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

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THE DATEN TECHNOLOGY, in constant process of evolution, it presents the society your code of conduct business, ruled in the more rigid rules of transparency and ethics to your managers, partner employees, suppliers and other interested parties.

One excellent reading,

Silvio Comin

Director Industrial

CONTROL OF REVIEWS OF DOCUMENTS

REVISION	DATE	DESCRIPTION
00	11/17/2019	Emission Home
01	01/30/2020	Inclusion of item 7.2 of the standard in item 9 of this document referring to the retaliation, discriminations and actions disciplinary.
02	11/24/2020	Revision general of document and inclusion of item 9.2.1
03	08/31/2021	Revision node number of channel of complaints
04	09/30/2021	Inclusion of item 17 - Conduct general of relationship, digital compliance and personal data protection.
05	12/22/2021	Revision general of document – adjustments of the items 17.2, 17.3, 17.5, 17.9.2, 17.8, 17.9.4.
06	03/29/2023	Inclusion of the values node item 6.3 referent the sustainability, ethics and transparency.
07	09/29/2023	Update from the mission, vision and values
08	09/25/2024	Revision general of code of conduct – adjustments main node item 17 – Conduct general of relationship, digital compliance and personal data protection

1 THE WHAT AND THIS CODE OF BUSINESS CONDUCT

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

Attitudes must be common, which is why this Code of Business Conduct reflects the way in which professionals in all activities and sectors of DATEN TECNOLOGIA LTDA act in relationship the society, good as you suppliers and too much parts interested must act. All to the people must act of form correct, full and efficient in the search of results, incorporating you values expressed in this code, obeying to the regulations and standards internal.

2 OBJECTIVES DO CODE OF BUSINESS CONDUCT

THE Code of Conduct Business he was prepared with you following objectives:

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

3 THE WHO THIS CODE IF APPLY

THE Code of Conduct Business if applies to all you professionals what work at DATEN TECNOLOGIA LTDA and must regulate the relationships that these professionals maintain inside and outside the company with:

- Too much professionals from the enterprise or of other companies;
- Suppliers, customers, banks, others partners and competitors;
- Power public, in all the levels;
- Community local and with the society in general.

4 TERMS AND EXPRESSIONS EMPLOYEES

DATEN OR COMPANY

It is about from the DATEN TECHNOLOGY LTDA and to the activities what develops.

CONDUCT

Behavior, procedure moral collective.

CODE

Set of rules, laws or standards.

ETHICS

Set of customs, habits and behaviors individual.

SUPPLIERS

They are considered suppliers you partners commercials, people physical and legal with which DATEN relates to through purchases of either services or products.

CODE OF CONDUCT BUSINESS

Standards and behaviors what rule the performance from the organization and define the what she expectations of its professionals, suppliers and other partners.

PROFESSIONALS

They are all you professionals what work in the enterprise, independently of position, function, activity or time at the company.

VALUES

Express the commitment permanent from the enterprise with the society in general, with the people who work there and interact with it.

5 MISSION, VISION AND VALUES DATEN

THE performance from the DATEN and the behavior expected of your professionals and suppliers they are targeted, respectively, for the Aspiration and Skills

DATEN

Behavioral, widely disseminated internally and through this Code of Conduct.

5.1 Mission

Our mission is to be the driving force behind back of progress technological, providing solutions of high quality computing, based on in the best practices manufacturing, social welfare, environment, security, anti-bribery and digital compliance. With over two decades of experience, we are committed to satisfying our customers with innovative products that improve their efficiency, ensuring our success in all areas.

5.2 Vision

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

5.3 Values

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

6 CODE OF CONDUCT BUSINESS AND/OR RESPONSIBLE FOR COMPLIANCE

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

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

7 HOW TO ACT IN DIFFERENT SITUATIONS

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

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

8 CONDUCT GENERAL FROM THE DATEN IN RELATIONSHIP TO THE YOUR PROFESSIONALS

THE enterprise believe what the diversity of your professionals and one of the factors key to maintaining its success, permanence and growth. For this reason, it seeks select, admit and to maintain people efficient and talented and invests continuously in its development.

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

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

They are not tolerated practices discriminatory against any professional or candidate for job. This form, the DATEN only will decline of one candidate the any type of charge if there are really strong indications that the hiring has characteristics and/or interests outside of those ones solely linked to their professional competence and expertise, as well as their imminent contribution to the organization's growth.

