

Privacy Policy





PRIVACY POLICY

ALMACENES ÉXITO S.A.

We, at ALMACENES ÉXITO S.A., would like to share with you our privacy policy adopted in compliance with the current legal regulations contained in and developed from the provisions of the Statutory Law 1581 of 2012 and 1266 of 2008, as appropriate.

Definitions

For a better understanding of this policy, it is important that you understand the following concepts and their legal definitions:

Authorization: It is the prior, express, and informed consent by the owner to carry out the data processing.

Data Processor: It is the natural or legal person, public or private, who, individually or in association with others, carries out the processing of personal data on behalf of the Data Controller.

Data Controller: It is the natural or legal person, public or private, who, individually or in association with others, decides on the processing of personal data based on the authorization of the Data Subject or by any other legal authorization.

Data Subject: Is the natural person whose personal data is being processed.

Processing: It is defined as any operation or set of operations on personal data, such as gather, storage, use, circulation or deletion.

Transfer: Sending personal data from a Data Controller to a new Data Controller.

Transmission: Communication of personal data of a Data Controller to a Data Processor in order to perform any activity or deliver any service on behalf of the Data Processor who has communicated the data.

Our identification

Legal entity: ALMACENES ÉXITO S.A.

N.I.T: 8909006089

City: Envigado, Antioquia.

Main Address: Carrera 48 # 32 B Sur – 139

Email: proteccion.datos@grupo-exito.com

Introduction

ALMACENES ÉXITO S.A., as a multi-channel and multi-business organization, process personal data of its stakeholders according to its corporate purpose. This includes activities of: retail in non-specialized facilities with assortment made up of all kinds of goods and services of mass consumption, mainly food, beverages, home, technology, appliances, new motor vehicles, among other lines of business. The above is achieved through physical and/or electronic channels, for which it distributes and markets such products through its own and/or represented brands. These brands currently registered as CARULLA, ÉXITO, VIVA, SURTIMAX, SUPERINTER, SURTIMAYORISTA, among others, without prejudice to those which will become owner, and through commerce establishments in several cities of the

country; all activities required in the field of acquisition, creation, investment, organization, establishment, administration, and operation of other businesses included in the corporate purpose, such as wholesale, direct and electronic commerce, real estate, insurance and travel alliances, banking, money orders, wire transfers, remittances, among others authorized by law.

Our commitment

Personal data in custody of ALMACENES ÉXITO S.A., in its capacity as Data Controller and/or Data Processor, as the case may be, shall be processed and protected in compliance with the principles and regulations provided for in the Colombian laws and others that are applicable in the matter, as well as in conformity with good personal data protection practices.

Scope of Application

This policy applies to the processing of the personal data of the Data Subjects that make up the various stakeholders of ALMACENES ÉXITO S.A., if they are customers, suppliers, employees, shareholders, among others. In this sense, this policy is also applicable to the processing of personal data of the natural person providing us with his/her personal data, directly or through third parties, either as Data Controller or Data Processor, complying with all legal requirements in force.

For what purposes your data will be processed for?

In accordance with prior, express, and informed authorizations given to us except those situations in which according to the law such authorization is not required, Almacenes Éxito S.A. shall gather, store, guard, process, circulate, transmit or transfer and process

your personal data in accordance with the following general purposes:

- Comply with the obligations arising from commercial contracts and other legal businesses held by ALMACENES ÉXITO S.A. in the development of its corporate purpose.
- For the integral management of the customer loyalty program of ALMACENES ÉXITO S.A., whether it is managed directly or through third parties, which may involve the transmission or secure transfer of personal data that is relevant and necessary for such management, complying with all due legal requirements.
- Conduct business intelligence activities, customer prospective, trends and market research, profile tracking in social networks, pattern traceability and consumption behavior, data analytics, artificial intelligence developments, execution of marketing and related activities, behavior traceability in our web portals and applications, as well as in the electronic devices that allows it, in order to improve the experience of our customers and users, as well as having a more appropriate product and service offer, all in accordance with the prior authorizations given to us, no later than when you provided us with your personal data.
- Communicate information about our goods, services, publications, training events, business activities, discounts, sales, alliances, and advertising associated with our business activity, whether conducted directly or through third parties, in accordance with the terms authorized at the time of providing us with your data, and through the means of contact and communication channels that you provide and authorize us.
- For the fulfilment of legal obligations that ALMACENES ÉXITO S.A. has to carry out activities aimed at improving the working environment, training and well-being of its

employees, management of risks associated with its work and execution of appropriate processing measures, all of which shall be executed directly by ALMACENES ÉXITO S.A. or in alliance with third parties, such as employee funds, mutual investment funds, entities financial institutions, family compensation funds, educational institutions, among others.

- For the comprehensive management of employee recruitment and selection processes.
- Deploy corporate social responsibility activities to our stakeholders.
- Manage the security of people, goods, and information assets in custody of our organization, through mechanisms that may include video surveillance at our facilities and in nearby perimeters, depending on the range of the devices used.
- Transfer data to third parties in accordance with the legal provisions in force and in the terms that you authorize us in advance, in an expressed and informed manner.
- Develop activities that allow us to give an adequate comprehensive management of risks such as money laundering, terrorist financing, fraud, corruption and bribery.

