

MALLPLAZA PRIVACY POLICY

In Santiago, Chile, **PLAZA S.A.** and its subsidiaries listed below:

- ADMINISTRADORA PLAZA VESPUCIO S.A.,
- PLAZA VESPUCIO SpA,
- PLAZA OESTE SpA,
- PLAZA DEL TRÉBOL SpA,
- PLAZA TOBALABA SpA,
- PLAZA LA SERENA SpA,
- PLAZA ANTOFAGASTA S.A.,
- NUEVOS DESARROLLOS S.A.,
- INMOBILIARIA MALL CALAMA SpA,
- INMOBILIARIA MALL LAS AMERICAS S.A.,
- SERVICIOS MALLPLAZA SpA
- AUTOPLAZA SpA

(hereinafter also "**Mallplaza**") state that we work on a daily basis to serve you better when you visit us or use the services available on the website and participate in our contests. 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 and how we protect them to offer you a better and more personalized customer experience.

The entity responsible for your personal data is **Plaza S.A.**, RUT 76.017.019-4 and its subsidiaries:

Company	Taxpayers' ID Number
Servicios Mallplaza SpA	76.034.238-6
Plaza Vespucio SpA	96.538.230-5,
Administradora Plaza Vespucio S.A	79.990.670-8
Nuevos Desarrollos S.A	76.882.330-8,
Plaza Oeste SpA	96.653.650-0,
Plaza del Trébol SpA	96.653.660-8,
Plaza La Serena SpA	96.795.700-3,
Plaza Antofagasta S.A	99.555.550-6,
Autoplaza SpA	76.044.159-7
Inmobiliaria Mall Las Américas S.A	96.824.450-7
Inmobiliaria Mall Calama SpA	96.951.230-0,
Plaza Tobalaba SpA	96.791.560-2,

All domiciled at Américo Vespucio N°1737 9th floor, Municipality of Huechuraba, Santiago.

We invite you to read our Privacy Policy in detail and if you have any questions, please contact us at datos.personales@mallplaza.com.

1.- 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 capital initials, or are in plural or singular form.

- **Authorization:** Prior, free, specific, unequivocal and informed consent of owner to carry out the Processing of Personal Data.
- **Company:** Plaza S.A. or any of its subsidiaries.
- **Data or Personal Data:** Those related to any information concerning identified or identifiable natural persons. For example, the Company may collect the following Personal Data: contact data such as your name, identification number, address, telephone, email address; biometric data such as your fingerprints and facial features, among others; geolocation data; visits and navigation on the website; shopping habits (items or services you purchase, amount, date, frequency with which you acquire them, 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, Hipermercados Tottus S.A., Falabella Inmobiliario S.A., Open Plaza 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.
- **Data Processor:** Natural or legal person, public or private, who, on its own, or in association with others, performs the Processing of Personal Data on behalf of those Responsible for the Processing of Personal Data.
- **Data Controllers:** Natural or legal person, public or private, who on its own or in association with others, decides on the database and/or the Data Processing. For purposes of this policy, the Company is responsible for Processing your Personal Data.
- **Personal Data Processing:** technical procedures, automated or not, that allow the collection, storage, recording, organization, processing, selection, extraction, confrontation, interconnection, dissociation, communication, transfer, transmission or cancellation of personal data, or their use in any other way.

2. What does this policy cover?

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 Mallplaza or any Falabella Company. It also explains how we use and safeguard your Personal Data, with whom we share it, your rights and how you can exercise them.

3.- Our Principles

We are committed to guaranteeing that in all Personal Data Processing that we undertake, we always respect the rights that the Constitution and laws have enshrined in your favor. Therefore, we want you to know the principles that inspire us on this matter:

- **Principle of Processing legality.** 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.
- **Principle of proportionality.** We will only process Personal Data as necessary for processing purposes.
- **Principle of minimization:** We will implement appropriate technical and organizational measures with a view to ensuring that, by default, we only process personal data as necessary for each of the specific processing purposes. This obligation shall apply to the amount of personal data collected, the extent of their processing, their retention period and their accessibility.
- **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, breach, damage, accidental or destruction.
- **Principle of transparency and information.** We will ensure that our policies and practices for Personal Data Processing are always accessible and available to any proprietor 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 only keep your Data for the reasonable and necessary time to fulfill the purpose of Processing, contractual obligations, legal requirements or instructions from surveillance and control authorities or other competent authorities.