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

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

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

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

Acts of intimidation, offense or aggression carried out by professionals, on the premises from the organization or node exercise from the function, it is against colleagues of work or people who are not directly linked to the company (customers, suppliers, consumers, authorities, members from the community etc.) will be punished of agreement with legislation and internal regulations.

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

THE carrying of drugs or weapons no and allowed of form some node environment of work, being considered a serious infraction, subject to administrative, civil, labor and criminal sanctions.

8.1 Rights Fundamental of the Professional

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

The conditions health and security node work must be objects of permanent attention and must ensure to the professionals the minor possible risk in the performance of their functions.

To what that occur, all you involved must to comply to the general rules of health preventive and security and to participate of the trainings and of guidance activities.

8.2 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 compliance officer.

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

special 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.

THE indication of relatives and friends to vacancies existing in the DATEN is a traditional practice. It is up to the responsible areas, together with human resources , to decide on selection and hiring, and pressure to influence the admission, promotion or dismissal of professionals is not admissible. connected for the degree of kinship, friendship or any another type of relationship that is not professional.

No it will be allowed the subordination direct of relatives.

8.2.1 Responsibility social

THE DATEN TECHNOLOGY respect and values to the diversities social and cultural following individual differences, combating all forms of discrimination, stimulating treatment egalitarian and without prejudices of social, cultural and ethnic origin and/or relating to gender, age, religion, political opinion, sexual orientation, physical, psychological and mental condition.

DATEN encourages suppliers, partners, customers and other interested parties to adopt promotional practices the equity of gender and race and respect for diversity in its internal and external relations, promoting, together to the same, the adoption of standards of responsibility social compatible with the assumed in this code of conduct and integrity business.

DATEN reserves the right to disagree with personal opinions. related to the themes above described, issued in networks social media or any other form of communication, by employees or partners, who are fully responsible for the consequences of these opinions. Guides also those ones what want provide your personal opinions on those themes, what the do unlinking fully the DATEN image and requesting that those who do so remove any reference to DATEN from their social networks.

8.3 CONDUCT IN RELATION TO GIFTS

8.3.1 Rewards internal DATEN

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

8.3.2 Rewards provided for the DATES, although originating of suppliers

Same what these rewards be originating of suppliers or other interested parties, delivery to professionals will be intermediated by DATEN and will not constitute a gift.

8.3.3 Gifts

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

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

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

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

SERVICE TO THE CUSTOMER

In addition of ensure the quality of the products and services offered, the DATEN he has the commitment of to meet to the customers and consumers

always with efficiency, speed, education and transparency. When If the customer or consumer cannot be served, this must be stated clearly, explaining the reasons clearly and respectfully.

QUALITY AND ACCORDANCE

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

COMPETITION AND RIGHTS OF THE CONSUMER

THE DATEN he understands what the loyalty in the competition and the respect consumer rights are factors that favor the development of the market on sustainable bases. No customer can be forced to accept conditions what contradict these rules to acquire products or company services.

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

SHOPPING AND CONTRACTS

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

9 CONDUCT GENERAL FROM THE DATEN IN RELATION TO THE YOUR SUPPLIERS

DATEN believes in the solidity of its relationships with its suppliers. For this, it is essential what you suppliers meet and act in accordance with the legislation and with this Code, being responsible for disseminating, monitoring and ensuring compliance with it in all its activities.

9.1 INTEGRITY

All suppliers are expected to demonstrate high ethical standards and maintain integrity in all interactions with DATEN and public administration. Therefore, any and all forms of corruption, extortion or fraud are strictly prohibited. prohibited.

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

DATEN periodically carries out evaluations and inspections of suppliers critics, including of those what be considered critics in relation to risk of bribery for these A DUE DILLIGENCE procedure is also established, when applicable.

10 CONDUCT IN RELATION TO VEHICLES OF COMMUNICATION

THE DATEN considers legitimate the right from the population of to be informed on matters of public interest, even when related to a private company, and considers that it is the role from the press to obtain and to disclose these information. In addition from that, he understands what the existence of press free, independent and impartial contributes to the improvement of market, the democratic State and citizenship. For this reason, DATEN repudiates the use of economic power to constrain the action of the press or to induce it to publish false facts.

