
*CODE OF CONDUCT ON ANTI-
BRIBERY COMPLIANCE AND
INFORMATION PRIVACY*

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TECHNOLOGY AND TRANSPARENCY

DATEN TECNOLOGIA, in a constant process of evolution, presents society with 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

CONTROL OF DOCUMENT REVIEWS

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 reporting channel number
04	09/30/2021	Inclusion of item 17 - General conduct of the relationship, digital compliance and protection of personal data.
05	12/22/2021	General review of the document – adjustments to items 17.2, 17.3, 17.5, 17.9.2, 17.8, 17.9.4.
06	03/29/2023	Inclusion of values in item 6.3 regarding sustainability, ethics and transparency.
07	09/29/2023	Update of mission, vision and values

1 WHAT IS THIS CODE OF BUSINESS CONDUCT

DATEN TECNOLOGIA LTDA, a company manufacturing, selling, leasing and technical assistance for microcomputers – Stations, Servers and Notebooks and computer equipment, implements through this, 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, obeying internal regulations and standards.

2 OBJECTIVES OF THE CODE OF BUSINESS CONDUCT

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

- Make business 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 in a correct, fair and respectful manner in relation to the community and the environment.

3 TO WHOM DOES THIS CODE APPLY?

The Code of Business Conduct applies to all professionals who work 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.

CONDUCT

Behavior, collective moral procedure.

CODE

Set of rules, laws or norms.

ETHIC

Set of customs, habits and individual behaviors.

SUPPLIERS

Business partners, individuals and legal entities with whom DATEN works are considered suppliers. relates through purchases of services or products.

CODE OF BUSINESS CONDUCT

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

PROFESSIONALS

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

VALUES

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

5 VALUES OF DATEN TECNOLOGIA LTDA

DATEN follows permanent values, originating from its history and practice:

RESPECT FOR PEOPLE AND THE ENVIRONMENT

Always act correctly and fairly in relation to partners, professionals, customers, suppliers, governments, local communities and society in general. Act responsibly in relation to the environment.

RESPONSIBLE ACTION

Comply with legislation wherever we operate, acting with integrity. Respect diversity in accordance with universal standards of good human coexistence, without discrimination based on race, sex, creed, religion, position, function etc.

TRANSPARENCY

Provide clear and comprehensive information about DATEN's activities, achievements, policies and performance, in a systematic and accessible manner, committing to follow the requirements established in the general data protection law.

FOCUS ON THE RESULT

Always seek to maximize DATEN's performance, as a way of guaranteeing its longevity, investments, return to partners and adequate conditions for professionals.

6 DATEN MISSION AND COMPETENCIES BEHAVIORAL

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

6.1 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 more than two decades of experience, we are committed to satisfying our

customers with innovative products that improve their efficiency, ensuring our success in all spheres.

6.2 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 across the country. Thus defining new standards of operational excellence and beneficial impact.

6.3 Values

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

7 CODE IN CONDUCT BUSINESS AND /OR RESPONSIBLE FOR COMPLIANCE

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

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

8 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 work.

Whenever you are unsure about how to act, consult this Code of Business Conduct. If you have any questions, consult the company's Compliance officer or contact us via the integrity channel, website: <http://www.daten.com.br/canal-integrity>, email compliance@daten.com.br or telephone (73) 3222-6225.

9 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 in 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 diversities, 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 related to gender, age, religion, opinion politics, sexual orientation, physical, psychological and mental condition

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

Discriminatory practices against any professional or job candidate are not tolerated. Therefore, DATEN will only decline a candidate for any type of position if there really is strong evidence that the hire has characteristics and/or interests that are unrelated to them, those ones solely linked to their professional competence and expertise, as well as their imminent contribution to the organization's growth.

Retaliation, discrimination or disciplinary action by DATEN will not be permitted for those who refuse to participate in or decline any activity for 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 a favorable internal environment for 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 carried out by professionals, on the organization's premises or in the exercise of their function, whether against co-workers or people who are not directly linked to the company (clients, suppliers, consumers, authorities, community members, etc.) will be punished in accordance with legislation and internal regulations.

If you are the victim of any embarrassment of this type or know of someone who has been through this situation, inform your immediate superior or the Human Resources department or visit our integrity channel.

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

9.1 Fundamental Rights of the Professional

Every professional, regardless of their function, position, position 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 subject to permanent attention and must ensure that professionals have the lowest possible risk when carrying out their duties. functions.

