

PRIVACY POLICY

FALABELLA



 **SODIMAC**

 Banco
Falabella

 **TOTTUS**

 mallplaza

Falabella
INMOBILIARIO

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falabella.com

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At Falabella S.A. (hereinafter also referred to as the “Company”) **we work hard to provide you with a better service every time that you purchase a product or uses a service offered on the website or mobile applications of the Company.** Protecting the personal data that you share with us is a fundamental part of this. Therefore, we would like you to know how we use and protect your information, in order to provide you with a better and more tailored customer experience.

The controller of your personal data is Falabella S.A., RUT 90.749.000-9, our address is: Catedral 1401, Piso 14, Santiago.

We encourage you to read this Privacy Policy carefully and, if you have any concerns, please contact us at tusdatospersonales@falabella.cl



01

WHAT DOES THIS PRIVACY POLICY COVER? ●

This document (hereinafter referred to as the “Privacy Policy” or “Policy”) explains the types of Personal Data that Falabella collects from you when you interact directly or indirectly with Falabella. It also details how we use and protect your personal information, with whom we share it, what your rights are, and how you can exercise those rights.

02 DEFINITIONS

For purposes of this Privacy Notice, the words defined below will have the meaning assigned to them in this section, whether or not they are capitalized, or in the plural or singular form.

AUTHORIZATION

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

COMPANY

Falabella S.A.

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, Hipermercados Tottus S.A., Falabella Inmobiliario S.A., Open Plaza Chile S.A., Plaza S.A., Promotora Chilena de Café Colombia S.A. (Juan Valdez), Imperial S.A., Digital Payments SpA, Digital Payments Prepago S.A., and Fazil SpA.

CONTROLLER

Individual or legal entity, public or private, that by itself or in association with others, makes decisions regarding the database or the Data Processing.

DATA PROCESSOR

Individual or legal entity, public or private, that by itself or in association with others, carries out Personal Data Processing on behalf of the Controller.

PERSONAL DATA OR DATA

Those relating to any information concerning identified or identifiable individuals. For example, the Company may collect the following Personal Data: name, identification number, address, telephone number, e-mail address; biometric data such as your fingerprint and facial features, among others; geolocation data; browsing on our website; purchasing habits (items or services you purchase, amount, date, frequency of purchase, etc.), among others.

PERSONAL DATA PROCESSING

Technical procedures, whether automated or not, that allow personal data to be collected, stored, recorded, organized, processed, selected, extracted, compared, interconnected, dissociated, communicated, assigned, transferred, transmitted or cancelled, or otherwise put to use.

03

OUR PRINCIPLES.

Falabella's commitment is to guarantee that in all Personal Data Processing carried out by us, the rights that the Constitution and the laws have enshrined for your benefit are always respected; thus, we would like to share with you the principles that drive us in this regard:

PRINCIPLE OF LEGALITY OF PROCESSING

We will only process your Personal Data in accordance with the law.

PRINCIPLE OF PURPOSE

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

PRINCIPLE OF PROPORTIONALITY

We will only process the Personal Data that are necessary in relation to the purposes of the Processing.

PRINCIPLE OF SECURITY

In the processing of your Personal Data, we will apply appropriate security standards that will allow us to protect your Personal Data against unauthorized and unlawful processing and against loss, leakage, damage, or destruction.

PRINCIPLE OF TRANSPARENCY AND INFORMATION

At all times we will ensure that our Personal Data processing policies and practices are accessible and available to any interested party in accurate, clear, unequivocal and cost-free manner.

PRINCIPLE OF CONFIDENTIALITY

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

PRINCIPLE OF TEMPORALITY

Personal Data will be kept only for the time deemed reasonable and necessary to fulfill the purpose of the Processing, contractual obligations and legal requirements or instructions from supervisory and control authorities or other competent authorities.

