
*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, employees, partners, suppliers and other stakeholders.

A great read,

Silvio Comin

Industrial Director

DOCUMENT REVISION CONTROL

00	17/11/2019	Initial Issue
01	30/01/2020	Inclusion of item 7.2 of the standard in item 9 of this document regarding retaliation, discrimination, and disciplinary actions.
02	24/11/2020	General revision of the document and inclusion of item 9.2.1
03	31/08/2021	Review of the whistleblowing hotline number
04	30/09/2021	Inclusion of item 17 - General conduct of the relationship, digital compliance and protection of personal data.
05	22/12/2021	General revision of the document – adjustments to items 17.2, 17.3, 17.5, 17.9.2, 17.8, 17.9.4.
06	29/03/2023	Inclusion of the values in item 6.3 regarding sustainability, ethics, and transparency.
07	29/09/2023	Mission, vision and values update
08	25/09/2024	General review of the code of conduct – main adjustments to item 17 – General conduct of the relationship, 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.
10	30/12/2025	Revision of the Code of Conduct to align with the new SGPI Policy and ISO/IEC 27001:2022; inclusion of requirement 16.11 on the use of security cameras and image retention time; inclusion of requirement 16.12 on confidentiality, protection and privacy of information; renumbering of the other items; inclusion of guidelines on the acceptance of gifts in item 8.3.3, considering that what characterizes it is the intention, not the value; and inclusion of requirements 17.3, on collective responsibility, and 19.1, on disciplinary measures.

1 WHAT IS THIS CORPORATE CODE OF CONDUCT?

DATEN TECNOLOGIA LTDA, a company that manufactures, sells, rents, and provides technical assistance for microcomputers – workstations, servers, and notebooks – and computer equipment, hereby implements requirements to enhance the integrity of its business conduct.

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

All individuals must act correctly, with integrity and efficiency in the pursuit of results, embodying the values expressed in this code, and adhering to internal regulations and standards.

2 OBJECTIVES OF THE CORPORATE CODE OF CONDUCT

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

- Clearly communicate company values so that all professionals, suppliers, and other stakeholders can understand, respect, and practice them.
- To serve as an individual and collective reference for the attitudes and behavior of each stakeholder.
- To contribute to ensuring that these values are respected in all locations and that their professionals, suppliers, and other stakeholders act in a correct, fair, and respectful manner towards the community and the environment.

3 TO WHOM DOES THIS CODE APPLY? APPLY

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

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

4 TERMS AND EXPRESSIONS EMPLOYEES

DATEN OR COMPANY

This refers to DATEN TECNOLOGIA LTDA and the activities it carries out.

CONDUCT

Behavior, collective moral procedure.

CODE

A set of rules, laws, or norms.

ETHICS

A set of individual customs, habits, and behaviors.

SUPPLIERS

Suppliers are considered to be business partners, both individuals and legal entities, with whom DATEN interacts. It relates through purchases, whether of services or products.

Business Code of Conduct

Standards 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, role, activity, or length of service.

VALUES

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

5 DATEN'S MISSION, VISION AND VALUES

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

5.1 Mission

Our mission is to be the driving force behind technological progress, providing high-quality IT solutions grounded in best practices in manufacturing, social well-being, environment, security, anti-bribery compliance, and digital technology. 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 behind technological innovation and inspiring digital transformations across the country. In doing so, we define 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 PERSON RESPONSIBLE FOR COMPLIANCE

The Business Code of Conduct is an important step towards consolidating... values and from the ethics business and he was established the depart from the experience and based on extensive discussion among 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 stakeholders.

7 HOW TO ACT IN DIFFERENT SITUATIONS 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 how to proceed, 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 DA 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, its retention, and its growth. For this reason, it seeks to select, hire, and retain efficient and talented people and continuously invests in their development. In addition to respecting and valuing social and cultural diversity while respecting individual differences, combating all forms of discrimination, and providing all people with equal treatment without prejudice based on social origin, culture, ethnicity, gender, age, religion, political opinion, sexual orientation, or physical, psychological, or 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 applicant are not tolerated. Therefore, DATEN will only decline a candidate for any type of position if there is strong evidence that the hiring process involves characteristics and/or interests that are contrary to the company's principles. those ones solely linked to their professional competence and expertise, as well as their imminent contribution to the organization's growth.

