



PO.23 DATA GOVERNANCE AND PERSONAL DATA PRIVACY

**Area: Information Technology, Business Development and Innovation
Management: Data & Analytics**

Created: 11/23/2022

1. PURPOSE

To establish the guidelines and mechanisms of Data Governance, including the Privacy and Protection of Personal Data handled by Dexco ("Company") with a view to ensuring that data is managed in a consistent and suitable manner in relation to its quality, access, security, privacy, and use in the processes which supply and/or produce data, allowing Dexco's strategic plan to be executed in full as well as in conformity with the regulatory environment in which it is inserted.

2. COVERAGE

This Policy applies to all areas of the Company, its subsidiaries, its management, and staff as well as third parties that eventually may be contracted by Dexco and which represent it in the activities referred to herein.

3. NORMATIVE REFERENCES

- Law 13.709 of August 14, 2018 – General Personal Data Protection Law (LGPD);
- NO.73 Storage, Retention and Exclusion of Personal Data;
- NO.15 Documentation Storage
- PO.19 Cybernetic Security Policy;
- NO.44 Application of Disciplinary Measures;
- NO.58 Classification of Information;
- NO.71 Management of Data, Documentation and Content in Data Governance;
- NO.72 Data Governance, Treatment of Personal Data (LGPD);
- Dexco Privacy Policy – Personal Data Privacy and Protection Mundo D [Norma Sites]

4. DEFINITIONS

For the Purposes of this Policy, consider:

- 4.1. National Data Protection Authority (ANPD):** government body responsible for maintaining, implementing and supervising compliance with the LGPD throughout Brazil;
- 4.2. Staff Member:** is any Employee, Intern, Junior Apprentice that executes activities for the Company on the basis of a commercial/contractual relationship;
- 4.3. Controller:** natural person or public/private law entities, on whom the decisions relating to the handling of personal data is incumbent such as: determination of end purpose, conditions and means of handling and processing etc.;
- 4.4. Personal Data:** any information which identifies or renders a natural person identifiable based on a combination of information, direct or indirectly, such as for example: name, tax register number (CPF), ID card (RG), IP address, internal registration number in the Company (user registration, code etc.), profession, electronic address, including the combination of information of job and place of work, irrespective of this information being deemed corporate data;
- 4.5. Personal Data of a Child or Adolescent:** is data of a natural person of less than 18, requiring parental consent or consent of a legal guardian for use, except in specific cases set forth in the LGPD;
- 4.6. Sensitive Personal Data:** is personal data to which the LGPD dedicates greater attention and which requires greater care in its treatment given its more intimate nature and considered more susceptible to discriminatory practices against the Data Subject. Examples are: personal data concerning racial or ethnic origin, religious beliefs, public opinion, affiliation to a labor union or to an organization of a religious, philosophical or political nature, health related data (medical certification, results of medical examinations etc.) or sex life;
- 4.7. Data Steward:** represents the interests of the producers, consumers, and the organization regarding data, being responsible for the curating, quality, and correct use of the data;
- 4.8. Data Dominion:** a grouping of data relating to a macro entity;
- 4.9. Data Protection Officer:** is the person appointed by the Controller and Operator to act as a channel of communication between the Controller, the data subjects and the ANPD;
- 4.10. Manager:** refers to the line manager of an Employee and/or the contracting Manager of a company providing services to the Company to which a Third Party is bound. In the Company, the term may apply to the positions of Supervisor, Coordinator, Manager, Director, Vice President, and President;
- 4.11. Information:** is the body or set of organized data and knowledge which may constitute references on a certain happening, fact or phenomenon. Information may be exhibited through various means and formats: physical, digital, electronic, verbal, printed, written, etc;
- 4.12. General Personal Data Protection Law (LGPD):** inspired by the European General Data Protection Regulation, Law 13.709/2018, provides the legal provisions for the handling of personal data, either through physical or digital means, by a natural person or legal entity, publicly or privately held, with the purpose of protecting the fundamental rights of freedom and privacy and the free development of the personality of the natural person;
- 4.13. Operator:** natural person or legal entity, publicly or privately held, that handle personal data in the name of the Controller;
- 4.14. Data Sub-dominion:** Grouping of data relating to a macro entity in the same way as a data dominion, albeit with greater granularity than the latter;
- 4.15. Third Party:** or supplier/service provider is any natural person or legal entity which provides services to the Company through a commercial/contractual relationship;
- 4.16. Personal Data Subject:** means any natural person whose personal data is being handled;

4.17. Handling of Personal Data: any operation executed using personal data such as that relating to the: collection, production, reception, classification, utilization, access, reproduction, transmission, distribution, processing, filing, storage, elimination, evaluation or control of information, modification, communication, transfer, disclosure or extraction;

4.18. Shared Use of Data: communication, disclosure, international transfer, interconnection of personal data or shared treatment of personal databanks by government bodies and entities in the fulfilling of their legal functions, or between these and private parties, on a reciprocal basis, with specific authorization, for one or more modalities of treatment permitted by these government parties or between private parties.

