



PRIVACY POLICY

FALABELLA.COM S.A.C.

I. Introduction

FALABELLA.COM S.A.C.. has a firm commitment to respect and comply with all applicable legal and regulatory provisions. It also understands that personal data, being an integral part of the privacy of individuals, and also essential to our activity, must be processed in such a way that not only implies compliance with the law, but also that measures must be taken to generate an environment of trust and security among the general public with respect to such processing.

II. Purpose

The purpose of this Policy is to inform the public of our commitment to the protection of their personal data, as well as the guidelines under which we process such data in the exercise of our business activities, the purpose for which we do so, as well as the procedures for data subjects of such data to exercise their rights under the Personal Data Protection Regulations.

III. Scope

This Policy applies to all personal data processing activities carried out by FALABELLA.COM S.A.C. (hereinafter "LINIO PERU"). It shall also apply to those persons or companies to which LINIO requests the processing of personal data for which it is responsible.

IV. Definitions

The terms used in this policy with a capital letter are defined in Annex No. 1.

V. Guiding Principles

LINIO is committed to respect the guiding principles set forth in the Personal Data Protection Regulations. These are:

Principle of Legality: The processing of personal data is done in accordance with the provisions of the law, being prohibited the collection of personal data by fraudulent, unfair or unlawful means.

Principle of Consent: For the processing of personal data, consent from the data subject must be obtained, unless there are any of the exceptions provided by law. Such consent must comply with the requirements of being free, prior to its collection or processing, express and unequivocal, and informed.

Principle of Purpose: Personal data must be collected for a specific, explicit and lawful purpose, and its processing must not be extended to a purpose other than that for which it was collected.

Principle of Proportionality: The processing of personal data must be adequate, relevant and not excessive to the purpose for which they were collected.

Principle of Quality: The personal data to be processed must be truthful, accurate and, in so far as possible, updated, necessary, relevant and adequate with respect to the purpose for which they were collected.

Principle of Security: The Data Controller of the personal data bank and the Data Processor of the personal data bank must adopt the necessary technical, organizational and legal measures to ensure the security of the personal data.

Principle of Availability of Appeal: The data subject must have the necessary administrative or jurisdictional means to claim and enforce their rights when these are violated by the processing of their personal data.

Principle of Adequate Level of Protection: For the transborder flow of personal data, a sufficient level of protection must be ensured for the personal data to be processed or, at least, comparable to that provided by the Personal Data Protection Law or by international standards on the matter.

VI. Purpose of Personal Data Processing

LINIO PERU processes personal data of associates, customers and potential clients, suppliers, employees and other persons that make up its stakeholders, in accordance with the purposes authorized by each of them in the consents they have granted to LINIO PERU, with the exceptions to the requirement of obtaining consent provided by the Personal Data Protection Regulations.

LINIO PERU informs that it will process personal data, among others, for the following general purposes:

- Comply with the obligations generated by the contractual and non-contractual links generated with the data subject.
- Notify its stakeholders business information about its business activity, its goods and services, according to the consent obtained from the Data Subject.
- Comply with its legal obligations as an employer.
- Track and monitor for security risk management purposes through its video-surveillance devices, biometric registration, and others that may be available.
- Carry out due diligence and enterprise risk management activities.

- Provide the Personal Data to third parties, in Peru or abroad, with whom Linio has a contractual relationship, and it is necessary to deliver it to them for the fulfillment of the contracted purpose. For example, Linio may use third parties to assist in the delivery of product promotions, collect payments, ship products or operate our customer service systems. In Annex 2 you will find a list of these suppliers, responsible for the processing of personal data.
- Transfer personal data to the related companies listed in Annex 2 of this policy, within the framework of the purposes informed herein.
- Process them so that under the services provided, the customer can make use of the benefits of Falabella's loyalty program "CMR Point" through any of the communication, sales or redemption channels available, both face-to-face and remotely.
- Automatically fill out the documents associated with the transactions made by the Data Subject based on the products purchased and/or services used, or
- Develop sales actions or post-sale services, general or personally directed at the Data Subject, aimed at improving their experience as a customer through the Communication Channels.
- Keep the Data Subject informed, through the Communication Channels, about the delivery process and status of the orders placed.

The processing of personal data for the foregoing purposes, and for any other lawful purpose other than those aforementioned, is duly notified to the Data subjects, requiring specific authorization according to the corresponding stakeholder, in compliance with the principle of consent, with the exceptions provided in the Personal Data Protection Regulations

VII. Processing Under Commission

LINIO PERU may entrust all or part of the processing of personal data contained in the personal data banks of which it holds, to legitimate suppliers for the performance of its business activities, located in Peru or abroad, including the company Administradora de Servicios y Sistemas Automatizados Falabella Limitada, with address at Rosas 1665, Santiago de Chile, Chile, for processing, equipment and technological solutions.

