

Privacy Notice



Privacy

Zenvia is committed to privacy and to protect Personal Data obtained from its Users, establishing rules to collect, register, store, use, share, enrich, and remove ("Processing") Personal Data obtained from Users, within the products and services offered, as per the current laws, with transparency and clarity for Users and the market in general.

By accessing and using **Zenvia** website's features, the User states that he/she has read this entire Privacy Notice and is fully aware of the information herein.

Glossary

Within this Notice, the following definitions and descriptions should be considered for a better understanding:

Beacons: Small devices that use Bluetooth Low Energy (BLE) technology emit signals that can be captured by technological resources, enabling the interaction between the User and the technological resource. Web Beacons are settings that monitor the User's navigation on an internet page.

Cloud Computing: Refers to a service virtualization technology built from interconnecting more than one server through a common information network (e.g., the Internet) to reduce costs and increase the availability of the sustained services.

Controller: Individual or legal entity responsible for decisions on the Personal Data Processing, such as which Personal Data to collect, from whom to collect, what is the Processing's purpose, with whom to share, among others.

Cookies: Files sent by the Platform's server to the Users' computer to identify the computer and get access data, such as pages browsed or links accessed, thus allowing customized navigation of the Users on the Platform, according to their profile.

Access Account: User's credential that may be required to use or access **Zenvia**'s restricted areas or products and services.

Personal Information: Any information related to an individual, directly or indirectly, identified, or identifiable.

Supervisor/DPO (Data Protection Officer): Person responsible for the Users' Personal Data within **Zenvia** regarding protecting the Users' privacy.

IP: Abbreviation for Internet Protocol. Refers to the alphanumeric code that identifies Users' devices on the Internet.

LGPD: General Law on Personal Data Protection (LGPD), Law 13709, August 14, 2018.

Logs: Logs of Users' activities on **Zenvia**'s website or products and services.

Operator: Individual or legal entity that processes Personal Data on behalf of a Controller, as per his/her instructions.

Session ID: User session ID in the service purchase process or when accessing a restricted area.

Holder: Individual owner of the Personal Data, such as customers, employees, and contractors.

Processing: Every operation with Personal Data, i.e., collecting, registering, storing, using, sharing, enriching, and removing.

Users: People who access or interact with the activities offered by **Zenvia**'s products and services, also referred to in this Notice of Holders.

1. DATA COLLECTION AND ACTIVITY LOG

1.1. Some Personal Data processed by **Zenvia** is directly informed by the User when using the features offered on the website, including, but not limited to, accessing, browsing, and contracting/using products and services. Besides, the website can record all the User's activities through Logs.

1.2. **Zenvia** may obtain the following information from the website:

- Full Name;
- Individual Taxpayer's ID;
- ID;
- Phone Number;
- Mobile Number;
- Email Address;
- Address;
- Company and/or Position;

1.3. **Zenvia**'s website can also use technologies such as:

a) Cookies. The User can choose which ones to activate when first accessing Zenvia's website. Cookies called necessary are key to run the website and cannot be disabled. They are:

- Session data, navigation and pages accessed;
- New sessions;
- Domain, utk, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit) and number of sessions;
- Browsing behavior;
- Browsing history;
- Users' Distinction;
- First navigation;
- Registration and navigation data;
- Registration data via IP address.
- Data to adjust and optimize navigability;
- Data to ensure the security of a transaction (purchase) when on the applicable page;

b) Web Beacons. Collects Personal Data on the User's behavior when accessing pages where no file needs to be installed on the equipment;

c) Other technologies to obtain the User's navigation data (API analytics).

1.4. It should be noted that, when on the website, the User may be taken, via a link, to content or services, conversational platforms - such as chatbot, which may collect different information from the User.

1.5. **Zenvia** may collect Personal Data from Holders through other collection points, even if they are not necessarily Users of the website. In this case, depending on the Holder's relationship with **Zenvia** (customer, supplier, etc.), **Zenvia** may process the following Personal Data:

- Personal Registration Data: Name, Individual Taxpayer's ID, marital status, signature, nationality, Username, date of birth, age;
- Personal Contact Details: Address, city, zip code, country, phone number, mobile number, User in messaging application and/or social networks, email;
- Personal Behavioral Data: Musical taste, consumption habits, consumption record, complaints record, browsing record;
- Personal Financial Data: Investments and assets, credit card data, credit history, income tax statement, public property records, bank details (bank, branch, and account number), salary;

- Professional Personal Data: Position, professional email, occupation, professional address, job, entity/company/organization;
- Call Logs (Origin, Destination, and Duration); and
- Voice Recording.

1.6. Not all Personal Data described above will be collected. This will depend on many factors, such as the service contracted, the nature of the Holder's relationship with **Zenvia**, the option to provide Personal Data (considering that not all are mandatory; the Holder may refuse to provide certain Personal Data), among others.

1.7. **Zenvia** may process other Personal Data during its services, in which case it will act as a mere Operator and follow its client's instructions.

