

	DOCUMENTARY RETENTION AND DESTRUCTION POLICY	Code:
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1. PURPOSE

The objective of this Policy is to ensure that documents controlled by the STT Group, confidential client data and personal data of employees, partners, interested third parties, both on paper and electronically, are adequately protected and maintained, in order to ensure that the records that fulfilled their purpose in the STT Group are discarded as appropriate.

2. SCOPE

2.1. This document applies to all areas of the STT Group, specifically the management of personal data processed by the STT Group.

2.2. Personal data of people subject to this Policy is considered to be any information relating to a naturally identified or identifiable person, or that can be individualized through the processing of information, in accordance with the data processing carried out by the STT Group and the provisions set forth in applicable legislation.

2.3. Sensitive Client's Data is considered data received from clients or their associates, in any form, for payroll processing purposes, and can potentially identify client's employees, their personal information and/or provide information about client's finances.

2.4. **Out of scope** of this policy are documents that are not exhaustively within the list of documents specified in the Document Retention Table and documents defined as confidential client information (user logins and passwords for banks, for government entities, digital certificates, tokens), **which must have the approval of the Regional Legal Department for the destruction of the document**, in accordance with the guidelines in clause 11.6 of this document.

3. RESPONSIBILITY AND AUTHORITY

3.1. It is the responsibility of the Ethics and Regulatory Compliance Manager.

- a. Keep this document updated.
- b. Review and approve possible modifications or updates to this document.
- c. Make sure this document is communicated to the employees involved.
- d. Ensure that the guidelines outlined in this document are met.

It is the responsibility of employees of the Regional Ethics and Regulatory Compliance Department and all employees of the STT Group:

- a. Follow the guidelines described in this document.

3.2. Users authorized to request the archiving, blocking and destruction of personal data:

- a. Only the person responsible for the area may request the archiving, blocking and destruction of personal data.
- b. Before sending the request for archiving, blocking and destruction of data, the person responsible must have the approval (VB) from the Ethics and Regulatory and Legal Compliance Department.

3.3. It is the responsibility of the person responsible for the area:

- a. Follow the deadlines described in the Document Retention Table or in the clause stipulated in the Personal Data Processing Agreement, to proceed to request the appropriate disposal method, as determined in this policy.
- b. Request approval from the compliance and legal areas for the destruction of personal data.
- c. Send approval of the areas mentioned above to the IT department, to proceed with the appropriate destruction of personal data.

3.4. Improper processing of personal data and confidential information of the client and the STT Group will give rise to sanctions in accordance with the Internal Labor Regulations and local legislation, without excluding the responsibilities corresponding to current legislation.

4. DEFINITIONS

For the purposes of this policy, the following definitions must be taken into account:

Personal data: any information relating to an identified or identifiable natural person;

Sensitive Personal Data: information relating to the person's personal privacy, such as that revealing racial origin, political opinions, religious or spiritual convictions, socioeconomic condition, biomedical or genetic information, life and sexual orientation, among others defined by applicable legislation;

Client's Personal Data: any information relating to an identified or identifiable natural person shared by the client for the execution of the contract established between the client and the STT Group;

Confidential Information from the client: Dataset (not personal) organized that belong to or were shared by the client by virtue of the service provided, such as user logins and

passwords for banks, government entities, digital certificates, tokens.

Data anonymization: use of reasonable technical means available at the time of processing, whereby the data loses the possibility of association, directly or indirectly, with a natural person;

Pseudonymization data: Processing whereby data loses the possibility of association, directly or indirectly, with an individual, except through the use of additional information kept separately by the controller in a controlled and secure environment;

Data lock: temporary suspension of any processing operations, through the storage of personal data or the database;

Data deletion: deletion of a data or set of data stored in a database, whatever the procedure used;

Database Controller: natural or legal person who administers, manages or is responsible for the database to decide what the purpose of the database is and what type of treatment will be applied to it;

Database Operator: natural or legal person who processes personal data on behalf of the person responsible for the database (Controller);

Processing of personal data: any operation or set of operations, carried out by automated or manual procedures and applied to personal data, such as collection, registration, organization, conservation, modification, extraction, consultation, use, communication by transmission, dissemination or any other way that facilitates access them, grouping or interconnection, as well as their blocking, exclusion or destruction, among others;

Document retention period: Period defined by applicable legislation during which the STT Group must store a certain category of personal data, in accordance with legitimate and reasonable storage methods;

Methods of destruction of data personal: process by which personal data is permanently deleted from a storage device and/or information systems.

5. PERSONAL DATA LIFECYCLE

The information collected by the STT Group is organized based on the lifecycle of personal data identified through the record of processing activities managed by the STT Group, in its collection, management, retention and disposal phases.

