



Subject: Data Protection and Privacy Policy	Identification: PO-TI-01 Version: 02
Board in Charge: Data Intelligence & AI - Data Governance & AI	Published on: 21/06/2024
Related Rules: ISO 27001 and ISO 27701	Review by: 21/06/2027

1. Purpose

The TOTVS Group Data Protection and Privacy Policy ("Policy") outlines the TOTVS Group's commitment towards transparency in processing Personal Data of Subjects, in addition to expressing its commitment towards the security of services rendered related to the processing of its customers' data.

This Policy is part of the TOTVS Group Data Protection and Privacy Program, which also includes other documents, guidelines, rules and procedures.

2. Scope

This Policy applies to all areas and companies of the TOTVS Group, including third parties in any way processing Personal Data on behalf of or at the request of the TOTVS, as well as reflecting the governance applied to Personal Data protection by the TOTVS Group. TOTVS Group companies that have their own Governance and Data Protection policies and structures, described at: <https://www.totvs.com/pt-br/privacidade-e-protecao-de-dados/>, may adopt specific or complementary guidelines in their areas of activity, compatible with the provisions of this document. Compliance with this Policy is mandatory and reflects applicable laws and regulations pursuant to Data Protection Laws.

3. References

- Law No. 13.709/2018 – Brazilian General Data Protection Act.
- Law No. 12.965/2014 – Brazilian Civil Rights Framework for the Internet.

4. Definitions

Acquired Companies: companies whose corporate control was acquired by the TOTVS Group.

Brazilian Civil Rights Framework for the Internet: Law 12965/2014, governing the rights and duties of users, service providers and other parties involved in the use of the Internet in Brazil.

Brazilian General Data Protection Act (LGPD): Law 13709, regulating all Personal Data processing activities conducted in Brazilian territory or aiming to render goods or services to individuals located in Brazilian territory, or also in cases where processed Data were collected in Brazilian territory, regardless of where the Data are located.

Brazilian National Data Protection Authority (ANPD): public entity responsible for safeguarding, implementing and overseeing compliance with the Brazilian General Data Protection Act (LGPD).

Controller: public or private individual or corporation responsible for decisions related to the processing of Personal Data. The Controller is who determines the purpose and means of execution of such processing.

Data Processing Agreement (DPA): document governing the contractual relationship between processing agents, whenever the primary agreement involves the processing of Personal Data. This document outlines the limits, means, purposes and all obligations attributed to processing agents.

Data Protection Impact Assessment (DIPA): documentation that contains a description of the processes for processing Personal Data that may generate risks to civil liberties and fundamental rights, as well as containing the measures, safeguards and risk mitigation mechanisms.

Data Protection Officer: employee of the TOTVS Group hired to oversee the communication channel between the TOTVS Group, Personal Data Subjects and the ANPD.

Data Subjects: individuals to which the Personal Data refer.

Franchise: regional business unit that operates as a corporate franchise contractually authorized to use the TOTVS brand and certain intellectual properties, in addition to marketing TOTVS software and services and providing technical services to customers on an exclusive basis.



Subject: Data Protection and Privacy Policy

Identification:

PO-TI-01

Version: 02

International Data Collection: direct collection of the Dataholder's Personal Data by a Processing Agent located abroad.

International Data Transfer: transfer of personal data carried out by a Processing Agent located in Brazil to a foreign country or international organization of which Brazil is a member.

International Market or IM: TOTVS Group units located abroad.

Partner: Companies with which the TOTVS Group has contractual relations under the goal of conducting business activities.

Personal Data: any piece of information related to identified or identifiable individuals.

Privacy by Default: concept stemming from privacy by design. It establishes that a product or service, when launched on the market, must have all the restricted privacy settings determined in its development and only the user can release or deactivate their access if necessary.

Privacy by Design: premise applied to the development of services or products, as well as software, that requires the application of good privacy practices since inception. Hence, any new processing activity must meet the principles, rules, and standards set out and determined by applicable law throughout its entire lifecycle.