2. DATA USE

2.1. Personal Data collected from Users of **Zenvia**'s website and Holders, in general, can be used for the following:

- Identify and authenticate them properly;
- Get buyers to contact suppliers to request quotes and other information (about the services they intend to hire, as well as to make the payment);
- Manage system features, provide services, and fulfill obligations from the use of **Zenvia**'s services;
- Provide support to the User, including answers to questions on **Zenvia**'s products and services;
- Optimize and improve the User's experience;
- Carry out statistics, studies, surveys, and research on the Users' behavior when using **Zenvia**'s website and services, anonymizing Personal Data as far as possible to prevent a direct link to the Holder;
- Inform Users about news, resources, content, and other events to continue the relationship with Users;
- Safeguard **Zenvia**'s rights on the use of the website, products and services, as proof in judicial, administrative, or arbitration proceedings, and unlawful acts or acts contrary to this Privacy Notice or any other legal document made available by **Zenvia**;
- if undue changes are made in its systems and records or actions that could put the platform and its Users at risk;
- Meet existing legal requirements to which **Zenvia** is subject;
- Execute internal organization procedures, prepare productivity, sales and billing reports, prepare customer satisfaction studies, and create business intelligence indicators; and
- Prevent fraud.

2.1.1. We can also combine Personal Data from many customers to understand general consumer trends without specifically identifying a Holder. As far as possible, we will anonymize the Personal Data processed to prevent a direct link to a Holder.

2.2. The purposes described here will apply to Holders according to the product or service actually hired and the Holder's relationship with **Zenvia**. To learn more about the purposes that apply in each case, the Holder may contact **Zenvia** through the channel indicated in item 9 of this Notice.

2.3. It should be noted that the purposes described above refer to activities where **Zenvia** acts as the Personal Data's Controller. For situations in which **Zenvia** acts as an Operator, the Holder must contact the Controller to request the desired information.

2.4. When **Zenvia** acts as a Controller and when the legal grounds to process Personal Data is consent, **Zenvia** will ensure that the data will be collected in a free, unambiguous, and informed manner and complying with all applicable legal requirements.

2.5. The Personal Data from **Zenvia**'s database will only be processed within the limits and purposes set forth herein, with the access to Personal Data restricted only to employees and persons authorized by **Zenvia**.

3. DATA STORAGE

3.1. Personal Data processed by **Zenvia** are stored in secure and controlled environments and will be deleted when they are no longer useful for the purposes for which they were collected or when the Holder requests their removal unless storing data is supported by law or applicable regulation or is part of a system or product backup.

3.1.2. **Zenvia** may (to audit, secure, control fraud, preserve rights or any other legitimate purpose complying with the provisions of the applicable data protection law) keep the Holders' Personal Data for a period longer than the one set by law or by the applicable regulatory standard.

3.4. Personal Data processed by **Zenvia** will be stored in **Zenvia's** data centers or contracted from third parties, located both in Brazil and abroad. For more information, see item 4.5. of this Notice.

4. SHARING PERSONAL DATA

4.1. During the Holder's relationship with **Zenvia**, it may be necessary to share Personal Data in some situations, such as, but not limited to, (a) implementing the agreement and providing the requested service, (b) complying with **Zenvia's** legal obligations, (c) acting in administrative, judicial or arbitration proceedings, or (d) performing any activity for which **Zenvia** has a legitimate reason.

4.2. Personal Data may be shared, depending on the case, with:

- a) **Zenvia's** customers to implement the agreement;
- b) Telecommunications service providers, for Internet data link and connectivity;
- c) Companies in the same business group as **Zenvia**;
- d) Companies acquired or incorporated by **Zenvia**;
- e) Communication platforms to create business accounts in the available communication applications;
- f) Technology companies that provide services to or have partnerships with **Zenvia**;
- g) Law firms or recovery firms;
- h) External auditing companies;
- i) Accounting firms;
- j) Advertising agencies to send **Zenvia's** newsletters and ads;
- k) Event management for organizers to communicate with customers and prospects; and
- l) Marketing platforms to communicate with customers and prospects.

4.3. Besides, Holders' Personal Data may also be shared with the following third parties:

- a) With authorities, governmental entities or other third parties, to protect **Zenvia's** interests in any conflict, including judicial and/or administrative proceedings;
- b) In transactions and corporate changes involving **Zenvia**, with the transfer of information necessary to continue the services; and
- c) By court order or at the request of administrative authorities with the legal power to make such request.

4.4. In cases where **Zenvia** shares Personal Data with third-party companies, **Zenvia** undertakes to, whenever possible, enter into a contract that contains clauses that regulate Personal Data Processing and the confidentiality of shared information.

4.5. For some operations, such as data backup, the Personal Data may need to be sent to other countries. In any case, **Zenvia** will take all due measures to safely share the Personal Data, complying with applicable legal provisions.

