

Privacy Policy and Site Terms of Use for External Access

The **PLÍNIO FLECK** Group, a legal entity governed by private law, with address at Av. Carlos Strassburger Filho, nº 5370, Bairro Zona Industrial Norte, Campo Bom, RS, registered with the CNPJ/MF under nº 88.242.862/0001-71, establishes, below, the SITE Privacy Policy, in order to clarify the rights, obligations and responsibilities of its Users.

1. GENERAL INFORMATION

1.1. The Plínio Fleck Group makes available to users in general the website <http://grupopliniofleck.com.br/> (SITE), to provide corporate, product and market information to the public.

1.2. For navigation and general use of the SITE, it is not necessary for the User to identify himself. However, to enable the provision of some services through the SITE, such as a contact request, it is necessary for the User to provide some data to Plínio Fleck Group.

1.3. All information collected will be stored in Group Plínio Fleck's database, which has security systems compatible with Brazilian and international market standards.

1.4. For the purposes of this Privacy Statement, capitalized words and terms that are not defined herein will have the definitions established in the General Data Protection Law (LGPD) - Law 13,709/2018.

2. HOW THE PLÍNIO FLECK GROUP TREAT YOUR PERSONAL DATA

2.1. As pointed out in clause 1.2. of this Policy, some features and services of the SITE require the provision of personal data by the User for their feasibility, as explained below:

- Contact: In order to be able to answer your contact request, the Plínio Fleck Group collects your Full Name, Telephone, State, City and Country. This information is intended to identify you, as well as to enable the company to contact you to fulfill your request and these will be stored for a period of two (2) years. The user may, at any time, request the unsubscribe, simply by contacting the organization.

CONTACT

CONTACT PLINIO FLECK GROUP COMPANIES DIRECTLY. WE WANT TO HEAR YOUR SUGGESTIONS, QUESTIONS AND COMMENTS ABOUT OUR PRODUCTS AND SERVICES. WE WILL GET BACK TO YOU AS SOON AS POSSIBLE.

NAME	PHONE NUMBER		
<input type="text"/>	<input type="text"/>		
E-MAIL	COUNTRY	ESTADO	CIDADE
<input type="text"/>	PAÍS <input type="text"/>	ESTADO <input type="text"/>	CIDADE <input type="text"/>
MENSAGEM			
<input type="text"/>			

2.2. In view of the concern of the Plínio Fleck Group with the privacy and data protection of its customers and partners, we also take the opportunity to inform you about the processing of personal data carried out by the company in activities not necessarily related to the SITE or its Portals, as below exposed:

- **Sending Announcements and Advertising Messages:** The Plínio Fleck Group may send announcements and advertising messages to Users registered on its SITE, Portals or customers in general. Such communications and messages may be transmitted using all types of technologies and means of communication available, whether by e-mail, SMS, MMS, direct mail and others that may be implemented. If the User is not interested in receiving the messages mentioned above, he/she may, at any time, choose not to receive them anymore, simply using the link available in the message itself or by contacting informatica@flecksteel.com.br.
- **Customer Service:** In order to be able to respond to requests related to Customer Service, the Plínio Fleck Group may request and process personal data from the applicant, such as name, telephone, e-mail and CPF (individual registration), depending on the treatment, for communication and sending material replacement, gifts, among other activities.
- **Campaigns and Promotions:** On some occasions, the Plínio Fleck Group carries out, sponsors and/or promotes campaigns and promotions aimed at its partners and customers. In these cases, the processing of personal data will be regulated by the regulation of the campaign or promotion, and this Declaration will apply in a complementary way insofar as it is not contrary to those terms.

3. PROCESSING AGENTS AND SHARING PERSONAL DATA

3.1. The personal data collected, stored or processed, in any way, due to the use of the SITE are controlled by Plínio Fleck Group. Thus, the Controlling company must be consulted by the Holder of the personal data for possible exercise of the rights provided for in the General Law for the Protection of Personal Data - LGPD.

3.2. Personal data will not be sold, assigned or shared with Parent companies outside the business group without prior authorization, being used, if not to comply with the legal and regulatory obligations of the Plínio Fleck Group, in the same ways described in item two (2) of this Declaration, for a period of five (05) years.