No retaliation, discrimination, or disciplinary action will be permitted by DATEN against those who refuse to participate in 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, to value and recognize people based on the results achieved, and to 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 conducive 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 performance of their duties, whether against colleagues or individuals not directly affiliated with the company (clients, suppliers, consumers,

authorities, community members, etc.), will be punished in accordance with legislation and internal regulations.

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

Carrying drugs or weapons is strictly prohibited in the workplace and is considered a serious offense, subject to administrative, civil, labor, and criminal penalties.

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 opportunities for personal and professional development within the competitive environment and realities of their unit. work.

Health and safety conditions at work must be the subject of constant attention and must ensure that professionals face the lowest possible risk in the performance of their duties. functions.

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

8.2 Personal conduct of professional

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

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

Do not accept positions or roles in other companies or entities during hours that conflict with your company's work schedule. Teaching activities may be accepted outside of work hours, but must be agreed upon with your supervisor. Exceptions are only permitted... In special cases, these should be recorded in the Human Resources area of the unit.

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

The practice of recommending relatives and friends for existing positions at DATEN is traditional. The responsible departments, along

with human resources, are responsible for deciding on the selection and hiring process; pressure to influence the hiring, promotion, or dismissal of professionals is not permitted. connected by kinship, friendship, or any other type of relationship that is not professional.

Direct subordination of relatives will not be permitted.

8.2.1 Social responsibility

DATEN TECNOLOGIA respects and values social and cultural diversity, respecting individual differences, combating all forms of discrimination, and promoting equal treatment without prejudice based on 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 stakeholders to adopt practices that promote gender and racial equity and respect for diversity in their internal and external relationships, promoting, among them, the adoption of social responsibility standards compatible with those assumed in this code of conduct and corporate 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 completely dissociating themselves from the image of DATEN and requests that those who do so remove any reference to DATEN from their social media.

8.3 CONDUCT IN RELATION TO GIFTS

8.3.1 DATEN internal rewards

The existence of internal events at DATEN TECNOLOGIA LTDA that promote rewards through challenges or raffles voluntarily offered to employees will not be considered gifts in the context of anti-bribery regulations.

8.3.2 Rewards provided by DATEN, but originating from suppliers.

Even if these rewards come from suppliers or other stakeholders, the delivery to professionals will be handled by DATEN and will not constitute a free gift.

8.3.3 Giveaways

The acceptance of gifts and presents should be limited to a value of **R\$ 150.00**, and the professional must inform the **Compliance Officer**. Items that do not meet this definition should be refused. If refusal or return is not possible, gifts and/or presents exceeding the established value limits 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. Evaluation will be individual, and approval of each professional's expenses must be made, at a minimum, by their supervisor.

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

It should be noted that, regardless of the amount involved, the characterization of bribery is related to the intention of offering or receiving an undue advantage, and not only to its monetary value. Situations that could be interpreted as being of such a nature should be promptly rejected. If there is any doubt, the employee should consult the Compliance department before making a decision.

8.4 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 serving its clients and consumers with efficiency, speed, courtesy, and transparency. When a client or consumer

cannot be served, this must be clearly stated, explaining the reasons in an evident and... respectful.

QUALITY AND CONFORMITY

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

COMPETITION AND CONSUMER RIGHTS

DATEN understands that fair competition and respect for consumer rights are factors that promote sustainable market development. No customer may be forced to accept conditions that violate these rules in order to purchase the company's products or services.

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

PURCHASES AND CONTRACTS

Relationships with suppliers and other partners should always be guided by the pursuit of quality and an appropriate cost-benefit ratio. reliability technique and financial, integrity while driving from the negotiation, node what if refers the legislation, to the environment and to the rights commercials, social and contractual. With the With the goal of expanding its sustainable operations, DATEN recommends that its areas of Shopping and Supplies search forms permanent of To influence their suppliers of products, services, and equipment to adopt responsible practices in the social and environmental areas, and to become signatories to this Code of Conduct and Integrity. Business.