Privacy and Data Protection Program: structured set of policies, procedures and organizational practices designed to protect the privacy and security of personal data collected, processed and stored by the TOTVS Group.

Processing Agent: the Controller or the Processor.

Processor: public or private individual or corporation responsible for processing Personal Data on behalf of the Controller.

Records of Processing Activities (RoPA): records of activities to map Personal Data processing activities.

Sensitive Personal Data: personal data on racial or ethnic origin, religious beliefs, political opinions, affiliation to a union or organization of a religious, philosophical or political nature, data regarding health or sex life, and genetic or biometric data, when linked to an individual.

Service providers: individuals or corporations that provide some type of service contracted by the TOTVS Group.

Third Parties: individuals or companies hired to carry out certain activities over a specified period.

TOTVER: any employee who works for the TOTVS Group.

TOTVS Cloud: cloud service provider belonging to TOTVS.

TOTVS Group: TOTVS S.A. its subsidiaries and controlled companies.

TOTVS or Company: TOTVS S.A.

Vendor(s): individuals or corporations that supply goods or services to the TOTVS Group within a specific period of time agreed upon between the parties.

5. Guidelines

5.1. Classification as a Processing Agent

It is a priority of the TOTVS Group to protect, preserve and respect the privacy and rights of Personal Data Subjects in line with the LGPD.

TOTVS Group employs best business practices and ethical conducts to maintain and enhance compliance with processes related to Personal Data Protection, in order to meet the needs of TOTVS Group's Customers, Partners, Vendors and Employees.

5.2. Non-Processing Agents

In some cases (such as, for example, cases in which it only provides software to customers without storing its content) the TOTVS Group acts without having any contact with Personal Data and cannot therefore be classified as a Processing Agent. In these cases, the TOTVS Group acts as a partner to customers, using practices such as Privacy by Design and Privacy by Default in the development of its products and services, and incorporating resources into these solutions so that customers can carry out business processes in a way that complies with the law.



Subject: Data Protection and Privacy Policy

Identification:

PO-TI-01

Version: 02

The use of the resources for the protection of Personal Data made available by the TOTVS Group in its products and solutions is a decision of the customer, at its sole discretion and full responsibility. In accordance with applicable law, customers may decide the best way to process the Personal Data of their own users, customers and vendors.

5.3. Operating as a Processing Agent

In other cases, the TOTVS Group may process Personal Data on its own or share it with other Processing Agents. Depending on the processing activity performed, TOTVS Group may be classified as a Controller or Processor of Personal Data:

- **As Controllers**, TOTVS Group companies adopt technical security and privacy measures to preserve the availability, integrity and confidentiality of all Personal Data processed by them or with the help of third parties. To this end, the TOTVS Group maintains a Privacy and Data Protection Program, in which all those involved, without exception, must participate.

Corporate processes that deal with personal data from all areas are documented and assessed in terms of the risks and impacts they generate for Data Subjects and the Company. The evaluations are carried out periodically by the areas responsible for the business processes with the supervision of the TOTVS Data Governance area and Legal through the Records of Processing Activities (RoPAs). In some cases, depending on the risk attributed to the process or in order to comply with legal requirements, a Personal Data Protection Impact Report (PDPIR) is drawn up, which describes in more detail the risks and mitigation measures applied to the process.

- **As Processors**, TOTVS Group companies must abide by all contractual guidelines set out by the Controllers (their customers), in order to process Personal Data, based on good security practices ensured by independent audit proceedings. Moreover, the TOTVS Group uses Personal Data protection clauses (through DPAs) in all contracts where it falls under the role of Processor, clearly defining the responsibilities of the TOTVS Group's companies. DPAs determine which processing activities the TOTVS Group will carry out on behalf of the Controller.

5.4. Collection and Use of Personal Data

As a Controller, the TOTVS Group processes Personal Data as follows:

- Collected from the Personal Data Subject themselves, provided by them, or collected automatically from their interactions;
- Received through sharing by third parties, partners or franchisees; and
- Produced by TOTVS from the processing of other Personal Data.