When LINIO PERU entrusts the processing of a data bank for the provision of a specific service to third parties engaged after the publication of this policy, it will comply with the requirements set forth for data processors in the Personal Data Protection Regulations.

VIII. Consent

LINIO PERU will require the free, prior, express, unequivocal and informed consent of the data subject for its processing, except in the cases of exception expressly set forth by the Personal Data Protection Regulations.

LINIO PERU will not require consent to process your personal data obtained from sources accessible to the public, whether they are free, for the use for which such sources were made accessible to the public; it may also process your personal data from non-public sources, provided that such sources have your consent to process and transfer such personal data.

IX. Transfer of Personal Data

In the cases in which data subject has expressly authorized it, LINIO PERU may transfer personal data locally and internationally to its related companies, which you will find in Annex 2 of this policy, among which are included companies of the Falabella Group (Banco Falabella, Hipermercados Tottus, Saga Falabella, Tiendas del Mejoramiento del Hogar (Sodimac Perú and Maestro Perú), Corredores de Seguros Falabella, Open Plaza, Falabella Servicios Generales, Linio, Ikso S.A.C., Digital Payments S.A.C., Falabella Perú S.A.A. and Falapuntos S.A.C.), and its business partners Viajes Falabella and Mall Plaza, to send you advertising, conduct surveys, send invitations to events, learn about your consumption preferences, prepare statistics and/or behavioral studies, evaluate your debt capacity, consumption payment behavior and assets.

FALABELLA.COM S.A.C.. also transfers personal data abroad to third-party data processors, including the company responsible for providing the Host services of the website. The details of the data processors may be found in Annex 2 of this policy.

LINIO PERU may also transfer personal data to public entities legally empowered within the scope of their jurisdiction, in compliance with current or future regulations, or upon their request, or when there is any of the exceptions provided by law.

X. Rights of Data Subjects

In accordance with the Personal Data Protection Regulations, data subjects have the following rights:

1. Right of Information Access:

As a consequence of the right of access, the data subject has the right to obtain the information about themselves that is subject to processing in data banks held by LINIO PERU, how their data was collected, the reasons that motivated its collection, the transfers made, or to whom they are expected to be made, among others. The right to information, on the other hand, grants the holder the right to know, prior to the collection of their data, the purpose for which their data will be processed, the existence of the data bank in which they will be stored, the identity and address of the data controller of the personal data bank and of the data processors of the personal data bank, if the transfer of personal data will take place and to whom, time kept, among others.

2. Right of Rectification, Updating and Inclusion:

The data subject has the right of updating, inclusion and rectification of their personal data subject to processing by LINIO when they are partially or totally inaccurate, incomplete or when an omission, error or falsehood has been noticed.

3. Right of Cancellation or Deletion:

The data subject may request the cancellation or deletion of their personal data not related or necessary for the execution of the obligations of LINIO PERU provided in the contracts signed or those provided by current regulations.

4. Right to Prevent the Provision:

The data subject has the right to prevent their personal data from being provided, especially when the provision affects their fundamental rights, unless the provision is executed between the data controller of the personal data bank and a data processor of the personal data bank, for the purposes of its processing.

5. Right of Opposition:

The data subject may oppose the processing of their personal data at any time. The opposition will become effective to the extent that the processing has no contractual or legal justification.

6. Right of Revocation:

The data subject may withdraw at any time the consent previously granted. The revocation will not reach the uses and/or treatments that may be executed under the scenarios authorized by the regulation.

7. Right to Objective Processing:

The data subject has the right of not being affected by a decision that is based solely on a processing of personal data intended to evaluate certain aspects of their personality or conduct, unless that occurs within the framework of a contract or in cases of evaluation for the purpose of incorporation into a public entity, according to law, notwithstanding the possibility of defending their point of view, to safeguard their legitimate interest.

8. Right to Tutela:

In the event that the data controller of the personal data bank or data processor of the personal data bank denies the data subject, in whole or in part, the exercise of the rights set forth in this Law, the latter may appeal to the National Authority for the Protection of Personal Data by way of complaint or to the Judiciary for the purposes of the corresponding habeas data action.

9. Right to be Indemnified:

The Data Subject who is affected because of the breach of this Law by the data controller or by data processor or by third parties, has the right to obtain the corresponding indemnification, in accordance with the law.

XI. Procedure for the Exercise of the Data Subject's rights

Data Subjects may revoke their consent or exercise their legal rights by sending an email to datos.personales@linio.com indicating their full name, ID number and attaching a copy of such ID number.