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

Just you professionals and suppliers indicated to exercise the paper of Spokespersons are authorized to speak on behalf of the company. If you are contacted for information, write articles or give interviews and statements in name from the enterprise the some vehicle communication, inform your superior or the Compliance Officer.

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

11 CONDUCT IN RELATION TO COMPANY AND TO YOURS GOODS

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

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

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

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

RECORDS ACCOUNTING AND OTHERS

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

INFORMATION PRIVILEGED

Any professional or supplier who becomes aware of non-public information has a duty to keep it confidential, even after leaving the company or closing down. the link contractual. THE use of information privileged in benefit guys or third parties is a crime, subject to labor, civil and criminal sanctions.

PAPERS OF WORK AND DOCUMENTS FROM THE ENTERPRISE

Working papers, reports, correspondence and other documents used in the activity of each professional and supplier they are of property from the enterprise and cannot be taken or copied when the professional is dismissed or the contract is terminated.

PASSAGES AIRLINES

To the shopping of passages aerial necessary to the activities from the enterprise will be requested and quoted by the sector designated for this purpose, and may not be issued in the name of third parties who are not directly involved in the aforementioned activity, in a justified manner.

12 CONDUCT IN RELATION TO THE COMMUNITY NEXT AND TO THE ENVIRONMENT

THE DATEN search always coexist of form harmonious with to the communities where your unit of business acts, respecting to the people, your traditions, your values and the environment. At the same time, it seeks to actively collaborate in local development, in improving quality of life and in reducing social problems and inequalities.

CHILD LABOR

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

ACTIVITIES POLITICAL- PARTISAN

THE DATEN no exercises activities policies, and each professional what wish Participating in this process must do so individually, without involving the name or resources of the company. 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 the work environment and during working hours.

ACTIVITIES UNIONS

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

QUITE ENVIRONMENT

All the activities of the company must be carried out in obedience to the legislation and to standards environmental, looking for additionally the assessment preview of aspects and environmental impacts, the rational use of natural resources, and the preservation of the environment where we operate.

ENTITIES RELIGIOUS

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

13 CONDUCT IN RELATIONSHIP THE ASSOCIATIONS PROFESSIONALS, BUSINESSMEN AND ENTITIES

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

The active participation of professionals in social, cultural or charitable entities what have recognition public, done in character individual, and view as an important contribution to society and the country, as long as it does not affect your activity and regular work at DATEN.

14 VOLUNTEERING AND RESPONSIBILITY SOCIAL

These activities are considered part from the responsibility with 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 employed and the time of the professionals involved.

15 CONDUCT IN RELATION TO POWER PUBLIC

THE relationship with authorities, politicians and agents public, he must to be ruled by professional and correct attitudes. DATEN repudiates any and all acts that are harmful to the public assets of any country. It is the duty of each and every DATEN professional and of all you suppliers to guide your activities and relationships with organs and public agents within the strictest legality and morality.

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

THE DATEN he has as philosophy the strict greeting from the legislation current and expects the same behavior from its professionals and suppliers. It considers, however, that it is legitimate to challenge abusive, discriminatory or incorrect legal or tax measures, which will be done through administrative and/or judicial actions in the competent authorities.

16 CONDUCT GENERAL DO RELATIONSHIP, DIGITAL COMPLIANCE AND PERSONAL DATA PROTECTION

16.1 Policy Privacy Policy of Information

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

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

- Commitment and protection of data, whether sensitive or not, and information of the holders;

- Provide information protection and privacy to interested parties' data;
- Carry out consistent communication and information with stakeholders;
- Continuously improve;
- Compliance with legal, regulatory and statutory requirements.

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

1. **Human Resources** - Registration of selection, admission, dismissal, training and competence activities of employees to compose the dossier;
2. **System of Management Integrated** – Realization from the search of satisfaction of customers of retail, application of the confidentiality term, execution of Due Diligence on employees and suppliers, in addition to control, management and monitoring during the continuous improvement of Daten management systems, in internal and external systems and software;
3. **Commercial bidding** – To participation in processes bidding the record of data such as name, CPF and address are collected when necessary for signing contracts and minutes, integrated with the finance, logistics, purchasing and warehouse departments;
4. **Retail Commercial** – For customer registration, sending of sales order, issuing of invoice and delivery of the product to the customer;
5. **PDI / Projects** – Provision of accounts to the entities and organs governmental and of state;
6. **Website/E-Commerce** – Use of cookies to to improve the experience of user and collection of data to carry out purchases made on the website;
7. **Expedition / RMA** - To conference and validation of the actions of expedition, register of shipping requires access to the name, address and order details and invoice to effectively identify and deliver the product to the customer, invoicing, opening a warranty service order, sending materials to technical assistance, sending materials for transfer between warehouses.
8. **Marketing** - Basic customer registration to maintain contact methods, control and payment methods through the card administrators' Gateway; Collection of information via cookies and social media management.
9. **Stock** - To what to the parts requested be delivered node address current of the assistance, if they have not updated their address with SIGEP or SEFAZ after changing address;

