

## PRIVACY POLICY

*Last updated: 02/06/2025*

Hello, User! Thank you for using the Dattos Platform!

Our Privacy Policy shows Users of the Dattos Platform how we process their personal data in accordance with the best market practices. This processing may involve the collection, use, storage, sharing and disposal of this data.

Some definitions have been taken from the Terms and Conditions available in their most recent version on our Platform. As explained in our Terms and Conditions, the functionalities of the Dattos Platform vary according to the contracted plan and are described in the respective contract signed between the "Administrator" (who is the representative of the company that actually contracted the Dattos Platform, and the Administrator can also block or exclude other Users of the Dattos Platform) and Dattos.

By using, accessing and registering on the Platform, You declare that You are aware of the Terms and Conditions of the Dattos Platform.

It is also important to mention that, as established in the contract that governs the hiring of the Dattos Platform, Dattos recommends that Users do not share personal data while using the tool, but only those necessary for its operation and provided for in this Policy. If you process personal data while using the Dattos Platform and you have a contract signed with Dattos, you must follow the masking rules set out therein. In addition, please do not hesitate to contact Dattos so that we can take the necessary measures.

measures and precautions, remembering that, in these cases, Users will be fully responsible for sharing this personal data.

## **1. OBJECTIVES OF THIS PRIVACY POLICY.**

Here at Dattos, we value your privacy. That's why the purpose of this document is to be as transparent as possible with you, describing how Dattos collects, uses and shares your personal data through our Platform. To fulfil this objective, we keep our privacy policy up to date at all times and let You know whenever we make any changes to our personal data processing activities. In addition, this document should also serve as a guide to procedures that you can follow if you wish to find out about your rights.

The services provided by Dattos follow the guidelines set out in the General Data Protection Law (Law No. 13,709/18), but that name is too long, so let's shorten it to LGPD. In addition to the LGPD, Dattos processes your data in compliance with all other legislation so that your rights are guaranteed. It is important to mention that we do not share, rent, sell or exchange your personal data. Your privacy is extremely important to Dattos and all operations are carried out in accordance with the LGPD.

## **2. WHAT IS PERSONAL DATA AND ANONYMISED DATA? WHICH OF MY DATA CAN BE COLLECTED?**

Personal data is any data that identifies you or makes you identifiable. Your CPF, for example, identifies you almost immediately. But there are those pieces of data that, although they can't identify you as easily as your CPF, in combination with other data or through the use of software, lists and systems, can make you identifiable.

Anonymised data, on the other hand, is data that used to be personal and that, after going through some processes involving reasonable effort, costs and technology,

lose the possibility of direct or indirect association with an individual (in this case, You).

We will now go into detail about the data we collect, depending on your activity on our platform:

- Usage Data: Usage Data is technical data that we collect from the actual use of the Dattos Platform by Users. This data includes data on buttons clicked, interaction with the functionalities present on the Platform, time of use, date and time of the last update of "Agents" (the "Agent" is the User added to the Dattos Platform by the Administrator), Agents created, those responsible for creating/changing Automations or Reconciliations, among other data related to the active interactions of Users with the Platform.
- User data: This is the data collected to identify who is using the application. This data includes your name, login<sup>1</sup>and password, e-mail address, job title and department.
- Access Data: This is the data collected when someone accesses and browses our web platform. This is more technical data related to the device through which you are accessing our platform, such as the IP, operating system of the accessing device, date and time of access, browser and browser version, screen time, screen path, number of clicks, among others.
- File Data: this is the personal data contained in the files entered by the Client on the Dattos Platform. These files do not necessarily contain personal data. However, such files may contain personal data and, where applicable, Dattos processes such data as an operator, for the purposes determined by You in the context of the Dattos Platform and its solutions.

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<sup>1</sup>Here, it is recommended that the login be in the form of "[first name].[last name]".

Finally, it is worth noting that Dattos does not, in principle, collect any "sensitive data", which is understood to be data that, due to its nature (i.e. some sensitive data, if revealed, could put the data subject in a situation of vulnerability, such as data related to racial or ethnic origin, religious conviction, political opinion, membership of a trade union or religious organisation). Such data requires enhanced protection under the terms of the LGPD.

### 3. AND HOW IS MY DATA PROCESSED?

To make it easier for us to explain how your data is processed, we've put together the table below, which shows which data is processed, as well as the reason for processing it and the legal basis, which takes into account the provisions of the LGPD. But before we go any further, it is necessary to briefly explain who the data processing agents are under the LGPD.

Basically, there are two processing agents: the controller and the operator. The first is the one who makes the decisions regarding the processing of your data. The latter is the one who processes your data on behalf of the controller, in accordance with the latter's instructions. Because of this, the controller has more obligations to fulfil than the operator, but this does not mean that the latter has little or no obligation towards the user.

For certain activities involving the processing of your data, we are considered controllers, and for other activities, we are considered operators. We may also be both controllers and operators for certain activities.

