

## FALABELLA.COM PRIVACY POLICY

At Falabella.com SpA (hereinafter also the "**Company**") every day we work hard to serve you better when you purchase the products that are marketed through the Company or use the services available on the Company's website or mobile applications. Taking care of your personal data that you share with us is a fundamental part of this. Therefore, we want you to know how we use them to offer you a better and more personalized customer experience and how we protect them.

The person responsible for your personal data is Falabella.com SpA, RUT 76.212.492-0, with address at Av. Catedral 1401, 5th floor, commune of Santiago – Chile.

We invite you to read our Privacy Policy in detail and if you have any questions, please contact us at the email [datos.personales@Falabella.com](mailto:datos.personales@Falabella.com).

### 1. What is covered by this policy?

This document, hereinafter "Privacy Policy" or "Policy", explains in detail the types of Personal Data we collect about you when you interact directly or indirectly with a Falabella Company. It also explains how we use and safeguard your Personal Data, with whom we share it, what your rights are and how you can exercise them.

### 2.- Definitions:

For the purposes of this Privacy Policy, the words defined below shall have the meaning assigned in this section, whether or not they are written with a capital initial, or are in the plural or singular.

**Authorization:** Specific, unequivocal and informed consent of the subject to carry out the Processing of Personal Data.

**Company:** Falabella.com SpA

**Data or Personal Data:** Those relating to any information concerning natural persons, identified or identifiable. For example, the Company may collect the following Personal Data: contact data such as your name, identification number, address, telephone, email; biometric data such as your fingerprint and facial features, among others; geolocation data; visit and navigation on the website; buying habits (items or services you purchase, amount, date, frequency of purchase, etc.); among other data.

**Falabella or Falabella Companies:** Falabella S.A., Servicios Falabella SpA, Falabella Retail S.A., Sodimac S.A., Falabella.com SpA, Promotora CMR Falabella S.A., CF Seguros de Vida S.A., Seguros Falabella Corredores Limitada, Banco Falabella Corredores Limitada, Banco Falabella, Hipermarcados Tottus S.A., Falabella Inmobiliario S.A., Open Plaza Chile SpA, Plaza S.A., Ikso SpA (Ikea), Promotora Chilena de Café Colombia S.A. (Juan Valdez), Imperial S.A., Digital Payments SpA, Digital Payments Prepago S.A. and Fazil SpA.

**Processor:** Natural or legal person, public or private, who by himself or in association with others, carries out the Processing of Personal Data on behalf of the Controller of Personal Data.

**Controller:** Natural or legal person, public or private, that by himself or in association with others, decides on the database and/or the Processing of the Data. For the purposes of this policy, the Company is Controller of your Personal Data.

**Processing:** technical procedures, automated or not, that allow collecting, storing, recording, organizing, elaborating, selecting, extracting, confronting, interconnecting, dissociating, communicating, assigning, transferring, transmitting or canceling personal data, or using them in any other way.

### **3.- Our Principles**

Our commitment is to guarantee that in all Processing of Personal Data that we carry out, we always respect the rights that the Constitution and the laws have enshrined in your favor, so we want to let you know the principles that inspire us in this matter:

**Principle of Processing Legality.** We will only process your Personal Data subject to the law.

**Principle of Purpose.** We will only process your Data for the specific, explicit and lawful purposes that we have informed you.

**Principle of Proportionality.** We will only process Personal Data that is necessary in connection with the purposes of the Processing.

**Principle of Security.** In the Processing of your Personal Data, we will apply technical and organizational security measures that allow us to protect your Personal Data against unauthorized and unlawful Processing and against its loss, leak, accidental damage or destruction.

**Principle of Transparency and Information.** At all times we will ensure that our policies and practices of Processing of Personal Data are accessible and available to any subject in a precise, clear, unequivocal and free manner.

**Principle of confidentiality.** We will keep your Data confidential and establish appropriate controls and measures to preserve such confidentiality.

**Principle of Temporality:** We will keep your Data only for the reasonable and necessary time to fulfill the purpose of the Processing, contractual obligations, legal requirements or instructions from the surveillance and control authorities or other competent authorities.

