

# PERSONAL DATA PROTECTION POLICY

FALABELLA



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# 01 INTRODUCTION.

For Falabella, the **protection of Personal Data** is an expression of its commitment to respect the fundamental rights of individuals.

That is why Falabella **requires and promotes compliance with the Personal Data Protection Regulations** in all jurisdictions in which it carries out its activities, protecting the Personal Data of Employees, Customers, Suppliers and other Data Subjects



# 02

## OBJECTIVE.

This Policy **aims to establish the general principles and guidelines that should guide the behavior of Falabella and its Employees**, in order to: i) require and promote compliance with the Personal Data Protection Regulation; ii) promote a culture of protection of the Personal Data that Falabella Processes; iii) honor the confidence of the Data Subjects that their Personal Data are properly Processed by Falabella; and, iv) promote a secure use of Personal Data.

# 03

## SCOPE.

This Policy is corporate in scope, so it is applicable to Falabella as a whole, and must be implemented and complied with by all Employees. In addition, Falabella will encourage its Suppliers to align their conduct to the standards, guidelines and principles established in this Policy.

# 04

## DEFINITIONS.

Capitalised terms used in this Policy are defined in Annex No. 1.



# 05

## GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA.

In the Processing of Personal Data, Falabella and its Employees shall observe the following general principles:

1

### LAWFULNESS

Falabella will Process the Personal Data to which it has access in a fair and lawful manner, complying at all times with the Personal Data Protection Regulations, internal regulations, and the commitments on privacy and protection of Personal Data voluntarily assumed by each Company.

In compliance with this principle, for the Personal Data Processing, the consent of the Data Subject must be obtained or, in its absence, must apply any other Legal Base for the Processing, according to Personal Data Protection Regulations.

2

### PURPOSE

Falabella shall only carry out the Processing that is adequate and pertinent to achieve the specific purposes and objectives previously stated, which must be lawful and expressly informed to Data Subjects before any Processing activity.

3

### PROPORTIONALITY AND MINIMIZATION

Falabella will only access Personal Data in accordance with the Need to Know criterion, and will only Process Personal Data that is adequate, relevant and limited to the purpose for which it is being processed.

#### 4 **TRANSPARENCY**

Falabella shall inform Data Subjects about the Processing activities it carries out, and their purpose, in a clear, precise and accessible manner. This shall be done, among other regulatory elements, through the Privacy Policy and, when the Company so determines, also by any other means of communication.

#### 5 **RESPECT FOR THE RIGHTS OF DATA SUBJECTS**

Falabella shall provide the means that allow it to respond to the exercise of the rights of the Data Subjects with respect to their Personal Data, particularly, the rights of access, rectification, cancellation and objection.

#### 6 **SECURITY, CONFIDENTIALITY AND INTEGRITY OF PERSONAL DATA**

Falabella shall adopt the appropriate standards that are necessary and reasonable to guarantee the security and confidentiality of the Personal Data that it processes and that allow mitigating the risks of unauthorized Processing, or accidental loss, destruction or damage.

#### 7 **TEMPORALITY**

Personal Data shall be kept only for the time allowed by the Personal Data Protection Regulations to comply with the purpose for which such data were collected.

#### 8 **QUALITY**

Falabella will only Process Personal Data that are truthful and complete and will adopt the necessary mechanisms to ensure that such data remain updated.

#### 9 **ACCOUNTABILITY**

Any Company acting as Data Controller shall adopt the technical and organizational measures that allow it to comply with the Personal Data Protection Regulations.

To do so, it shall incorporate the protection of Personal Data of Employees, Customers and other Data Subjects throughout the entire life cycle of the systems, products, services, business practices and internal processes that involve or imply Processing, i.e., from the early stages of development and throughout all stages of operation thereof.

# 06

## GENERAL GUIDELINES REGARDING PROCESSING

In accordance with the aforementioned principles, Falabella and its Employees must adjust their conduct to the following guidelines:

**1**

### IMPLEMENTATION OF A COMPLIANCE PROGRAM

Each Company shall implement a Personal Data protection compliance program that, in accordance with the nature of its activities, incorporates the general objectives and principles set forth in this Policy.