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

9.2 Personal conduct of professional

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 person responsible for compliance.

Do not accept a position or role in other companies or entities at times that conflict with the company's working hours. Teaching activities can be accepted outside of working hours, but must be agreed with your leadership. Exceptions can only be admitted 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.

Recommending relatives and friends for existing vacancies at DATEN is a traditional practice. It is up to the responsible areas, together with human resources, to decide on the selection and hiring, and pressure to influence the admission, promotion or dismissal of professionals is not permissible. linked by degree of kinship, friendship or any other type of relationship that is not professional.

Direct subordination of relatives will not be permitted.

9.2.1 Social responsibility

DATEN TECNOLOGIA respects and values social and cultural diversities, following individual differences, combating all forms of discrimination, encouraging equal treatment and without prejudice of social, cultural and ethnic origin and/or related to 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 equity and respect for diversity in their internal and external relationships, promoting, together, the adoption of social responsibility standards compatible with those assumed in this code of conduct and business integrity.

DATEN reserves the right not to agree with personal opinions related to the topics described above, issued on social networks or any other form of communication, by employees or partners, with these having full responsibility for the consequences of these opinions. It also advises those who wish to provide their personal opinions on these topics to do so by completely unlinking the image from DATEN and requesting that those who do so remove any reference to DATEN from their social networks.

9.3 CONDUCT IN RELATION TO GIFTS

9.3.1 DATEN internal rewards

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

9.3.2 Rewards provided by DATEN, but 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.

9.3.3 Gifts

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

Invitations to events and travel must be communicated to the Compliance Officer through the respective manager. The evaluation will be individual and the approval of each professional's expenses must be carried out, at least, by their superior.

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

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

CUSTOMER SERVICE

always serving customers and consumers with efficiency, speed, education and transparency. When the customer or consumer cannot be served, this must be said clearly, explaining the reasons clearly and clearly. respectful.

QUALITY AND COMPLIANCE

Only products or services that comply with legislation and sector 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 market development on a sustainable basis. No customer can be forced to accept conditions that contradict these rules to purchase the company's products or services.

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

PURCHASES AND CONTRACTS

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

10 GENERAL CONDUCT OF DATEN IN RELATION TO YOUR SUPPLIERS

DATEN believes in solid relationships with its suppliers. To this end, it is essential that suppliers know and act in accordance with the legislation and this Code, being responsible for disseminating, monitoring and ensuring compliance with this Code in all its activities. activities.

10.1 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.

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

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

11 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 relating 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 press or to induce it to publish untrue facts.

DATEN considers the role of the press to be important in shaping the organization's image in the public eye and seeks to provide information or respond to requests, when they are relevant, considering the right not to speak out on issues that contradict their interests or to maintain confidentiality regarding information considered strategic.

Only professionals and suppliers appointed to play the role of 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 a media outlet, inform your superior or the Compliance Officer.

DATEN has an internal and external communication procedure to deal with relevant information with its interested parties. Everyone involved must comply with the established standard for communicating.

12 CONDUCT TOWARDS THE COMPANY AND ITS ITS ASSETS

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 goes for the assets of customers, suppliers and partners used in the company's activities. These goods and assets must not be used for personal benefit, except when expressly authorized.

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

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

ACCOUNTING AND OTHER RECORDS

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

PRIVILEGED INFORMATION

The professional and supplier who becomes aware of information that is not public has the duty to keep it confidential, even after leaving the company or ending the contractual relationship. The use of privileged information for personal benefit or that of third parties is a crime, subject to labor, civil and penalties.

COMPANY WORKPAPERS AND 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 is fired or the contract is terminated.

AIRLINE TICKETS

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

13 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-PARTY ACTIVITIES

DATEN does not carry out 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, funding or involvement from other professionals or business units with any candidate or party. Political activities carried out by professionals must take place outside the work environment and working hours. office hour.

UNION ACTIVITIES

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

ENVIRONMENT

All company activities must be carried out in compliance with legislation and environmental 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 the communities in which it operates.

14 CONDUCT IN RELATIONSHIP A ASSOCIATIONS PROFESSIONALS, BUSINESSES AND ENTITIES

DATEN's philosophy is to participate in entities and associations representing its sectors of activity, as long as this participation contributes to the development of the sector and does not imply infringements of the rules and principles of free competition. The form of participation must be defined case by case by the Board, 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.