9 DATEN'S GENERAL CONDUCT IN IN RELATION TO THEIR SUPPLIERS

DATEN believes in the strength of its relationships with suppliers. To this end, it is fundamental that suppliers understand and act in accordance with the legislation and this

Code, being responsible for disseminating, monitoring, and ensuring compliance with it in all its operations. 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. Forbidden.

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

DATEN periodically conducts assessments and inspections of critical suppliers, including those considered critical in relation to the risk of bribery; for these, a due diligence procedure is also established, when applicable.

10 CONDUCT IN RELATION TO VEHICLES OF COMMUNICATION

DATEN considers the public's right to be informed about matters of public interest, even those related to a private company, to be legitimate, and believes 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 actions of the press or to induce it to disseminate false information.

DATEN considers the role of the press important in shaping the organization's image in the eyes of the public and seeks to provide information or respond to requests when pertinent, respecting the right not to comment on matters that contradict its interests or to maintain confidentiality regarding information considered relevant. strategic.

Only designated professionals and suppliers authorized to act as spokespeople are permitted to speak on behalf of the company. If you are contacted to provide information, write articles, or give interviews... If you make statements on behalf of the company to any media outlet, inform your supervisor or the Compliance Officer.

DATEN has internal and external communication procedures for handling relevant information with its stakeholders. All those involved must adhere to the established communication standards.

11 CONDUCT IN RELATION TO THE COMPANY AND ITS EMPLOYEES GOODS

Each professional and supplier is responsible for the proper use and safekeeping of company assets and property 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 should not be used for personal benefit, except when expressly authorized. authorized.

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

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

ACCOUNTING RECORDS AND OTHERS

Records must be prepared and monitored by both direct supervisors and all area managers, in accordance with legislation, tax regulations, and internal rules. Entries and records must be available to managers, control and audit departments, and authorities. Legal. DATEN has a document matrix and a master record list to manage the organization of your documentation.

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 their contractual relationship. The use of privileged information for personal gain or the benefit of third parties is a crime, subject to labor, civil, and other sanctions. criminal.

Company working papers 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 may not be taken or copied when the professional leaves the company or the contract is terminated.

AIRLINE TICKETS

Airline ticket purchases necessary for company activities will be requested and quoted by the designated department, and cannot be issued in the name of third parties not directly involved in said activity, with justification.

12 CONDUCT IN RELATION TO THE CLOSE COMMUNITY AND TO 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 actively seeks to collaborate in local development, improving quality of life and reducing social problems and inequalities.

CHILD LABOR

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

POLITICAL PARTY ACTIVITIES

DATEN does not engage in political activities, and any professional wishing 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 of other professionals or business units with any candidate or party. Political activities carried out by professionals must occur outside of the work environment and working hours. office hours.

UNION ACTIVITIES

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

ENVIRONMENT

All company activities must be carried out in compliance with environmental laws and regulations, additionally seeking prior assessment of environmental aspects and

impacts, the rational use of natural resources, and the preservation of the environment in which we operate.

RELIGIOUS ENTITIES

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

13 CONDUCT IN RELATIONSHIP THE ASSOCIATIONS PROFESSIONALS, BUSINESSES AND ENTITIES

DATEN's philosophy is to participate in representative entities and associations in 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 should 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 publicly recognized social, cultural, or charitable organizations, undertaken on an individual basis, is seen as an important contribution to society and the country, provided it does not affect their regular work and activities at DATEN.

14 VOLUNTEERING AND RESPONSIBILITY SOCIAL

These activities are considered part of the responsibility to the community where the organization operates, and should 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 officials must be guided by professional and ethical conduct. DATEN repudiates any and all acts that harm the public assets of any country. It is the duty of every DATEN professional and all suppliers to conduct their activities and relationships with public bodies and officials within the strictest legality and morality.

DATEN does not tolerate practices involving any undue advantage to or from public officials, 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, being the obligation of the DATEN professional and suppliers, who have knowledge of such attitudes, to report them to the person responsible for Compliance and/or on 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 based on strict compliance with current legislation and expects the same behavior from its professionals and suppliers.

