the system.
- Control access to and exits for visitors in the organization
- SHIP

If the data subject agrees, DATEN will share their data with our partner companies so that they can offer their products and services.

When Daten processes your order, it may send your data and use the resulting information from credit reference agencies to prevent fraudulent purchases.

16.4.3 Data storage method

Daten stores your data securely in our system, clouds and/or physically.

Daten will keep your personal identification data, such as name, CPF, RG, for a maximum period of 15 years (unless the holder requests deletion and presents legal justification for doing so). Data retention may also occur when there are specific purposes, respecting the following limits and conditions:

- Compliance with legal obligations: When necessary to meet legal or regulatory obligations.
- Studies and research: When data is necessary for studies carried out by research bodies, ensuring anonymization whenever possible.
- Transfer to third parties: When it is essential to transfer data to third parties, provided that the legal requirements regarding data processing are met.
- Exclusive use by the company: When the data is used exclusively by DATEN, as long as it is anonymized and not accessed by third parties.

16.5 Marketing

DATEN TECNOLOGIA sends information about activities, processes, products and services that we believe to be of interest to the data owner, always with due consent. In addition, this information may also include that of our partner companies, if any. This also includes the NAVE website, referring to the gamer line, which belongs to DATEN.

As regards receiving marketing, the data subject may at any time choose to unsubscribe at a later date.

The data subject has the right to request at any time that DATEN cease contacting him for marketing purposes or disclosing his data to other members of the Daten Group.

If the data owner no longer wishes to receive communications for marketing purposes, they may unsubscribe via the link available in the footer of marketing emails.

16.6 The data owner's rights to data protection

DATEN ensures that data subjects are fully aware of all their rights related to data protection. Each data subject has the right to:

- **Right of Access:** The data subject has the right to know whether his/her personal data is being processed and, if so, to obtain a copy of such data and other information related to the processing.
- **Right to Rectification:** The holder may request the correction of incorrect, outdated or incomplete personal data.
- **Right to Anonymization, Blocking or Deletion:** The holder may request that his/her personal data be anonymized, blocked or deleted when they are unnecessary, excessive or processed in non-compliance with the LGPD.
- **Right to Portability:** The holder may request that their data be transferred to another service or product provider, subject to regulation by the National Data Protection Authority (ANPD).
- **Right to Information about Sharing:** The holder has the right to know with which public and private entities their data has been shared.
- **Right to Revoke Consent:** The holder may revoke the consent previously given for the processing of his/her personal data at any time, without compromising the legality of the processing carried out based on the consent previously given.
- **Right to Review of Automated Decisions:** The data subject has the right to request the review of decisions taken solely on the basis of automated processing of personal data that affect his/her interests.
- **Right to Object:** The data subject may object to the processing of his/her personal data in certain circumstances, such as when the processing is carried out based on the legitimate interests of the controller.
- **Right to Petition:** The holder may petition the ANPD in case of non-compliance with the LGPD.

When the data subject chooses not to provide consent, they understand that this decision may have several consequences. The lack of consent may result in the inability to access certain services or features, restrictions on options or customizations, and even the impossibility of formalizing contracts, such as the hiring of services. In addition, refusal may impact customer service, limit participation in promotions and loyalty programs, and restrict the receipt of important

communications. Therefore, by not providing consent, the data subject acknowledges that this choice may affect their experience and access to certain services and benefits.

If the data owner makes a request, we will have 15 (fifteen) calendar days, counting from the date of the request, to provide a response. If the data owner wishes to exercise any of these rights, they can contact us through our communication channels:

E-mail: sgpi@daten.com.br ;

Call: (73) 3222-6225;

Or contact us through our data subject support channel, available at: www.daten.com.br/suporte-lgpd.

16.7 Cookies Policy

Cookies are small text files placed on your device to collect standard internet log data and visitor behavior information. When you visit our websites, we may automatically collect information from you through cookies or similar technologies.

We use cookies to personalize content and ads, to provide social media features, and to analyze our traffic. We also share information about your use of our site with our social media, advertising, and analytics partners, who may combine it with other information that you've provided to them or that they've collected through their services.

Cookies are used to improve the user experience, making navigation more efficient. According to the law, we can store cookies on your device if they are strictly necessary for the functioning of the website. For other types of cookies, your consent is required. Our website uses different types of cookies, some of which are set by external services that appear on our pages.

You can at any time change or withdraw your consent via the Cookie Declaration on our website.