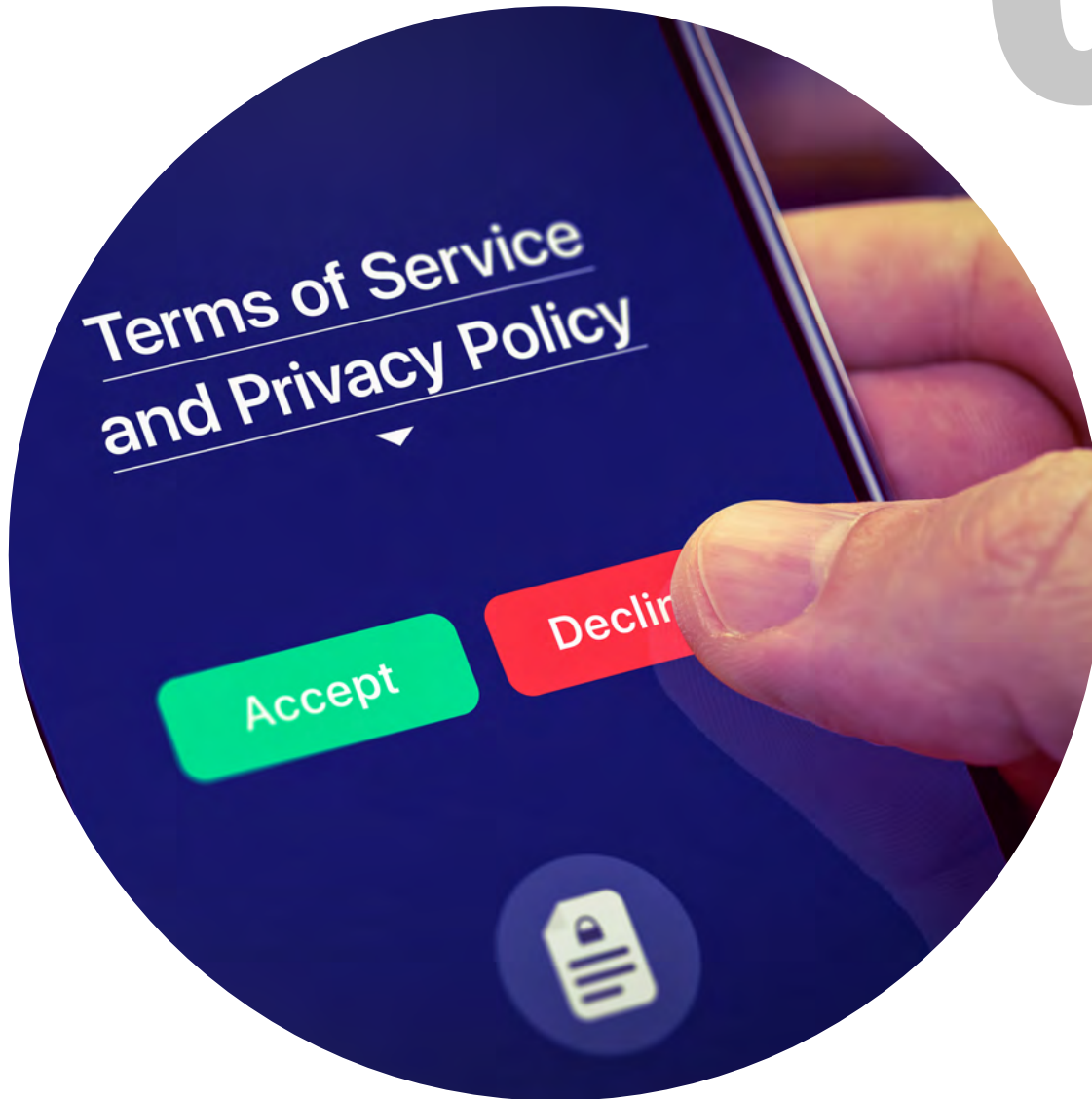
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ARE WE AUTHORIZED TO PROCESS YOUR PERSONAL DATA?

By accepting this Privacy Policy, you authorize Falabella to process the Personal Data that you provide us when you purchase our products; use or hire our services through any of our communication or sales channels (in-person or remote), in conformity with the laws that regulate the protection of privacy. Likewise, and as far as permitted by the law, you authorize the Company to share your Data with the other Falabella Companies, and extend this authorization so that the latter may also Process, to their benefit, your Personal Data; and may share them among themselves.

Falabella and the other Falabella Companies will only process your Personal Data with your Authorization or where otherwise permitted by Law to process your Personal Data and only for the purposes authorized in Section 6 below.