5.1. The personal data collected must be limited to the purpose for which they were collected, so that their processing is in accordance with applicable legislation.

5.2. Confidential information and personal data must be treated in accordance with the provisions of the contract, or, when applicable, in the pre-contractual procedure between the STT Group and the interested party (client, supplier, applicant, employee, among others).

5.3. When processing personal data, it is recommended that they be stored electronically, except if the physical document is necessary to comply with legal or regulatory obligations.

5.4. In the case of physical retention of documents, physical security measures must be taken to ensure quality and integrity of personal data.

5.5. During the document retention period, any information must be stored in accordance with the appropriate level of security and in accordance with the established retention period.

5.6. Once the purpose for which personal data was collected has been achieved, it must be discarded, respecting the established retention period and method.

5.7. Grupo STT maintains confidential data and personal data of clients in its systems, as long as the contract with the client is active and during the limitation period regulated by local legislation.

5.8. Client's personal data may exist on systems for up to 24 months after the end of the contract, unless a longer period is specified and mutually agreed as part of the contract termination.

6. GENERAL GUIDELINES FOR RETENTION OF PERSONAL DATA

Personal data processed by STT Group must be stored in accordance with the retention periods established in the Document Retention Table of Grupo STT.

6.1. Once the purpose for which the personal data was collected has been achieved, the employee must dispose of it, respecting the period and method of conservation and deletion established in the STT Group Document Retention Table.

6.2. In cases of pseudonymization and blocking of personal data, the IT department must be notified so that the appropriate disposal procedure can be carried out.

7. GENERAL GUIDELINES FOR RETENTION OF PERSONAL DATA PRIOR TO CLIENT'S CONTRACTUAL TERMINATION

Client's personal data managed by the STT Group must be stored in accordance with the retention periods and methods of deletion established in: i. the Data Processing Agreement and the Service Provision Agreement signed with the client or; ii. The STT Group document retention table.

7.1. In the event of the client's departure, the Ethics and Regulatory Compliance Department must be notified, with the aim of reviewing the Personal Data Processing Agreement or, in its

absence, the Framework Contract, to validate clauses relating to personal data retention and destruction prior to the termination of a contract.

7.2. The review of the aforementioned clauses must follow the guidelines established in the Procedure for Processing Personal Data upon client Exit.

8. DATA LOCATION AND RETENTION SCHEDULE FOR CONFIDENTIAL CLIENT’S INFORMATION.

Sensitive client data that falls within the scope of this policy may exist in different media and in different forms, as detailed below.

	Storage location	Standard retention schedule
Client media (CD/DVD)	Closed cabinets	Maximum 3 months after receipt of client notification
Paper documents	Closed cabinets	Maximum 3 months after receipt of client notification
Database (primary)	Server	13 months after the end of the contract
Database (secondary)	Server	13 months after the end of the contract
Database (test/preparation)	Server	13 months after the end of the contract or earlier if requested
Workspace	Server	13 months after the end of the contract
Backups	Server	13 months after the end of the contract

8.1. For cases of legal retention requested by a client, STT Group will identify, capture and preserve user data within the scope without affecting the data of other users or clients, upon validation of additional costs for the storage service. This is achieved through system screenshots or database backups.

8.2. Data extracts can be transferred to the client in common file formats (txt, csv, xls, pdf or others).

9. DESTRUCTION OF CONFIDENTIAL CLIENT INFORMATION.

Data is removed from multiple systems/locations using the methods listed below.

	Data destruction method
Client media (CD/DVD)	Certified shredding
Paper documents	Certified shredding
Database (primary)	In situations where client data resides in a multi-tenant database, only the records associated with that client are removed from all database objects and mdf/ldf files and the database instance. They are not removed.

Database (secondary)	In situations where client data resides in a multi-tenant database, records are only deleted from the primary database, which is then replicated to the secondary site after one hour.
Database (test/preparation)	In situations where client data resides in a multi-tenant database, only the records associated with that client are removed from all database objects and mdf/ldf files and the database instance. They are not removed.
Workspace	Delete files/folders/workspaces using native functions of WorkZone, Google Drive or others.
Backups	To replace

The above methods are used to wipe/delete data only within the scope of this policy and should not be confused with the methods described in the Asset Control and Deletion Policy.

10. DATA LOCATIONS AND PERSONAL DATA RETENTION SCHEDULE

Personal data is stored on physical and digital media, as verified through the records of processing activities carried out by the STT Group.

10.1. The document retention schedule must follow the guidelines established in the STT Group Document Retention Table, which will define the conservation and storage periods for the different categories of personal data, in accordance with applicable legislation.