Learn more about who we are, how to contact us and how we process your personal data in our privacy policy. When contacting us regarding your consent, please provide your consent ID and date.

Essential cookies make the website functional by enabling basic functions like navigation and access to secure areas of the website. Without these cookies, the website may not function properly.

16.7.1 Method of using cookies

Daten uses cookies in a variety of ways to improve your experience on our website, including:

- Keep data owner logged in;
- Understand how the data owner uses our website;
- Store users' login and password, addresses or credit cards so that they do not need to provide them every time they access the website.

16.7.2 Types of cookies used

There are several different types of cookies, however our website uses:

- **Necessary** – These are essential for the website to function; without them, the website will not function properly. (Ex.: access to secure areas of the website, security, legislation).
- **Marketing** – Marketing or advertising cookies track visitors' browsing and collect data so that the company can create relevant advertisements based on such behavior.
- **Performance** – Allows the website to behave according to the visitor, adjusting to their location, preferred language, etc.
- **Statistics** – Statistics or Analytics cookies translate visitor interactions into detailed behavior reports in an anonymized manner.
- **Functional** – Adjust the website to third-party services, such as links to your social media profile, comments, chats, etc.

16.7.3 Cookie management

The data owner can configure his/her browser not to accept cookies. However, in some cases, some of the features of our website may not work as expected.

16.8 Encryption Policy:

DATEN's encryption policy comprises cryptographic controls which will be used to ensure, among others:

- The confidentiality, integrity and authenticity of sensitive or critical information that is stored or undergoing electronic transmission;
 - Non-repudiation: will prove the occurrence of an alleged event or action and its originating entities, in order to resolve disputes about the occurrence, non-occurrence or action of the entities involved in the event.
 - Authentication: confirming the identity of users or automated systems.
- a) The choice of types, quality and strength of algorithms, as well as the definition of what type of cryptographic control is appropriate for each purpose and business process, will be

based, whenever possible, on the result of the information security risk management process, see inventory and asset map;

- b) It is prohibited to implement cryptographic controls not approved by DATEN's IT department or to use them in a way that is different from the objectives of this policy;
- c) Network login/password traffic, during user authentication, and information classified as restricted between the layers involved in the systems or services made available by Daten must be protected using encryption mechanisms such as HTTPS, SSL, TLS and VPN.

Digital certificates for internal use

In addition to the digital certificates valid in ICP-BRASIL , digital certificates signed by a root certification authority created by DATEN's IT department may be used, provided that they are used to identify a server/application (computer or software) for internal use or to replace user credentials based on login and password and used only in DATEN's internal systems;

Within the limits of the law, the use of digital certificates in network devices may be approved , with the aim of intercepting, for the purpose of filtering, previously encrypted content that may be considered inappropriate, improper or malicious.

Responsibilities

- a) It is the responsibility of DATEN's IT department
 - Create and maintain certification procedures and control the infrastructure of digital certificates for internal use;
 - Approval of cryptographic resources for use in DATEN;
 - Create, distribute, recover and destroy keys for use in cryptographic resources;
 - Cases not covered by this policy should be forwarded to the IT department;
 - Any omissions will be resolved by the IT department.
- b) Owners and custodians of information assets are responsible for:
 - Properly apply the cryptographic resources identified to protect the information in your custody, in accordance with the provisions of this policy;

16.9 Clean Desk Policy and Clean Screen

To reduce the risks of unauthorized access, loss of information or damage to information during and outside of business hours, Daten considers adopting a “clean desk” policy, aiming

to safeguard information contained in documents and/or printed materials during the employee's absence from his/her location and/or workstation.

The policy should consider the information security classifications, the corresponding risks and the cultural aspects of the organization. Information left on work desks is likely to be damaged or destroyed in a number of ways.

The goal of a “clean desk” policy is to establish guidelines that reduce the risk of a security breach, fraud, and information theft caused by documents being left unattended on company premises. A clean desk and clear screen policy reduces the risk of unauthorized access, loss, and damage to information during and outside of normal business hours.