### **4. Do we have permission to process your Personal Data?**

By accepting this Privacy Policy you authorize the Company, in accordance with the rules governing the privacy protection, to process your Personal Data that you provide us when you buy our products and/or use or contract our services, through any of our communication or sales channels, both face-to-face and remote. Likewise, and provided that there are no legal restrictions for this, you authorize the Company to share your Data with the rest of the Falabella Companies and for the latter to Process, for their benefit, your Personal Data; and, share them with each other.

Both the Company and the other Falabella Companies will only process your Personal Data when they have your Authorization or the rules that regulate the protection of private life recognize another legal basis to process your Personal Data and, only for the purposes authorized in paragraph 6 below.

We may obtain your Authorization through any means that may be the subject of subsequent consultation, such as pop ups or banners on the website or app, online or physical forms, contests (face-to-face or online as in social media), data messages, or others.

## **5.- What Personal Data do we collect from you?**

Regarding your interaction with the Company, we may collect the following Personal Data from you:

- Those Data that you deliver directly in the course of your relations with the Company and that are necessary for you to acquire the products or services offered through the Company or you can participate and make use of the Falabella loyalty program (hereinafter "CMR Points"). In the latter case, for example, we collect identification and contact data such as: name, identity card, address, telephone, email and transactional data such as: your purchases and redemptions, among others.
- Data derived from:
  - (i) the performance of operations related to the acquisition of products or contracting of services in Falabella Companies, such as information about your shopping habits, returns, payments, among other economic information, unless its access is prohibited by a special law.
  - (ii) the use of services offered by Falabella Companies such as WiFi network, click & collect, customer service, Rating & Reviews and technical service, among others. Through these services we can, for example, obtain geolocation data and know your location.
  - (iii) when purchasing or using products or services at Falabella Companies you may provide biometric data, for example, your fingerprint, facial features and voice.
  - (iv) other sources of information such as: sources of public access, for example, your date of birth available in the civil registry.
  - (v) the navigation you make on the websites and mobile applications of the Falabella Companies, for example, the type of device with which you connect, your operating system and web browser, the identification number of your network device (MAC address) or your IP address, among others. If you have an account with a Falabella Company, this data may allow us to identify you each time you browse the websites or mobile applications of the Falabella Companies.
  - (vi) the use of automatic techniques based on your current and historical Personal Data and statistical data. Thus, for example, by applying these techniques we could access data about your preferences and tastes.

## **6. What do we use your Data for?**

By virtue of the consent you give us by accepting this Policy, we are entitled to process your data for the following:

a.- The main purpose is the management and execution of the contracts you enter into with or through the Company and the management and execution of the benefits granted by the Company through CMR Puntos. That means you authorize us to:

- (i) manage the execution of the contract or contracts you enter into with or through the Company, respond to your queries, claims, requests, among other actions that we must perform to manage these contracts.
- (ii) process your personal data so that you can participate and make use of the benefits of CMR Points through any of the communication, sale or exchange channels, both face-to-face and remote.
- (iii) contact you with information about products and services provided by the Company and, in general, manage queries, requests and claims related to them.
- (iv) comply with marketing objectives, this means that the Falabella Companies can elaborate a user profile (individual or aggregated) applying or not predictive models and, thus, improve the products that are marketed or services offered through the Falabella Companies. Likewise, the Falabella Companies may send you offers, promotions and advertisements for products and services that are preferred by our users in general, or by you in particular, and invite you to participate in contests offered by the Falabella Companies.
- (v) analyze and prepare statistical studies on the consumption interests and buying habits of our users and, in general terms, on matters relevant to the preparation of market studies or marketing campaigns of our own or of third parties.
- (vi) develop commercial actions, including after-sales services, of a general nature or personally directed to you, aimed at improving your experience as a client, for example: informing you about the status of your offices or events related to the exchange or purchase of products or contracting of services in Falabella Companies, automatically completing the necessary documents to carry out your transactions in Falabella, carry out satisfaction surveys, Personal Data update campaigns and carry out collection actions.
- (vii) contact you through our physical and remote communication channels, for example: letter, call center, email, social media such as Facebook, or text messages (via SMS, website or mobile applications), WhatsApp or other similar platforms, to the mobile number you have registered or any other contact information you inform us, in order to send you information related to the purposes described in this section.