10.1. Under no circumstances may personal data be stored in a manner contrary to the Document Retention Table.

11. DESTRUCTION OF PERSONAL DATA

Personal data must be deleted after its retention period has elapsed, or immediately, after reaching its purpose, in cases where there is no need for conservation.

11.1. The STT Group Document Retention Table will indicate the appropriate destruction method for each category of personal data such as anonymization, deletion, among others applicable to the STT Group.

11.2. The deletion of personal data will occur upon prior approval and request from the person responsible for the area to which the personal data is sent, in conjunction with the legal, compliance and IT areas.

11.3. Only certain users are authorized to share information to destroy personal data, therefore it is essential that requests made are accompanied by approval under the terms described above.

11.4. The authorized user requesting the destruction of personal data must contact the IT department to properly dispose of personal data. The IT department will only delete personal data after validating the approval of the areas specified above.

11.5. Once the disposal of personal data is authorized, a personal data deletion record must be generated, which will contain the category of deleted personal data, in accordance with the deletion method chosen in the Documentary Retention Table or in the Data Processing Agreement – DPA.

11.6. Documents that do not contain personal data are outside the scope of the previous provisions, in which case the legal department must be consulted before archiving, blocking or destroying.

12. ADDITIONAL PROVISIONS

12.1. Each STT Group employee is responsible for complying with the guidelines of this policy, respecting the privacy and confidentiality of information.

12.2. Failure to comply with the established guidelines is subject to sanctions in accordance with internal regulations and applicable local legislation, without prejudice to the STT Group's compensation for losses and damages suffered.

12.3. Upon becoming aware of any vulnerability or incident related to the retention or destruction of personal data, immediately contact Grupo STT, via the following emails:

- For Mexico: privacidad.mx@grupostt.co
- To Brazil: privacidade@grupostt.com
- For other countries: privacidadinformacion@grupostt.com

13. RELATED DOCUMENTS

- STT Group personal data privacy policy
- Document Disposal Certificate

ANNEX: DOCUMENTARY RETENTION TABLE

	INFORMATION ASSET	RESPONSABLE DEPARTMENT	LEGAL TERM	COMMENTS	RELATED LEGISLATION
HUMAN RESOURCES - CONTROLLER	Occupational Health Plans (CR)	HR	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Personal action	HR	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Performance appraisal record	HR	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

				And at 15 it is eliminated	
	Trial period test team registration	HR	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Labor file	HR	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
HRO CONTROLLER	Commercial contract	Legal	5a-10a-15a	Keep the information on file for the duration of the commercial relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

	Commercial contract (employer replacement)	Legal	5a-10a-15a	In cases of employer replacement, it is understood that the document retention periods are the same as those defined for employment documents.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Work contract	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Proof of payment of labor and social security obligations to government entities	Operations	5a-10a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. At age 15, all documentary supports are digitized, but NOT DELETED	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	client invoices	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship,	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection

				once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Law
	Purchase orders	Operations	5a-10a-15a	Keep the information in the archive for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Incidence Sheets (Projects)	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Talent Payroll Report	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

				digital archive. And at 15 it is eliminated	
	Bank records	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Labor archive	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	client reports	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

IMPLEMENTATION - PROCESSOR	Evidence of third-party payments	Operations	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years send it to a physical and/or digital file. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	IMP-FO-02 format (Filled out by the client, company information, employees, history, concepts or the same information in the client format	PPO IMPLEMENTATION	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	IMP-FO-09 format (HRO provides employee information, salaries, charges and history)	PPO IMPLEMENTATION	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	IMP-FO-06 format (Legal representative contact details, client contacts, user codes for	PPO IMPLEMENTATION	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection

	government reporting)			sent to the archive and at the end of the period it is deleted	Law
	Client Folders (collect forms 02, 09 and 06 and any other license or salary garnishment documents and documents related to payroll, contracts, copy of legal representative identification, proposals,	PPO IMPLEMENTATION	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
PPO - PROCESSOR	Process backups	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Payroll Calendar	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	client Management Form	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is	Labor Code, Penal Code, Civil Code, Commercial

				blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Code, GDPR, Data Protection Law
	Payroll Incidents	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Processed payroll	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Final Reports	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Pay slips for the month	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection

				sent to the archive and at the end of the period it is deleted	Law
	Settlements	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Main government entities	NOMINAS DO PPO	1a-2a-3a	It stores the information for one year, after 2 years it is blocked, in the third year it is sent to the archive and at the end of the period it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
LEGAL-CONTROLLER	Employment contracts	LEGAL	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Commercial and supplier contracts	LEGAL	5a-10a-15a	Keep the information in the file for the duration of the employment	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR,

				relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Data Protection Law
	Court lawsuits	LEGAL	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Administrative procedures	LEGAL	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Labor and commercial law applications	LEGAL	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

				a physical and/or digital archive. And at 15 it is eliminated	
	Consolidated Legal - CR	LEGAL	5a-10a-15a	Keep the information in the file for the duration of the employment relationship, once it ends after 5 years it is blocked, after 10 years it is sent to a physical and/or digital archive. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
RPO - PROCESSOR	Labor file (shared with HRO and HR)	RPO	5a-5a-10a	Once the service has been provided, the information is kept for 5 years, sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Job profile	RPO	5a-5a-10a	Once the service has been provided, the information is kept for 5 years, sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Candidate's CV	RPO	5a-5a-10a	Once the service has been provided, the information is	Labor Code, Penal Code, Civil Code, Commercial

				kept for 5 years, sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Code, GDPR, Data Protection Law
	REC-FO-04 Labor and/or Personal References	RPO	5a-5a-1 0a	Once the service has been provided, the information is kept for 5 years, sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
PURCHASES - CONTROLLER	GRUPO STT supplier databases	SHOPPING	5a-5a-1 0a	Once the service is received, the information is kept for 5 years, sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Contracts with other suppliers (except Telecommunications)	SHOPPING	5a-5a-1 0a	Once the service is received, the information is kept for 5 years, sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Documentation submission template	SHOPPING	5a-5a-1 0a	Once the service is received, the information is kept for 5 years,	Labor Code, Penal Code, Civil Code, Commercial

				sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Code, GDPR, Data Protection Law
	Monthly purchasing report and supplier reevaluation (sent on the stipulated dates)	SHOPPING	5a-5a-1 0a	Once the service is received, the information is kept for 5 years, sent to physical and/or digital storage and kept for another 5 years, after 10 years it is deleted.	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
COMMERCIAL - CONTROLLER	Potential client Database	BUSINESS PARTNERS	5a-5a-1 0a	Keep the information as long as the commercial relationship is kept in the client's file, once the relationship ends after 5 years it is blocked, after 5 years it is sent to a digital and/or physical archive and after 10 years of storage it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Commercial offer (email - not in the unit)		5a-5a-1 0a	Keep the information as long as the commercial relationship is kept in the client's file, once the relationship ends after 5 years it is blocked, after 5 years it is sent to	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

				a digital and/or physical archive and after 10 years of storage it is deleted	
	Commercial contract (email-not on unit)		5a-5a-1 0a	Keep the information as long as the commercial relationship is kept in the client's file, once the relationship ends after 5 years it is blocked, after 5 years it is sent to a digital and/or physical archive and after 10 years of storage it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Certification of the existence of companies (email not on drive)		5a-5a-1 0a	Keep the information as long as the commercial relationship is kept in the client's file, once the relationship ends after 5 years it is blocked, after 5 years it is sent to a digital and/or physical archive and after 10 years of storage it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	Copy legal representative ID (email, not on unit)		5a-5a-1 0a	Keep the information as long as the commercial relationship is kept in the client's file, once the relationship	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

				ends after 5 years it is blocked, after 5 years it is sent to a digital and/or physical archive and after 10 years of storage it is deleted	
	Copy CNPJ		5a-5a-1 0a	Keep the information as long as the commercial relationship is kept in the client's file, once the relationship ends after 5 years it is blocked, after 5 years it is sent to a digital and/or physical archive and after 10 years of storage it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
	client and contact person databases (Operations)	OPERATIONS	5a-5a-1 0a	Keep the information as long as the commercial relationship is kept in the client's file, once the relationship ends after 5 years it is blocked, after 5 years it is sent to a digital and/or physical archive and after 10 years of storage it is deleted	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law
OCCUPATIONAL HEALTH COMMITTEE - CONTROLLER	Occupational Health meeting minutes book	RH	5a-10a-15a	Keep the information on file for the duration of the	Labor Code, Penal Code, Civil Code, Commercial

				employment relationship, once it ends after 5 years it is blocked, after 10 physical and/or digital storage. And at 15 it is eliminated	Code, GDPR, Data Protection Law
	Work Matrix	RH	5a-10a-15a	Keep the information on file throughout the entire period of the employment relationship, once it ends after 5 years it is blocked, after 10 years of physical and/or digital storage. And at 15 it is eliminated	Labor Code, Penal Code, Civil Code, Commercial Code, GDPR, Data Protection Law

In specific cases, the STT Group will reserve the right to retain personal data beyond the deadline, for the regular exercise of rights in judicial, administrative or arbitration proceedings, in accordance with the content of applicable personal data protection legislation.

11. UPDATE CONTROL

IN	Name of the change requester	Position	Data	P.	Description of the change