However, it considers it legitimate to challenge abusive, discriminatory, or incorrect legal or fiscal measures, which will be done through administrative and/or judicial actions in the competent authorities.

16 GENERAL CONDUCT, DIGITAL COMPLIANCE AND INFORMATION PROTECTION

16.1 INFORMATION PRIVACY POLICY

DATEN TECNOLOGIA's Information Protection and Privacy Management System policy, for its activities of manufacturing, marketing, leasing and technical assistance of microcomputers – workstations, servers, notebooks and IT equipment – is to protect and ensure the privacy of internal data and information and that of the respective stakeholders.

The organization is committed to protecting personal data, whether sensitive or not, and information, ensuring the confidentiality, integrity, and availability of information through the control, management, and application of best practices for information protection and privacy, keeping stakeholders informed, communicated with, and involved.

This commitment is supported by the implementation, maintenance, and continuous improvement of the Information Protection and Privacy Management System, focusing on the identification, assessment, and treatment of risks, the prevention of and response to incidents, and the strengthening of information security throughout its scope of operation.

In this context, the organization seeks to:

- Establish and maintain appropriate controls for the protection, privacy, and security of

information;

- To systematically identify, assess, and address information-related risks;
- To prevent, detect, and respond to information security incidents;
- Ensure clear and consistent communication with stakeholders;
- Monitor and fulfill the objectives and goals defined for the protection and privacy of information;
- To ensure compliance with applicable legal, regulatory and statutory requirements, including those inherent to digital law, the Brazilian Civil Rights Framework for the Internet, the General Data Protection Law (LGPD) and ISO/IEC 27001:2022;
- To promote the continuous improvement of processes and controls related to information protection, privacy, and security.

16.2 DEFINITION OF THE CONTROLLER

DATEN TECNOLOGIA is responsible for processing the personal data under its management, acting as a controller, as established by the General Data Protection Law (LGPD). In this role, the company is responsible for defining the purposes and means by which the data will be processed, always in full compliance with applicable legislation.

Furthermore, DATEN is committed to adopting all necessary measures to ensure the protection of personal data under its responsibility, in accordance with the principles and guidelines established by the LGPD (Brazilian General Data Protection Law).

It is important to note that when the processing of personal data is carried out by other companies that assume responsibility for this data, DATEN is not responsible for such operations. In these cases, the controller must ensure full compliance with the obligations set forth in the LGPD (Brazilian General Data Protection Law), being responsible for the actions and decisions that fall under its purview.

16.3 DECLARATION OF LEGITIMATE INTEREST

DATEN declares that, for the purposes of using the personal data of its stakeholders, in compliance with the LGPD (Brazilian General Data Protection Law), it legitimately uses this data for the execution of its business scope in the following processes and for the following purposes:

1. **Human Resources** - Registration of activities related to the selection, hiring, termination, training, and competencies of employees for the compilation of their personnel file;
2. **Integrated Management System** – Conducting customer satisfaction surveys for the retail sector, applying confidentiality agreements, performing due diligence on employees and

suppliers, as well as controlling, managing, and monitoring the continuous improvement of DATEN's management systems, both internal and external.

3. **Commercial Bidding** – For participation in bidding processes, registration data such as name, CPF (Brazilian tax identification number), 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 sales orders, issuing invoices, and delivering products to the customer;
5. **PDI / Projects** – Accountability to governmental 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** - For verification and validation of shipping actions, shipment registration requires access to the name, address, order details, and invoice for effective product identification and delivery to the customer, invoicing, opening of warranty service orders, sending materials to technical assistance, and sending materials for transfer between warehouses.
8. **Marketing** - Basic customer registration to maintain contact methods, control, and payment methods through a card administrator gateway; Collection of information via cookies and social media management.
9. **Inventory** - To ensure that the requested parts are delivered to the current address of the service centers, in case they have not updated their address with SIGEP or SEFAZ after changing address;
10. **Production** – Registering customers for sales order placement and creating production orders;
11. **Logistics** - Reports for decision-making (Business Opportunities), and an overview of freight costs incurred by the company during the month and year, and planning for employee transportation on regular and extra days.
12. **Purchasing** – To carry out registration, qualification, due diligence, evaluation and payments to suppliers, individuals and those who provide digital services and products;
13. **Billing / Accounts payable and receivable, Taxation and Accounting** - For registering clients and suppliers, collections, tax calculation, payments and financial consolidations with stakeholders, individuals;
14. **Human Resources/Occupational Health and Safety Department** – Payroll calculation, benefits administration, vacations, overtime, time bank, termination, hiring and payroll

