

Zen App - Privacy Policy

Welcome!

For all information to be correctly understood, we present our Privacy Policy in a transparent and accessible document, as shown below:**DATA SUBJECT RIGHTS**

- Data subjects could be **USERS**, they have rights to:
 1. Request to erase personal data;
 2. Request copy and/or rectification of stored personal data;
 3. Request the portability of personal data to another Platform;
 4. Request to unsubscribe advertising;

WE HIGHLIGHT THAT THE COMPLETE UNDERSTANDING AND FULL READING OF THIS DOCUMENT IS EXTREMELY IMPORTANT

CHAPTER I – GENERAL TERMS

1.1. General Terms. This Privacy Policy is designed to communicate our practices regarding the processing (including collection, storage, use, sharing, etc.) of **USERS** personal data for **ZEN** (hereinafter referred to as the “Platform”), which encompasses the website and its subdomains, applications, programs and other extensions. The Platform is owned by MOVENEXT SERVIÇOS DE INTERNET LTDA, registered under brazilian CNPJ/MF nº 18.587.207/0001-70, and is under their responsibility and management

1.2. Personal Data. Personal data are those entered by **USERS**, which can be used to identify them individually.

1.3. Consent. By using the Platform, you must accept and authorize, through the “read and agree to the terms” button, the collection, storage, use and other processing of your personal data, in accordance with this privacy policy.

1.3.1. You may withdraw your consent to the provisions of this Privacy Policy at any time by notifying **ZEN** through help.app-zen.com within five (05) business days.

1.4. Regulation. The Platform operates in accordance with Brazilian law, including, and in particular, complying with the terms of Law No. 12,965 / 2014 (The Brazilian Civil Framework of the Internet) and Law No. 13,709/2018 (Brazilian Data Protection Law) and other applicable laws.

1.5. Data Protection Officer. **ZEN** has appointed a Data Protection Officer to solve all issues related to data protection, such as contacting national authorities, **USERS** and to provide any information or notifications. The contact may occur through help.app-zen.com, mail to address Street Professor Dr. Olavo de Paula Borges, nº 70, Ponta da Praia, Santos/SP, Zip Code 11.035-130, Brazil in accordance with Article 41 of the LGPD.

1.6. Contact. In case of questions or suggestions regarding the Platform Privacy Policy or any other information, the **USER** may contact the administrators through help.app-zen.com available on the Platform, which will be answered during business hours, Monday to Friday, from 9:30 am to 6:00 pm.

1.7. Controlling. This Policy describes what personal data may be collected from **USER** while using the Platform services, how such information may be used and regular measures taken against unauthorized access or use of this information.

CHAPTER II – STORAGE DATA

2.1. ZEN may collect, store and use the following information and/or personal data from **USERS**:

1. Full name;
2. E-mail;
3. IP address;
4. Feedbacks;
5. Comments;

2.2. ZEN may also collect, store and use the following information:

1. Registration in the database of any files or information uploaded to **ZEN** by the data subjects;
2. Details of access to **ZEN** and the resources the holder has accessed;
3. Information of the access device used, including, for example, hardware model, operating system and version, file names and versions, preferred language, unique device identifier, advertising identifiers, serial number, movement information device and network information;
4. Server registration information that may include information such as device IP address.
5. Mapping of browser clicks, browsing data, statistics, demographics etc.
6. Apple iOS and iPadOS users may choose to allow the Products to provide *Healthkit* data regarding the number of meditated minutes to be displayed in the Apple iOS “Health” app. This data will not be shared with third parties or used for marketing purposes.

CHAPTER III – SHARED DATA

3.1. Sharing Personal Data. Exceptions for sharing personal **USER** data:

1. Cases in which **ZEN** is required to disclose or share the data collected in order to comply with court order, or for the purpose of preventing fraud or other crimes, as well as in response to a request by the competent authority, if we believe that the disclosure complies with or is required under applicable laws, regulations or legal procedures;
2. To protect the rights, property or safety of **ZEN** and the Platform;
3. With law enforcement and/or government officials, if their actions are deemed inconsistent with the provisions of our terms of use, or to protect the rights, property or safety of **ZEN**, its **USERS**, or others;
4. By your own action;
5. In the event of sale, in whole or in part, of the business or its assets, or as part of any business reorganization or restructuring, merger, spin-off or merger, **ZEN** may share **USER** information with third parties that are part of its business, taking the necessary steps to ensure that privacy rights continue to be protected in accordance with this Policy.

3.2. Contact. **USERS** authorize **ZEN** to contact them using any of the contact information provided on registration with **ZEN**.

3.3. Improvements. We use **AppsFlyer** and **Clever Tap** in order to better understand our **USERS'** needs and to optimize this service and experience. They use cookies and other technologies to collect data on our **USERS'** behavior and their devices.