15 VOLUNTEERING AND RESPONSIBILITY SOCIAL

These activities are considered part of the responsibility towards the community where it operates, and must be structured and organized in order to obtain the maximum possible social return in relation to the resources used and the time of the professionals involved.

16 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 harmful acts against the public property of any country. It is the duty of each and every DATEN professional and all suppliers to base their activities and relationships with public bodies and agents within the strictest legality and morality.

DATEN does not tolerate practices that involve any undue advantage to/or a public agent, fraud in contracts and/or bidding procedures, Manipulation of the economic-financial balance of contracts, impediment or obstruction of investigative or supervisory activity of public bodies, with the obligation of the DATEN professional and suppliers, who are aware of such attitudes, to report them to the person responsible for Compliance and/or the channel integrity, by telephone (73) 3222-6225, website <http://www.daten.com.br/canal-integridade> or email compliance@daten.com.br.

DATEN's philosophy is to strictly comply 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 by the competent authorities.

17 GENERAL RELATIONSHIP CONDUCT, DIGITAL COMPLIANCE AND PROTECTION OF PERSONAL DATA

17.1 Information Privacy Policy

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

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

- Protect relevant data and information;
- Provide information security and privacy to interested party data;
- Carry out consistent communication and information with interested parties;
- Continuously improve;
- Compliance with legal, regulatory and statutory requirements.

17.2 Declaration of Legitimate Interest

Daten Tecnologia declares that for the purposes of using the Personal Data of its interested parties, it complies with the General Data Protection Law and uses Personal Data legitimately to carry out its business scope in the following processes and for the following purposes:

1. **Human Resources** - System registration of selection, admission, dismissal and employee training activities;
2. **Integrated Management System** – Carrying out retail customer satisfaction surveys, applying the confidentiality agreement, carrying out Due Diligence on employees and suppliers, in addition to control, management and monitoring during the continuous improvement of Daten management systems;

3. **Commercial bidding** – For participation in bidding processes, registration data such as name, CPF and address are collected when necessary for signing contracts and Minutes;
4. **Commercial retail** - For issuing the invoice and delivering the product to the customer;
5. **Website/E-Commerce** – Use of cookies to improve the user experience and collect data to carry out purchases made on the website;
6. **Shipping/RMA** - To check and validate shipping actions, access to the name, address and order details and invoice is necessary to effectively deliver the product to the customer;
7. **Marketing** - Basic customer registration to maintain contact, control and payment methods through the card administrator Gateway;
8. **Stock** - For the requested parts to be delivered to the current address of the assistance, if they have not updated their address with SIGEP or SEFAZ after changing address;
9. **Logistics** - Reports for decision making (Business Opportunities), and overview of freight costs spent by the company during the month and year;
10. **Purchases** – To carry out registration, qualification, due diligence, evaluation and payments of individual suppliers and those who provide digital services and products;
11. **Billing/Accounts payable and receivable** - To carry out registration, collection, payments and financial consolidations with interested parties;
12. **Personnel Department** – Calculation of payroll, granting of benefits, vacations, overtime, time bank, termination;
13. **Call Center** – To carry out warranty Service Order openings.

17.3 Types of data collected

Daten collects the following data:

- Full name;
- Number and image of the Individual Taxpayer Registry (CPF);
- Identity Card (RG) number and image;
- Admission, periodic and dismissal medical examinations;
- Number and image of the National Driving License (CNH);
- Telephone number, WhatsApp and email addresses;
- Proof of full address;
- Marital status;
- Union data.

17.3.1 The method used to collect data

Data owner directly provides Daten Tecnologia with most of the data we collect. We collect data and process data when the data owner:

- Register online or place an order for any of our products or services;
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email;
- Use or view our website through your browser's cookies;
- During the internal process of selecting and hiring employees and/or suppliers;
- Still in the relationship with our suppliers and partners, there is the possibility of collecting business information and personal data, all controlled and managed by the declaration of legitimate interest.

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

- SESI/Senai/
- I EL/CIEE
- Occupational Medicine

17.3.2 How data is used

Daten technology 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 owner might like.
- Conduct customer satisfaction surveys.
- Registration of employees and suppliers in the system.

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

- SHIP

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

17.3.3 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, ID, for an indefinite period (deletion may be carried out if the holder requests it and provides legal justification).

17.4 Marketing

Daten sends information about activities, processes, products and services that we think it believes will be of interest to the data owner, with due consent, as well as those of our partner companies, if you have a partner company .

