

PRIVACY POLICY

Version 1.1

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Brief summary

In its day-to-day practices, Colruyt Group always takes into account the various legislations to guarantee the privacy of its customers, suppliers, employees, etc.

This policy covers the following three privacy legislations: the General Data Protection Regulation, the Camera Surveillance Act and the ePrivacy Directive.

When processing personal data, Colruyt Group takes into account GDPR legislation. This means that we respect the seven basic principles in the legislation, take appropriate technical and organisational measures to secure personal data, put all of this in a record of processing activities, etc. We have also appointed a Data Protection Officer to advise us on this matter.

When using camera surveillance and when the ePrivacy Directive applies, we also respect the obligations under the applicable legislation.

1 Scope

The concept of privacy is very broad. Privacy is best described as:

- The right to respect of a private life
- The right to freedom of life and unlawful interference

And it is governed by various laws, which are constantly evolving:

- The right to the protection of personal data, specified in terms of B2C
- The use of camera surveillance
- The ePrivacy Directive on electronic communications, cookies and B2B

This policy focuses on the following three definitions.

In 2018, the General Data Protection Regulation (GDPR) came into force for all European companies and businesses that process personal data of European citizens. The main purpose of the law is that companies handle direct and indirect personal data (e.g. name, address, phone number, customer number, etc.) consciously, secure them properly and communicate about them transparently. To this end, this legislation lays down strict guidelines for all companies that handle personal data. It further ensures that European citizens are given more control over how their data is used by giving data subjects a number of rights.

Colruyt Group also follows all changes to Union or Member State law¹ data protection provisions and makes adjustments to processing operations where necessary.

While carrying out its activities, Colruyt Group processes personal data of several groups of data subjects. This is how Colruyt Group comes into contact with the data of customers, suppliers, employees, press contacts, etc. We always do this with great care.

Along with the entry into force of the GDPR, the Camera Surveillance Act was also amended. This act regulates the use of cameras by companies for security measures.

Finally, Colruyt Group also follows the ePrivacy Directive. This ePrivacy Directive provides direction on the use of cookies and other electronic tracers via website and apps, as well as the electronic communications that are sent. The ePrivacy Directive also specifies a number of rules regarding the use of data from our B2B contacts.

Colruyt Group shall be understood to mean all legal entities associated with Colruyt Group NV, with registered office at 1500 Halle, Edingensesteenweg 196, VAT BE 400.378.485, according to article 1:20 of the Belgian Companies and Associations Code.

Moreover, the directors representing Colruyt Group in (minority) shareholdings uphold the values of this policy and strive to implement this Colruyt Group Policy as effectively as possible.

¹ Of countries where Colruyt Group operates

2 Privacy within Colruyt Group

This policy applies to all processing of personal data within Colruyt Group, where one of Colruyt Group's entities is the data controller.

Personal data has a very broad definition. Personal data means any data relating to an identified or identifiable living natural person. Isolated data that can be aggregated to identify a particular person also constitute personal data. For all this personal data, Colruyt Group follows the GDPR legislation.

Colruyt Group has always been committed to privacy, even before the new GDPR legislation came into force in 2018. GDPR principles are fully in line with Colruyt Group's values and standards. Colruyt Group values the relationship of trust with its customers. The way we handle their personal data is consistent with this. We protect their personal data and follow legal procedures in doing so. We also choose to communicate clearly and transparently about exactly what data we collect and exactly what we do with this data.

Colruyt Group has installed camera surveillance in several locations, including our stores. We have done this in accordance with the legal obligations. All cameras have been registered with the government, a correct retention period within which the images are deleted again has been set, and the images are only used for the purposes described in the Camera Act. The presence of cameras is also always clearly indicated with the necessary icons. You can read an example of how Colruyt Group uses cameras in the Colruyt Group Camera Surveillance Privacy Statement at www.colruytgroup.com.

As Colruyt Group has many different websites and apps, we also carefully follow the ePrivacy Directive. This allows us to ensure that every website has a correct cookie banner and a clear cookie policy. The cookie banner ensures that cookies are installed only with the visitor's consent. The cookie policy informs visitors about which cookies are installed, how long they are kept, etc. The cookie policy of each website and app is available on the website and in the app itself.

3 General data protection objectives

The GDPR defines the framework within which personal data can be processed. This framework lays down a number of general principles that personal data processing must comply with and imposes various obligations when personal data is processed. The camera images we obtain from surveillance cameras and the technical data we obtain from cookies and other tracers are also considered personal data. The principles below apply to this information as well.

3.1 Lawful, fair and transparent

Whenever we launch a new project that involves processing personal data, we consider how to set it up lawfully. To do so, we look at GDPR obligations. When we process so-called sensitive personal data, we also check for additional legal obligations.

We inform data subjects when they transfer their data to us in order to inform them in due time, among other things via the privacy statement. This allows us to comply with the legal transparency principle at all times.

3.2 Purpose limitation and data minimisation

All personal data is processed in the context of a particular purpose. This purpose is always defined in advance, described in our privacy statement and in our record of processing activities. If personal data were to be used for other, new purposes, we ensure that these purposes are compatible with the previously defined purpose.

When processing personal data, we ensure that the personal data we process is adequate and necessary for the intended purpose. In other words, we do not process more personal data than necessary.

