

Privacy Policy of MULTIPLUS S.A.

Welcome to MULTIPLUS. Please carefully read our Privacy Policy ("Policy") to learn about the benefits, facilities and resources available on MULTIPLUS website ("Website"), as well as the personal information to be collected through the Website and how such information is used, handled, stored and deleted.

Acceptance of this Policy will be made by clicking the "Accept" button, so that, from that moment, you (hereinafter also "User" or "Participant") allows the access and handling of your information by MULTIPLUS according to this Policy. This Policy should be updated at any time by MULTIPLUS, by notice on the Website and/or by e-mail, if the user has chosen to receive MULTIPLUS' newsletter, therefore, checking the Website and/or e-mail is recommended from time to time.

1. Personal Information Requested and Collected

MULTIPLUS shall collect and store all information you provide on the Website at the time of your registration, browsing and completing any form available on the Website.

By filling in our registration, you will note that some information is required and other in order to MULTIPLUS knows you better. After completing your registration, you will have access to many features available on the Website, such as: redemption and accumulation of products and services, consult to your account statement, change of registration information, among others. Your information will be stored on a secure provider and shall only be accessed by means of a personal password.

The user is solely responsible for the security of the password. In this way, you should never disclose or provide your password to third parties under any circumstances.

In addition, MULTIPLUS should collect also some information automatically. Thus, in every access to the Website, MULTIPLUS will collect some information about you, such as: access device features, browser, IP number (date and time), IP source, information about clicks, pages accessed, the following pages accessed after leaving the Website, or any search term typed on the Website or in reference thereto, among others. Therefore, MULTIPLUS should also use some other standard technologies, such as *cookies*, *pixel tags*, *beacons* and local *shared objects*, to collect user's information and improve your browsing experience.

You can disable through your Internet browser settings, automatic collection of information by means of some technologies, such as *cookies* and *caches*. However, the User should be aware that if these technologies are disabled, some features offered by the Website should not operate properly.

Moreover, you can access, update, add or delete your personal information at any time, as well as to oppose to handling and/or request the transfer of any registration information that have been shared with us.

However, it is pointed out that MULTIPLUS reserves the right to store all information collected through the Website at least for the storage period set forth in the applicable legislation.

In addition, the Website contains links to other websites, which should have collection and use policy of information differing from the one used by MULTIPLUS. In this way, MULTIPLUS is not responsible for the handling of information by such websites.

2. Privacy:

The Website was developed, according to the best security practices, to preserve as much as possible your personal information. MULTIPLUS has committed to respecting your privacy and endeavors to ensure the confidentiality of all information shared with us. Thus, we will use your registered information and collected on our Website to enhance your experience in the use and browsing the features provided by MULTIPLUS and for better management of their points in the loyalty program, storing thereof until the User requests its deletion. In any request for deletion of information, MULTIPLUS can also store some of them if there is legal justification for both grounded.

In short, these are activities that we should perform with the information obtained from the User: (i) provide our advantages and perform the redemption of benefits and (ii) send you offers that may be of your interest, if you have agreed on.

In this way, the User gives free, express and informed consent for collection, use, processing and sharing of the information specified in the Policy, for customization of your access to the Website, and to the regular offer of benefits by MULTIPLUS. The user accepts also to receive advertising information through the contact information provided during the registration on the Website.

In addition, MULTIPLUS works in partnership with several companies, so that you can share the information collected with third parties under certain circumstances:

- a) With partner companies, in the development of the commercial activities of MULTIPLUS, such as for change of points or supply of products and/or services;
- b) To protect the interests of MULTIPLUS in any kind of conflict, also administrative and legal ones;
- c) In the case of transactions and corporate changes involving MULTIPLUS, in cases the collected information will be handled as assets of the company;
or
- d) By court order or by request from administrative authorities having legal authority for the request thereof.

The complete and updated list of partners that should receive your personal information under the conditions set forth above should be checked at any time in the official platforms of MULTIPLUS. We also clarify that your information should also be shared with technology and operational infrastructure providers as required for the MULTIPLUS' activities, as agents of payment and services providers of the information storage.

MULTIPLUS uses all reasonable efforts in the market to ensure the security of its systems and information collected, using software to protect against unauthorized access to systems, as well as standard methods for encrypting and pseudonomize the information collected. In addition, MULTIPLUS only authorizes the access to persons previously established in the places the information is stored, determining absolute confidentiality on the information collected.

