LDExtras Achieve Privacy Policy

Effective Date: April 1st, 2021

Globant, acting as a service provider for London Drugs, values individual privacy and we want to give our application users the opportunity to know what information we collect about them and how it is treated by us.

This Privacy Policy explains:

- 1) Which information about you we collect.
- 2) Purposes of using your personal information and legal basis.
- 3) Retention of your personal information.
- 4) Disclosures of personal information.
- 5) Where is your personal information stored and which are your rights.
- 6) Contact us.

INITIAL EXPLANATORY NOTE

Capitalized terms not otherwise defined in this Privacy Policy shall have the meaning ascribed to such terms in the <u>Terms and Conditions</u>. We recommend you to read this Privacy Policy together with our Terms and Conditions in order to better understand the rules governing the use of our Application and Services.

Even if you are using our Application and Services, London Drugs has its own policies regarding storage, access, modification, deletion, and retention of information you submit or provide through the use of our application and services as set out in the Terms and Conditions.

Globant, in this case, is a processor of your information. This means we are processing your information as instructed for the specific purposes and services outlined herein and in the Terms and Conditions.

We may update this Privacy Policy from time to time. When we update the Privacy Policy, we will revise the "Effective Date" date above and post the new Privacy Policy.

1) Which information about you we collect

- a) Information provided by you when setting-up your account. You will need an account to use and access our Application and use our Services.
- b) Data from your mobile device. We may require features that rely on the access and use of additional information acquired by your mobile device or require access to certain services on your mobile device that will enhance your experience with our Products but are not required to use the Services. Before we access this information or these features from your mobile device, we will ask for your permission. If you provide such permission, we will collect the information for the specific purposes explained at the time we ask for your permission.

- c) Data from your HealthKit: Weight, Height, Activity Level (ie: Exercise time, Calories, Stand time) ("HealthKit Data").
- d) Personal data that is provided by London Drugs to Globant, that will be used and stored on Globant's Database
 - i) First Name
 - ii) Last Name
 - iii) Address City, Postal Code, Country
 - iv) Date of Birth
 - v) 10-digit phone number used for the LDExtras Loyalty program
 - vi) Email
 - vii) Sex

2) Why we collect and use your information

Globant uses the information collected through our application and services to (i) identify Users; (ii) send Users notifications regarding important news involving the application and services, like updates or modifications to the Terms of Use, (iii) notify Users about events related to the application and services themselves, (iv) generate reports to send to London Drugs based on the member ID, reward status and HealthKit Data, and (v) to process your instructions or requests.

Globant will report the following Application generated data to London Drugs:

- o List of Users
- o Each user's monthly activity goal and achieved goal (the number of stars earned).
- o Program population level information (meaning non-personally identified information) illustrating program engagement and accomplishments.

If you contact us regarding identity theft or some other form of unauthorized use of the application and services, Globant may disclose pertinent information to law enforcement agencies and other third parties with responsibility and authority.

At all times, however, Globant reserves the right to disclose information where required by law or to comply with valid legal process (such as a search warrant, subpoena or court order), to protect Globant's rights or property, including without limitation in the event of a transfer of control of Globant or substantially all of its assets, or during emergencies when safety is at risk. We are entitled to use your personal information based on (i) our legitimate interest such as for research and development, to market and promote our services, to protect our legal rights and interests, to the extent that your interests or your fundamental rights are not overridden; (ii) your consent to do so for a specific purpose; (iii) to process your data to comply with a legal obligation; or (iv) to process your data for the performance of a contract.

3) Retention of your personal information

Globant will retain your personal information for as long as necessary to fulfill the purposes for which it was collected or as necessary to comply with our legal obligations, resolve disputes, and maintain appropriate business records. Once the purpose has been fulfilled your personal

information will be retained due to the possibility of legal and governmental requirements and until their status of limitations have run out.

4) Disclosures of personal information

Globant may share your personal information with affiliated companies. In addition, Globant reserves the right to disclose information where required by law or to comply with valid legal process (such as a search warrant, subpoena or court order) as well as to protect Globant's rights or property, including without limitation in the event of a transfer of control of Globant or substantially all of its assets, or during emergencies when safety is at risk.

For any unauthorized disclosure or potential data breach, Globant maintains a data breach plan and procedures in place in accordance with this Privacy Policy.

5) Where is your personal information stored and which are your rights?

Globant values the information that you choose to provide and will take reasonable steps to protect your personal information from loss, misuse or unauthorised alteration. We ensure the privacy and confidentiality of that information.

Storage of the Information. All of the information collected by Globant through the application and services is stored on secured servers, to protect against unauthorized use and access. Our servers are located in the United States of America.

Globant may share your information with other companies in the Globant group that are located in countries different than your home country in order to carry out the activities specified in this Privacy Policy.

Irrespective of which country you live in, you authorize us to transfer, store, and use your information in the United States. In some of these countries, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those in the country where you live.

Your access rights. You can exercise your rights, of access, rectification, cancellation and /or opposition regarding your personal information, directly by email to the following address: privacy@globant.com.

6) Contact us.

If you have any questions regarding this Policy, please contact us at privacy@globant.com.