Colruyt Group collects and uses personal data to provide the best possible service to its customers. For example, we use the data to provide our services, e.g. sending an Xtra card or personal benefits to the correct address. We also try to tailor our information, ranges and services as much as possible to our customers' personal needs and interests, at every stage of their lives. This is also how we stay in touch with customers by inviting them to workshops and customer panels or for direct marketing purposes. Data of suppliers and other B2B contacts is mainly used to carry out our services.

3.3 Storage limitation

We will not keep personal data collected according to a specific purpose for longer than necessary. When the data is no longer necessary for the purpose for which it was collected, it will be rendered anonymous or deleted. We also take into account other applicable laws when setting these terms. Other laws may require us to retain certain personal data for a specific period.

3.4 Accuracy

Colruyt Group ensures that the personal data collected and processed is accurate and regularly updated. We take reasonable measures to delete or adjust personal data that is inaccurate, depending on the purposes for which it is processed.

3.5 Integrity and confidentiality

Colruyt Group always takes appropriate technical and organisational measures to protect personal data correctly. For example, we protect personal data against unauthorised and unlawful processing, against unintentional loss, destruction or damage.

3.6 Accountability

Colruyt Group applies the above principles and keeps the necessary documentary evidence to prove it. In the event of investigations by the competent authorities, we cooperate with the investigation and provide the necessary information.

3.7 Technical and organisational measures

Taking into account the state of the art, costs of implementation, and the nature, scope, context and purpose of the processing of personal data, Colruyt Group will take appropriate technical and organisational measures to secure personal data. In doing so, we also take into account the severity and probability of risks to rights and freedoms that data subjects may face.

When assessing the fitting level of security, we take into account the processing risks due to destruction or loss, unavailability or unauthorised access.

When we cooperate with other companies and they thus have access to personal data, we require the same level of security from them. This is laid down contractually.

4 Organisation of Colruyt Group's obligations

4.1 Appointment of a Data Protection Officer

Given the amount and nature of the personal data Colruyt Group processes, we have appointed a Data Protection Officer (or DPO).

The Data Protection Officer was assigned a number of specific tasks in the law. For instance, the DPO must advise and inform Colruyt Group on the applicable rules on the processing of personal data and supervise our processing activities. In addition, the DPO assists Colruyt Group in contacts with the various Data Protection Authorities. The Data Protection Officer performs the role independently. Finally, the Data Protection Officer also acts as a contact for data subjects on all matters relating to the processing of their personal data and the exercise of their rights.

Colruyt Group involves the Data Protection Officer from the start in new initiatives involving the processing of personal data. Colruyt Group also grants the Officer access to the necessary information, processing activities and the expertise of other services to the extent this is relevant to the mission and the performance of the position.

Finally, the Data Protection Officer reports to the CEO and via the Audit Committee to the Board of Directors and keeps them informed of events concerning the processing of personal data within Colruyt Group.

The Data Protection Officer can be reached at the following email address: privacy@colruytgroup.com

4.2 Draw up a record of processing activities

Colruyt Group keeps a record of the processing activities carried out under its responsibility. The record of processing activities is an official document describing all processing of personal data carried out by Colruyt Group. Colruyt Group's record of processing activities is maintained centrally so that there is an overview of all processing operations.

The record of processing activities also keeps track of all other obligations in accordance with the GDPR arising from the purpose and legal ground.

4.3 Rights of data subjects

Colruyt Group has set up the necessary processes through which the various categories of data subjects can exercise their rights. We ensure that the necessary stakeholders within Colruyt Group are aware of these obligations.

Within the GDPR guidelines, natural persons have various rights:

- Right to be informed: the data subject has the right to transparency about the processing operations carried out on their personal data. This is mostly regulated through the privacy statement.
- Right of access: data subjects have the right to request their personal data.
- Right to rectification: data subjects have the right to correct their data (or have it corrected) if personal information is incorrect or incomplete.

- Right of erasure: data subjects have the right to have their personal data erased. However, this right does not apply in all cases. When we receive such a request, Colruyt Group will evaluate whether this right applies in a specific situation and inform the data subject should this not be the case.
- Right to restriction of processing: persons have the right to restrict the processing of their personal data. This means the personal data may no longer be used.
- Right to transfer data: data subjects have the right to request their personal data in a machine-readable format to be transferred to another data controller.
- Right to object: data subjects have the right to object to the use of their personal data in specific cases.
- Rights in the context of automated individual decision-making and profiling: data subjects have the right to human intervention, the right to know Colruyt Group's point of view and the right to challenge the decision, if it concerns a decision taken automatically without human intervention.

However, these rights do not apply in all cases. Each time we receive a request, we will check whether the law exercised applies to the processing and the legal ground chosen.

If a data subject should have complaints or questions in connection with the processing of their personal data, they can always contact Colruyt Group's Data Protection Officer at privacy@colruytgroup.com.

If the Data Protection Officer cannot provide sufficient assistance, the data subject also has the right to file a complaint directly with the Data Protection Authority at any time.

If a data subject wishes to submit a complaint to Colruyt Group or ask a question anonymously, they can also do so via the whistleblower procedure at [Colruyt Group Whistleblower's Channel \(convercent.com\)](https://www.colruytgroup.com/whistleblower)



4.4 Colruyt Group as processor

If Colruyt Group acts as a processor of personal data, we comply with GDPR principles and the instructions of our client (the data controller).

In this case, we also keep a record of processors. This contains the data of the controller and the agreements we reached with them.

Even when Colruyt Group or one of its subsidiaries processes personal data on behalf of a data controller, we take appropriate technical and organisational measures and comply with the requirements of this data controller.