- SHIP

If data owner has agreed to receive marketing, data owner can always opt out at a later date.

Data owner has the right, at any time, to prevent Daten from contacting the data owner for marketing purposes or providing their data to other members of the Daten Group.

If the data owner no longer wishes to be contacted for marketing purposes, they can unsubscribe using the link available at the end of the marketing emails.

17.5 The data protection rights of the owner

Daten ensures that data owners are fully aware of all their data protection rights. Every user is entitled to the following:

The right of access - Data owner has the right to ask Daten for copies of their personal data.

The right to rectification - Data owner has the right to request that Daten correct any information that it considers inaccurate. Data owner also has the right to request Daten to complete information that data owner believes is incomplete.

The right to erasure - Data owner has the right to request that Daten erase their personal data, under certain conditions.

The right to restrict processing - Data owner has the right to request that Daten restrict the processing of their personal data, under certain conditions.

The right to object to processing - Data owner has the right to object to the processing of their personal data by Daten, under certain conditions.

The right to data portability - Data owner has the right to request that Daten transfer the data we collect to another organization, or directly to the data owner, under certain conditions.

If a data owner makes a request, we have 5 (five) business days to respond to the data owner. If the data owner wishes to exercise any of these rights, please contact us on our communication channels:

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

Call: (73) 3222-6225;

Or write to us through our integrity channel available at the link: www.daten.com.br/canal-integridade.

17.6 Cookies Policy

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When a data owner visits our websites, we may collect information from you automatically through cookies or similar technology.

For more information, see our cookie policy:

We use cookies to personalize content and ads, provide social media features and 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 from your use of their services.

Cookies are small text files that can be used by websites to make the user experience more efficient.

The law says we can store cookies on your device if they are strictly necessary for the functioning of this website. For all other types of cookies we need your permission.

This website uses different types of cookies. Some cookies are placed by independent services that appear on our pages.

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

Find out more about who we are, how you can contact us and how we process personal data in our privacy policy.

Please indicate your Consent ID and date when you contact us regarding your consent.

Necessary cookies help make a website useful by enabling basic functions such as navigation and page access to secure areas of the website. The website may not function properly without these cookies.

NAME	SUPPLIER	GOAL	VALIDITY	TYPE
rc :: a	Google	This cookies is used I'm distinguish between humans beneficial for the website, in order I'm makeup valid reports	Persistent	HTML

		on the use of their website.		
rc :: c	Google	This cookies is used to distinguish between humans and bots.	Session	HTML
CookiesConsent	Cookiebot	Stores the user's cookies consent state for the current domain	1 year	HTTP
Language	www.navegamer.com	Saves the user's preferred Language on the website.	29 days	HTTP
PHPSESSID	www.navegamer.com	Preserves user Session state across page requests.	Session	HTTP

17.6.1 Method of using cookies

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

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

17.6.2 Types of cookies used

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

- **Necessary** – They are essential for the website to function, without them the website will not function properly. (E.g.: 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** – They allow 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.

17.6.3 Cookie management

The data owner can configure their browser not to accept cookies. However, in some cases, some of our website's features may not function as a result.

17.7 Password policy and access controls:

This policy applies to all Daten Tecnologia employees, whether they are: employees, interns, minor apprentices, outsourced workers or individuals who directly or indirectly use or support Daten's systems, infrastructure or information. All these employees will be treated in this policy as users.

Other people, accessing, for example: electronic mail, network, computer and systems accounts; improper websites or Daten's privileged information, as if it were the owner.

Normally used passwords

- a) The user is solely responsible for the use of their access credentials. Considering that the password is the main authentication tool, it must be individual, non-transferable and kept secret, and the user is responsible for any transaction carried out during its use;
- b) Passwords must not be transmitted in email messages or other forms of electronic communication that do not have encryption control;
- c) The systems, services and devices of Daten's technological environment must be configured so that strong password standards are required when created, according to the recommendations below:
 - I. Have at least 6 (six) characters;
 - II. Have numeric and alphabetic characters;
 - III. There must be no repetition of letters or numbers in the password definition, that is, 3 (three) or more identical characters sequenced (ex : 111aaabbb);
 - IV. Password entries must be masked on the screen, stored and transmitted in an encrypted form, through the system or application;
 - V. After 5 (five) wrong attempts to enter a password, the user's account must be blocked. Unlocking requests must be made directly with the IT team responsible for system support, who will follow a user information validation procedure to carry out the unlocking;
- d) Access requests must be made through the immediate manager of the IT team, via email;
- e) Requests to recover passwords, due to forgotten or other reasons, must be made directly

with the IT team responsible for system support and will follow a user information validation procedure to make the initial passwords available;

- f) Initial passwords must be provided directly to users and configured so that the change request occurs automatically upon first access.