Check out the table below to find out how and why your data is processed:

Types of Treaties	Types of Purpose Treatment	Legal basis	We are controllers of this data?
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Usage Data	<ul style="list-style-type: none"> <li>- Monitoring;</li> <li>- Improvements Platform</li> </ul>	Legitimate Interest (Art. 7, IX, and Art. 10, I, of the LGPD)	Yes. Dattos makes decisions about how some of this data is processed.
Access Data	<ul style="list-style-type: none"> <li>- Access validation;</li> <li>- Access statistics</li> </ul>	Legitimate Interest (Art. 7, IX, and Art. 10, I, of the LGPD)	Yes. Dattos makes decisions about how some of this data is processed.
User data	<ul style="list-style-type: none"> <li>- Validation;</li> <li>- Contact;</li> <li>- Improving KYC (<i>Know your Customer</i>) policies;</li> <li>- Invoicing</li> </ul>	Legitimate Interest (Art. 7, IX, of the LGPD) e Execution of Contract (Art. 7, V, of the LGPD)	Yes. Dattos makes decisions about how some of this data is processed.
File Data	Dattos does not process this data for any purpose other than those expressly indicated by You.	Given that Dattos is not controller of this data, it has no obligation under the LGPD to list a legal basis.	Dattos treats this data as operator, for any purposes/instructions defined by the controller (You).

Learn more about our purposes:

Monitoring: based on the Usage Data, we assess whether a particular access is legitimate and whether the functionalities of the Dattos Platform are being used appropriately.

Improvements to the Platform: from the same Usage Data, we identify points and functionalities of our Platform that need to be improved to enhance your experience as a Dattos Platform User.

Validation: this is the registration and login procedure by which we identify the User in the Dattos Platform layer of accounting applications and functionalities.

Billing: Dattos needs to control the functionalities and corresponding access limits of the solutions offered to Users for using the tools on the Platform.

#### **4. AND IS MY DATA SAFE?**

All security systems are subject to errors and unlawful intervention by third parties and You should be aware of this. However, security is one of our priorities and we have adopted high levels of protection and technical, physical and administrative measures in line with best market practice.

We contract third-party databases that have high security standards and, in addition, Dattos aims to ensure that any access to your personal data by collaborators is confidential. One of the principles we respect is that only employees and collaborators who need to access your personal data (to fulfil the interactive purpose of the Dattos Platform, for example) will do so.

We remind you that you are responsible for your access data to the Dattos Platform, such as login and password, and access by third parties is your responsibility (except in cases where Dattos contributes to this).

Dattos has a specific procedure for security incidents. In such cases, once the incident has been identified, we will: a) assess the type of incident; b) if required by law, notify Users, informing them of the incident and the security measures adopted by Dattos; and c) inform the National Data Protection Agency (ANPD), as determined by art. 48 of the LGPD.

#### **5. SHARING DATA WITH THIRD PARTIES**

To enable us to offer you our services, we share your data with third parties. These third parties include our employees and collaborators, and third-party service providers, but only on an exceptional basis and always in accordance with the relevant legislation.

When personal data is transferred outside of Brazil, this is done to the United States of America, where the servers and databases of the operators and sub-operators with whom we share your data are located. But don't worry, because in general these *datacentres* of the applications we use are highly renowned, trusted and secure on the world market, so any sharing takes place to countries that protect personal data to a degree equivalent to or greater than the terms of the LGPD.

Furthermore, the data collected may also be shared with judicial or administrative authorities, in the event of a legal determination and judicial request or order, or even automatically in the event of a corporate reorganisation of the owner of the Dattos Platform.

## **6. IS MY DATA PROCESSED BY ARTIFICIAL INTELLIGENCE?**

Dattos may process part of the File Data in its capacity as an operator for the provision of the services You have contracted (according to our Terms and Conditions). Part of this processing is done by our already developed artificial intelligence, which works through the Dattos Platform solutions in an automated way.

In addition, we are always looking to improve our products and services in order to deliver the best possible experience for You. This requires constant training and updating of our artificial intelligence, both through our own system and through the use of third parties who offer the state of the art (i.e. the most current and advanced technology) in artificial intelligence. At this stage of AI improvement and development, we are not interested in personal data from your market operations, but only in the textual elements and automations that are sub-produced from your commands.

Therefore, when we use this kind of application, we try to configure it in such a way that any personal data that may be shared is not



used for training or stored, but Dattos has no control over the personal data You enter in Your interactions with the artificial intelligence applications and our recommendation is that, as far as possible, You do not make this type of sharing with us.

## **7. DATA DISPOSAL AND RETENTION**

We retain your personal data for the period necessary to fulfil the purposes set out in this Privacy Policy, in the Contract signed between the Administrator and Dattos, or for a longer period if required or permitted by law. After this period, the data will be deleted, anonymised or, where this is not possible, stored and isolated in such a way that it can no longer be used to identify its owner.