taxes; preparation and completion of documentation related to worker health and safety, including examinations and control of the delivery of protective equipment;

15. Call Center – For initiating warranty service orders during after-sales support;

16. Surveillance / Property Security – Registration and control of physical access for any interested party and control of the entry and exit of materials;

16.4 TYPES OF PERSONAL/SENSITIVE DATA COLLECTED

DATEN collects the following data:

- Full name;
- Taxpayer Identification Number (CPF) and image;
- Identity card number and image;
- Pre-employment, periodic, and termination medical examinations;
- Driver's License number and image;
- Phone numbers, WhatsApp addresses, and email addresses.
- Proof of complete address;
- Marital status;
- Union data;
- Educational documentation;
- Passport

16.4.1 The method used for data collection

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

- You register online or place an order for any of our products or services;
- Voluntarily fill out a satisfaction survey or provide feedback through our communication channels, such as message boards or email;
- You use or view our website through your browser's cookies;
- Participates in the internal process of selecting and hiring employees and/or suppliers;
- Open a ticket in the client's system, integrated with the Daten system, website, or by phone, providing the necessary information;
- Access the organization's facilities in person;

- In our relationships with suppliers and partners, we may collect business information and personal data, all of which are processed in accordance with the declaration of legitimate interest and consent regarding the data provided.

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

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

16.4.2 The way the data is used

DATEN TECNOLOGIA collects stakeholder data so that it can:

- Process orders and manage accounts;
- To send communications, including emails with information about products and services that may be of interest to the data subject;
- Conduct customer satisfaction surveys;
- To register employees and suppliers in their systems;
- Control the entry and exit of visitors to the organization's premises;
- To fulfill other specific purposes related to the organization's activities (NAVE).

If the data owner 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 TECNOLOGIA stores data securely in its systems, cloud environments, and/or on physical media, adopting appropriate measures for its protection.

Personal identification data, such as name, CPF (Brazilian taxpayer ID) and RG (Brazilian national ID), are kept for a maximum period of 15 (fifteen) years, except in cases where the data subject requests deletion, provided that the applicable legal requirements are met.

Data retention may be extended when necessary to fulfill specific purposes, observing the following limits and conditions:

- Compliance with legal obligations: When necessary to meet legal or regulatory obligations.

- Studies and research: When data is needed for studies conducted by research institutions, ensuring anonymization whenever possible.
- Transfer to third parties: When it is essential to transfer data to third parties, provided that the legal requirements relating to data processing are met.
- Exclusive use by the company: When the data is used exclusively by DATEN, provided it is anonymized and not accessed by third parties.

16.5 MARKETING

DATEN TECNOLOGIA may send communications related to activities, processes, products, and services that it considers to be of interest to the data subject, always with their due consent. These communications may also include information from partner companies, when applicable, as well as content related to the NAVE website, belonging to DATEN's gaming line.

The data subject may, at any time, choose not to receive marketing communications, as well as request the interruption of contact for such purposes or the non-sharing of their data with other companies in the Daten Group.

Opting out of receiving communications can be done simply and immediately via the link available in the footer of marketing emails.

