



PRIVACY POLICY

DATE OF THE LAST UPDATE: September 4, 2020.

We at Companhia Brasileira de Distribuição (“Pão de Açúcar Group”, “GPA” or “we”), with Tax Id. (CNPJ/ME) No. 47.508.411/0001-56 and headquartered at Avenida Brigadeiro Luis Antônio 3142, in Sao Paulo, State of Sao Paulo, Brazil, are one of the largest retail groups in Brazil, having operations with some of the major brands in the country, and are committed to safeguarding your privacy and protecting your personal data.

But why does GPA process my personal data?

GPA is committed to always offering the best products and services, believing in the customer's freedom of choice as part of our purpose. When we talk about personal data, this involves not only respecting and committing to the security and privacy of our customers, but also our commitment that this same power of choice extends to their personal data.

When we make a sale, it is common for us to collect some personal data from customers to effect a purchase—for example, credit card data. Likewise, some of our services involve registering, either to take part in loyalty programs or to receive purchases at your home. We also use security cameras in our physical stores to ensure your security, and collect certain personal data to better understand your profile and offer you more attractive, tailored ads.

These are just a few examples that show how our activities need to use personal data, legitimately and within your expectations. We are very serious about complying with the laws that protect your privacy, and this policy (“[Policy](#)”) describes how your information and personal data are collected, used, shared, and stored. If you still have questions after reading this Policy, please feel free to contact us through our service channels provided in the Privacy Notices.

Important: this Pão de Açúcar Group Policy applies to all our brands, businesses, and services, as listed in section 10 of this Policy. However, other **Privacy Notices** may also apply specifically to certain services. In this case, you can find them at the bottom of this page. In the event of a conflict between this Policy and any of the **Privacy Notices**, we ask you to consider the provisions set forth in the **Privacy Notice** specific to the service you could be using.

1. BASIC CONCEPTS: WHAT DO I NEED TO KNOW TO UNDERSTAND THIS POLICY?

In order to make your reading easier, we provide you with some useful definitions for your interpretation:

- (i) **“Legal Bases”** are the legal grounds that allow GPA to Process Personal Data. Any and all Processing of Personal Data is considered valid if it is grounded on a legal basis.
- (ii) **“Personal Data”** is any data relating to an identified or identifiable individual, including identifying numbers, location data, electronic identifiers or any data that, when combined with other information, is able to identify someone, make them identifiable, or even individualize them.
- (iii) **“Digital Platforms”** or **“Platforms”** are the websites and applications owned by GPA.
- (iv) **“Process”** or **“Processing”** are the uses GPA makes of Personal Data, including for example the following activities: collection, recording, storage, organization, consultation, use, disclosure, sharing, transmission, classification, reproduction, processing, and evaluation.
- (v) **“you”** or **“Data Subject”** is the person to whom the Personal Data relates.



2. HOW DOES GPA COLLECT YOUR PERSONAL DATA? WHAT TYPES OF PERSONAL DATA ARE COLLECTED?



The types of Personal Data and how GPA collects them depends on how you relate to GPA and why. For example, the Personal Data collected are different if you use our delivery app, or make a purchase at any of our physical stores.

For this reason, and to ensure your easy access to information, we have prepared **Privacy Notices** that are specific to each of our businesses.

All **Privacy Notices** are available at the bottom of this page, and also describe what types of Personal Data are collected in each case.

Without prejudice to other information provided for in specific Privacy Notices, we may foresee some situations that occur more frequently in the relationship between GPA and its customers, which we explain briefly below:

Origin	Type of Data Collected	Purpose	Legal Basis
Navigation on Digital Platforms	<p>Browsing data: data collected through cookies or device IDs, including IP, date and time of access, geographic location, browser type, duration of visit, and pages visited.</p> <p>Access device data: model, manufacturer, operating system, telephone carrier, browser type, connection type, and speed.</p>	<p>Site operation: activate essential features such as antivirus software, responsiveness of the site/application to the desktop/mobile, among other functions.</p>	Legitimate Interest and Legal Obligation
		<p>Analytics: Understand your browsing behavior and how the site/app is being used, in order to improve your experience as a user. The data collected is aggregated and, whenever possible, anonymized.</p>	Legitimate Interest
		<p>Marketing: targeting of content and advertising from us and our partners, according to your profile and preferences.</p>	Legitimate Interest
Registration Forms	<p>Registration data: email, name, telephone, address, and other information (depending on the contracted service).</p>	<p>Services provided: delivery, registration in loyalty programs, among others.</p>	Performance of Contract
		<p>Marketing: targeting of content and advertising from us and our partners, according to your profile and preferences</p>	Consent, Legitimate Interest
Ombudsman and Customer Service	<p>Registration data: email, name, telephone, and other information (depending on the contracted service).</p>	<p>Answering requests: make return requests, exchanges, direct customer complaints and requests, among others.</p>	Performance of Contract, Legal Obligation and Legitimate Interest
Physical Stores	<p>Payment Data: credit and debit card information.</p> <p>Registration Data (forms): email, name, telephone, address, and other information (depending on the contracted service).</p> <p>Other data: image capture by security cameras (CCTV).</p>	<p>Provision of Services: processing of purchases, division in installments, delivery, and registration in loyalty programs, among others.</p>	Performance of Contract, Legal Obligation, Credit Protection and Legitimate Interest
		<p>Answering requests: make return requests, exchanges, direct customer complaints and requests, among others.</p>	
		<p>Credit Protection: confirmation of credit card limit, analysis of credit restrictions for division in installments, among others.</p>	
		<p>Security: physical and logical security of store environments.</p>	