3.3. In order to fulfill the purposes listed in item 2 of this Declaration, the User's personal data may be shared with the Group Plínio Fleck's employees, independent contractors, subsidiaries, affiliates, consultants, service providers and suppliers, if the disclosure allows the entity to perform a business, professional or technical support function for the Plínio Fleck Group; also for employees, independent contractors, service providers and suppliers of Plínio Fleck Group to satisfy a request for service or products. In these cases, third parties who have access to personal data, whenever possible, will be considered as Operators in the processing of personal data, being subject to specific contractual clauses regarding the processing of data, as well as the Internal Policies and practices of the Empresarial Group regarding the privacy and data protection.

3.4. Eventually, personal data may be shared with third-party Controllers in addition to those indicated here, which will only take place after the User's authorization.

4. TRUTH OF INFORMATION

4.1. The User guarantees the veracity and accuracy of the information and data provided to Plínio Fleck Group, assuming the corresponding responsibility in case of inaccuracy, as well as committing to keep them updated. The Plínio Fleck Group assumes no responsibility in the event of inaccuracy in the data provided.

4.2. The Plinio Fleck Group may, at its sole discretion, suspend and/or cancel the User's registration, at any time, if it detects any inaccuracy in the information provided by the User, until the inaccuracy is corrected. This procedure aims to protect the User and optimize the process.

5. COOKIES AND OTHER TECHNOLOGIES

5.1. The SITE, online services, e-mail messages and advertising material may use "cookies" and other technologies, such as pixel tags and web beacons. These technologies help us better understand User behavior, tell us which parts of our website people have visited, and facilitate and measure the effectiveness of advertising and web searches. We treat information obtained through cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) address or similar identifiers are considered personal information under local law, we will also treat these identifiers as personal information. Likewise, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Statement. If you wish to block cookies, please consult your browser's guidelines/settings.

5.2. As with most websites, we obtain some information automatically and store it in log files. This information includes IP addresses, browser type and language, Internet Service Provider (ISP), referring and exit pages, operating system, date and time information, and clickstream data. We use this information to understand and analyze trends, administer the site, learn about User behavior on the site, and obtain general demographic information about our user base.

5.3. At any time, if you no longer want to receive future contacts via email, just access the unsubscribe link in the message.

6. EXTERNAL LINKS

6.1. On the SITE there may be access links to other sites with their own content and Privacy Policy. Whenever this occurs, the user will be informed.

7. USERS' RIGHTS REGARDING THEIR PERSONAL DATA

7.1. Users are entitled, upon request to the Data Protection Officer:

- I. Confirmation of the existence of treatment;
- II. Access to personal data;
- III. Correction of incomplete, inaccurate or outdated data;
- IV. Anonymization, blocking or elimination of unnecessary, excessive or processed data in violation of the provisions of the LGPD Law;
- V. Data portability to another service or product provider, upon express request, in accordance with ANPD regulations;
- VI. Revocation of consent and consequent deletion of personal data processed, except in the cases provided for in art. 16 of the LGPD;
- VII. Information on the public and private entities with which the controller made shared use of data;
- VIII. Information about the possibility of not providing consent and about the consequences of denial;

7.2. The Plínio Fleck Group reserves the right to maintain data processing if it has a legal basis for treatment applicable to the specific case, such as, but not limited to, compliance with legal obligations, contract execution, etc.

8. DATA OF THE PERSONAL DATA PROCESSING MANAGEMENT

8.1. For matters related to the processing of personal data, the interested party must contact the Person in Charge, according to the data below:

Rafael Frohlich by email: lgpd@flecksteel.com.br

9. RESPONSIBILITY

9.1. As there are no infallible or inviolable security systems, the Plínio Fleck Group is not responsible for any damage, loss or loss of user information caused by third-party conduct, as well as in cases of fortuitous event or force majeure beyond its control.

10. MODIFICATIONS TO THE PRIVACY POLICY

10.1. Seeking continuous improvement, the Plínio Fleck Group may change this Declaration at any time, and the changes will be published on the SITE for consultation at any time.

10.2. When using the services of the SITE, the User is aware of the terms of this Declaration in force on the date of use, being responsible for checking it in advance each time they visit the SITE.



Version 2021/1.1
Campo Bom, RS
July/21