Personal Data may be processed by the TOTVS Group for all of the following purposes:

- Offering and marketing products and services in a more personalized way, tailored to customers' needs;
- Service rendering;
- Fulfilling customer requests;
- Operating and managing sites;
- Compliance with legal and contractual requirements;
- For the regular exercise of the controller's rights;
- Communication and marketing activities;
- Defending the rights of Data Subjects;
- Statistical data analysis under the goal of enhancing the performance of its products and services, upon de-characterizing sensitive and personal information.



Subject: Data Protection and Privacy Policy

Identification:

PO-TI-01

Version: 02

As an Operator, the TOTVS Group uses Personal Data as determined by the Controller (customer) and to fulfill contracts.

The TOTVS Group may process data transacted by customers, due to the use of its products, which may identify data subjects without any type of relationship with TOTVS. With due regard for customer guidelines on processing processes, the purposes and protection measures adopted by TOTVS products are detailed in the TOTVS Product Privacy Statement, available at: <https://www.totvs.com/protecao-e-privacidade-de-dados/>.

The TOTVS Cloud area processes Personal Data required to operate contracted services, observing its performance as a Processor, particularly in the following situations:

- Access record: Personal Data of employees and former employees of customers;
- Access control: Personal Data of employees and former employees of customers.

It is important to note that TOTVS Cloud, as a Processor, is agnostic in terms of the Data hosted in its environment, which means that TOTVS Cloud does not have any knowledge regarding the content of information owned by the Customer hosted on the Cloud. As a result, TOTVS Cloud does not consider the type and/or category of information in the Database hosted in its environment, but operates under the premise that, among such information are Personal Data (either sensitive or not) in the Customer's infrastructure, classifying them as confidential.

5.5. Personal Data Sharing

The TOTVS Group treats responsibly the personal data of its customers, TOTVERS and employees of third parties who provide services to the TOTVS Group.

TOTVERS' Personal Data may be shared to fulfill: (i) current legal requirements and the defense of the rights of Data Subjects; (ii) contractual obligations with TOTVERS themselves; (iii) the benefits provided to TOTVERS.

Regarding customers, the TOTVS Group may share Personal Data to fulfill: (i) requests made by the customer; and (ii) legal obligations related to the business relationship.

TOTVS Group may also, subject to compliance with the LGPD, share such Personal Data with Third Parties: (i) Service Providers; (ii) Partners; (iii) Government Authorities.

When required to share Personal Data, the TOTVS Group adopts appropriate measures to ensure all shared information are processed for specific purposes only.

5.6. Personal Data Protection

The TOTVS Group applies strict measures to ensure the integrity and security of Personal Data, adopting a control policy of restricted access to Personal Data. This ensures only authorized personnel have access to such data. Access is granted for the areas in charge to fulfill their activities and provide due support. The TOTVS Group has procedures in place to ensure internal areas and Processors of the TOTVS Group process all Personal Data in accordance with the protection and privacy guidelines set out by the group.

Moreover, the TOTVS Group invests in an awareness-raising program for TOTVERS, Third Parties, Partners and Franchises. The Data Privacy and Protection Program aims to introduce good practices that should be adopted when processing personal data.



Subject: Data Protection and Privacy Policy

Identification:

PO-TI-01

Version: 02

5.7. Personal Data Retention

The Personal Data required to comply with the Brazilian Civil Rights Framework for the Internet is stored in a secure and controlled environment for a minimum period of six (6) months, subject to change depending on the type of contract with customers.

Personal Data may be stored in dedicated or Third-Party servers contracted for this specific purpose, either based in Brazil or abroad, in accordance with applicable laws, and may also be stored through cloud computing technology and/or other future technologies, always under the purpose of enhancing and improving our services.

The TOTVS Group processes Personal Data for the period strictly necessary to fulfill the predetermined purposes, or for as long as the Data Subject's registration remains active in its environment.

Upon termination of the relationship between the customer and the TOTVS Group, in some cases, it may be necessary to keep Personal Data stored for a certain period in order to fulfill legal obligations or court orders.