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



05

WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

As a result of your interaction with Falabella, we may collect the following Personal Information about you:

- 1** **Data that you provide directly in the course of your dealings with Falabella and that are necessary for you to purchase the products and services that are offered through Falabella and manage your participation in the Loyalty Program of Falabella (hereinafter “CMR Points Program”).** We collect, among other information, identification and contact data such as your name, identity card number, address, telephone and e-mail.
- 2** **Data derived from:**
 - The performance of operations related to the acquisition of products or services in Falabella, such as information about your purchases, returns, payments, among other economic information, unless access is restricted by a special law.
 - The use of services offered by Falabella 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.
 - When you purchase or use products or services from Falabella you may provide biometric data, for example, your fingerprint, facial features and voice.
 - Other sources of information such as: public access sources, e.g., information available in your birth certificate.
 - The browsing you do on Falabella's Web sites and apps, e.g., the type of device you connect to them, your operating system and Web browser, your network device identifier number (MAC address) or your IP address, among others. If you have an account with a Falabella Company, this data could allow us to identify you every time that you browse of websites or use our mobile apps.
 - The use of automated techniques based on current and historical Personal Data about you and statistical Data. Thus, we could apply these techniques to access, for example, information about your likings and preferences.

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WHAT DO WE USE YOUR DATA FOR?

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

- 1 The main purpose is the management and execution of the services you contract with Falabella, and the management and execution of the benefits awarded by Falabella through the CMR Points Program. This means that you authorize us to:**
 - Manage the services of the Company to which you are accessing by virtue of the contract entered into with the Company, to answer your queries, claims, requests, among other actions that we must carry out to manage these contracts.
 - Process your personal data in order for you to participate and make use of the benefits of the CMR Points Program through any channel of communication, sale or exchange; both in-person and remote.
 - Contact you with information about products and services provided by Falabella, and in general, to manage queries, requests and claims related to them.
 - For marketing purposes, meaning that Falabella may develop a user profile (individual or aggregated) by applying or not applying predictive models and thus improve the products that are marketed or services that are offered by Falabella. Likewise, Falabella could send you offers, promotions and advertisements for products and services that are of preference to our users in general or to you in particular and to invite you to participate in contests offered by Falabella.
 - Analyze and prepare statistical studies on the consumer interests and purchasing habits of our users, and in general, on matters relevant to the preparation of our own or third party market research or marketing campaigns.
 - Perform commercial actions (including after-sales services) of a general nature or directed personally to you, aimed at improving your experience as a customer, for example: to inform you about the status of your deliveries or events related to the exchange or purchase of products or the contracting of services at Falabella; automatically complete the documents necessary to finalize your transactions at Falabella; generate customer satisfaction surveys; implement campaigns to update Personal Data; and execute debt-collection activities.
 - Contact you through our physical or remote communication channels, such as: mail; call-center; email; social-networking websites (e.g. Facebook); text message (via SMS, Website or App); WhatsApp or other similar platforms, via the cellphone number that you provide us or any other contact information that you register with us, in order to send you information regarding the matters described in this section.

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WHAT DO WE USE YOUR DATA FOR?

These Personal Data will only be processed as long as they are necessary for the purposes for which they are granted, except for those that under statutory or regulatory provisions must be kept for periods of time that exceed this term, in which case they will be kept for the period indicated by such regulations.

2

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

- To improve Falabella's credit risk management, for example, by using predictive behavior and risk-scoring models so that we may be able to offer you financing services tailored to your needs. To achieve this, we may use the Data you provide us, in addition to financial, business, and credit information provided by third parties (such as credit bureaus) as long as their use is not expressly restricted by special laws or regulations.
- To implement security protocols, and to prevent and detect misleading, fraudulent or criminal uses of our systems and facilities, which is necessary to protect the legitimate interests of Falabella and its respective customers.

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We will use your biometric and geolocation data, which will be collected through writing and signature scanning devices and other biometric readers; fingerprint scanners, security cameras, among others that can be implemented and that will be informed in time and form; and technology that allows us to know your location, for the following purposes:

- To automatically complete the documents necessary to purchase or redeem products or services from Falabella.
- To prevent and detect misleading, fraudulent or criminal uses of our systems and facilities necessary to protect the legitimate interests of Falabella and its respective customers.
- To develop a user profile (individual or aggregated) based on your preferences for purchasing, product redemption, visits to Falabella stores, Internet browsing and the frequency and timing of your visits. completar automáticamente los documentos necesarios para adquirir o canjear productos o servicios en la Sociedad y en las Empresas Falabella.
- To allow for the execution of the contracts agreed upon on the website, through any of the formats provided by Falabella for such purposes



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TO WHOM DO WE TRANSFER YOUR PERSONAL DATA?

Your Personal Data, as long as there are no legal restrictions to do so, will be shared among all Falabella companies. These companies may use, for their benefit, your Personal Data only for the purposes authorized indicated in section 6.