3. WHO DOES GPA SHARE YOUR PERSONAL DATA WITH?



Like any large company, GPA operates in partnership with several other companies to offer its products and services. In this way, we can share your Personal Data with these GPA partner companies, always seeking to preserve your privacy to the maximum extent and, whenever possible, anonymously. Here we describe situations in which we would share Personal Data and for what purposes:

- (i) **Our suppliers.** We have many suppliers that we need to hire to operate our services, and some of them may Process Personal Data that we collect, such as companies that provide data hosting, property security, registration authentication and validation services, advertising companies, means of payment, among others. To the extent possible, we always seek to evaluate our suppliers carefully and enter with them contractual obligations of information security and protection of Personal Data to minimize risks to the Subjects.
- (ii) **Social media.** Some of our Digital Platforms allow you to register by signing in to your account through a third-party service, such as your Facebook or Google profile. When this happens, certain Personal Data may be shared with those third parties. It is always the Subject's choice to decide whether to integrate and/or share these pieces of information or not. We remind you that we do not control the policies and practices of any other third-party website or service.
- (iii) **Data Companies.** Some of our business partners are data companies, popularly known as bureaus, with which we may share Personal Data for some important purposes, such as validating a certain profile to prevent fraud, to supply information for credit purposes, to release the sale in installments, or to carry out other commercial and business transactions that involve financial risk.
- (iv) **Business Partners.** In addition to our suppliers, we may occasionally share Personal Data with GPA's business partners in order to enable a particular product or service or special condition for our customers. For example, we have to share Personal Data for delivery services, or so that the Subject can enjoy a certain reward in a loyalty program. In the same way as we do with our suppliers, we use our best efforts to assess carefully our business partners and enter with them contractual obligations of information security and protection of Personal Data to minimize risks to Subjects.
- (v) **Public Authorities.** We have to comply with the law. Thus, if a judge or an authority of competent jurisdiction requires GPA to share certain Personal Data for purposes of, for example, an investigation, we will share them. We are against any abuse of authority and, if GPA understands that an order is abusive, we will always defend the privacy of the Subjects.

Moreover, we reserve the right to share any Personal Data that we believe to be necessary to comply with a legal obligation, cause to enforce or enforce our terms of use, or otherwise protect the rights, property or security of GPA, our employees, and customers.

4. DOES GPA TRANSFER PERSONAL DATA TO OTHER COUNTRIES?



Yes. Although GPA is headquartered in Brazil and its products and services are intended for people located in Brazil, and therefore Brazilian laws relating to the protection of Personal Data apply, the Personal Data we collect may be transferred to European Union countries and the USA. Such transfer is the responsibility of certain GPA suppliers and business partners, which may be established at these sites.



Those transfers involve only companies that prove to be compliant or in the process of being compliant with applicable laws and maintain a similar or even stricter level of compliance than that provided for in the applicable Brazilian laws.

5. WHAT ARE YOUR RIGHTS AS A PERSONAL DATA SUBJECT?

The Personal Data is yours, and Brazilian laws ensure that you have several rights related to them. We are committed to the enforcement of these rights and in this section we will explain how you can exercise these rights with GPA.

How can you know if GPA has Personal Data about you, and how can you access them?

GPA allows you to confirm that we have Personal Data about you, as well as allows you to access those Personal Data by requesting it from our service channels. As a security measure, we may request other information to verify your identity and prevent fraud.

How can you edit Personal Data that GPA has about you?

GPA allows you to request corrections to your Personal Data through our service channels. You can also change them directly on some Digital Platforms, in the section related to your registration.

How can you delete your Personal Data in whole or in part?

GPA allows you to request the deletion of your Personal Data in whole or in part. Just request it through our service channels. Two important points: (i) we may occasionally verify your real identity in order to ensure that there is no fraud, and (ii) some Personal Data cannot be deleted because of legal obligations (such as invoices, which must be stored throughout the statutory period of limitation), but in these cases we will maintain our commitment to secrecy and protection of those data.

