

PRIVACY STATEMENT

INTRODUCTION

The guarantee of privacy is an important right that assists all holders of personal data, and the use of such data by third parties must be lawful, transparent, limited and secure.

This privacy policy was created by ZEN S.A. Indústria Metalúrgica with the aim of letting you, the user of our websites, duly informed about everything that concerns personal information, within the scope of the data processing we carry out.

We also inform you that this policy extends to the following sites:

- zensa.com.br
- portal.zensa.com.br
- catalogo.zensa.com.br

PRINCIPLES

ZEN S.A.'s online privacy notice is based on its Information Security Policy, its Code of Ethics and its principles, which include a commitment to transparency and respect in relations with all its customers, employees, partners, suppliers and users of its websites.

USE OF COOKIES

Cookies serve to improve the user experience, both in terms of performance and in terms of usability, since the content made available will be directed to your needs and expectations.

Cookies allow ZEN S.A. websites to memorize information about the user's visit, their preferred language, their location, the recurrence of their sessions and other variables that we consider relevant to make their experience much more efficient.

Cookies may also be used to compile anonymous and aggregated statistics that allow us to understand how users use and interact with ZEN S.A. websites, as well as improve their structures and content. Because these are anonymous statistics, we cannot personally identify you through this data.

The use of cookies is common on any website these days. Their use in no way harms the devices (computers, smartphones, tablets, etc.) on which they are stored.

When accessing ZEN S.A. websites, the user authorizes the use of cookies. If you do not agree with the use of cookies in the way presented here, the user may adjust the settings of their browser to not allow their use.

We remind you that disabling the use of cookies may impact your experience on ZEN S.A. websites.

Handling of personal data

ZEN S.A.'s websites contain areas of restricted access, accessible only to users who receive specific authorization, through a user identifier and authentication through an access password. In order for a user to be identified and authenticated, some personal data may be requested.

The personal data requested are the minimum necessary for the performance and improvement of the services provided, including through the websites, and are stored in the Information Systems of ZEN S.A.

ZEN S.A.'s information systems are safe and controlled, and users' personal data are kept only for the necessary period and in accordance with the following criteria:

- While the relationship between users and ZEN S.A. lasts.
- For the period necessary for ZEN S.A. to fulfill its legal and contractual obligations.

Personal data is collected and protected in accordance with strict confidentiality and security standards and is not passed on to third parties, unless expressly authorized by the users themselves or in accordance with the provisions of this policy regarding its disclosure.

The adoption of such protection measures, despite reducing the risks, does not prevent the possibility of problems in the treatment of data. ZEN S.A., observing the principles of transparency and responsibility, as soon as it becomes aware of any incidents related to personal data, it will immediately communicate the fact to the respective holder(s).

DATA SECURITY

All information collected on the websites will be stored in our database without human interference.

Access to users' personal data is restricted to ZEN S.A. employees, contractors and agents who need to know this information to operate, develop or improve the services offered by ZEN S.A. These individuals have confidentiality obligations and may be civilly and/or criminally prosecuted. If they fail to fulfill their obligations. Users' personal data is not sold, rented or exchanged with third parties.

Intrusion attempts on the websites or any other computerized environment of ZEN S.A. will be understood as illegal attitudes and will be treated in accordance with the provisions of civil and criminal legislation in force.

PERSONAL DATA GATHERED AND USAGE THEREOF

For the use of services and restricted access areas of ZEN S.A. websites, the following types of personal data may be required from the user: When the user requests a service or access to information that requires registration, his/her personal data may be requested (such as name, e-mail address, access password and registration number). To register for a newsletter or "contact us", additional data may be requested, such as a telephone number.

In order to offer content and materials of interest to you, it is often necessary to cross-reference data so that our marketing actions are directed towards what you expect to receive. We guarantee that this crossing is not done in a discriminatory way, not hurting any of your individual rights or freedoms. In addition, you can, at any time, request a change to remove such data processing permissions, through our email address: privacidade@zensa.com.br.