4.6. Your personal data will not be sold, rented, or exchanged by Zenvia under any circumstances.

5. INTERNATIONAL TRANSFERS OF PERSONAL DATA

5.1. Personal Data recipients (for backups) may be located outside of Brazil, where Personal Data protection laws may not be equivalent to LGPD. In such cases, the recipient will be asked to protect the Personal Data as per the current data protection and privacy laws.

5.2. **Zenvia** will take all necessary measures to ensure that transfers to such organizations are duly protected, following the applicable Personal Data protection law.

6. RIGHTS OF THE PERSONAL DATA'S HOLDER

6.1. Under LGPD, the Holder has the following rights with the Personal Data's Controller:

1. Confirming any Processing by **Zenvia** or any group company.
2. Accessing Personal Data processed by **Zenvia** or any group company.
3. Correcting and/or updating Personal Data Processed by **Zenvia**.
4. Anonymizing, blocking, or deleting Personal Data unnecessary, excessive, or illegally processed.
5. Revoking the consent when Personal Data is processed under this case.
6. Making the Personal Data Portability to another service or product provider upon express request.
7. Reporting the third parties with whom **Zenvia** shares the Personal Data.
8. Reviewing automated decisions, if applicable.

6.2. The Holder can send an email to **Zenvia**'s Responsible/DPO through the email privacy@zenvia.com to request the exercise of the rights.

6.3. When not possible to meet the Holder's request, **Zenvia** will explain the reasons for this.

For Example: Requests related to operations where **Zenvia** acts as an Operator cannot be answered and must be forwarded by the Holder directly to the Personal Data's Controller.

7. SECURITY

7.1. Any information provided by the Holder will be collected and stored under security standards reasonably accepted by the market. To this end, **Zenvia** adopts several precautions, following the guidelines on security standards set in the applicable laws and regulations, such as:

- a) Methods and equipment available on the market to encrypt and anonymize Personal Data when necessary. Encryption allows protecting Personal Data before transmitted over the Internet. Advanced encryption techniques can render this information unreadable and prevent others from viewing the information before it reaches destination servers;
- b) **Zenvia** has protections against unauthorized access to its systems;
- c) **Zenvia** uses automated tools that detect attempts to prevent unauthorized access to systems and products;
- d) **Zenvia** only restricts access to the place where personal information is stored. The access must be key to develop the intended activity;
- e) **Zenvia** ensures that those agents, internal employees or external partners that Process the Personal Data must agree to keep the absolute confidentiality of the accessed information and adopt the best practices to handle this information, as set in the external policies and procedures;
- g) **Zenvia** regularly backs up the website. The website activity is verified consistently to protect the information provided. Sophisticated protection systems are used, and the activity on the website is monitored.
- h) **Zenvia** makes every effort to monitor its environment for public vulnerabilities, patching them whenever required;

7.2. Besides the technical efforts, **Zenvia** also adopts institutional and administrative measures to protect Personal Data, such as its privacy governance and data protection program, awareness campaigns, and periodic training.

7.3. Access to information collected is restricted to employees and authorized persons. Those who misuse this information, violating the adopted internal policies, will be subject to administrative, disciplinary, and legal sanctions.

7.4. Even though **Zenvia** adopts the best efforts to preserve your privacy and protect your Personal Data, no information transmission is completely secure. Therefore, **Zenvia** cannot fully guarantee that all information you

receive and/or send is not subject to unauthorized access through methods developed to improperly obtain information, such as technical failures, viruses, or breaches on the website's database.

7.4.1. Anyway, in the remote case of incidents of this nature, **Zenvia** guarantees the full effort to remedy the event's outcome.

8. GENERAL PROVISIONS

8.1. **Zenvia** may change this Privacy Notice's content at any time, according to the purpose or need, such as to adjust and legally comply with a law or rule that has equivalent legal force. The Holder is responsible for verifying it whenever accessing **Zenvia**'s website.

8.1.1. If this document is significantly updated, **Zenvia** will notify the User through tools available in the products and/or support tools.

8.2. If the Holder has questions on this Notice, he/she can contact **Zenvia** through the channel privacy@zenvia.com.

8.3. Warning: There may be a conflict between the information in this Privacy Notice and other documents with the same purpose, specifically related to a product, service, or application. If so, the specific information in the other document will prevail over this Notice.

9. APPLICABLE LAW AND JURISDICTION

9.1. This Privacy Notice will be governed and interpreted as per the Brazilian law, in Portuguese, elected as the jurisdiction of the User's domicile to settle any lawsuit or controversy involving this document, unless an applicable law specifically elects other personal, territorial, or functional jurisdiction.

9.2. Questions or requests on privacy can be sent to **Zenvia** by email privacy@zenvia.com or to the address below:

Zenvia Mobile Serviços Digitais S.A.
Av. Paulista, nº. 2300, Salas 182 e 184 – Bela Vista
São Paulo – SP
CEP: 01310-300

Thank you, and welcome to **Zenvia**!

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