Such programs shall contain the elements that allow to: i) establish, communicate, promote and guide the conduct expected of Employees and Suppliers in relation to Personal Data protection; ii) ensure the existence of a single Personal Data protection standard for all of Falabella; iii) identify, manage and continuously measure the risks associated with the Company's Processing activities; iv) designate an Employee who will exercise the functions and responsibilities of [Data Protection Officer] for the implementation, management and maintenance of such programs; and, v) allocate sufficient financial and human resources for the proper implementation of the program.

**2**

### PERSONAL DATA PROTECTION COMPLIANCE DEPARTMENT

Falabella shall have a Personal Data Protection Compliance Department, which shall be corporate in nature, i.e., with jurisdiction over all of Falabella.

The main objectives of the Personal Data Protection Compliance Department shall be: i) to promote, alongside the leaders of each Company, a culture of Personal Data protection in Falabella; ii) to propose the general rules that shall be implemented for the proper execution of the Personal Data Protection Program and this Policy; and iii) to ensure that the Personal Data protection compliance programs are implemented and executed.

### 3 INFORMATION SECURITY DEPARTMENT

Falabella will have a specialized area that will define and design the technical and organizational security measures to be implemented in order to comply with the Personal Data Protection Regulations and its internal regulations.

### 4 CROSS-BORDER FLOW OF PERSONAL DATA

Personal Data may be communicated, assigned, transferred and transmitted for Processing between Companies and to third parties located in different countries. This may be done provided that: i) it complies with the Personal Data Protection Regulations and the internal regulations on the matter; and, ii) the recipient of such data has measures to protect the rights of the Data Subjects, and security levels, at least equivalent to those of the Company from which they originate.

### 5 DATA PROCESSOR

Any Company that, as Data Controller, uses the services of one or more Suppliers as Data Processors, shall consider as a relevant element in the selection of the latter, the measures for the protection of Data Subject's rights and the Personal Data security measures offered by them. To this end, for the contracting processes of such Suppliers it shall be carried out the due diligence or review activities defined by the Data Protection Officer .

Likewise, any Company that uses the services of one or more Suppliers shall incorporate, in its contractual relationship with the latter, control elements that ensure that they comply with a Personal Data protection level at least equivalent to the Company's standard of protection.

### 6 OBLIGATION TO REGISTER

Each Company shall keep a record of the Processing activities it performs, from the time the Personal Data is collected and saved in its databases until such data is deleted, or it is no longer possible to identify the Data Subject to whom it refers.

Each Company shall implement the technological tools that allow it to keep such record.



# 07 INTEGRITY CHANNEL.

Employees may use the Integrity Channel to conduct any information they may have or complaints regarding any anomalous or prohibited activity or any activity that contravenes the provisions of this Policy. The channel will also be available to Suppliers and Customers for the aforementioned purposes.

## The Integrity Channel's means of communication are:



1 by e-mail sent to:  
**[contactochile@gerenciadeetica.com](mailto:contactochile@gerenciadeetica.com)**



2 by telephone at  
**800 726 100**



3 **Through the Integrity Channel link** located on each Company's website and intranet



4 **In person** at the offices of Ethics Department of Falabella S.A.



# 08 COMPLIANCE WITH THE POLICY.

All Employees are responsible for complying faithfully with the Personal Data Protection Regulations, this Policy and the internal regulations on Personal Data protection.

Likewise, the Personal Data Protection Compliance Department and the [Data Protection Officer] shall ensure faithful and timely compliance with this Policy and shall adopt the necessary measures in the event of detecting any non-compliance.

## 09

## BREACH OF THE PROVISIONS OF THIS POLICY

Any breach of this Policy by an Employee shall give rise to disciplinary measures against the offender, in accordance with the provisions of the [Code of Integrity], the Personal Data Protection Regulations and the [Internal Rules of Order, Hygiene and Safety] of the Company.

The Processing of Personal Data by an Employee without the Legal Base that authorizes it shall be considered a gross violation of this Policy.





# 10

## RELATED DOCUMENTS.

- Integrity Code
- Personal Data Protection Program
- Privacy by Design Procedure
- Intercompany Data Sharing Procedure
- Personal Data Taxonomy Standard
- Legal Enabler Identification and Registration Procedure
- General Information Security Policy
- Information Security Compliance Policy





# ANNEX

## DEFINITIONS

The words and terms defined below, when capitalised shall have the meaning ascribed to them regardless of where in this Policy they are used, or whether they are used in a person, number, manner, tense or grammatical variable, as necessary for the proper understanding of this document:

### COMPANY

Means a Falabella company about what is said in this document in a particular case may specifically apply.