5. DESCRIPTION OF THE PROCEDURES AND RESPONSIBILITIES

Data and information are valuable assets of organizations and as with all assets, the data must be managed, to ensure adequate quality, security, integrity, protection, availability, comprehension, and effective use, be it Personal Data, including Sensitive Personal Data, or otherwise.

5.1. Data Governance: means a structure which guides and establishes the strategy, culture, policy, and objectives for managing company data in the same way as other resources are managed.

The responsibility for Data Management is shared between Business Data Management and Data Technology Management personnel.

To ensure suitable data governance, the following “Guidelines” and “Data Management Control” must be implemented:

5.1.1 Objectives:

- To understand the strategic data requirements of the company;

- To develop and maintain a data strategy with respect to obtaining, maintenance and quality based on identified strategic needs;
- To establish organizational units and roles to manage data such as: business structure “Data Stewards”, operational structures in IT (Active Directory, DBA, etc.), tactical structures (CDO, DMO, managing the Data Stewards) and strategic structures (Data Governance Committee);
- To identify the Data Stewards, responsible, within the businesses area for the control and use of data;
- To establish filters of Data and Data Stewards Governance. To involve members of the Data Governance Committee and the leading Data Stewards and participating members of the DMO, among others. For the functions in business, to define priority areas (in the context of strategy) which shall have their own Data Stewards;
- To develop and approve Data Policies, Norms and Procedures;
- To revise and approve the Data Architecture settled under detailed and gradual concept levels (data subjects, business entities, data entities, relationships, main duties etc..) and showing **its connection with other architectures**, such as those of businesses, system, processes, technology, among others;
- To plan and sponsor Data Management Services and Projects through prioritization, pursuant to the business strategy, for initiating the implementation of the Data Governance concepts;
- To estimate the value of the Data Assets and costs associated to “Risks”.

5.1.2 Control of Data Management:

- The Company shall plan, implement, and control activities for storing, protecting, and accessing data in electronic files and physical registers (text, graphs, images, audio and video), that is, the focus is on non-structured data, not stored in related systems, divided in two fronts: “Documentation and Registers Management” and “Content Management”;
- The areas are responsible for adhering the instructions in Policy NO.58 Classification of Information with respect to the access (permissioning) and classification of data/documentation

5.2. Personal Data Protection and Privacy: an integral part of Data Governance, involves a structure which provides guidance on the various ways of handling personal data, including through digital means, with the purpose of protecting the fundamental rights of freedom and privacy and the free development of the personality of any natural persons with which Dexco has and/or may come to have, a relationship, also known as Personal Data Subjects.

Further, the Company is responsible for the formulation of the rules of good practice and governance, which establish the organizational conditions, the functioning regime, the procedures, including complaints and petitions of data subjects, rules of security, technical standards, the specific obligations for the various players involved in data treatment, educative initiatives, internal mechanisms of supervision and risk mitigation and other aspects relating to the handling of personal data.

In establishing the rules of good practice and in relation to the treatment and personal data, Dexco considers the nature, coverage, end purpose, the probability and gravity of the risks and the benefits arising from the treatment of Data Subject’s personal data.

In the light of the structure, scale, and volume of Dexco’s operations as well as the sensitivity of the personal data in question and the probability and gravity of the damage for the Data Subjects, the Personal Data Protection and Privacy structure should involve the implementation of a privacy governance program which at least:

- Demonstrates Dexco’s commitment in adopting internal processes and policies that ensure overall compliance with the norms and good practices relative to the protection of personal data;
- Be applicable to the entire combination of personal data under its control, irrespective of the manner in which its collection has been executed;
- Is adapted to the structure, scale, and volume of its operations as well as the sensitivity of the personal data handled;
- Establishes adequate policies and safeguards based on systemic evaluation of impacts and risks to privacy;
- Has the purpose of establishing a relationship of trust with the data subject through transparent activity and one which ensures mechanisms of participation by the data subject;
- Is integrated in its general governance structure and establishes and applies internal and external mechanisms of supervision;
- Has incident and remediation response plans in place; and
- Is constantly updated on the basis of information raised from monitoring and periodic evaluations.

Additionally the respective structure should show the effectiveness of its privacy governance program when appropriate and, particularly, at the request of the ANPD or other entity responsible for promoting conformity with good practices or codes of conduct, which in an independent manner, promote compliance with the

LGPD.

This Policy was approved by DEXCO's Board of Directors.

6. SANCTIONS

Non-compliance with the guidelines of this Policy shall be subject to the imposition of the applicable disciplinary measures.

7. DURATION

This Policy will become effective from its publication date and shall be revised every 3 (three) years.

8. APPROVAL

9. ATTACHMENTS

- N/A

DEXCO

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