Privileged use passwords

- a) All privileged accounts (e.g. administrator, sa , root, etc.) must have their passwords changed or disabled in case of user termination;
- b) Privileged access, for security reasons, must be carried out by a minimum number of users, who will have administrator profiles and access authorization for these functionalities;
- c) If privileged accounts cannot be renamed, they will be disabled and considered “service accounts” and will not be used for any type of access;
- d) Passwords must not be entered into open command lines (source code), but, if necessary, they must be encrypted and considered “service accounts”.

Good practices for creating passwords

- a) Avoid using:
 - Names, surnames, data user account names of family members;
 - Document or telephone numbers;
 - License plate;
 - Birthdays, holidays, etc .;
 - Keyboard sequence
- b) Use:
 - Random numbers;
 - Various and different types of characters;
 - Special characters;
 - Replace a letter with a number with visual similarity;
 - Long sentence with letters and numbers;
 - The first, second or last letter of a sentence including numbers

17.8 Encryption Policy:

Daten Tecnologia'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 in the process of electronic transmission;
 - Non-repudiation: will prove the occurrence of an alleged event or action and its originating entities, in order to resolve disputes about 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 which type of cryptographic control is appropriate for each purpose and business process, will be based, whenever possible, on the result of the security risk management process. information, see inventory and asset map;
 - b) It is prohibited to implement cryptographic controls not approved by Daten's IT sector or to use them in ways other than 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 provided by Daten must be protected with the use of encryption mechanisms such as HTTPS, SSL, TLS and VPN .

Digital certificates for internal use

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

Respecting the limits of the law, the use of digital certificates on network devices may be approved, aiming to intercept, for the purpose of filtering, previously encrypted content that may be considered inappropriate, inappropriate or malicious.

Responsibilities

- a) It is the responsibility of Daten's IT sector
 - 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 must be forwarded to the IT sector;
 - Any omitted cases will be resolved by the IT sector.

- b) The owners and custodians of information assets are responsible for:
- Appropriately apply the cryptographic resources identified to protect the information in its custody, in accordance with the determinations of this policy;

17.9 Mobile Device Policy

17.9.1 Users with corporate mobile devices

- Procedures must be established for granting mobile devices, even if temporary, covering terms of use and responsibility for use;
- Corporate mobile devices must be granted by DATEN in accordance with the functional needs of the work, in accordance with the Asset Management Policy;
- All mobile devices made available by DATEN must be registered and configured with unique identification, minimum security standards and user responsible for use, in order to be approved and incorporated into the corporate network;
- Mobile devices made available by DATEN must be linked to the sector and be used solely and exclusively by users who have assumed responsibility for their use, in accordance with the procedure for granting mobile devices;
- Users should not be allowed to install applications or change security settings when their device is a notebook.
- Employees who receive and use corporate mobile devices will not be permitted to use these devices on a personal basis. There is no expectation of privacy and the content (information and data) of the device may be monitored and inspected by Daten at any time.

17.9.2 User with private mobile devices (BYOD)

- The use of BYOD mobile devices must be formalized by the immediate manager, through a call with IT and the Data Protection Officer, informing which resources or corporate data the device will have access to on DATEN's corporate network;
- Every BYOD mobile device incorporated into DATEN must have the same configuration and security standards established in the Asset Management process, as well as comply with the Asset Management Policy in order to be approved;
- Corporate licenses on BYOD mobile devices will be restricted to some tactical and strategic functions and positions, subject to approval by Senior Management;
- Only BYOD mobile devices approved by DATEN's information technology area will be able to access the corporate data network;

- DATEN's information technology area is responsible for managing BYOD mobile devices, including monitoring and control;
- DATEN will not be responsible for refunds or percentages of the BYOD mobile device, in cases of theft, damage, theft, misuse and similar conduct.

17.9.3 Visitors with mobile devices

- Non-approved mobile devices will only be able to access the visitor network;
- The procedure for granting and controlling access to visitors who, while staying at DATEN facilities, need to connect their mobile devices to the internet must be observed;
- Granting access to the visitor network must be associated with awareness of the internal rules for using the network.