16.9.1 What Should Be Considered?

- Papers (reports) should be stored in locked cabinets and/or other forms of secure furniture when not in use, especially outside office hours;
- Personal computers and printers should not be left “logged in” when there is no user present and should be protected by passwords and other controls when not in use;
- Photocopiers must be protected against unauthorized use, both during and outside business hours;
- Sensitive or confidential information, when printed, must be removed from the printer immediately;
- Maintain a “clean desk” policy by removing papers, notes, and reminders from your desk;
- At the end of the day, or in the case of a prolonged absence, clean your desk;
- Do not leave papers, books or any information on your desk when you are not there;
- Store confidential information in an appropriate location (away from prying eyes);
- Use a screen saver that requires a password for access;
- Your organization's information is your responsibility! (Even in your home!);
- Ensure that all important documents, in the event of an evacuation, are in a strategically protected location which will facilitate recovery;
- Leave all documents properly stored/organized at the end of the working day;
- Documents containing customer information must be locked in drawers or cabinets;
- Dispose of items relating to internal or external customer information, relevant stakeholders or company property in designated secure locations;
- Always clean your work area before going home, ensuring proper organization of the items/objects handled or reminding/noting who you passed them on to to file/save them;

16.10 Privacy policies of other websites

The DATEN website may contain links to third-party websites. Our privacy policy applies only to our website. When accessing other websites, please consult the privacy policy of each one.

16.11 How to contact us

If you have any questions about DATEN TECNOLOGIA's privacy policy, the data we hold about you, or if you wish to exercise any of your data protection rights, please do not hesitate to contact us. Mr. Frederico Santos de Oliveira, Personal Data Protection Officer, together with DATEN's Internal Controls, Digital Compliance and Personal Data Protection Committee, will be available for clarification and technical support. Send us an email to:

sgpi@daten.com.br ;

Call: (73) 3222-6225

Or contact us through our communication channel, available at the link:
<http://www.daten.com.br/suporte-lgpd>.

16.12 How to contact the appropriate authority

If you wish to report a complaint or consider that DATEN TECNOLOGIA has not addressed your concern satisfactorily, please contact ANPD – National Personal Data Protection Authority.

Email: anpd@anpd.gov.br

Address: National Data Protection Authority

Esplanade of Ministries, Block C, 2nd floor, CEP 70297-400 - Brasília – DF.

17 RESPONSIBILITY FOR THE CODE OF CONDUCT AND BUSINESS INTEGRITY

Overall responsibility for DATEN's Code of Business Conduct.

17.1 LEADERS

Each team leader is a representative of DATEN in relation to the professionals he/she leads and has the obligations described below. Suppliers must also have a representative with the following: obligations:

- Know the code in detail, in order to clarify any doubts your team may have. If this is not possible, you should forward the questions to the Compliance Officer;

- Adopt behaviors and attitudes that correspond to those established by the anti-bribery management system, in order to serve as an example;
- Disclose the values and definitions of the code to your team, partners, customers, suppliers and other social segments with whom you maintain contact, guiding them on the expected procedures;
- Identify violations of the code and act to correct and eliminate them, bringing cases to the attention of the Compliance Officer for information and possible additional actions.

17.2 RESPONSIBILITY INDIVIDUAL

Each DATEN professional and each supplier must ensure compliance with the Code of Business Conduct and inform the person responsible for Compliance when they become aware of any violation of the rules.

No one will be punished or retaliated against for making good faith reports of suspected inappropriate behavior or behavior that is contrary to the Code.

Special situations must always be brought to the attention of the Compliance Officer.

18 INTEGRITY AND REPORTING CHANNELS

Any professional and/or supplier who is undecided about how to act or is aware of any illegal act or non-compliance with this code of conduct or any other SGAS document, suffers any form of pressure or illegal request from public agents, must immediately notify the company through the Ethics and Integrity, for the telephone (73) 3222-6225, e-mail compliance@daten.com.br and/or website <http://www.daten.com.br/canal-integridade>.

The Ethics and Integrity channel guarantees absolute confidentiality of identity and information provided. No one will be punished or retaliated against for information provided in good faith about suspected inappropriate behavior or behavior that is contrary to this Code.

19 MEASURES DISCIPLINARY

Full understanding and compliance with the guidelines of the anti-bribery management system (e.g. anti-bribery policy and code of conduct) is a fundamental condition for the professional and supplier to remain on DATEN's staff. Failure to comply with the principles and commitments expressed in this document will be treated as a matter of extreme seriousness and may result in:

FOR INTERNAL STAKEHOLDERS

Adoption of disciplinary measures, which may include warning, suspension, cancellation of variable remuneration and even dismissal for just cause, according to the level and nature of the infraction, as well as in accordance with applicable laws, without prejudice to civil, criminal and/or administrative liability. applicable.

FOR EXTERNAL STAKEHOLDERS

Termination of the commercial relationship, without prejudice to applicable civil, criminal and/or administrative liability.