Considering all these points, your data may be used in the following ways:

- Your e-mail is used to send the material or information requested by you when filling out the form. It can also be used to send newsletters, communicate the launch of new materials or new products from ZEN S.A., as well as our partners. However, the user can unsubscribe at any time;
- Send you messages regarding support or service, such as alerts, notifications or updates;
- Communicate with you about products, services, promotions, news, updates, events and other matters that you may be interested in; and
- Carry out targeted advertising according to your tastes, interests and other collected information.

The user may refuse to submit personal data to the services or websites of ZEN S.A. In this case, the provision of these services or access to restricted areas of the websites may not be possible.

MINORS

Our website is not intended for use by minors. The participation of users is conditioned to their legal capacity, being authorized and valid only the registration of people over 18 years of age. That is, minors under the age of 18 should not register on our sites.

WHO WE SHARE YOUR PERSONAL DATA WITH

We may share your personal data with:

- Partner companies for the purpose of analyzing your profile and forwarding targeted offers, according to your habits and customs;
- Government entities, in compliance with the law or court orders;
- When contracting a prize or experience that requires the name of the holder who has the right to usufruct;
- Advertisers: You may eventually receive advertisements, content and links displayed in a personalized way from ZEN S.A., according to your interests and behavior on our website or on other services with which you interact. For this purpose, data may be shared between ZEN S.A. and the targeted advertising platform, mainly unique identifiers, IP addresses, cookies and other information collected from your browser that can be used to measure the efficiency of online advertising. You can request to unsubscribe from this advertising by contacting us at the following email address: privacidade@zensa.com.br.
- Statistics: The data stored by ZEN S.A. may be used for statistical purposes (analytics). These data are grouped in order to provide a macro analysis of the scenario, and therefore, they do not seek to identify or make identifiable the holders of personal data, but only to better understand how they access ZEN SA websites, with the purpose of improving the provision of services and customizing products more targeted to the interests of users.

YOUR RIGHTS REGARDING THE PERSONAL DATA WE PROCESS

In addition to the care we take to preserve the security of your personal data, we also guarantee the holder to obtain clear and accurate information regarding the data processing we carry out.

Thus, you have the right, at any time, upon request:

- Know if we process data owned by you;
- Have access to know what personal data we process about you;

- Request correction of incomplete, inaccurate or outdated data;
- Request blocking, deletion or anonymization of data;
- Revoke the consent given to the use of the data and request their deletion from our databases;
- Get information about data sharing.

CHANGES TO THIS PRIVACY NOTICE

This online privacy notice may be changed without notice, due to technological, legal or commercial factors, effective immediately upon posting on the websites. By changing this notice, ZEN S.A. will modify the date of the update that appears at the top.

ACCEPTANCE OF TERMS

By using ZEN S.A. websites, the user agrees to accept the terms of this privacy notice. If the user does not agree with this online notice, he/she should not use the websites. The continued use of the websites after the publication of changes to these terms means that the user accepts them.

HOW TO ANSWER DOUBTS ABOUT PERSONAL DATA PROCESSED BY ZEN S.A.

In case of doubts about the data processing carried out by ZEN S.A., you can request more information and clarifications directly from our Data Officer, who will be able to answer you, within the time provided by law.

To do so, use the following e-mail address: privacidade@zensa.com.br.

The name of the data officer is SOTTO MAIOR & NAGEL ADVOGADOS ASSOCIADOS (CNPJ/MF: 08.799.555/0001-57).

RECOMMENDATIONS

For security reasons, users are recommended to keep their software and other protection devices on their computers always up to date, such as the operating system, personal firewall, antivirus and antispyware systems, and to adopt good information security practices.

ZEN S.A. does not forward emails requesting passwords, personal data, credit card numbers or passphrases from its users. Likewise, ZEN S.A. does not forward emails containing files or links to any types of charges. If the user receives e-mails sent by strangers in this regard, he/she must immediately inform ZEN S.A. about the occurrence, by means of the telephone or e-mail provided on our website.