10. **Production** - Register of customers to launch of order of sales and creation from the production order;
11. **Logistics** - Reports to taken of decision (Opportunities of Business), and vision General of costs of freight expenses for the company during month and year and planning of transportation of employees, on normal and extra days.
12. **Purchases** – To carry out registration, qualification, due diligence, evaluation and payments of suppliers, individuals and those who provide digital services and products;
13. **Invoicing / Accounts the pay and the to receive, taxation and accounting** - To registration of customers and suppliers, billing, tax assessment, payments and financial consolidations with interested parties, individuals;
14. **Human Resources Department / OHS** – Payroll calculation, granting of benefits, vacations, hours extras, bank of hours, termination, admission and charge; elaboration and filling of documentation inherent the health and security of worker, including exams and controls deliveries of protective equipment;
15. **Call Center** – To open Service Orders under warranty in after-sales service;
16. **Surveillance / Asset Security** – Registration and control of physical access of any interested party and control of entry and exit of materials;

16.2 Types of data collected

THE Dates collect you following data:

- Name full;
- Number and image of Register of People Physics (CPF);
- Number and image from the Portfolio of identity (RG);
- Exams doctors admissions, periodicals and dismissals;
- Number and image from the Portfolio National of Qualification (CNH);
- Number of phones, WhatsApp and addresses of E- mail;
- Proof of address full;
- State civil;
- data ;
- Documentation of education;
- Passport

16.2.1 THE method used to collect data

Owner of the data provides directly the Dates Technology the majority of the data what we collect. We collect data and process data when the data owner:

- Register online or do one order to any one of the ours products or services;
- Fill in voluntarily one search with customers or provide feedback in any one of our message boards or by email;
- Use or visualize our website through of the cookies of your browser;
- During the process internal of selection and hiring of collaborators and / or suppliers;
- Opening of called for the system of customer, integrated to the system Date, website or by telephone, with data indication;
- Access to the facilities from the organization in person;
- Still in the relationship with our suppliers and partners there is the possibility of collecting information business and data personal, all controlled and managed for the declaration of legitimate interest.

THE Dates also he can to receive your data indirectly of the following sources:

- SESI/Senai/
- IEL/CIEE
- Medicine of Work

16.2.2 THE form of use of data

THE Dates technology collect you data of the parts interested to that can:

- Process your order and manage your account.
- Send an email with special offers about other products and services we think the data subject might like.
- Perform search of satisfaction with customers.
- Registration of collaborators and suppliers node system.
- Control you accesses of entries and exits of visitors in the organization

If the owner of the data to agree, the Data will share your data with our partner companies so they can offer their products and services.

- SHIP

When the Data processing your request, she he can send your data and use to the information resulting from credit reference agencies to prevent fraudulent purchases.

16.2.3 Method of storage of the data

THE Dates stores your data with security in our system, clouds and/or physically.

Daten will keep your personal identification data, such as: Name, CPF, RG, for a period indeterminate (being able to to be carried out the exclusion case the holder request and present legal justification).

16.3 Marketing

Daten sends information about activities, processes, products and services that we believe may 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 the data subject has agreed to receive marketing, the data subject can always opt out at a later date.

The data subject has the right to prevent Daten from contacting the data subject for marketing purposes or providing his/her data to other members of the Daten Group at any time.

If owner of the data no wish more to be contacted to ends of marketing, he can to remove your registration using the link available at the end of marketing emails.