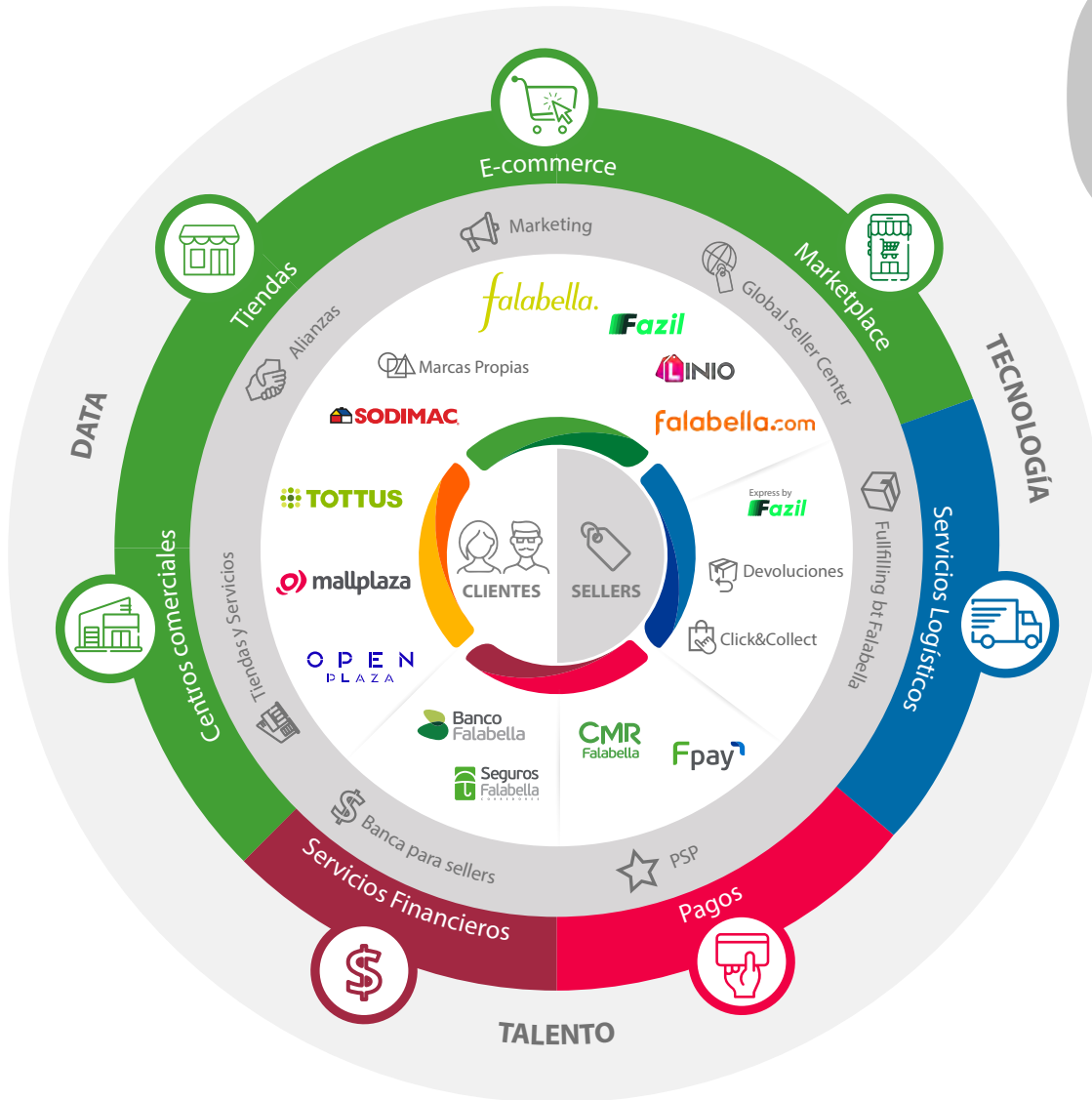
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WHO CAN HELP US PROCESS YOUR PERSONAL DATA AS “DATA PROCESSORS”?

In order to process your Personal Data, we may need the assistance of third party companies (“Data Processor”) who provide services to Falabella, such as: marketing services, logistics, transport or delivery of products and services sold through Falabella, among others. These Providers will perform these service as agents 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 appropriate security and confidentiality measures for the processing of your data and in compliance with the Law.

All these Data Procesor will have a valid contract with the corresponding Company and can only process your data for the purpose of fulfilling the specific task assigned to them.