With regard to the processing of data based on the consent of the Data Subject, the TOTVS Group terminates the processing of Personal Data, where applicable, if the Data Subject objects or revokes consent. If you have any doubts about the period during which the TOTVS Group will process your Personal Data after the end of the contractual relationship, you can contact the service channel for the Data Subject's rights: <https://www.totvs.com/protecao-e-privacidade-de-dados> and obtain the information applicable to the specific case.

5.8. Data Subject Rights

Personal Data Subjects have rights and guarantees regarding their Personal Data. At TOTVS Group, we provide the following detailed mechanisms for Data Subjects to clearly and transparently exercise their rights. Data Subjects may contact TOTVS Group requesting information regarding their rights. To respond to such requests, the TOTVS Group provides a centralized channel (<https://www.totvs.com/protecao-e-privacidade-de-dados>), through which the Data Subject can obtain information and make requests related to their rights:

- **Confirmation of data processing:** TOTVS Group processes the Personal Data of its customers, TOTVERS, visitors, Vendors, partners, among others, keeping this Data stored in secure and controlled environments. Data Subjects may request confirmation of whether their Personal Data are being processed;
- **Access to Data:** at any time, Data Subject may request TOTVS Group to inform them which Personal Data is being processed;
- **Correction of incomplete, inaccurate or outdated Personal Data:** if the Data Subject finds that the information is incomplete, inaccurate or out of date, he/she may request that the missing or inaccurate Personal Data be corrected or supplemented, as the case may be;
- **Anonymization, blocking or deletion of Personal Data that is unnecessary, excessive or processed in non-compliance with the LGPD:** Data Subjects may request anonymization, blocking or deletion of the Personal Data that the TOTVS Group is processing when there is no legal basis justifying the processing. However, if the TOTVS Group has a legal or regulatory justification to keep such data, they shall be retained for the period required to fulfill the legal obligation or exercise the right of defense in legal, administrative or arbitration proceedings, or also in certain situations, acting in the rightful interest of the TOTVS Group (e.g. to avoid violations and frauds);
- **Portability of Personal Data to another service or product provider, upon express request by the Data Subject:** the Data Subject may request the TOTVS Group to port their Personal Data to another service or product provider. If applicable, the Data Subject's request will be complied with as quickly as possible;



Subject: Data Protection and Privacy Policy

Identification:

PO-TI-01

Version: 02

- **Obtaining information about the public or private entities with which the TOTVS Group shares the Data Subject's Personal Data:** the Data Subject may contact the TOTVS Group through the Data Subject rights service channel (<https://www.totvs.com/protecao-e-privacidade-de-dados> - LGPD Assistant) for information on with whom their Personal Data has been shared;

- **Information on the possibility of the Data Subject not providing consent for the processing of Personal Data, as well as being informed of the consequences in case of refusal:** in the event that the Data Subject does not wish to provide his/her consent for the specific processing that the TOTVS Group needs to carry out, the TOTVS Group will clarify to the Data Subject whether it is possible to provide the services or software of his/her interest without processing his/her Personal Data, and will also inform him/her of the consequences of his/her non-consent;

- **Withdrawal of consent:** when the processing of Personal Data is based on the consent of the Data Subject, the Data Subject may withdraw his/her consent and the deletion of his/her Personal Data at any time. The withdrawal of consent may result in the Data Subjects' inability to use the services rendered by the TOTVS Group. Personal Data processing activities shall not be interrupted when the respective Data are (i) anonymized; or (ii) required by the TOTVS Group and/or third parties involved in the provision of services for the purposes of defense in judicial, arbitration or administrative proceedings, as well as to fulfill legal and regulatory obligations;

- **Deletion of data:** in some cases, Data Subjects may request the deletion of their personal data.

In the capacity of Processor, the TOTVS Group may not be held liable for the definitions of data processing. This activity is the responsibility of the customer, as Controller, as set out in the agreement, ensuring that all instructions given to the TOTVS Group comply with Data Protection and Privacy Legislation applicable to Personal Data Subjects.

The TOTVS Group undertakes to fulfill all Data Subject requests as quickly as possible, also in accordance with the deadlines set out by the ANPD.