This policy represents the MULTIPLUS' effort in safeguarding your information. However, on the very nature of the Internet, it is not possible to ensure that malicious third parties do not obtain unduly access to the information stored by MULTIPLUS.

3. Your Rights:

In compliance with the applicable regulations, MULTIPLUS respects the User's rights to access, rectify, object to the handling, transfer of registration information and deletion of personal information. Some of them should be exercised directly by the User, from the management of information about the account thereof. Data transfer will not result in transfer of points to another loyalty program.

If any assistance is required to exercise the rights, the User should contact MULTIPLUS, according to guidelines in this document. In addition, in the case of Users residing in EU Member States, MULTIPLUS informs that the submission of complaints, regarding the form of treatment of their data, can be offered to the competent authority, whose relationship can be found in the link: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

The user is informed that the deletion of critical information to the account management by MULTIPLUS will result in termination of your registration with consequent cancellation of points accumulated so far. In addition, MULTIPLUS should continue storing certain information by obligation or legal reasons.

4. Sending email.

MULTIPLUS, always respecting the privacy of its participants, only sends messages by e-mail: a) to alerts, confirmations or cancellations of requests; and b) for advertising purposes. Promotional newsletter containing offers from partners of MULTIPLUS' network, selected for our participants. The frequency of transmission may vary, according to the participant's interaction with our e-mails. The User by the acceptance agrees to receive such informative advertising from MULTIPLUS.

If you no longer wish to receive our emails, (i) just select at the footer of every email the option "Cancel your subscription here" and you will be redirected to the confirmation page of the cancellation; or (ii) in "my account", select "My Registration", and "Contact Information" tab, uncheck "receive news by email".

5. Fake E-mails:

Fake e-mails circulate on the internet called *Phishing*, on behalf of MULTIPLUS or MULTIPLUS' Partners, in order to induce the participants to share personal information like passwords, credit card information, personal information, among others, with malicious people. These messages are not from the MULTIPLUS or our network of partners. MULTIPLUS does not send emails requesting confidential information, passwords, credit card numbers, and other. Thus, never provide personal information in response to emails sent, supposedly on behalf of MULTIPLUS.

If you have any doubt about incoming messages on behalf of MULTIPLUS, contact MULTIPLUS through our service channels, informed below.

6. Confirmation of identity:

Thinking about the security of personal information collected and the effective guarantee of your requests, MULTIPLUS should request, at the exchange of User's

points, a one-time password, called a Second Factor of Authentication (2FA), to be submitted through SMS or Voice Recorded Message to a phone of your choice, provided that this phone is registered in MULTIPLUS. MULTIPLUS should request such one-time password randomly to some requests made by the participants on our website.

7. Collecting information on the use of Payment Means:

In the purchase of Facilities, such as Multiplus Club, Purchase, Renovation and Transfer of Points and other, MULTIPLUS should use an online outsourced payment service ("Payment Service"). The processing of the payment shall be the exclusive responsibility of Payment Service. MULTIPLUS will not store or transmit banking information, such as Credit Card Number, Verification Code.

MULTIPLUS has no control over the process of approval or cancellation of payments, with responsibility is solely on Payment Service. MULTIPLUS will receive the information from Payment Service about the status of your payment process.

8. Physical address and contact information:

MULTIPLUS is located in the City of Barueri, State of São Paulo, at Alameda Xingu, nº 350, 17º andar, conjuntos 1701 e 1702, Condomínio iTower Iguatemi Alphaville, CEP 06455-911.

If you have questions or requests, contact our customer service on telephones 0300-313-7474 (Brazil) and (55 11) 3137-7474 (Overseas), or sent your request by e-mail, by accessing the section "Contact us" in our Website: <http://www.pontosmultiplus.com.br/home/faleConosco>, or to the e-mail DPO: gdpr@pontosmultiplus.com.br.

9. Legislation and Venue

This policy shall be governed, construed and enforced according to the laws of the Federative Republic of Brazil, regardless of conflicts of these laws with laws from other states or countries, and Venue of the domicile of the User in Brazil is qualified or venue of the district court of the State capital of São Paulo, to resolve any issue arising out of this Policy.

For Users residing in European Union member states, MULTIPLUS reaffirms its commitment to comply, where appropriate, with European data protection legislation, especially Regulation EU 679/2016.

Last update: 07/04/2018