4. Are we authorized to process your Personal Data?

By accepting this Privacy Policy you authorize the Company, in accordance with the rules governing the protection of privacy, to process the Personal Data that you provide to us by using our Wi-Fi service in Shopping Centers, using our services on the web and participating in our contests, through any of our communication channels, both face-to-face and remotely. Likewise, and provided that there are no legal restrictions in this regard, you authorize Mallplaza to share your Data with the rest of the Falabella Companies and for the latter to Process, to their benefit, your Personal Data; and share it among them.

Both Mallplaza and the other Falabella Companies will process your Personal Data only when they have your Authorization or the rules governing private life protection recognize another legal basis to process your Personal Data and only for the purposes authorized in numeral 6 below.

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

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

Based on your interaction with Mallplaza we may collect the following Personal Data from you:

- Data that you provide directly in the course of your relations with Mallplaza and that are necessary for you to use the services offered through Mallplaza or to participate in and use 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 exchanges, among others.
- Data derived from:
 - (i) carrying out operations related to the acquisition of products or contracting services in Mallplaza or Falabella Companies, such as information about your shopping habits, returns, payments, among other economic information, unless access is prohibited by a special law.
 - (ii) the use of services offered by Mallplaza and Falabella Companies such as Wi-Fi network, Click&Collect, customer service, *Rating & Reviews*, *PitStop* and technical service, among others. Through these services we can, for example, obtain geolocation data and know your location.
 - (iii) purchasing or using products or services in Mallplaza and Falabella Companies you might provide biometric data, for example, your fingerprint, facial features and voice.
 - (iv) other sources of information such as public access sources. For example, your birth date available in the Civil Registry.
 - (v) your navigation of Mallplaza's websites, for example, the type of device you use to connect to them, your operating system and web browser, the identifier number of your network device (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 each time you browse the websites or mobile applications of Mallplaza and 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 regarding your preferences and tastes.

6. What do we use your Data for?

By virtue of your consent provided upon 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 Mallplaza and the management and execution of the benefits granted by Mallplaza through CMR Points. That means you authorize us to:

- (i) Manage the execution of the contract or contracts you enter into with or through Mallplaza, 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 in and make use of the benefits of CMR Points through any of the communication, sale or exchange channels, both face-to-face and remotely.
- (iii) Contact you to provide information about services provided by Mallplaza and, in general, manage queries, requests and claims related to them.
- (iv) Meet marketing objectives, this means that Mallplaza and Falabella Companies can develop a user profile (individual or aggregate) by applying predictive models or not and, thus, improve the products marketed or services offered through Falabella Companies. Likewise, Mallplaza and Falabella Companies may send you offers, promotions and advertisements of 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 Mallplaza and Falabella Companies.
- (v) Analyze and prepare statistical studies on our users' consumer interests and buying habits and, in general terms, on matters relevant to the preparation of market studies or own or third-party marketing campaigns.
- (vi) Carry out commercial actions, aimed at improving your customer experience, for example: automatically completing the necessary documents to carry out your transactions in Mallplaza, conducting satisfaction surveys, campaigns to update Personal Data.
- (vii) Contact you through our physical and remote communication channels, for example: letter, call center, email, social networks such as Facebook, or text messages (through SMS, website or mobile applications), WhatsApp or other similar platforms, to your registered mobile number or any other contact information you inform to us to send you information regarding the purposes described in this section.

b.- Commercial processing of your Personal Data for the following purposes:

- (i) Perform better credit risk management by Falabella, for example, using predictive models of behavior and risk scoring so that Falabella Companies can offer you appropriate financing services for your needs. For this purpose, we may use the Data you give us and the financial, commercial and credit information offered by third parties such as the credit bureau, provided that its 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 Mallplaza and Falabella Companies and their respective customers.