16.4 You rights of owner of protection of the data

THE Dates guarantees what you owners of the data be fully aware of all you your data protection rights. Every user has the right to the following:

- **Right of Access:** The data subject has the right to know whether his/her personal data is being processed and, if so, to obtain a copy of such data and other information related to the processing.
- **Right to Rectification:** The holder may request the correction of incorrect, outdated or incomplete personal data.
- **Right to Anonymization, Blocking or Deletion:** The holder may request that his/her personal data be anonymized, blocked or deleted when they are unnecessary, excessive or processed in non-compliance with the LGPD.
- **Right to Portability:** The holder may request that his/her data be transferred to another supplier of services or product, through regulation from the Authority National Data Protection Agency (ANPD).

- **Right to Information about Sharing:** The holder has the right to know with which public and private entities their data has been shared.
- **Right to Revoke Consent:** The holder may revoke the consent previously given for the processing of his/her personal data at any time, without compromising the legality of the processing carried out based on the consent previously given.
- **Right the Revision of Decisions Automated:** THE holder he has the right of request the review of decisions taken solely on the basis of automated processing of personal data that affect your interests.
- **Right of Opposition:** THE holder he can if oppose to the treatment of your data personal in certain circumstances, such as when the processing is carried out on the basis of the legitimate interests of the controller.
- **Right of Petition:** THE holder he can petition before the ANPD in case of non-compliance with the LGPD.

If owner of the data do one request, we will have 15 (fifteen) days, counted from the date of the application of holder, to to respond to the owner of the data. If the owner of the data If you wish to exercise any of these rights, please contact us through 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/suporte-lgpd.

16.5 Cookies Policy

Cookies are small text files placed on your device to collect standard data. of log from the Internet and information on the behavior of the visitors. When you When you access our websites, we may automatically collect information from you through cookies or similar technologies. For more details, please see our cookie policy.

We use cookies to personalize content and advertisements, offer features of social media 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 through their services.

Cookies are used to improve the user experience, making navigation more efficient. Of agreement with the legislation, we can store cookies in your device if are

strictly necessary to the operation of website. To you too much types of cookies, and your consent is required. Our website uses different types of cookies, some of which are set by external services that appear on our pages.

You he can, the any moment, to alter or to remove your consent put quite from the Cookie Declaration on our website.

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

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

16.5.1 Method of use of the cookies

THE Dates use cookies of several ways to to improve your experience in our website, including:

- To maintain owner of the data connected;
- To understand as owner of the data use our website;
- Store users' login and password, addresses or credit cards so that they do not need to provide them every time they access the website.

16.5.2 Types of cookies used

They exist several types different of cookies, node however, our website uses:

- **Necessary** – These are essential for the website to function; without them, the website will not function properly. (Ex.: access to secure areas of the website, security, legislation).
- **Marketing** – You Cookies of marketing or propaganda track the navigation of the visitors and collect data the end of what the enterprise may to create ads relevant, of agreement with such behavior.
- **Performance** – Allow what the website if behave of agreement with the Visitor, adjusting the your location, preferred language, etc.
- **Statistics** – Statistics or Analytics cookies translate visitor interactions into detailed behavior reports in an anonymized manner.
- **Functional** – Adjust the website to third-party services, such as links to your social media profile, comments, chats, etc.

16.5.3 Management of the cookies

THE owner of the data he can configure your browser to no to accept cookies. However, in some cases, some of the features of our website may not work as expected.

16.6 Policy:

THE policy of encryption from the Dates Technology understands controls cryptographic you which will be used to ensure, among others:

- The confidentiality, integrity and authenticity of sensitive or critical information that is stored or undergoing electronic transmission;
 - THE non-repudiation: will prove occurrence of one event or action alleged and your originating entities, in order to resolve disputes about the occurrence, non-occurrence or action of the entities involved in the event.
 - THE authentication: confirm the identity of users or of systems automated.
- a) THE choice of the types, from the quality and strength of algorithms, like this as the definition of what type of cryptographic control is appropriate for each purpose and business process, and will be based, whenever possible, on the result of the information security risk management process, see inventory and asset map;
 - b) The implementation of controls is prohibited cryptographic data not approved by Daten's IT department or using them in a way that is different from the purposes of this policy;
 - c) Network login/password traffic, during user authentication, and information classified as restricted between the layers involved in the systems or services made available for the Dates must to be protected with the use of mechanisms of encryption such as HTTPS, SSL, TLS and VPN.

Certificates digital of use internal

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

Respected you limits from the law, may to be approved the use of certificates digital in devices network, aiming intercept with the objective of filtering, content previously encrypted and what may be considered inappropriate, improper or malicious.