How long does the data remain in our repositories?

Your personal data will remain stored in the Company's repositories for as long as it is used for the purposes described in the respective Authorization of processing of personal data.

The authorization for the processing of your personal data

In order to process your personal data for the above purposes, or for other particular purposes, we shall request, in accordance with the provisions of the applicable regulations and the legal means permitted,

your prior, express and informed authorization, except where is not required by legal provisions. Thus, in each company process, and in accordance with the personal data collected and the processing to be carried out, in the respective privacy notice or in the request of authorization we will inform you in advance on any particular purpose, any possibility of that data being shared with third parties, any rights that assist you as a Data Subjects, the mechanisms that we have available to guarantee the exercise of those rights, and the channels of access to this Privacy Policy.

With whom can we share your personal data?

As permitted by law and your authorization, ALMACENES ÉXITO S.A. will transfer your personal data with its parent company, its subsidiaries and joint ventures. We will request your prior, express and informed authorization at the latest at the time of data collection.

ALMACENES ÉXITO S.A. informs you that it may commercialize products or services of aggregate information generated by the processing of various information among which may be included your personal information, business information of the company, among others. The processing of your personal information will allow us to understand the various processing activities mentioned in the section "For what purposes will we process your data?" which, as stated in said section, will only be carried out with your prior, express, and informed consent.

In addition, on some occasions, third parties allied with ALMACENES ÉXITO S.A. may share your personal data to us, either through transfers previously authorized by you, or through transmissions to further develop activities that must be executed in

accordance with the legal provisions in force in the matter.

What are the rights you have about your personal data (*habeas data* rights)?

- Access, know, consult, rectify, correct and update your personal data.
- Revoke in part or in full the authorization you have granted us and/or to request the partial or total deletion of your personal data, except when due to legal or contractual duties your data must remain in our databases.
- Request proof of the authorization you have given us to process your personal data.
- Exercise the other actions that the law gives you in the matter of protection of personal data and *habeas data*.

How can you exercise your rights to *habeas data*?

In order to make inquiries or claims in exercise of your rights to *habeas data*, you must accredit your status as Data Subjects by providing a copy of your identity document, which you can send together with your request, either by physical or digital means on the channels as follows. In case you are represented by a third party, that person must provide the notarized POA. The proxy must proof his/her identity in the terms stated here in.

You can direct your queries and *habeas data* claims through the following channels:

- Email proteccion.datos@grupo-exito.com
- Service and attention points in our stores.
- Written request to “Gerencia del Cliente” at the administrative headquarters of ALMACENES ÉXITO S.A., located at Carrera 48

32 B Sur – 139, Envigado – Antioquia, Colombia.

ALMACENES ÉXITO S.A. shall have other channels for the exercise of your *habeas data* rights, which will be informed in due course.

For an efficient processing time, your request must contain the following information:

- Name and identification of the Data Subjects, and of his/her proxy, if applicable.
- Specific request, indicating which or how many of your *habeas data* rights you want to request, what do you want request, or what your claim is and what are your reasons.
- Mailing and/or electronic address to give notifications.
- Documents that support the request, if any.

ALMACENES ÉXITO S.A. informs you that if any of the requirements indicated herein are missing, we shall inform you within five (5) days after receipt of the request, so that they will be remedied, proceeding then to give response to the *Habeas Data* application submitted. After two (2) months without submitting the required information, it will be understood that you have forsaken the application.

ALMACENES ÉXITO S.A., will respond to the request within ten (10) business days, if it is a consultation or request; and fifteen (15) business days for complaints or claims. In the same abovementioned terms ALMACENES ÉXITO S.A. will answer when verifying that it has no personal data of who exercises any of the rights indicated herein.

In case of consultation or request, if no answer is given within ten (10) business days, we will inform you of the reasons for delay and the date on which the claim will be handled. In no case, this may exceed five (5)

working days following the expiration of the first term.

In the event of a claim, if it is not possible to give a response within fifteen (15) business days, we will inform you of the reasons for the delay and the date on which the claim will be handled, in no case this may exceed eight (8) working days following the expiration of the first term.

ALMACENES ÉXITO S.A., in cases it bears the status of Data Processor, shall inform the Data Subjects of such situation, and shall inform the Data Controller of the request, in order for the latter to respond to the request for consultation or complaint filed. Copy of such communication shall be sent to the Data Subject, so that he or she has knowledge of the identity of the person responsible for the personal data.

Treatment of personal data of children and / or adolescents

ALMACENES ÉXITO S.A. does not treat personal data of children and / or adolescents, except in specific cases, in which it will guarantee:

- The best interest of the minor.
- The fundamental rights of the minor.
- The collection of the Authorization for data processing by the legal representative of the minor.

How do we care for your personal data?

ALMACENES ÉXITO S.A. protects your personal information with the technical, human and administrative measures necessary to provide security throughout its life cycle, from gathering to collection and disposal, as defined in the security policies and guidelines that impact the entire organization, from senior management to operations.

This policy was approved by the Legal Representative of ALMACENES ÉXITO S.A. on June 26, 2023 in Envigado – Antioquia.