If the data subject requires to exercise the rights through a representative, former must send a power of attorney legalized by a notary public empowering the latter as such and their identity document.

XII. Term of Processing of Personal Data

The personal data processed by LINIO PERU will be stored for the time necessary to fulfill the purposes of processing authorized by the data subject, notwithstanding that the data subject may exercise at any time the rights mentioned in paragraph X of this policy.

XIII. Security of Personal Data

In compliance with the regulations in force, LINIO PERU adopts the appropriate legal, organizational and technical measures to ensure the security of personal data, avoiding its alteration, loss, improper treatment or unauthorized access.

For this purpose, it makes available all the necessary human and technological resources, applying them in proportion to the nature of the data stored and the risks to which they are exposed.

LINIO PERU will only process personal data stored in repositories that meet the security conditions required by the current regulations on personal data protection.

XIV. Cookies

At Linio we use cookies and similar technologies to tailor and enhance your customer experience and to show you relevant online advertising. Cookies are small text files that contain a unique identifier that is stored on the computer or mobile device through which you access the Site, so that they may be recognized each time you use the Site.

You can disable the use of cookies according to your browser settings. In this regard, you can contact us at datos.personales@linio.com. Please note that there are some technical cookies that, if disabled, may even prevent the proper operation of the website.

XV. Amendments

In the event of any change or amendment to this Policy, the current text will be published on our website: <https://www.linio.com.pe/> in the Privacy Policy section.

XVI. General Information

As part of our business, we process personal data in compliance with the provisions of the Personal Data Protection Regulations.

The personal data we process are stored in personal data banks owned by LINIO PERU, duly registered with the Authority for the Protection of Personal Data:

1. Occupational medical examinations – Code RNPDP-PJP 14178
2. Emergency Contacts – Code RNPDP-PJP 14179
3. Applicants – Code RNPDP-PJP 14277
4. Suppliers – Code RNPDP-PJP 15452
5. Customers – Code RNPDP-PJP 15453
6. Potential Customers – Code RNPDP-PJP 15454
7. Sellers – Code RNPDP-PJP 15570

Annex No. 1

Definitions

The words and terms defined below, when they are written with initial capital letters as defined in their respective definitions below, whether or not it is necessary according to the spelling rules for the use of capital letters, and regardless of the place in this policy where they are used, or if they are used on a person, number, mode, tense or grammatical variable, as necessary for its proper understanding, will have the meanings ascribed to each of such words or terms as follows:

- **Personal Data Protection Law:** Law 29733 as amended.

- **Regulation of the Personal Data Protection Law:** Supreme Decree No. 003-2013-JUS as amended.
- **Personal Data Bank:** Organized set of personal data, automated or not automated, regardless of the means, whether physical, magnetic, digital, optical or other that may be created, whatever the form or modality of its creation, formation, storage, organization and access.
- **Sensitive Data:** Personal data consisting of biometric data that by itself can identify the data subject, data referring to racial and ethnic origin; economic income, political, religious, philosophical or moral opinions or convictions; union membership; and information related to health or sex life.
- **Data Processor of the Personal Data Bank:** Any natural person, legal person under private law or public entity that alone or acting jointly with another performs the processing of personal data on behalf of the data controller of the personal data bank.
- **Personal Data Protection Regulations:** Refers to the Personal Data Protection Law. To the Regulation of the Personal Data Protection Law and its amendments and complementary rules.
- **Data Subject:** Natural person to whom the personal data corresponds.
- **Data Controller of the Personal Data Bank:** Natural person, legal person of private law or public entity that determines the purpose and content of the personal data bank, the processing thereof and the security measures.
- **Transfer of Personal Data:** Any transmission, provision or representation of personal data, national or international, to a legal person under private law, to a public entity or to a natural person other than the data subject.
- **Processing of Personal Data:** Any operation or technical procedure, automated or not, that allows the collection, recording, organization, storage, conservation, elaboration, modification, extraction, consultation, use, blocking, suppression, communication by transfer or dissemination or any other form of processing that facilitates the access, correlation or interconnection of personal data.
- **ARCO Rights:** Rights held by any natural person as data subject.
- **Request to Exercise ARCO Right:** It is the request for access, rectification, updating, inclusion, cancellation, suppression or opposition, made by the data subject regarding their information.
- **Consent of Stakeholder:** It is any free, specific, informed and unequivocal representation of will by which the stakeholder accepts, either through a statement or a clear affirmative action, the processing of their personal data.

- **Communication Channels:** Physical mail, email, text messages (SMS and/or MMS), digital media such as Facebook, or “WhatsApp” or other similar platforms, cell phone number or any means of communication that the Data Subject provides to LINIO PERU.