c.- We will use your biometric and geolocation data that we collect through writing and signature digitization 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 locating your location, for the following purposes:

- (i) Automatically complete the necessary documents to acquire or exchange products or services in the Company and in 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 Falabella Companies and their respective customers.
- (iii) Create a user profile (individual or aggregated) based on your purchasing preferences, product exchanges, visits to Falabella Companies stores, Internet browsing, and the frequency and hours in which you usually do it.
- (iv) Allow the execution of the contract or contracts you enter into on the Site through any of the formats provided for this purpose by Mallplaza and Falabella Companies.

This Data will only be processed as long as they are necessary for the purposes for which it was granted, except data that, due to legal or regulatory provisions in force, must be maintained for periods of time beyond this term, in which case, they will be kept for the period indicated by those regulations.

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

Your Personal Data, provided that there is no legal prohibition in this regard, will be shared among the Falabella Companies.

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

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 marketing services, logistics, and technology services to Mallplaza and Falabella Companies. These Suppliers will perform this task as managers of Mallplaza, acting on behalf of the latter, following their instructions, submitting to the terms of this authorization and adopting adequate security and confidentiality measures for processing your data and in compliance with the rules governing private life protection.

All these Suppliers will have a current contract for the provision of services with Mallplaza or the corresponding Falabella Company and can only process your data for the purpose of complying with the specific instruction assigned.

9.- Who is responsible for Processing your Personal Data?

Mallplaza will be responsible for the Data Processing of all the companies indicated in the two preceding numerals regarding the Data it shares with them. The foregoing, without prejudice to the liability of each of them for any breach of their obligations as accountable parties in accordance with the rules governing the protection of private life.

10.- For how long will we keep your Personal Data in our Personal Databases?

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

11.- What safeguards does Mallplaza take to protect your Personal Data?

The Company maintains the physical, electronic and procedural safeguards required by legal regulations in regard to the collection, storage and transfer of your Personal Data, and assesses 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 is through a secure server with protection programs. In addition, the Company's security procedures require that you be requested at times to provide proof of identity before you can be provided information about your Personal Data.

Lastly, it is important that you bear in mind that Mallplaza and Falabella Companies websites may facilitate access through links to different websites corresponding to entities, companies, institutions or organizations outside Mallplaza. Mallplaza will not be responsible in regard to your registration of personal data on these websites.

12.- What happens when you provide us with Personal Data of third parties or if a third party has provided us their Personal Data?

Some of the services offered by Mallplaza 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, among others.

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

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

13.- Why do we use cookies?

By accepting this Privacy Policy, you also authorize Mallplaza 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 Mallplaza and Falabella Companies, you remain anonymous, unless you have an account on any of the websites or mobile applications of Falabella Companies in which case we could identify you.

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

Except for 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 Mallplaza. However, this may restrict your use of the website and/or mobile applications, since certain features may not work with disabled cookies and limit your experience there.

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.mallplaza.com

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

You can revoke the authorization you provide to process your Personal Data at any time, in which case you might not be able to use any or all of the services or benefits offered by Mallplaza and Falabella Companies. You are entitled to request information about your Personal Data that we have collected and to exercise your rectification, cancellation, and opposition rights and all other rights conferred by the rules governing the protection of private life. To exercise these rights, you only have to send an email to [**datos.personales@mallplaza.com**](mailto:datos.personales@mallplaza.com). Likewise, you can always request suspension of promotional or advertising communications, in accordance with the provisions of Article 28 B of Law No. 19,496 on Consumer Rights Protection. Mallplaza will stop their processing, eliminating or anonymizing them; i.e., by suppressing any link that allows connecting that information with your person

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 through different means, for example, through a banner, a pop-up or a push notification, or we will even communicate it to your email address when the change in question is significant, so that you can review the changes, evaluate them and, as appropriate, oppose them by revoking your consent to process your Personal Data.

An updated version of the Privacy Policy will be published on the Company's website at all times.