

# **GALLO WORLDWIDE, LDA.**

## **Privacy Notice**

We know that you care about your personal data and how it is used, and we want you to trust in GALLO to collect and process your personal data. This Privacy Notice will help you understand what personal data we collect, why we collect it and what we do with it.

Please take a moment to familiarise yourself with our privacy practices and let us know if you have any questions by sending us an email to [Privacy@galloww.com](mailto:Privacy@galloww.com) or submitting a request through the “Contact Us” form on our website. We have tried to keep this Notice as simple as possible, but if you’re not familiar with terms, such as cookies, IP addresses, and browsers, do not hesitate in contact GALLO for further clarifications or information.

### **1. Who collects your personal data and who is the entity responsible for processing the same?**

Any data collected or processed by GALLO are the responsibility of the company GALLO WORLDWIDE, LDA., with registered offices in Largo Monterroio Mascarenhas nº. 1, Campolide, 1070-184 Lisboa, entity number 508966442.

This Privacy Notice applies to all personal data collected and processed by GALLO in connection with the services and products we offer.

This Privacy Notice also applies to GALLO’s marketing content, including offers, advertising for products and services that GALLO (or a service provider acting on its behalf) send to you on third-party websites, platforms and applications based on your site usage information. These third-party websites generally have their own Privacy Notice and Terms and Conditions. We encourage you to read them before using those websites.

### **2. What personal data is being collected and how are they collected?**

**Personal data** means any information that can be used to identify directly or indirectly a specific individual. This definition includes personal data collected offline through our Consumer Engagement Centres, direct marketing campaigns, sweepstakes and competitions and online through our websites, applications and branded pages on third-party platforms and applications accessed or used through third-party platforms.

You are **not required** to provide GALLO with the personal data that we request, but if you choose not to do so, we may not be able to provide you with our products or services, or respond to any queries you may have.

GALLO may collect personal data that you directly made available to us, personal data that we collect automatically, and personal data that GALLO collects by other means.

Personal data is made available to us directly when we collect information about your use of our services and products, such as the types of content you view or engage with, or the frequency and duration of your activities. We also collect personal data you provide us when you complete a survey. In so doing, we may ask for personal data, such as your name, gender, date of birth, address, email address or telephone number.

GALLO automatically collects certain types of personal data whenever you interact with us online. For example, we use cookies and tracking technologies (to find out more, please see our Cookie Notice) to obtain personal data when your web browser accesses our websites or advertisements and other content served by or on behalf of GALLO on other websites. Your personal data is also collected when you search, participate in a contest or questionnaire or communicate with our customer service teams. Examples of the types of personal data we collect include IP address, device ID, location data, computer and connection information such as browser type and version, time zone setting, browser plug-in types and versions and operating system. During some of your internet browsing on GALLO's websites we may also use software tools to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information, and methods used to browse away from the page. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.

There is also personal data that is collected from other sources, such as through trusted partnerships with third-parties and where we operate GALLO accounts on third-party platforms. For example, when you use the "like" functionality on Facebook or the +1 functionality on Google+. Additionally, we receive information about you and other visitors' interactions with our advertising to measure whether our advertising is relevant and successful. We also collect information about you and your activities from a third-party when we jointly offer services or products, or from third-party data enrichment providers who may deliver insights to GALLO about the personal data we hold.

Certain categories of personal data which reveal racial or ethnic origin, political opinions, religious or philosophical convictions, or trade union membership, genetic data, biometric data to unambiguously identify a person, health or sexual orientation or sexual orientation are classified as "special categories of personal data" and benefit from

additional protection under European data protection legislation. GALLO limits as far as possible the circumstances in which it collects and treats these special categories of data.

GALLO only collects and process these personal data in situations where you have given us your express consent to do so.

### **3. For what purpose and on what basis are your personal data processed?**

Your personal data are collected and processed within the scope of services and products offered by GALLO on its website and trading network. In particular, GALLO collects and processes your personal data to:

- To process and answer your inquiries or to contact you to answer your questions and/or requests;
- To communicate information to you or send you other communications;
- To manage our everyday business needs regarding your participation in our contests, sweepstakes or promotional activities or request;
- To authenticate the identity of individuals contacting us by telephone, electronic means or otherwise;
- For internal training and quality assurance purposes;
- To understand and assess the interests, wants, and changing needs of consumers, to improve our website, our current products and services, and/or developing new products and services; and
- To provide personalised products, communications and targeted advertising as well as product recommendations to you.