One of your rights as a data subject, as you will see below, is to request the deletion, blocking or anonymisation of certain personal data that may be stored in our systems. Our disposal policy is secure and, when proceeding with the disposal of your personal data, Dattos takes all necessary care to ensure that the data is permanently deleted or anonymised, in accordance with the LGPD.

However, it is important to note that Dattos has the right and duty to keep certain personal data stored in order to fulfil legal and regulatory obligations, or in the event of litigation. For example, when there is a risk that Dattos may be ordered by the competent authorities to share this data.

## **8. WHAT ARE MY RIGHTS WITH REGARD TO PERSONAL DATA?**

You, as the owner of the personal data we process, have numerous rights guaranteed by law. These rights mainly revolve around easy access to information regarding the processing of your data.



This information must be made available by Dattos, upon your request, in a clear, conspicuous, user-friendly and free of charge manner. For example, you can ask us for information on the following topics:

- (a) specific purpose for which we process your personal data (information already contained in this Privacy Policy);
- (b) the form and duration of the processing of your personal data;
- (c) our identification and other information necessary for You to contact us (information already present in this Privacy Policy);
- (d) information on the shared use of your personal data with third parties, in the event that these third parties jointly determine with us the purpose of the processing of your data;
- (e) confirmation of the fact that we process your personal data and which of them are being processed;
- (f) access to your personal data that is being processed by us (Dattos is obliged by law to store your personal data in a format that facilitates your access);
- (g) correction of any incomplete, inaccurate or outdated personal data in the context of our processing;
- (h) anonymisation, blocking or deletion of personal data that is unnecessary, excessive or processed in breach of the provisions of this Privacy Policy or the relevant personal data protection legislation;

In addition, You may choose to revoke the processing of some data processed by means of consent, as well as choose to delete such data, with the exception of the legal hypotheses of conservation by Dattos.

## 9. WHAT ARE COOKIES AND HOW DO WE USE THEM AND OTHER SIMILAR TECHNOLOGIES?

Cookies are files added to your device (computer, mobile phone, etc.) or browser to make it easier for you to fill in certain information and access Dattos services.

To give an example, Cookies serve to save your access data to the services we offer and allow you direct access to our Platform without the need to log in. Cookies also allow this access to be personalised, within certain limits.

The data that is stored from cookies can be temporary (i.e. it is discarded after each access) or it can be stored for a longer period of time (which allows you, for example, to access our website without having to log in).

Dattos uses cookies when you browse our website and platform, always to validate the authentication of the user who is accessing that account, in order to prevent unauthorised access. In this case, we use so-called "essential cookies".

There are also third-party cookies that are considered "non-essential cookies", such as cookies and other similar technologies from Google Analytics that serve to enhance your experience when browsing our website. When your data is stored in these cookies, when you access our website you will send this data to the server of a third party (Google), as we have already stated above.

Finally, when we mention the expression "similar technologies", this means that there are other technologies besides Cookies that allow personal data to be stored on the device or browser You are using. The form and type of data that is collected (generally the

Access) are very similar, as are the data transfer activities involving these technologies.

## 10. **ADDITIONAL INFORMATION**

Dattos is concerned about the privacy and protection of your personal data from the conception of our products and services to their actual execution. For this reason, in this chapter we have separated some other information that may be of interest, separated into some general topics:

- (a) Whenever we amend this Privacy Policy, due to changes in the purpose of processing your personal data, the form and duration of this processing and/or establish any new shared use of this data with third parties, You will be informed as soon as possible; and
- (b) You may exercise the so-called right to object to certain processing of personal data carried out by us, as controllers, in particular when the processing is not based on obtaining your consent; as Dattos aims to fully respect the so-called principle of necessity (we only process your personal data when it is strictly necessary to enable our services and the functionalities offered through the Dattos Platform), we believe that this will not be necessary, but it is your right and we have seen fit to inform you in this Privacy Policy.

## 11. **QUESTIONS AND CONTACT**

Dattos is a business owned by **DATTOS S.A.**, a legal entity governed by private law, with headquarters at Avenida Dos Autonomistas, 900, Andar 8, Torre 1, Conj. 804, Sala 804 X, Vila Yara, Osasco, SP, CEP: 06.020-012, registered with the CNPJ/MF under No. 12.962.907/0001-10.

If you have any questions about this Privacy Policy, please contact our official communication channel by e-mail [dpo@dattos.com.br](mailto:dpo@dattos.com.br). This

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he e-mail is administered by our Data Protection Officer (DPO), FUCCI SOCIEDADE DE ADVOGADOS (CNPJ/MF no. 19.697.893/0001-02). Your enquiries will be handled primarily by Paulo Ruggiero Fucci and, if he is unavailable, by Eduardo Ruggiero Fucci or another specialised lawyer from the firm.

Our average response time is 7 (seven) calendar days, but we guarantee that you will receive the attention and care you deserve!