5.9. International Data Transfer and Collection

In cases where it is not possible or feasible to process data in Brazil, leading to sharing with other Processing Agents located outside the territorial limits of the LGPD, the TOTVS Group seeks to meet all legal requirements in force in the countries involved and adopts cybersecurity and data protection measures ensuring the integrity, transparency and confidentiality of Personal Data.

For the provision of services that involve the international sharing of Personal Data, the TOTVS Group prioritizes the processing carried out in countries that offer personal data protection equivalent to that of the LGPD, or establishes standard contractual clauses appropriate to the purpose of carrying out this transfer, in addition to requiring the providers involved to guarantee that the Data Subjects will have the expected protection. In exceptional cases, the TOTVS Group may carry out other types of International Data Transfer as authorized by the LGPD.

Likewise, the possible International Transfer of TOTVERS' Personal Data is provided for in their employment contracts.

Some TOTVS Group products are marketed and made available by TOTVS Group companies located in the international market or by business partners abroad. These cases may constitute International Data Collection. The TOTVS Group extends to these cases the protection offered to Data Subjects by the hypotheses of International Data Transfer.

In the cases in which the TOTVS Group processes personal data that is not protected by the LGPD, because it is outside the limits of legal territoriality or because it falls within any of the cases of exclusion defined in the law itself, the TOTVS Group undertakes to offer the Data Subjects involved the security and protection of their Personal



Subject: Data Protection and Privacy Policy

Identification:

PO-TI-01

Version: 02

Data and their privacy in the same way, and to respond to the exercise of the rights established by the LGPD, within the limits of what is reasonable, and within its possibilities, if requested through its official customer service channels available.

5.10. Franchises

The TOTVS Group Franchises have their own personal data protection and governance structures, however they must follow the guidelines defined by the TOTVS Group, both in relation to the adequacy of their internal processes and the adjustments made to the products and services provided to customers, with each franchisee being responsible and obliged to fully comply with the LGPD.

Franchises must periodically review their processes (RoPA) to identify measures that must be implemented to ensure unabridged compliance with the LGPD.

5.11. Partners

The TOTVS Group enters into partnerships with companies to employ technologies and processes and expand its range of services. These Partners must also rigorously abide by all security guidelines set out in contracts and in this Policy, ensuring all Personal Data of customers or employees is handled as confidential information.

5.12. Companies acquired by the TOTVS Group

As part of the execution of its inorganic growth strategy, the TOTVS Group may acquire other companies that process Personal Data. For each of the scenarios described below, integration strategies are adopted to offer greater protection to the Data Subject, depending on the specific case, as follows:

Fully integrated companies:

Companies that have gone through all the incorporation phases are fully integrated into the TOTVS Group's Privacy Governance processes, including the communication, training, mapping, data management and incident reporting stages, so that there is no longer any distinction between the operations of the acquired company and the other areas of the TOTVS Group.

Partially integrated companies:

Companies acquired by the TOTVS Group that maintain their own or specialized processes for their business segments or activities must adopt measures to adapt them, on a temporary basis, so that they are compatible with the guidelines of this Policy until they are able to fully adhere to the TOTVS Group's standards.

Non-integrated companies:

Companies acquired by the TOTVS Group that still operate exclusively with legacy structures and policies are subjected to a careful assessment of their Privacy Governance processes by the TOTVS Group. At the end of the assessment, the Privacy Governance area indicates transitional or definitive measures for adapting and mitigating risks. These companies must follow the guidelines established by the TOTVS Group, as well as adjust their internal processes in all phases of the incorporation.



Subject: Data Protection and Privacy Policy

Identification:

PO-TI-01

Version: 02

Companies with autonomous privacy structures:

The companies controlled by the TOTVS Group have their own governance structures and permanent Data Privacy policies, which are aligned and operate in coordination with the TOTVS Group's governance practices and this Policy.

5.13. Questions

Inquiries regarding the TOTVS Group's Protection and Privacy Policy or any other doubts related to Personal Data protection and security must be forwarded through our service channels (<https://www.totvs.com/politica-de-privacidade/>) or via the DPO email address (dpo@totvs.com.br).

