

SENIOR MANAGEMENT COMMITMENT LETTER



FEB/2021

Notice on this translation. This is an English courtesy translation of the document originally issued in Brazilian Portuguese (“Carta de Compromisso da Alta Direção – LGPD”). The Brazilian Portuguese version is the official document, bears the qualified electronic signature of the legal representative and shall prevail in the event of any discrepancy, divergence of interpretation or omission.

Jaraguá do Sul, February 17, 2021

Subject: UPFLUX and the LGPD

The Brazilian General Data Protection Law, better known by its acronym LGPD, is a Brazilian statute that applies to all organizations that collect and process the personal data of individuals within Brazilian territory.

As a responsible and committed company, **UPFLUX** acknowledges the need to comply with the LGPD and to ensure that effective measures are taken to protect the personal data of our clients, employees, suppliers and other parties.

The commitment to the privacy and security of personal data extends to every individual in the organization and shall be demonstrated through the relevant policies and through the provision of appropriate resources to establish and develop effective data protection and information security controls.

As part of the fulfilment of our obligations, we will implement a comprehensive program to validate the use of personal data and to reaffirm the legal basis of our procedures.

Our Information Security Policy and our updated Privacy and Data Protection Policy are made available in electronic format in our knowledge base and are disclosed within the company and to all interested third parties.

We will also ensure that a systematic review of the program is conducted on a regular basis, so that its objectives are met and relevant matters are identified and addressed.

We encourage all employees and business partners to ensure that they play their part in implementing the LGPD program and all of our information security objectives.

Yours sincerely,

Cleiton dos Santos Garcia

Legal Representative – Smart Process Ltda. (UpFlux)

The original Portuguese version of this letter was digitally signed by Cleiton dos Santos Garcia (ICP-Brasil digital certificate) on February 17, 2021, at 09:03:25 (GMT-03:00).