b.- Processing of your Personal Data of a commercial nature for the following purposes:

- (i) perform better credit risk management by Falabella, for example, using predictive behavioral models and risk scores so that Falabella Companies can offer you financing services appropriate to your needs. To do this, we may use the Data you provide to us and financial, commercial and credit information offered by third parties as a credit bureau, provided that their use is not prohibited by special laws or regulations.
- (ii) execute security protocols, and to prevent and detect deceptive, fraudulent or criminal uses of our systems and facilities, which is necessary to protect the legitimate interests of the Falabella Companies and their respective customers.

c.- We will use your biometric and geolocation data that we will collect through writing and signature scanning devices, and other biometric readers; fingerprint scanners, security cameras, among others that can be implemented, and that will be timely and duly informed; and, technology that allows you to locate your location, for the following purposes:

- (i) automatically complete the documents necessary to acquire or exchange products or services in the Company and in the Falabella Companies.
- (ii) prevent and detect deceptive, fraudulent or criminal uses of our systems and facilities, which is necessary to protect the legitimate interests of the Falabella Companies and their respective customers.
- (iii) develop a user profile (individual or aggregate) based on your shopping preferences, exchange of products, visits to the stores of the Falabella Companies, Internet browsing, and the frequency and schedules with which you usually do so.
- (iv) Allow the execution of the contract or contracts that you enter into on the Site through any of the formats provided for this purpose by the Falabella Companies.

These Data will only be processed as long as they are necessary for the purposes for which they are granted, except those that, due to current legal or regulatory provisions, it is necessary to keep them for periods of time that go beyond this term, in which case, they will be kept for the period indicated by that regulation.

#### **7.- To whom do we transfer your Personal Data?**

Your Personal Data, provided that there is no legal prohibition for it, will be shared between the Falabella Companies.

These companies may use, for their benefit, your data only for the purposes authorized in paragraph 6 above.

In those cases where any of the services or products marketed through the Company requires marketplace sellers to access certain Data to complete your transaction, for example, the issuance of the corresponding ticket or dispatch of the product, you authorize these sellers to access your Data solely and exclusively for that purpose. These sellers are responsible for the Processing of these Data and acquire the obligations that this implies.

#### **8.- Who can help us process your Data as "Data Processors"?**

To process your Personal Data we may need the help of third parties ("Suppliers") that provide services to the Falabella Companies, for example, marketing, logistics, transport and/or delivery services of products and services marketed through Falabella, among others. These Suppliers will carry out this task as managers of the Falabella Company that hires them, acting on behalf of the latter; following their instructions, submitting to the terms of this authorization and adopting adequate security and confidentiality measures for the Processing of your data and compliance with the rules that regulate the protection of privacy.

All these Suppliers will have a current contract for the provision of services with the corresponding Company or Falabella Company and can only process your data for the purposes of complying with the specific order entrusted.

#### **9.- Who is Controller of your Personal Data?**

The Company will be Controller of the Data Processing carried out by all the companies indicated in the two preceding paragraphs with respect to the Data it shares with them. The foregoing, without prejudice to the responsibility that each of them bears for any breach of their obligations as controller in accordance with the rules governing the protection of privacy.

**10.- How long will we keep your Personal Data in our Personal Data databases?**

We will keep your Personal Data as long as it is necessary for the purpose for which it was collected, except those that by legal or regulatory provisions must be kept for periods of time that go beyond this term, in which case they will be kept for the period indicated by that regulation.

**11.- What safeguards does the Company take to protect your Personal Data?**

The Company maintains the physical, electronic and procedural safeguards required by legal regulations in relation to the collection, storage and transfer of your Personal Data, and evaluates their effectiveness periodically. The purpose of these safeguards is to prevent unauthorized or unlawful access, or accidental loss, destruction or occurrence of damage to your Personal Data.

Therefore, when the Company collects data through its site or mobile application, it does so through a secure server that has protection programs. In addition, the Company's security procedures require that you are sometimes asked for proof of identity before we can provide you with information about your Personal Data.