6. Assignments:

Board of Directors

- Approving the TOTVS Group Data Protection and Privacy Policy.

Governance and Appointment Committee

- Reviewing this Policy and its revisions and submitting recommendations to the TOTVS Board of Directors regarding its approval.

Statutory Audit Committee

- Assess and propose relevant changes to the Protection and Privacy Policy, presenting its recommendations to the Board of Directors;
- Monitoring indicators of incidents, risks and rule violations of this Policy, reporting them to the Board of Directors.

Data Governance & AI

- Devising and proposing changes to the Personal Data Protection Policy and Standards and Procedures related thereof;
- Defining the strategies needed to keep the TOTVS Group's operations in compliance with applicable data protection legislation.

Data Processing Officer (DPO)

- Responsible for managing Data Protection activities at the TOTVS Group;
- Receiving complaints and communications as well as requests for clarification from Data Subjects, and adopting the corresponding corrective/preventive measures;
- Receive and make due arrangements regarding communications to the ANPD;
- Instructing TOTVS Group employees and contractors regarding the practices to be adopted regarding Personal Data protection;
- Replying to Personal Data Protection and Processing inquiries from internal areas of the TOTVS Group;
- Carry out the attributions assigned by the TOTVS Group or established in supplementary Data Protection standards.

Data Protection Officer (DPOs) of the TOTVS Group's Subsidiaries:

- Reporting Data Protection management activities to the DPO of the TOTVS Group;



Subject: Data Protection and Privacy Policy

Identification:
PO-TI-01
Version: 02

- Reporting any security incident to the DPO of the TOTVS Group.

Legal

- When called upon, guiding the internal areas of the TOTVS Group on legal inquiries regarding Personal Data Processing and Protection, as provided by applicable laws;
- Assisting in the understanding the internal processes for complying with applicable laws on Personal Data Processing and Protection;
- Analyzing and devising documents submitted to the Legal department, in order to ensure that the requirements and standards of applicable Personal Data protection laws are addressed appropriately;
- Forwarding any reports of incidents to the ANPD, as needed.

Chief Data Officer (CDO)

- Formally appointing the Data Protection Officer and his/her alternate.

Information Security

- Keeping the Information Security incident response plan up to date, submitting it to approval by the Data Protection and Privacy area whenever Personal Data are involved;
- Defining Information Security controls to ensure Personal Data Protection and Privacy;
- Propose measures to protect Personal Data;
- Assessing impacts in processes, actions, products and services with Personal Data;
- Ensure the Registration of Processing Activities under the TOTVS Group's responsibility;
- Supporting the controller in devising a Personal Data Protection Impact Assessment, as needed;
- Report any security incidents to the Data Processing Officer (DPO) of the TOTVS Group, as needed.

TOTVERS

- Complying with the guidelines and rules set out in this Policy;
- Engaging competent areas in case of any doubts related to this Policy;
- Carry out all required training courses on Personal Data Protection provided by the TOTVS Group.

Ombudsman

- Engaging the Protection and Privacy area in case of requests related to personal data processing activities.

7. Consequence Management

Noncompliance with this policy may result in managerial measures involving labor, civil, criminal and administrative consequences for those responsible for such illegalities, including the possibility of dismissal with just cause and contractual termination for just cause in the case of Third Parties.



Subject: Data Protection and Privacy Policy

Identification:
PO-TI-01
Version: 02

8. Approvals

Name/Position	Description
Ronie Teixeira Leite Data Processing Officer (DPO)	Development
Daniel Aviz Executive Information Security Manager	Review
Diogenes Augusto Junior Executive Cloud Manager	Review
Cristiano Nobrega Director of Data Intelligence & AI	Review
Marcos Corradi Executive Manager of Internal Controls, Risks and Compliance	Review
Gilsomar Maia Vice President of Finance and Administration	Review
Gustavo Bastos Vice President of Information Technology and Platforms	Review
Dennis Herszkowicz CEO	Review
Statutory Audit Committee	Recommendation
Governance and Appointment Committee	Recommendation
Board of Directors	Approval