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	Vice President of Management & Finance	Target Audience:	Corporate
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1. OBJECTIVE

This Digital Channels Privacy Policy was created with the objective of guaranteeing transparency in our activities and allowing our customers to easily access clear, adequate and accurate information about the purposes and means of the processing of personal data.

Throughout this Privacy Policy, you will get information about our purposes to collect, use, store and share your personal data, so that you can continue to acquire our products and services with the desired trust. It will also be possible to get information about the time we store your personal data, the agents we share them with, as well as guidance on how to exercise the rights provided for in the laws in force, especially Federal Act no. 13.709/2018 ('General Data Protection Act').

In case you still have any doubts, please contact our Person in Charge of Personal Data Processing at dpo@rd.com.br. You will be served free of charge and adequately to obtain easy access to any information you need.

2. IDENTIFICATION OF THE PERSONAL DATA CONTROLLER

For the processing of personal data within the scope of this Privacy Policy, the 'Personal Data Controller' shall be RAIA DROGASIL S.A. ('RD') or the companies that comprise its business group ('RD Group'), depending on the products or services you make use of. We recommend you refer to the Privacy Policy of the company belonging to the RD Group with whom you have a relationship, as applicable.

For the purposes of this Digital Channels Privacy Policy, any mention to the 'RD Group' shall be referring to the following companies:


- a. Drogasil, Droga Raia and Onofre;
- b. 4bio Medicamentos S.A.;
- c. Stix;
- d. Vitat;
- e. Healthbit;
- f. Other companies that may join the RD Group in the future.

3. PROCESSED PERSONAL DATA

According to the products and services you use, we can collect and obtain access to the following personal data:

- **Registration Data:** full name, ID, CPF (individual taxpayer ID no.), gender, home phone number, cell phone number, date of birth, full address, email, identification number linked to a Pharmacy Benefit Management ('PBM'), health plan user ID number or code, and Regional Council of Medicine (CRM) registration number of prescribing physician;
- **Sensitive Personal Data:** medical prescription data, data of products or services referred to in invoices classified as sensitive, purchase history of drugs or health products;
- **Transactional data:** invoice data linked to a natural person, number, code and value of sales order, and sales authorization code;
- **Financial Data:** payment data, including name of credit or debit card holder, safety code, name of credit card and expiry date;
- **Behavioral Data:** navigation data in digital apps ('cookies'), georeference and behavioral profile of customers, created based on their consumption preferences.

For the sake of transparency, we stress that we are not responsible for the quality or veracity of the personal data you provide. Therefore, it is your responsibility to keep them updated.

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4. **BENEFITS OF THE USE OF YOUR PERSONAL DATA**

Respect to privacy and transparency in our activities is part of our commitment to you. For this reason, we believe it is critical that you know the benefits of RD's use of your personal data:

- Provision of our products or services according to each customer's preference, (including additional services, such as home delivery, for instance);
- Customized discounts according to each customer's consumption preferences;
- Communication of benefits when purchasing our products or services;
- Special discounts linked to the so-called Pharmacy Benefit Management ('PBM') or **Continuous Use / Chronic-Use Products ('PUC')**;
- Reward points to be redeemed for prizes resulting from purchases made in our pharmacies;
- Improved navigation experience in our digital channels and with our products or services;
- Guaranteed security and fraud prevention, especially in the identification and registration authentication processes in electronic systems.

5. **PROCESSING PURPOSES AND LEGAL GROUNDS**


Depending on the products or services you use, we can process personal data and sensitive data for the following purposes:

- Identification and individual registration of customers in our systems;
- Maintenance of product purchase history in our pharmacies;
- Supply of products or services according to each consumer's preferences;
- Improved navigation experience in our digital channels, through cookies;
- Notifications to our customers about campaigns, benefits or special conditions to purchase our products or services;
- Discounts and benefits linked to the so-called Pharmacy Benefit Management ('PBM'), **Continuous Use / Chronic-Use Products ('PUC')** or other relationship programs;
- Creation of behavioral profile and purchase target, aimed at offering products and services that better meet the needs and preferences of each customer;
- Fraud prevention, especially in the identification and registration authentication processes in electronic systems.
- Compliance with our legal and/or regulatory obligations, including tax obligations;
- Regular exercise of rights in agreements or in administrative, judicial and/or arbitral processes.

The General Data Protection Act allows us to carry out processing activities for the purposes described above according to different legal grounds. In some cases, your consent shall be indispensable to our activities. In other situations, we can use your personal data without having to request your authorization.

In order to achieve the foregoing purposes, we can collect, use, share, store or, in any other way, process your personal data according to the following grounds:

- Free, informed, unequivocal and specific-purpose consent;
- Whenever necessary for the execution of agreements or related preliminary procedures;
- To meet our or contractors' legitimate interests, always respecting the personal data protection rights;
- To comply with our legal or regulatory obligations;
- To enable the regular exercise of our rights in agreements or in administrative, judicial and/or arbitral processes;

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- To guarantee fraud prevention and data owner security, especially in the identification and registration authentication processes in electronic systems.