Annex No. 2

1. Companies related to FALABELLA.COM S.A.C..

- LINIO ARGENTINA SRL (Linio Argentina), company located in Argentina.
- INVERSIONES BAZAYA CHILE LTDA (Linio Chile), company located in Chile.
- LINIO COLOMBIA SAS (Linio Colombia), company located in Colombia.
- ECUAELECOMMERCE S.A. (Linio Ecuador), company located in Ecuador.
- Bazaya México Sociedad de Responsabilidad Limitada de Capital Variable (Linio Mexico), company located in México.
- LINIO LATAM CORP. (Linio Panamá), company located in Panamá.
- R-SC INTERNET SERVICES C.A. (Linio Venezuela), company located in Venezuela.
- Saga Falabella S.A, company located at Av. Paseo de la Republica Nro. 3220, San Isidro, Lima.
- Sodimac Perú S.A, company located at Av. Angamos Este Nro. 1805 Int. 2, Surquillo, Lima
- Mall Plaza Perú S.A.C., company located at Av. Mariscal Oscar R. Benavides Nro. 3866 Int. C-P3, Bellavista, Callao.
- Hipermercados Tottus S.A. company located at Av. Angamos Este Nro. 1805 Int. P10, Surquillo, Lima.
- Banco Falabella Perú S.A, company located at Calle Chinchon. Nro. 1060, San Isidro, Lima.
- Corredores de Seguros Falabella S.A.C, company located at Av. Angamos Este Nro. 1805 Int. 3c, Surquillo, Lima.
- Viajes Falabella S.A.C., company located at Av. Angamos Este Nro. 1805 Int. 3a, Surquillo, Lima.
- Tiendas del Mejoramiento del Hogar S.A., company located at Av. Angamos Este Nro. 1805 Int. 2, Surquillo, Lima.
- Open Plaza S.A, company located at Av. Paseo de la Republica Nro. 3220, San Isidro, Lima
- Contact Center Falabella S.A.C, company located at Av. Tacna Nro. 665, Cercado de Lima, Lima.

- Servicios Informativos Falabella S.A.C., company located at Av. Angamos Este Nro. 1805 (Piso 9), Surquillo, Lima
- Ikso S.A.C., company located at Av. Paseo la Republica Nro. 3220, San Isidro, Lima
- Digital Payments S.A.C., company located at Av. Paseo la Republica Nro. 3220, San Isidro, Lima
- Falabella Perú S.A.A., company located at Av. Paseo la Republica Nro. 3220, San Isidro, Lima
- Falapuntos S.A.C., company located at Av. Paseo la Republica Nro. 3220, San Isidro, Lima
- Falabella Servicios Generales, company located at Cal. Carpaccio Nro. 250 (Piso 4), San Borja, Lima

2. Data Processors of FALABELLA.COM S.A.C..

- Amazon Web Service Inc, located at 21147-21155 Smith Switch Rd, Ashburn, VA 20147, USA, company responsible for providing the Host services of the website.
- LOGISTIC ACJ S.A.C., company located at Calle Linares Mza. D Lote. 13, Ate, Lima, company responsible for providing logistics services.
- OLVA COURIER S.A.C, company located at Av. Gral.Alvarez de Arenales Nro. 177, Lince, Lima, company responsible for providing logistics services.
- URBANO EXPRESS PERU S.A., company located at Av. Argentina Nro. 3127, Cercado de Lima, Lima, company responsible for providing logistics services.
- SERVICE J.C.U. SRL, company located at Calle los Diamantes Nro. 252, La Victoria, Lima, company responsible for providing logistics services.
- MOVIL BUS S.A.C, company located at Av. Materiales Nro. 2215, Cercado de Lima, Lima, company responsible for providing logistics services.
- INVERSIONES MOY S.A.C., company located at Calle 6 Mz. K Lote. 1A, Villa el Salvador, Lima, company responsible for providing logistics services.
- COMPAÑIA PERUANA DE MEDIOS DE PAGO S.A.C, company located at Av. José Pardo Nro. 831, Miraflores, Lima, company responsible for payment processing.
- PROCESOS DE MEDIOS DE PAGO S.A., company located at Av. Jorge Chavez Nro. 275 Int. P 7, Miraflores, Lima, company responsible for payment processing.
- ORBIS VENTURES S.A.C., company located at Jr. Santa Rosa Nro. 300, Cercado de Lima, Lima, company responsible for providing the services
- BANCO DE CREDITO DEL PERU S.A., company located at Calle Centenario N° 156, La Molina, Lima, company responsible for managing payments made.

- CORE ANDINA GROUP S.A.C., company located at Jr. Narciso de la Colina Nro. 421 Int. 1201, Miraflores, Lima.