

## What is the purpose of this Policy?

Zircosil Brasil Ltda is concerned with your privacy and consequently protects your personal data. We collect your personal data to enable the development of our activities and, specially, to maintain a good relationship with you. We are aware that, when collecting them, they are under our responsibility. Precisely for this reason, we have developed this Policy to inform you how your personal data is treated and to ensure the transparency of all the actions we take.

We hereby point out that if you do not have the time to read this Policy in full, or if you have any questions, you can contact us by email: [privacidade@zircosil.com.br](mailto:privacidade@zircosil.com.br)

When using our website and/or providing your personal data, we consider that you understood the terms of this Policy.

## What are the abbreviations you need to comprehend?

We have developed this Policy in easy and objective language so that the message reaches the main recipient: you!

But still, we need you to understand some terms:

- **We/Us:** whenever we use the expression “we” and its variations we are referring to the company that owns the website you are using;
- **Personal data:** it is all the information related to you, both information that quickly allows you to identify yourself (such as name, e-mail or identity), and that which indirectly allows you to identify yourself (such as address and IP protocol).
- **Processing of personal data:** whenever we use this expression and its variations, we are referring to any and all actions that can be performed with your personal data (for example: collection, processing, dissemination, access, storage, among others).
- **Goal:** it is the purpose for which we use your personal data; the purpose of collecting and processing personal data.
- **LGPD:** abbreviation of the General Data Protection Law - legislation that guides and conducts all of our actions while we process your personal data.
- **Legal Basis:** are the hypotheses for the treatment of personal data to be justified, according to the LGPD.

## What personal data do we collect?

For the development of our activities and to maintain a relationship with you, we need to collect your personal data. Most of the time, you provide us with your personal data when:

State	Personal data provided
Register your user	Name, address, e-mail, telephone number
Subscribe to our newsletter	Name, address, e-mail, telephone number
Participate in contests or promotions	Name, address, e-mail, telephone number
Use the “contact” tab on the website	Name, address, e-mail, telephone number
Use online chat or send us a text message on WhatsApp	Name, e-mail, ID number, telephone number

However, there are situations where we collect personal data from your activities (online or offline) from other sources, which are based on that personal data that you have decided to make public (eg information from your media profiles and social networks). The personal data that you do not inform us, but that we process from your activities on our website, is usually collected through automated technologies, such as cookies and web beacons, when:

State	Personal data provided
During and after visiting / using the site	<ul style="list-style-type: none"><li>• Logs register</li><li>• IP address</li><li>• Location</li><li>• Mobile device identifier</li><li>• Information about your computer equipment</li><li>• Consumption behavior</li><li>• Interaction behavior with the content we provide</li></ul>

- Length of your visit.
- Information about the content you are looking for

## For what purpose do we use your personal data?

Your personal data are used for different purposes, depending on the situation in which they are collected. Most of the time, the purpose is linked to the relationship we maintain with you after your interaction in our virtual environments and to the methods we use to personalize your experience while using our website

State	Personal data provided
Register your user	<b>Enable</b> you to keep the user registered on our <i>website</i> ; <b>manage</b> your account and website activities that you have chosen to participate in; <b>broadcast</b> Zircosil advertising and marketing content; <b>interact</b> and communicate with you.
Subscribe to our newsletter	<b>Send</b> information and marketing content related to our products and our performance; <b>maintain</b> analytical and statistical data on the interaction with the content we send.
Participate in contests or promotions	Perform activities related to the contest or promotion with whom you have decided to interact (eg, make a sweepstakes, <b>send</b> e-mails about the promotion, <b>grant</b> you a benefit for purchasing a certain product); <b>perform</b> marketing and advertising actions.
Use "contact" tag on the website	<b>Respond</b> to your requests; <b>fulfill</b> your rights; receive your suggestions.
Use online chat or send us <b>State</b>	<b>Respond</b> to your requests our questions; <b>fulfill</b> your rights <b>receive</b> your <b>Personal data provided</b>
a text message on WhatsApp	suggestions; <b>identify</b> you in the relationship programs maintained by Zircosil, for personalized and agile service.



During and after  
visiting / using the *site*

**Perform** marketing and advertising actions, based on the analysis of which of our products may interest you; **provide** content and / or services customized according to your profile and characteristics; **personalize** your experience while using our website; and **maintain** and, in some cases (read the section "with whom we share your personal data") **share**, analytical and statistical data on visits and the characteristics of visitors to our website so that the results of our interaction with you are quantified and monitored.