It is important to remind you that the way we operate our business may vary over time, whether due to the advent of new methods, technologies, or to the launch of new products or services, as well as to changes in the laws in force.

Therefore, we will seek to continuously adjust this Privacy Policy to our business updates and evolution.

6. PERSONAL DATA SHARING

Depending on the products or services you use, it might be necessary to share some of your personal data with contractors, namely:

- Companies that provide support services in the supply of our products or services, such as product delivery companies;
- Companies hired to provide payment services or banking institutions when the customer chooses to pay through a payment slip;
- Companies hired to provide fraud prevention and security services to our customers;
- Companies hired to provide analysis and creation of a behavioral profile, aimed at allowing us to offer products and services that better meet the needs and preferences of our customers;
- Companies hired to send messages informing our customers about campaigns, benefits or special conditions to purchase our products or services;
- Companies hired to provide customer service chatbot in digital channels;
- Companies hired to provide internet access through a Wi-Fi network;
- Companies responsible for managing Pharmacy Benefit Management ('PBM'), Continuous Use / Chronic-Use Products ('PUC') or other relationship programs customers participate in;
- Companies belonging to the RD Group, always following what is necessary for the provision of products or services you acquired or that are for your benefit;
- Companies hired to provide data storage services in cloud computing, including companies located in other countries, with the adoption of technical, managerial and organizational measures to guarantee the protection of personal data confidentiality, integrity and availability;
- Agencies, authorities and public officials, always in compliance with the laws in force or, whenever necessary, for the enforcement of judicial or administrative orders.

7. PERSONAL DATA STORAGE

To offer our products and services adequately, as well as fully meet our obligations, we need to store some of your personal data. We do that in total security and only to ensure the adequate performance of our activities in a timely manner.

8. EXERCISING YOUR RIGHTS

The General Data Protection Act ('LGPD') guarantees several information processing-related rights. Due to our commitment to and respect for you, we guarantee the exercise of such rights in a friendly manner, at no cost. LGPD guarantees to you:

- a. Confirmation of a personal data processing in place;
- b. Access to the personal data processed by RD;
- c. Rectification of incomplete, inaccurate or outdated data;

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- d. Anonymization, restriction or erasure of personal data that is unnecessary, excessive or processed in a manner that is not compliant with the General Data Protection Act;
- e. Portability of personal data to another service or product provider, upon express request, according to the National Data Protection Authority ('ANPD') regulations, provided our commercial and industrial secrecy is safeguarded;
- f. Erasure of personal data processed without your consent;
- g. Information of public and private entities with whom we share your personal data;
- h. Information about the possibility of not providing consent and about the consequences of such refusal;
- i. Withdrawal of consent;
- j. Change in decisions taken based exclusively on automated processing of personal data that affect your interests, including decisions aimed at defining your personal, professional, consumption and credit-related profile or aspects of your personality.

Whenever you wish, you may exercise these rights through the following channels:

- a. Digital channels, through the Privacy Portal (www.rd.com.br/privacidade) or accessing the Portal on the website of the desired brand;
- b. Through the email address dpo@rd.com.br;
- c. In our pharmacies, by informing one of our representatives.

In this case, you can be forwarded to one of our digital channels to safely exercise specific rights.

Nevertheless, we inform that these rights are not absolute. In certain situations, we may not be able to meet your requests by virtue of some legal or regulatory obligations that prevent us from respecting your wish. In some cases, it is also possible that your request be denied so that we can guarantee the regular exercise of our rights, whether in agreements or in administrative, judicial or arbitral processes. In case this occurs, you shall be duly notified about the impossibility of meeting your request and the rationale for declining the request.

You are not obliged to give us your consent when we request your authorization to use your personal data. We shall always inform you about the consequences related to the supply of our products or services in case you refuse to give us consent.

9. WITHDRAWING YOUR CONSENT

Have we requested your consent and you have authorized us to process your personal data? It is good to know that you can rethink this decision at any time.

You can withdraw it through the following channels:

- a. **Digital channels:** by accessing the website or app of the desired brand and, after entering your login and password, by clicking the Menu '*Privacidade de Dados*' (data privacy);
- b. **Telesales:** by requesting a change in your consent to the attendant;
- c. **Points of sale:** by requesting a change in your consent to one of our attendants.

10. RECTIFYING OR UPDATING YOUR PERSONAL DATA

Would you like to rectify incomplete, inaccurate or outdated personal data about you? Just use one of the following channels:

- a. **Digital channels:** by accessing the website or app of the desired brand and, after entering your login and password, by clicking '*Minha Conta*' (my account), '*Meus Dados*' (my data) and '*Meus Endereços*' (my addresses);
- b. **Telesales:** by requesting the rectification of your personal data to the attendant;
- c. **Points of sale:** by requesting the rectification of your personal data to one of our attendants.