16.6 The Data Owner's Rights to Data Protection

DATEN ensures that data owners 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 their personal data is being processed and, if so, to obtain a copy of that data and other information related to the processing.
Right to Rectification: The data subject may request the correction of incorrect, outdated, or incomplete personal data.
- **Right to Anonymization, Blocking, or Deletion:** The data subject may request that their personal data be anonymized, blocked, or deleted when it is unnecessary, excessive, or processed in violation of the LGPD (Brazilian General Data Protection Law).
- **Right to Data Portability:** The data subject 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 Regarding Data Sharing:** The data subject has the right to know with which public and private entities their data has been shared.
- **Right to Revoke Consent:** The data subject may revoke their previously given consent to the processing of their personal data at any time, without compromising the legality of the processing carried out based on the previously given consent.
- **Right to Review Automated Decisions:** The data subject has the right to request a review of decisions made solely on the basis of automated processing of personal data that affect their interests.
- **Right to Object:** The data subject may object to the processing of their personal data in certain circumstances, such as when the processing is based on the legitimate interests of the controller.
- **Right to Petition:** The data subject may petition the ANPD (National Data Protection Authority) in case of non-compliance with the LGPD (Brazilian General Data Protection Law).

The data subject's failure to grant consent may imply limitations in the provision of certain services or functionalities, including restrictions on access, personalization, and, in some cases, the impossibility of formalizing contracts. This decision may also impact customer service, participation in promotions or loyalty programs, as well as the receipt of relevant communications. Therefore, the data subject declares to be aware that the refusal of consent 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, counted 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:

Email: sgpi@daten.com.br ;

Call: (73) 3222-6225;

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

16.7 COOKIE POLICY

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

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 this information 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 browsing more efficient. According to the law, we can store cookies on your device if they are strictly necessary for the website to function. 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.

Consent may be changed or revoked at any time through the Cookie Statement available on the institutional website.

Additional information regarding the organization's identity, contact channels, and how personal data is handled can be found in the Privacy Policy. In matters related to consent, it is recommended to provide the respective consent ID and registration date.

Cookies classified as essential are necessary for the proper functioning of the website, enabling basic functionalities such as navigation and access to secure areas. Disabling these cookies may compromise the full functionality of the platform.

16.7.1 How to use cookies

Daten uses cookies in various ways to improve your experience on our website, including:

- Keep the data owner logged in;
- Understanding how the data owner uses our website;
- To store users' login and password information, addresses, or credit card details so that they do not have to enter them every time they log in to the site.

16.7.2 Types of cookies used

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

- **Necessary** – These are essential for the site to function; without them, the site will not work properly. (Ex.: access to secure areas of the site, security, legislation).
- **Marketing** – Marketing or advertising cookies track visitors' browsing activity and collect data so that the company can create relevant ads based on that behavior.
- **Performance** – These features allow the website to behave according to the visitor, adjusting to their location, preferred language, etc.

- **Statistics** – Statistical or Analytics cookies translate visitor interactions into detailed behavioral reports in an anonymized way.
- **Functional** – These 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 their browser to not accept cookies. However, in some cases, some of our website's features may not function as expected.

16.8 CRYPTOGRAPHY POLICY:

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

- The confidentiality, integrity, and authenticity of sensitive or critical information that is stored or being transmitted electronically;
 - 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 algorithm types, quality, and strength, 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 results of the information security risk management process, see inventory and asset map;
 - b) The implementation of cryptographic controls not approved by DATEN's IT department or their use in a manner other than that intended by this policy is prohibited;
 - 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 using encryption mechanisms such as HTTPS, SSL, TLS, and VPN.

DIGITAL CERTIFICATES FOR INTERNAL USE

In addition to digital certificates valid under ICP-BRASIL , digital certificates signed by a root certification authority created by DATEN's IT department may be used, provided 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 on network devices may be approved, with the aim of intercepting, for filtering purposes, 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 manage the infrastructure for internally used digital certificates;
 - Approval of cryptographic resources for use in DATEN;
 - Create, distribute, retrieve, and destroy keys for use in cryptographic resources;
 - Cases not covered by this policy should be referred to the IT department;
 - Any omissions will be resolved by the IT department.
- b) It is the responsibility of the owners and custodians of information assets to:
 - To properly apply the identified cryptographic resources for the protection of the information in your custody, in accordance with the provisions of this policy;

16.9 Clean Desk and Clean Screen Policy

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, aimed at safeguarding information contained in documents and/or printed materials during the employee's absence from their workplace and/or workstation.