Responsibilities

- a) Compete to the sector of YOU from the Dates
 - To create and to maintain procedures of certification and to do the control from the infrastructure digital certificates for internal use;
 - Approve you resources cryptographic to the use in the Dates;
 - To create, distribute, recover and destroy keys of use in resources cryptographic;
 - You cases no predicted in this policy should to be forwarded to the sector of YOU;
 - You cases omitted will be resolved for the sector of YOU.
- b) Compete to the owners and custodians of assets information :
 - Properly apply the cryptographic resources identified for the protection of information in your custody, in accordance with the provisions of this policy;

16.7 Policy table clean and Clean Screen

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

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

THE objective from the policy of "table clean" and define guidelines what reduce the risk of one 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 access no authorized, loss and damage from the information during and outside of time normal working hours.

16.7.1 THE what He must To Be Considered?

- You papers (reports) must to be stored in cabinets locked and/or in others 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 present and should be protected by passwords and other controls when not in use;
- Photocopiers must be protected against unauthorized use, both during and outside business hours;
- Sensitive or confidential information, when printed, must be removed from the printer immediately;
- Maintain a “clean desk” policy by removing papers, notes, and reminders from your desk;
- To the end of day, or in case of absence prolonged, to clean the table of work;
- No leave papers, books or any information in the your table when no you are on site;
- Store information confidential in local appropriate (far away of the eyes of curious);
- Use one protector of screen what request one password for access;
- To the information from the your organization they are of your responsibility! (Same in your house!);
- Guarantee what all you documents important, in case of one evacuation, be in strategically protected locations which will facilitate recovery;
- Leave all documents properly stored/organized at the end of the working day;
- Documents containing customer information must be locked in drawers or cabinets;
- Disposal you items referents the information of the customers internal, external, part relevant stakeholders or company property in designated secure locations;
- Always to clean your area of work before of go to home, ensuring suitable organization of items/objects handled or reminding/noting who you passed them on to to file/save;

16.8 Policies of privacy 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.

16.9 As to enter in contact with us

If you have some doubt on the policy of privacy from the Date, you data what we keep about you, or you I would like of exercise one of your rights of protection of data, no hesitate in to enter

contact us. Ms. Sandy Santana, responsible for personal data protection and compliance officer and the committee of controls internal, compliance digital and protection of data Daten Tecnologia staff will be available for clarification and technical support.

Send us one e-mail 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/suporte-lgpd>.

16.10 As to enter in contact with the authority appropriate

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

E-mail: anpd@anpd.gov.br

Address: Authority National of Protection of Data

Esplanade of the Ministries, Block W, 2nd to walk, CEP 70297-400 - Brasilia – DF.

17 RESPONSIBILITY FOR THE CODE OF CONDUCT AND BUSINESS INTEGRITY

THE responsibility general for the Code of Conduct Business from the DATEN.

17.1 LEADERS

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

- Know the code in detail, in order to clarify any doubts your team may have. If this is not possible, you should forward the questions to the Compliance Officer;
- Adopt behaviors and attitudes that correspond to those established by the anti-bribery management system, in order to serve as an example;
- Communicate the code's values and definitions to your team, your partners, customers, suppliers and others segments

social contacts with whom they maintain contact, guiding them on the planned procedures;

- Identify violations of the code and act to correct and eliminate them, bringing cases to the attention of the Compliance Officer for information and possible additional actions.

17.2 RESPONSIBILITY INDIVIDUAL

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

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

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

18 CHANNELS OF INTEGRITY AND COMPLAINTS

Any professional and/or supplier who is undecided about how to act or is aware of any illegal act or non-compliance with this code of conduct or any other SGAS document, suffers any form of pressure or illegal request for agents public, he must communicate immediately the enterprise put quite of channel of Ethics and Integrity, by phone (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 identity and information provided. No one will be punished or retaliated against for information provided in good faith about suspected inappropriate behavior or behavior that is contrary to this Code.

19 MEASURES DISCIPLINARY

THE full understanding and service of the guidelines of system of management anti-bribery (e.g. anti-bribery policy and code of conduct) is a fundamental condition for remaining of professional and supplier us pictures from the DATEN. THE non-compliance of the

principles and commitments expressed in this document it will be treated as subject of extreme gravity, and may result in:

TO PARTIES 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 applicable civil, criminal and/or administrative liability.

TO PARTIES INTERESTED PARTIES EXTERNAL

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