DATA PRIVACY STATEMENT

ZEN POLICIES — Online privacy notice

Revision: **02** Issued on: **Oct 3, 2025**

1. INTRODUCTION

Ensuring privacy is an important right of all personal data subjects. 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 to properly inform you, as a user of our websites, about everything related to personal information and the personal data processing activities we carry out.

This Policy applies to the following official ZEN S.A. channels:

- zensa.com.br
- portal.zensa.com.br
- catalogo.zensa.com.br
- **ZEN CAT** mobile app (Android/iOS) and installable catalog (PWA)
- Recruitment and selection environments operated at **zensa.gupy.io** and related pages

2. PRINCIPLES

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

3. COOKIES AND SIMILAR TECHNOLOGIES

We use strictly necessary cookies (without consent) and non-essential cookies (analytics, performance, and advertising), subject to free, informed, and granular consent. Our banner provides "Accept all", "Reject all", and "Configure" options at the first level. You may change or withdraw your consent at any time in the Preference Center available in our channels.

For each category, we inform: purpose, legal basis, retention period, and third parties involved. In our mobile apps, we additionally describe the SDKs used, their providers, and their respective purposes.

Disabling non-essential cookies may affect certain features, but it will not prevent basic use of our channels.

4. PROCESSING OF PERSONAL DATA

ZEN S.A.'s websites contain restricted-access areas available only to users who receive specific authorization, using a user identifier and password authentication. To identify and authenticate a user, certain personal data may be requested.

The personal data requested are the minimum necessary to provide and improve the services offered, including through the websites, and are stored in ZEN S.A.'s Information Systems.

ZEN S.A.'s information systems are secure and controlled. Users' personal data are retained only for as long as necessary and according to the following criteria:

Personal data are collected and protected in accordance with strict confidentiality and security standards and are not shared with third parties, except where expressly authorized by users or as provided in this Policy regarding disclosure.

Although these protection measures reduce risks, they do not eliminate the possibility of issues in data processing. In line with the principles of transparency and accountability, as soon as ZEN S.A. becomes aware of any incidents involving personal data, it will promptly notify the respective data subject(s).

- For as long as the relationship between users and ZEN S.A. lasts;
- For the period necessary for ZEN S.A. to comply with its legal and contractual obligations.

5. DATA SECURITY

We adopt appropriate **technical and organizational measures** to protect personal data, including least-privilege access control, strong authentication, encryption in transit and, when applicable, at rest, vulnerability management, backups, event logging and monitoring, and an **incident response plan**.

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 are bound by confidentiality obligations and may be subject to civil and/or criminal liability if they breach them. Users' personal data are not sold, rented, or traded with third parties.

6. PERSONAL DATA SECURITY INCIDENTS

In the event of an incident that **may pose relevant risk or harm** to data subjects, ZEN S.A. will notify **the ANPD and the affected data subjects within up to 3 (three) business days** from becoming aware of the incident, with the information required by applicable regulations. We will keep records of the measures adopted and, when applicable, recommendations to mitigate the incident's effects.

7. PURPOSES AND LEGAL BASES TABLE

Purpose	Personal data	Legal basis	Sharing
Newsletter and communications	email address, language	Consent	email/marketing platform
Web/app analytics	truncated IP, cookie/SDK ID	Consent	analytics providers
Support / customer service	contact data, technical logs	Performance of contract	support processors
B2B relationship / CRM	professional identification and contact details	Legitimate interests or performance of contract	CRM platforms and operational partners
Recruitment and selection	resume and recruitment process data	Pre-contractual procedures	recruitment platforms

8. MINORS

Our services are **not** intended for individuals under 18 years of age. If, exceptionally, data from **children or adolescents** are collected, we will do so in the data subject's **best interests** and, where required, with **specific, prominent consent** from at least one parent or legal guardian, as well as clear information about the purposes and how to exercise rights.

9. PROCESSORS AND RECORD OF PROCESSING ACTIVITIES

Our **processors** process personal data **in accordance with our instructions** and under contracts that provide for confidentiality, security, and audit rights. We maintain a **record of processing activities** and prepare a **Data Protection Impact Report** when processing may generate high risk to data subjects, as applicable.

10. INTERNATIONAL TRANSFERS

Whenever there is an **international transfer of personal data**, we will adopt the mechanisms provided by Brazilian regulations, including the **Standard Contractual Clauses** published by the ANPD, without modification. Until applicable adequacy decisions exist, transfers will observe appropriate contractual and technical safeguards.

11. PROFILING AND AUTOMATED DECISION-MAKING

We may use interaction data to **infer preferences** and **personalize content and offers**. Whenever a decision that **affects your interests** is made **solely** based on automated processing, you may **request human review** and obtain clear information about the criteria used.

12. YOUR RIGHTS REGARDING THE PERSONAL DATA WE PROCESS

In addition to the care we take to preserve the security of your personal data, we provide **clear and accurate information** about the processing we carry out. You may, **at any time**, by request:

- Confirm the existence of processing and obtain **access** to the data;
- Request **correction** of incomplete, inaccurate, or outdated data;
- Request **anonymization, blocking, or deletion** of unnecessary, excessive, or unlawfully processed data;
- **Portability** to another service or product provider;
- Information about **sharing** and **legal bases**;
- **Object** to processing carried out in violation of the law;
- **Withdraw consent**, without affecting the lawfulness of processing carried out up to that point;
- **Review of decisions made solely on the basis of automated processing** that affect your interests, with clear information about the criteria used.

Requests and response time

Requests may be submitted **free of charge** by email to **privacidade@zensa.com.br**. We undertake to respond within **15 calendar days** from receipt, or to provide a reasoned justification when it is not possible to fully comply.

13. CHANGES TO THIS PRIVACY NOTICE

This online privacy notice may be changed without prior notice due to technological, legal, or commercial factors, with immediate effect after publication on the websites. When changing this notice, ZEN S.A. will update the revision date shown at the top.

14. TERM AND ACCEPTANCE

By using ZEN S.A.'s websites and other channels, you declare that you have read and **agree** to the terms of this Policy. If you do not agree, you must not use the channels. Continued use after changes are published means you accept them. **Consents may be withdrawn at any time**, without affecting the lawfulness of processing carried out previously.

15. HOW TO ASK QUESTIONS ABOUT PERSONAL DATA PROCESSED BY ZEN S.A.

If you have questions about ZEN S.A.'s data processing activities, you may request more information and clarification directly from our Data Protection Officer, who will respond within the timeframe provided by

law.

Please use the following email address: **privacidade@zensa.com.br**.

The name of the Data Protection Officer is: **SOTTO MAIOR & NAGEL ADVOGADOS ASSOCIADOS** (Brazilian tax ID/CNPJ: 08.799.555/0001-57).

16. REVISION HISTORY

Revision level	Revision description	Date
00	Document created	Jan 26, 2022
01	Periodic document review	Oct 3, 2025

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APPROVED BY: Privacy and Data Protection Committee