The policy should consider information security classifications, the corresponding risks, and the organization's cultural aspects. Information left on work desks is susceptible to damage or destruction in various ways.

The goal of a "clean desk" policy is to define guidelines that reduce the risk of security breaches, 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 of normal working hours.

16.9.1 What should be considered?

- The documents (reports) should be stored in locked cabinets and/or other forms of secure furniture when not in use, especially outside of business hours;

- Personal computers and printers should not be left logged in when no user is 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 of business hours;
- Sensitive or confidential information, once printed, should be removed from the printer immediately;
- Maintain a "clean desk" policy by removing papers, notes, and reminders from your workspace;
- At the end of the day, or in case of prolonged absence, clean your work 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 to access it;
- Your organization's information is your responsibility! (Even from your home!).
- Ensure that all important documents, in case of an evacuation, are in strategically protected locations, which will facilitate recovery;
- At the end of the workday, leave all documents properly stored/organized;
- Documents containing customer information should be locked in drawers or cabinets;
- Dispose of items containing information about internal and external customers, relevant stakeholders, or company property in designated secure locations;
- Always clean your workspace before going home, ensuring proper organization of the items/objects handled, or remembering/noting who you passed them on to for filing/storage.

16.10 Privacy policies of other websites

DATEN's 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 individual website.

16.11 Guidelines for the Use of Security Cameras

DATEN adopts camera monitoring systems on its premises with the aim of safeguarding the safety of people, protecting assets and preserving its information, in accordance with internal guidelines and applicable requirements.

The existence of the monitoring is duly communicated through notices posted in visible locations. These notices provide instructions so that the data subject, should they require clarification or wish to make requests related to the images, can contact the building's intercom.

The captured images are processed exclusively for institutional security purposes, and their use for any purpose other than those established herein is expressly prohibited.

The storage of images is subject to a timeframe compatible with their purpose, limited to a maximum period of 30 (thirty) days, which may be shorter due to technical limitations of the systems used.

Access to the images is restricted, permitted exclusively to the security team and individuals duly authorized by the Board of Directors, and must occur only when there is a justified need and in accordance with current internal controls.

16.12 CONFIDENTIALITY, DATA PROTECTION AND INFORMATION SECURITY

DATEN emphasizes that compliance with confidentiality, data protection, and information security guidelines is mandatory for all stakeholders who have access to information, systems, or assets. In this context, it is expected that:

- The information accessed must be used exclusively for the execution of authorized activities, and its use for personal gain or the benefit of third parties is prohibited.
- The confidentiality of information must be maintained, regardless of the type of relationship, even after the termination of activities;
- Personal data will only be processed as directed by the organization and in accordance with applicable law;
- Access to information should follow the principle of least privilege, limited to what is strictly necessary;
- Access credentials (usernames, passwords, and profiles) must be for individual and non-transferable use, and their sharing is prohibited;
- Equipment, systems, and networks used should be protected with adequate security controls, such as system updates, the use of antivirus software, and blocking unauthorized access;
- Do not use unauthorized devices, emails, or systems to store or share corporate information;

- Ensure that information is protected against loss, leakage, alteration, or unauthorized access;
- Any suspected or confirmed information security incident must be reported to the organization immediately;
- Upon termination of activities or disconnection, all access, documents, media, and assets should be securely returned or deleted.

Failure to comply with these guidelines may result in disciplinary action and liability in the civil, administrative, and criminal spheres, as mentioned in this document.

16.13 HOW TO CONTACT US

If you have any questions regarding DATEN TECNOLOGIA's Privacy Policy, the personal data processed by the organization, or the exercise of rights provided for in applicable legislation, you may contact us through our official customer service channels.

Similarly, any stakeholder who identifies or suspects an information security incident should immediately notify the organization through these same channels.

The Data Protection Officer, Mr. Frederico Santos de Oliveira, together with the Internal Controls, Digital Compliance and Personal Data Protection Committee of DATEN, remains available for any necessary clarifications and technical support.