09 WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

The Company will be responsible for the Processing of Personal Data performed by all the parties mentioned in the previous two sections, regarding the Data shared with them. This however, does not exempt each party from the responsibilities required of them in order to fulfill their obligations in regards to the laws that regulate the protection of privacy.

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HOW LONG WILL WE KEEP YOUR PERSONAL DATA IN OUR DATABASES?.

We will keep your Personal Data as long as it is required for the purpose for which they were collected, except for those that under statutory 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 such regulation.





1 HOW DOES THE COMPANY PROTECT YOUR PERSONAL DATA?

The company uses the physical, electronic, and procedural safeguards required by the law regarding the collection, storage, and sharing of your Personal Data; and it evaluates its effectiveness periodically. The goal of these safeguards is to prevent unauthorized or illegal access, accidental loss, destruction, or damage to your Personal Data.

Thus, when the Company collects data through its website or mobile app, it does so through a secure server equipped with protection software. Furthermore, the Company's safety protocols require you to, occasionally, provide a proof of identity before any Personal Data can be revealed.

Regarding the information of electronic payment cards, the Company also makes use of systems that encrypt information, avoiding fraudulent activity.

Although it is impossible to completely guarantee this, these systems have proven to be effective in the handling of private information, preventing access from external threats, such as hackers. Nevertheless, we recommend that you do not send debit or credit card information that is not encrypted, or using public or unsafe devices and websites. Keep in mind that you are solely responsible for protecting your computer and password from any unauthorized access.

Finally, it is important that you take into consideration that the websites of Falabella Companies can facilitate access (through links) to the websites of external companies, entities, institutions or organizations unconnected to Falabella. Falabella will not be responsible for the registration of personal information that you may submit on those sites.



WHAT HAPPENS WHEN YOU PROVIDE US WITH PERSONAL DATA OF A THIRD PARTY, OR A THIRD PARTY PROVIDE US WITH YOUR PERSONAL DATA?

Some of the products or services offered by Falabella require us to Process Personal Data from a third party that you, as a user or customer, provide us. For example, when signing-up to the customer loyalty program of a Falabella company; or when you authorize a third party to pick-up an order from our stores or associated businesses; when you request the delivery of your order to a third party; or when you sign on for a product on behalf of a third party; and so on.

If you provide us with the Personal Data of a third party, you are agreeing to have informed that person on the purposes and the manner in which we need to Process their Personal Data.

If a third party has provided us with your Personal Data or you have submitted them as a result of a feature or service requested by one of our customers or users, we inform you that we will use them to manage said feature or service in accordance with the protocols detailed in this Privacy Policy.



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WHY DO WE USE COOKIES?

By accepting this Privacy Policy, you also authorize Falabella Companies the use of cookies and similar technologies in order to enhance your customer experience and show you relevant online advertising, under the terms described below.

During your visit to the Falabella website and Falabella mobile applications, you remain anonymous, unless you have an account on one of these sites and log in with your username and password. Cookies are small text files containing a unique identifier which is stored in the computer or mobile device through which you access Falabella's Websites so that those sites can be recognized each time you visit the website.

You can choose to disable some or all of the cookies used by Falabella at any time. However, this may restrict your use of the website or mobile apps, as certain features may not work with disabled cookies, which could limit your experience therein.

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WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

You may revoke your Authorization to the processing of your Personal Data at any time, in which case you may not be able to use any or all of the services offered by Falabella. It is your right to request information about your Personal Data that we have collected and to exercise your rights of correction, cancellation, opposition and all other rights conferred by Law. To exercise these rights you only have to send an e-mail to **tusdatospersonales@falabella.cl**. Likewise, you can request the cancelation to newsletters or promotional communication at any time, as outlined by Article 28B of Law N°19.496 regarding Consumer Rights Protection.



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HOW LONG IS THIS PRIVACY POLICY VALID FOR?

This Privacy Policy has an undefined term. However, it is possible that in the future we modify the information contained in this Privacy Notice. If we do so, we will notify you by various means, such as, through a banner, a pop-up or a push notification. We will even notify you by e-mail if the change in question is significant, so that you can review the changes, assess them and, if necessary, oppose them by revoking your Authorization to the processing of your Personal Data.

This Privacy Policy has been registered at the 2nd Notaría de Santiago of D. Francisco Leiva C., located in Alcántara N° 107, Las Condes, on 08th April, 2022.

An updated version of the privacy policy will always be published on the Falabella Websites and Apps.



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