CHAPTER IV – COOKIES

4.1. What are cookies? A cookie is a piece of information that is stored locally on your computer or device and contains information about your activities on the Internet.

4.2. Used Cookies. Cookies can be used in different ways and modalities, **ZEN** may use:

1. Performance Cookies: This type of cookie collects anonymous information about how the **USER** uses the platform so that we can optimize it. The information collected by these cookies never contains personal details from which it can be identified.
2. Functionality Cookies: These cookies are used by **ZEN** for some of its features, seeking to offer you a better experience when browsing the platform.
3. Advertising Cookies: These cookies collect information about browsing habits, seeking to make advertising more relevant to the **USER**.

4.3. Cookies Access. Access to cookies ends as soon as the **USER** closes the browser. The **USER** could choose between accept or decline the use of cookies.

4.4. Consent to Using Cookies. Acceptance of the **USER** is required before the section starts for cookies to be used.

4.5. Option Without Cookies. The data subject may choose to refuse the use of cookies. If you choose not to accept them, your access to most information available on the Platform will not be compromised. However, the data subject may not be able to make full use of the services offered.

CHAPTER V – ACCESS AND CORRECTION OF PERSONAL DATA

5.1. Access and Correction. **USERS** are entitled to access their personal data held by **ZEN** by contacting administrators through help.sapp-zen.com which will be answered during business hours, Monday to Friday, from 9:30 am to 6:00 pm within 15 (fifteen) days, together with a description of the form, purpose and duration of the processing of personal data, which may be sent by email or by letter, in accordance with the provisions of article 9 of the LGPD.

5.2. Erasure. The **USER** has the right to request the deletion of his personal data stored in **ZEN** at any time, except where there is a legal obligation or court order to maintain the storage of data, in accordance with the provisions of Articles 18, XVI, and 16 of the LGPD.

5.3. Incorrect Information. It is the responsibility of the holder to keep their information up to date, and in the event of inaccuracy, **ZEN** may update or delete it, except in cases of need for maintenance for legitimate business or legal purposes.

5.4. Protection Measures. **ZEN** takes all necessary security measures to protect the personal data of **USERS** and to protect them against unauthorized loss, misuse, access, disclosure, alteration or destruction.

5.5. Password Protection. **USER** is also responsible for taking reasonable steps to protect your passwords, usernames and other special access features to **ZEN**.

CHAPTER VI – NOTIFICATION OF PRIVACY POLICY CHANGES

6.1. Privacy Policy Changes. **ZEN** may change the Platform Privacy Policy at any time. The use of collected information is now under current Privacy Policy. If **ZEN** makes changes to the way you use personal information, it will notify your **USERS** by sending an email.

6.2. Unreported Amendments. Minor amendments to this Privacy Policy may occur without significantly affecting the ways in which **ZEN** treats the information collected so that it does not need to be reported.

CHAPTER VII – COMMUNICATION

7.1. Sending Communications. **USERS** by registering, agree that **ZEN** will send you email notifications, advertisements, news about services and important information about using the Platform that needs your attention.

7.1.1. Opt out. Upon receiving an email on behalf of the Platform, you may opt out of receiving them by using the opt-out option or via email request.

7.2. AntiSpam Policy. The Platform takes care to prevent unsolicited email.

7.3. Confidentiality. **ZEN** guarantees maximum confidentiality in the handling of the telephone and e-mail list during regular administration tasks.

CHAPTER VIII – SECURITY

8.1. Storage. Personal data from **USERS** accounts are hosted on Google Firebase servers (United States of America), and only employees authorized by **ZEN** may have access to your personal information, and are subject to confidentiality and strict respect for your privacy. of this Policy.

8.2. Security. All **ZEN** transactions are encrypted.

8.3. International Transfer. Personal data stored by **ZEN** are submitted to international transfer of personal data rules about transfer to countries that provide a protection similar to Brazil, in accordance with the provisions of Article 33 of the LGPD.

8.4. Notification. If **ZEN** becomes aware of any breaches of its own security or of its hosting companies, including any hackers or other data breach, we will notify the affected national authorities, **USERS** of such breach and will provide the details regarding the nature, extent of the violation and the compromised data within a reasonable time, in accordance with the provisions of articles 48, paragraph 1, of the LGPD.

8.5. Liability. **USERS** will be liable to indemnify **ZEN** for all costs and damages it may incur as a result of violating this Privacy Policy.

8.6. Cooperation. **ZEN** fully cooperates with any authorities or courts who may disclose the identity or location of any person who has posted any material on the Platform that violates the Clauses set forth in this Policy.

8.7. Restrictions. This Privacy Policy only addresses the use and disclosure of information collected by **ZEN** Platform. If **USERS** disclose your information to third party websites, different rules may apply to your use of the information.

Updated: 07/12/2021.