Contact can be made through the following channels:

Email: sgpi@daten.com.br

Telephone: (73) 3222-6225

Customer service channel: <http://www.daten.com.br/suporte-lgpd>

16.14 HOW TO CONTACT THE COMPETENT AUTHORITY (LGPD)

In cases related to the processing of personal data, if the data subject believes that their request has not been satisfactorily addressed by DATEN TECNOLOGIA, they may file a complaint with the National Data Protection Authority (ANPD), the body responsible for overseeing and regulating the General Data Protection Law (LGPD).

ANPD contact information:

Email: anpd@anpd.gov.br

Address: National Data Protection Authority, Esplanada dos Ministérios, Block C, 2nd floor, Postal Code 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 LEADERSHIP

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 responsibilities. obligations:

- You need to have a detailed understanding of the code in order to clarify any doubts your team may have. If this is not possible, you should refer 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;
- Disseminate the values and definitions of the code to your team, partners, clients, suppliers, and other social segments with whom you maintain contact, guiding them on the procedures foreseen;
- Identify code violations and take steps to correct and eliminate them, bringing the cases to the attention of the Compliance Officer for information and possible further action.

17.2 RESPONSIBILITY INDIVIDUAL

Every DATEN employee and every supplier must ensure compliance with the Code of Business Conduct and inform the Compliance Officer when they become aware of any violation of the rules.

No one will be punished or retaliated against for providing good-faith information about suspected inappropriate behavior or behavior that violates the Code.

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

17.3 RESPONSIBILITY COLLECTIVE

All stakeholders must act in accordance with the principles of ethics, integrity, and transparency, and are responsible for preventing and avoiding any practices that may constitute bribery, corruption, or the obtaining of undue advantage.

- Do not offer, promise, grant, solicit, or accept any undue advantage, of any nature, whether direct or indirect;
- Do not engage in acts of fraud, corruption, or bribery, including through third parties;
- Do not use intermediaries, partners, or any means to conceal or facilitate illegal practices;
- Not to influence decisions or obtain undue benefits through inappropriate means or in violation of the organization's guidelines;
- Report any suspicious situation, conflict of interest, or conduct that violates this Code to the Compliance Officer.

If you have any doubts about situations that may constitute undue advantage, you should seek guidance from the Compliance Officer.

18 INTEGRITY AND WHISTLEBLOWING CHANNELS

Any professional and/or supplier who is unsure how to proceed or who is aware of any illegal act or breach of this code of conduct or any other SGAS document, or who suffers any form of pressure or illegal solicitation from public agents, must immediately notify the company through the designated 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 information provided. No one will be punished or retaliated against for information provided in good faith regarding suspicions of inappropriate behavior or behavior contrary to this code. Code.

19 MEASURES DISCIPLINARY

Full understanding and adherence to the anti-bribery management system guidelines (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 warnings, suspension, cancellation of variable compensation, 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 any applicable civil, criminal and/or administrative liability.

19.1 Disciplinary proceedings related to information privacy.

DATEN establishes that failure to comply with Information Privacy guidelines, including but not limited to breaches of confidentiality, misuse of information, granting or use of unauthorized access, as well as the disclosure, exposure or improper handling of data, including sensitive data, in violation of internal guidelines and applicable legislation, will subject the responsible party to the application of appropriate disciplinary measures.

All employees, third-party contractors, and service providers are responsible for:

- To preserve the confidentiality of the information to which they have access;
- Use information assets ethically, securely, and exclusively for professional purposes;
- Do not access, attempt to access, or facilitate access to systems, networks, or data without proper authorization;
- Do not use virtual environments, systems, or tools that could compromise the integrity, confidentiality, or availability of the organization's information;
- Do not share, disclose, or make available organizational information, including with other employees, third parties, or external parties, without due need and authorization.

The disciplinary process will be conducted in a structured manner, taking into account the seriousness of the infraction, with the recording and analysis of the occurrences, ensuring the right to a full defense and due process, in accordance with internal guidelines and applicable legislation.

Disciplinary measures applicable to internal and external stakeholders will follow the provisions of the specific sections of this Code of Conduct, already established by Daten, and may be supplemented, when necessary, by actions such as restricting or revoking access, applying additional security controls, and other measures related to Information Security and Privacy.