In the case of electronic payment card information, the Company also uses systems that encrypt the information avoiding fraudulent use. While it is not possible to guarantee the above, these systems have proven to be effective in handling confidential information by preventing access from external threats (for example, hackers). Notwithstanding the foregoing, we recommend that you do not send unencrypted credit or debit card details or from public or unsecured sites or equipment. Please note that you are solely responsible for protecting against unauthorized access to your password and computer.

Finally, it is important that you bear in mind that the web pages of the Falabella Companies can facilitate access through links to different websites corresponding to entities, companies, institutions or organizations outside Falabella. Falabella will not be responsible in relation to the registration of personal data that you can do on these websites.

**12.- What happens when you provide us with Third Party Personal Data or if a third party has provided us with your Personal Data?**

Some of the products or services offered by Falabella imply that we process Personal Data of a third party that you, as a user or as a customer, provide us, for example, when activating the loyalty club of a Falabella company or when you authorize a third party to pick up an order in our stores or associated establishments, you request the sending of your purchases to third parties, or when you contract a product for the benefit of a third party, among others.

If you provide us with Personal Data of third parties, you confirm that you have informed them of the purposes and the way in which we need to Process their Personal Data.

If a third party has provided us with your Personal Data or you have provided it as a result of a function or service requested by one of our customers or users, we inform you that we will use them to manage the function or service in question and in accordance with the purposes listed in this Privacy Policy.

**13.- What do we use cookies for?**

By accepting this Privacy Policy, you also authorize the Falabella Companies to use cookies and similar technologies to personalize and improve your customer experience and to show you relevant online advertising in the terms indicated below.

During your visit to the websites and mobile applications of the Falabella Companies, you remain anonymous, unless you have an account on one of the websites or mobile applications of the Falabella Companies in which case we could identify you.

Cookies are small text files that contain a unique identifier that is stored on the computer or mobile device through which you access the websites or apps of Falabella companies so that they can be recognized each time you use these sites or mobile applications.

With the exception of cookies that are necessary for the operation of the site or mobile applications, you can choose to disable at any time some or all of the cookies used by the Companies. However, this may restrict your use of the website and/or mobile applications, as certain functionalities may not work with cookies disabled and limit your experience on them.

For more information about what type of cookies we use or what we use them for, we invite you to read our Cookies Policy that you can find in [www.falabella.com](http://www.falabella.com)

#### **14.- What are your rights over your Personal Data?**

You can revoke at any time the authorization you give to process your Personal Data, in which case you may not be able to use any or all of the services or benefits offered by Falabella companies. It is your right to ask us for information about your Personal Data that we have collected and to exercise your rights of rectification, cancellation, opposition and all other rights conferred by the rules governing the protection of privacy, as well as to exercise your right to request that your Personal Data be deleted. In the event that you exercise your rights of cancellation, opposition or deletion of your Personal Data, Falabella will cease the treatment of these, deleting or anonymizing them; that is, eliminating any link that allows linking that information with your person, as provided by legal regulations. To exercise these rights contact the email [datos.personales@falabella.com](mailto:datos.personales@falabella.com).

In the same way, you can always request the suspension of promotional or advertising communications, in accordance with the provisions of the applicable legal regulations. You can also request the deletion of your user account. To exercise these actions contact the email [datos.personales@falabella.com](mailto:datos.personales@falabella.com). If later you regret it and want to register a user account and thus take advantage of all the benefits that the user account provides, you can do it at any time.

#### **15.- What is the validity of this Personal Data processing policy?**

This Privacy Policy has an indefinite duration. However, we may modify the information contained in this privacy policy in the future. In the event that we do, we will notify you in different ways, for example, through a banner, a pop-up or a push notification, or we will even notify you to your email address when the change in question is significant, so that you can review the changes, assess them and, where appropriate, oppose them by revoking your consent to process your Personal Data.

This Privacy Policy has been protocolized in the 2nd Notary of Santiago de D. Francisco Leiva C., located in Alcántara N°107, Las Condes, under Repertoire N° 39.448, of May 20, 2022

An updated version of the Privacy Policy will always be published on the Company's website and mobile application.