### CUSTOMER

Means any user or purchaser of a service or product offered by the Company to the general public, as well as any person visiting a store, branch, premises, office or, in general, any physical or virtual space in which the Company carries out its commercial activities.

### DATA CONTROLLER

Means any individual or legal entity that, on its own or in association with others, makes decisions about a database and/or about the Processing activity to be carried out.

### DATA PROCESSOR

Means any individual or legal entity, which carries out the Processing of Personal Data, on behalf of a third party that has the character of Data Controller.

### DATA PROTECTION OFFICER

Means the Employee in charge of the implementation and maintenance of a Company's Personal Data Protection Program.

### DATA SUBJECT

Means that individual or legal entity to whom the Personal Data relates and who is therefore the owner of the data.

### EMPLOYEE

Means: i) any and all persons linked to a Company by an employment contract and/or who provide services on a fee basis; and, ii) all members and advisors of the Board of Directors or any other multi-member body of senior management that under applicable law corresponds to a Company.

### FALABELLA

Means: i) Falabella S.A. ii) any other legal entity, in any jurisdiction, in which Falabella controls directly or through another individual or legal entity more than 50% of its voting stock or capital, if it is not a corporation, or may elect or appoint or have elected or appointed a majority of its directors, advisors or administrators; iii) any other legal entity, in any jurisdiction, in which Falabella owns, directly or through another individual or legal entity, 50% or less of its voting stock or capital, provided that the former is distinguished to the public as a business with trademarks of Falabella, or of any of the Falabella companies described in paragraph ii) above.

# ANNEX

## DEFINITIONS

### LEGAL BASER

Means the legal grounds for the lawfulness of Processing of Personal Data of Data Subjects.

### NEED TO KNOW

Means that criterion whereby: i) Falabella will only access Personal Data that is essential for the achievement of the purposes sought by a Processing activity; and, ii) the Personal Data must be known and/or Processed only and exclusively by whoever has a role to perform that requires such knowledge and/or Processing, only with respect to those data and at the time that are strictly indispensable to fulfill such role.

### PERSONAL DATA

Means any information that relates to an individual [and legal entity], identified or identifiable such as, for example: name, identification number, address, telephone, email, geolocation data, use and visit of websites, browsing history, shopping habits and biometric data, among others.

### PERSONAL DATA PROTECTION COMPLIANCE DEPARTMENT

Means the area of the Governance, Ethics and Compliance Department of Falabella S.A. which, among other functions, shall be responsible for ensuring the implementation and execution of the Personal Data Protection Program of each Company, and for promoting a culture of Personal Data protection at Falabella.

### PERSONAL DATA PROTECTION REGULATIONS

Means any binding regulation that establishes a legal Personal Data protection statute applicable to a Company.

### PRIVACY POLICY

Means the document through which a Company informs Data Subjects of, among other matters: i) the Processing activities it performs; ii) what Personal Data it Processes; iii) the Legal Base for such activities; and, iv) the communication channels through which the Data Subject may assert his/her rights.

### PROCESSING

Means any operation or set of operations on Personal Data, whether automated or not, that makes possible to collect, capture, transmit, transfer, convey, store, record, organize, elaborate, select, extract, compare, interconnect, dissociate, communicate, correct, assign, transform, delete or cancel Personal Data, or use it in any other way.

### SUPPLIER

Means any individual or legal entity that has supplied, supplies, intends to supply, or could reasonably be expected to supply goods or services to a Company.

**Classification**  
Internal use

**Fecha aprobación**  
09/11/2021

**N° Política**  
21

**VERSION CONTROL**

**Date**  
09/11/2021

**Version**  
1

**Revisions**  
Original Text

**Drafter**  
Personal Data  
Protection Compliance  
Department Falabella  
S.A.

**Reviewer**  
Legal Affairs and  
Governance  
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Falabella S.A.

Data Governance  
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Tecnología  
Corporativa Ltda.

Manager of  
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(CISO), Falabella  
Tecnología  
Corporativa Ltda.

**Approver**  
Board of  
Directors  
Falabella S.A.

## PERSONAL DATA PROTECTION POLICY

# FALABELLA