In addition to the purposes specified above, we would like to inform you that we process your personal data using the following legal bases of LGPD:

- a. **Legitimate interest** - when we conclude that there is significant interest in the treatment of your personal data for the development of our activities, provided that this treatment generates some type of benefit for you or if you have already interacted with us at another moment.
- b. **Consent** - when you expressly authorize, in a free and spontaneous manner, that your data be treated for a specific purpose and clearly informed when the consent is collected; remember that it is possible to withdraw consent whenever you wish.
- c. **Compliance with legal obligation** - when we process your data because Law thus obliges us;
- d. **Contract enforcement** - when we have a contract with you.

## How long do we store your personal data?

We store your personal data until the purpose (information in the item above) for which it was collected is achieved. After the purpose is achieved, the personal data will be deleted. However, at any time you can request the deletion of personal data, especially in cases where a) you decide to revoke the consent you have given us; b) you consider that unnecessary or excessive personal data is processed; c) you consider that we have not complied with the provisions of the LGPD.

Whenever you request the deletion of personal data, we will do our best to comply with your request. However, in some circumstances personal data will not be deleted, especially in cases where personal data is treated because the law itself requires us to do so (eg if you request the removal of the IP address within 6 months after the visitation of our website, we will not be able to eliminate it because the Law requires us to store it for 6 months).

## What measures do we use to ensure the security of your personal data?

We understand that from the moment we collect your personal data, we are fully responsible for treating and storing it in accordance with strict **cyber security** protocols. The actions we take to keep your data safe include: a) protection against unauthorized access; b) restricted access only to employees, suppliers



and partners who really need to access them due to the functions they perform; c) contractual requirement that all our employees, suppliers and partners have the knowledge and adequate level of data protection and act in accordance with the LGPD; d) Information Privacy Program; e) frequent security checks (including tests against hacker intrusions) on our internal storage systems; f) complementary technical measures and automated security controls, based on the best information security practices, following ISO27001 / 27701, NIST and OWASP standards.

## With whom do we share your personal data?

We do not share your personal data.

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If you want more information about sharing your personal data, be sure to contact us - [privacidade@zircosil.com.br](mailto:privacidade@zircosil.com.br)

## Are your personal data transferred to other countries?

We carry out an international transfer of your personal data only when we hire third parties to have certain data stored and, specifically, when these third parties maintain servers in other countries. We **contractually** require these third parties to adopt adequate **and apt** standards to guarantee the physical and cyber security of your personal data and your privacy.

## What are your rights?

In compliance with the provisions of the LGPD, at any time you can request that the rights below be fulfilled, just send an e-mail to: [privacidade@zircosil.com.br](mailto:privacidade@zircosil.com.br) or access the **Contact Us** tab of the website.

- a. Confirmation of whether or not we process your personal data;
- b. Access to their personal data if they are treated by us;
- c. Correction of incomplete, outdated or inaccurate personal data;
- d. Blocking, anonymizing or deleting personal data that is unnecessary or that you consider to be treated in an irregular manner;
- e. Portability of your personal data, when applicable;
- f. Elimination of personal data, even if treated regularly;
- g. Elimination of personal data, even if treated on a regular basis; Information about the sharing of your data with other companies or with public entities / public bodies;
- h. Information about the consequences of not consenting to a specific treatment of personal data (example: when you do not accept our cookie setting, you have the right to know what the consequences are of not accepting);
- i. Revocation of consent;
- j. Opposition to any processing of data that you consider irregular.



## What do we expect from you?

In addition to the actions we take in our internal controls, to protect your personal data, it is essential that you also keep them safe. We recommend that you do not share or keep in public environments (shared computers, use of public and free WIFI networks in shopping malls, airports or cafes, for example, environments in which cybersecurity may not be the most appropriate) the **ID/user** or **password** that you registered on our website. We recommend that you **do not** choose the option of remembering your login ID or password when browsing the site or using the applications, as well as always making sure that you log out of your account when you are no longer using its features, especially if your equipment is shared or accessed from public equipment.

**It is worth remembering that sensitive personal data should not be entered by you in the text fields, while using our website, since none of the features of this environment enforces the insertion of such data.**

We also hope you understand this Policy and, if you have any contribution, send us an email: [privacidade@zircosil.com.br](mailto:privacidade@zircosil.com.br)

## How to contact us?

We have already informed you in the items above, but it does not hurt to repeat: you can contact us at any time, to:

- request information
- fulfillment of your rights
- give suggestions

Data Protection Officer: Felipe Polimeno

e-mail: [privacidade@zircosil.com.br](mailto:privacidade@zircosil.com.br)

## Updates to this privacy policy

You are our guest to periodically visit this Policy, as it may be changed to improve the relationship we have with you and to improve the measures we have implemented to keep your data safe and your rights fulfilled.