How can you restrict the Processing of your Personal Data by GPA?

GPA allows you to restrict the Processing of your Personal Data. There are a few ways to do this:

- (i) **On any website, via browser.** If you are using a browser (for example, Chrome, Explorer, Safari, Firefox), these programs have tools to refuse and disable the collection of some browsing data, including the ability for you to browse anonymously. We always respect that right. Important: By doing so, some areas of our Digital Platforms may not function properly.
- (ii) **On our Digital Platforms.** Besides browser options, GPA also offers preferences settings for managing how we can collect your browsing data (for example, preventing collection for marketing or analytics purposes, location, or camera access).
- (iii) **Through our service channels.** You will find the contacts of our service centers in the specific Privacy Notices for each product.

If GPA is using your Personal Data for a purpose which you do not agree with, can you object?

Yes. In our daily activities, it is normal that we can use legal bases that do not depend on your consent, such as legitimate interest. We always exercise this right responsibly and in your best interest, but if you believe that such a purpose affects your rights, please contact us by emailing to dpo@gpabr.com, and we will no longer use your Personal Data for that purpose. Remember that in some cases we can show that we have legitimate reasons to still continue processing your Personal Data (for example, to prevent fraud), but we will always justify this to you in the best possible way.

After you gave consent to GPA Processing your Personal Data, can you change your mind?

Yes. You can revoke your consent through our service channels. Some types of revocations may also be made directly on our Digital Platforms, such as the use of means of communication and browsing data.



Then, we will also inform you of any consequences of the withdrawal of your consent (for example, restrictions on the use of a particular service).

If I want a copy of all my Personal Data, can I ask GPA?

Yes. Just request this through our service channels, and we will provide this Personal Data in a format that can be opened on any computer. As a security measure, we may request other Personal Data to verify your identity and prevent fraud.

Is it possible to get a list of public or private entities with which GPA has shared your Personal Data?

Yes. You can request this information through our service channels. Remember that GPA reserves the right not to share this information if Personal Data has been shared with any public authority under judicial secrecy.

Whenever the Subject exercises his rights, GPA may request some additional information for the purpose of proving his/her identity, in order to prevent fraud. We do this to ensure the security and privacy of our customers. In addition, some requests may not be answered immediately, but GPA undertakes to respond to all requests within a reasonable time and always in accordance with applicable laws.

6. HOW LONG WILL YOUR PERSONAL DATA BE STORED?



GPA has a Personal Data retention policy in line with applicable laws. Personal Data are stored only for as long as necessary to comply with the purposes for which they were collected, unless there is any other reason for their maintenance such as, for example, compliance with any legal, regulatory or contractual obligations, among others, provided that they have grounds on Legal Basis. Of course, there is always your right to request the deletion of the data, according to section 5.

We understand that this statement may seem vague, but we will explain it further. We always do a technical analysis to determine the appropriate retention period for each type of Personal Data collected, considering their nature, need for collection, and purpose for which they will be processed.

7. WHAT ARE OUR RESPONSIBILITIES AND HOW DOES GPA PROTECT MY PERSONAL DATA?



Our responsibility is to take care of your Personal Data and use them only for the purposes described in this Policy. And to ensure your privacy and the protection of your Personal Data, we adopt all suitable security practices for our market, using encryption techniques and other information security systems.

We strive to protect the privacy of your Personal Data, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use of third parties in your account, failure of hardware or software that is not under the control of GPA and other factors may compromise the security of your Personal Data. Therefore, your performance is fundamental for the maintenance of a secure environment for all. You can help us by adopting good security practices in relation to your account and your data (such as not sharing your password with third parties), and if you identify or become aware of anything that compromises the security of your data, please contact us through our service channels.



8. HOW CAN I TALK ABOUT PERSONAL DATA WITH GPA?



If you believe that your Personal Data have been used in a manner incompatible with this Privacy Policy or with your choices as a Subject of those Personal Data, or if you have any questions, comments, or suggestions related to this Policy, please contact us. We have a Data Protection Officer (DPO) who is available at the following contact addresses:

- **DPO (in charge):** Marcelo Simões Pato
- **Mailing Address:** Avenida Brigadeiro Luis Antônio 3142, Jardim Paulista, CEP 01402-000 – Sao Paulo, SP (Brazil).
- **Service channel:** dpo@gpabr.com

9. CHANGES TO THE PRIVACY POLICY

As we are always seeking to improve our products and services, this Privacy Policy may be updated to reflect the improvements made. Thus, we recommend a periodic visit to this page so that you learn about the changes made.

10. SPECIFIC PRODUCTS AND SERVICES

To learn more about the Processing of your Personal Data, look for the Privacy Notices as they provide additional and specific information about each of our services and can be found directly on the corresponding websites and/or applications.