11. CHILDREN AND YOUTH DATA

In compliance with the laws in force, we adopt additional technical, managerial and organizational measures when processing personal data of children and youth, so that the processing of all sensitive personal data can be performed to the best interest of these people.

If you are a father, mother or legal guardian of a child or youth, we may request your consent to process the personal data of your child or minor under your responsibility. In case there is the need for such consent, you will be informed about it and also about the purpose of using the data.

12. WHAT WE DO NOT DO

It is also part of our commitment to transparency to inform you about what we do not do. We believe this type of content is important to enhance your trust in our activities and avoid misinterpretations about information disclosed by third parties. Therefore, we would like to inform you that we do not perform any of the following activities:

- Conditioning the access to our products or services to the provision of personal data or sensitive personal data beyond those strictly necessary for the compliance with our activities or the fulfillment of our legal or regulatory obligations;
- Using sensitive personal data of customers for purposes not authorized by the laws in force, or, when necessary, without the free, informed and unequivocal consent of the data owner;
- Predictive analysis and creation of behavioral profile of customers, based on purchase history of drugs and/or health products, without the free, informed and unequivocal consent of the data owner;
- Sharing of personal data with third parties for purposes that are incompatible with the products or services acquired by our customers, or that are not compliant with the laws in force;
- Sales of personal data, including sensitive ones, or any other form of data processing that is illegal or not authorized by the laws in force or the data owner;
- International transfer of personal data that does not follow technical, administrative and organizational measures able to provide our customers with an adequate level of information protection;
- Performance of any data processing activity for discriminatory or abusive purposes.

13. HOW WE PROTECT YOUR DATA

With the purpose of keeping your trust in our services, we adopt technical, administrative and organizational measures able to protect your personal data and sensitive data against unauthorized access or accidental or illegal situations including data destruction, loss, change, communication or any other form of inadequate or illegal processing.

Considering technological advances and the increasing exposure to cyberattacks, we periodically strengthen our security measures, aiming to ensure confidentiality, integrity and availability of the personal data we are entrusted with.

14. LEGACY CUSTOMER BASE

If you made your registration in one of our pharmacies or through the digital channels (Website or App) and purchased from us before September 18, 2020, we consider you are part of our 'legacy customer base'.

The 'legacy customer base' or 'legacy database' consists of personal data and sensitive data of our customers,



including the registrations made in one of our pharmacies or through the digital channels (Website or App) obtained by RD on a date prior to the LGPD effective date, that is, September 18, 2020. Applicable rules to the 'legacy customer base' or 'legacy database' are still to be created by the National Data Protection Authority ('ANPD').

Unless you have expressly informed us you do not desire anymore to have access to our benefits or receive messages containing customized discounts, we shall continue to offer you the following advantages:

- a. Access to customized discounts in products that are more compatible to your consumption preferences based on your purchase history;
- b. Notifications of general/standard offers, as well as customized offers, through SMS, email, apps and social networks;
- c. Participation in a rewards points program based on your purchases;
- d. Discounts linked to the so-called Pharmacy Benefit Management ('PBM') or **Continuous Use / Chronic-Use Products ('PUC')** managed by third parties where you are registered.

We adopt this conduct because we understand you have a lasting relationship with RD and we believe you are interested in keeping your customized benefits already offered before the LGPD's effective date. For this reason, we understand this measure is a regular exercise of our rights and your rights in the ongoing relationship we have, besides favoring your legitimate interests.

However, so that we can assure your satisfaction with our benefits and communication, we shall be gradually inviting you to confirm your consent in our digital channels. This invitation may be sent by SMS or email, or, if you prefer, you can:

- a. Look for our attendants in one of our pharmacies and inform you want to give your consent to the processing of your personal data;
- b. Access our digital channels and manage your preferences in the '*Privacidade de Dados*' (data privacy) menu by clicking '*Aceito*' (accept) in your consent options.

15. AMENDMENT TO THIS PRIVACY POLICY

This Privacy Policy may be amended at any time due to normative update or to the evolution of our business.

16. CONTACT

We understand doubts may come up. Therefore, if you want to talk to us, you can contact our Person in Charge of Personal Data Processing (Bruno Eduardo Mizga da Silva) or our Privacy Office at dpo@rd.com.br, or our Privacy Portal, or even send us a letter to our postal address: Avenida Corifeu de Azevedo Marques, 3.097, Butantã, São Paulo, SP, CEP 05339-900.

17. AUTHORITY

Act / Reason	Person in charge	Approval
Ensuring the integrity, confidentiality, legality and authenticity of information for RaiaDrogasil S.A. business operations as well as the security of data owners in our portals.	Privacy and Information Security Manager	Vice President of Management & Finance



18. RECORD

Version number	Created / modified on	Approved on	Access	Maintenance and update	Storage
001	Jul 23, 2020	Jul 31, 2020	Corporate	Privacy and Information Security Manager	Workplace
002	Oct 21, 2021	Oct 21, 2021	Corporate	Privacy and Information Security Manager	Workplace