17.9.4 Removable mobile storage devices

It is only possible to use removable mobile devices, such as pen drives and external hard drives, to store or copy information classified as confidential, with prior authorization from the IT team. Authorized pen drives will be controlled through an authorization list which will also make the managing deadlines for antivirus tests on all authorized devices.

17.9.5 User Acceptable Use

Users are responsible for keeping their access credentials to the corporate mobile device or BYOD confidential, as established in the Access Control and Password Usage Policies.

17.9.6 Good habits

- Whenever possible, the use of public networks should be avoided;
- It is recommended to keep communication connections, such as Bluetooth and infrared, disabled and only enable them when necessary;
- When traveling with mobile devices, it is suggested that they are properly protected, stored in safe or non-exposed places, such as, for example, in the trunk of the car;
- In airports or taxis, it is recommended that mobile devices are always under your sight and custody.

17.9.7 Adaptation to the Policy

- New projects or new acquisitions must follow the standards established in this policy;

- Implementations for the existing technological environment must be adapted to this policy within 2 (two) years, from its publication;
- If it is not possible to adapt the technical resource or process, the DATEN IT committee must document this information, as well as its reasons, for audit purposes.

17.10 Clean Desk and Clean Canvas Policy

To reduce the risks of unauthorized access, loss of information or damage to information during and outside office hours, Daten considers the adoption of a “clean desk” policy, aiming to protect information contained in documents and/or printed matter during the employee's absence from his/her location and/or workstation.

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

The purpose of the “clean desk” policy is to set 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 clean screen policy reduces the risk of unauthorized access, loss and damage to information during and outside normal working hours.

17.10.1 What Should Be Considered?

- Papers (reports) must be stored in locked cabinets and/or other forms of security furniture when not in use, especially outside office hours;
- Personal computers and printers should not be left “logged in” when there is no user there and should be protected by passwords and other controls when not in use;
- Photocopiers must be protected against unauthorized use, during and outside office 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 prolonged absence, clean the work table;
- 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 to 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, at the end of the work day, properly stored/organized;
- Documents containing customer information must be locked in drawers or cabinets;
- Dispose of items pertaining to internal customer, external customer, relevant stakeholder or company-owned information in designated secure locations;
- Always clean your work area before going home, ensuring adequate organization of the items/objects handled or remembering/noting down who you sent them to file/store;

17.11 Privacy policies of other sites

The Daten website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, please read their privacy policy.

17.12 Changes to our information security and privacy policy

Daten keeps its privacy policy under regular review and places any updates in this Guide and also on our web page. This privacy policy was last updated on July 26, 2021.

17.13 How to contact us

If you have any questions about Daten's privacy policy, the data we hold about you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us. Miss. Sandy Santana, responsible for personal data protection and compliance officer, and the internal controls, digital compliance and personal data protection committee at Daten Tecnologia will be available for clarifications and technical support.

Send us an email to: sgpi@daten.com.br ;

Call us: (73) 3222-6225

Or write to us through our integrity channel available at the link: <http://www.daten.com.br/canal-integridade>

17.14 How to contact the appropriate authority

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

Email: anpd@anpd.gov.br

Address: National Data Protection Authority

Esplanada dos Ministérios, Block C, 2nd floor, CEP 70297-400 - Brasília – DF.

18 RESPONSIBILITY FOR THE CODE OF CONDUCT AND BUSINESS INTEGRITY

Overall responsibility for the DATEN Code of Business Conduct.

18.1 LEADERS

Each team leader is a representative of DATEN in relation to the professionals they lead 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 your team's doubts. If this is not possible, you must 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 have 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.

18.2 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 for reporting in good faith about suspected inappropriate behavior or behavior that is contrary to the Code.

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

19 INTEGRITY AND REPORTING CHANNELS

Any professional and/or supplier who is undecided on 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 illicit request from public agents, must immediately notify the company through the channel Ethics and Integrity, for the telephone (73) 3222-6225 , email compliance@daten.com.br and/or website <http://www.daten.com.br/canal-integridade>.

The Ethics and Integrity channel guarantees absolute confidentiality of the identity and confidentiality of the 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.

20 MEASUREMENTS SUBJECTS

Full understanding and compliance with the guidelines of the anti-bribery management system (for example, 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 liability, criminal and/or administrative applicable.

FOR EXTERNAL STAKEHOLDERS

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