Nevertheless, there may be cases where the basis for the collection and processing of your personal data is the existence of a **legitimate interest** of GALLO - for example, to assist in the performance of a contract, or to optimise a service, and does not outweigh your rights as an individual. This legal basis will only be relied upon where there is no less intrusive way to process your personal data. We can assure you that if legitimate interest is used as a ground for processing your personal data, we will keep a record of this and you have the right to ask for this information.

We process your personal data to perform a **contract** to which you are or will be a party. For example, we need to process your personal data to allow you to take part in one of our competitions, or to send you samples that you have requested.

We also process your personal data when we have a **legal obligation** (e.g., tax or social security obligations) to perform such processing. For example, a court order or a subpoena may require us to process personal data for a particular purpose, or we may be compelled to process personal data to report suspicious transactions under the local anti-money laundering rules.

#### 4. With whom will your personal data be shared?

As part of the Unilever Group, GALLO shares your personal data internally and with third parties in the following circumstances:

- **Third-party service providers.** In order to carry out your requests, respond to your inquiries, provide you with samples, enable you to participate in sweepstakes or make various other features, services and materials available to you through our websites we share your personal data with third-party service providers that perform functions on behalf of GALLO, such as companies that host or operate GALLO's websites, process payments, analyse data, provide customer service, postal or delivery services, and sponsors or other third-parties that participate in or administer our promotions. They have access to personal data needed to perform their functions but may not use it for other purposes. Further, they must process this personal data in accordance with this Privacy Notice and as permitted by applicable data protection laws and regulations.
- **Other third-parties.** Your personal data will also be used by GALLO or shared with our sponsors, advertisers, advertising networks, advertising servers, social media networks, and analytics companies or other third-parties in connection with marketing, promotional, data enrichment and other offers, as well as product information.
- **Business transfers.** Your personal data will be used by GALLO or shared with Unilever Group for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase assets, subsidiaries or business units. In such transactions, your personal data generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, you consent otherwise). If another entity acquires us, our businesses or substantially all or part of our assets, or assets related to Unilever's websites, your personal data will be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such personal data will be considered an asset of ours and as such it is possible they will be sold or transferred to third-parties.
- **Legal disclosure.** We may transfer and disclose your personal data to third-parties:
  - To comply with a legal obligation;
  - When GALLO believes in good faith that an applicable law requires it;
  - At the request of governmental authorities conducting an investigation;
  - To verify or enforce our "Terms of Use" or other applicable policies;
  - To detect and protect against fraud, or any technical or security vulnerabilities;
  - To respond to an emergency; or otherwise
  - To protect the rights, property, safety, or security of third-parties, visitors to GALLO's websites.

## **5. International data transfers**

GALLO shares personal data internally or with third-parties for purposes described in this Privacy Notice.

GALLO will only send personal data collected within the European Economic Area (EEA) to foreign countries in circumstances such as:

- To follow your instructions;
- To comply with a legal duty; or
- To work with our agents and advisers who we use to help run our business and services.

If GALLO do transfer personal data to outside of the EEA, will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of the following safeguards:

- Transfer to a non-EEA Country whose privacy legislation ensures an adequate level of protection of personal data to the EEA one;
- Put in place a contract with the foreign third-party that means they must protect personal data to the same standards as the EEA; or
- Transfer personal data to organisations that are part of specific agreements on cross-border data transfers with the European Union (e.g., Privacy Shield, a framework that sets privacy standards for data sent between the United States and the European countries).

## **6. How do we protect your personal data?**

GALLO undertakes all the efforts to protect your personal data from misuse, interference, loss, unauthorised access, modification or disclosure.

GALLO measures in this regard include implementing appropriate access controls, investing in the latest Information Security Capabilities to protect the IT environments we leverage, and ensuring we encrypt, pseudonymise and anonymise personal data wherever possible.

Access to your personal data is only permitted among our employees and agents on a need-to-know basis and subject to strict contractual confidentiality obligations when processed by third-parties.

## **7. How long do we keep your personal data for?**

GALLO will keep your personal data for as long as is necessary for the purpose it is being processed for. For example, if you make a complaint, your data will be kept for a period of 10 years, so that we can have a history as personalized as possible, in case there are other contacts with GALLO for which this information is relevant (such as the existence of another complaint).

Your data may also be retained so that we can continue to improve your experience with us and to ensure that you receive any loyalty rewards which are due to you.

GALLO will retain the identifiable data we collect directly for targeting purposes for as little time as possible, after which we employ measures to permanently delete it.

GALLO will actively review the personal data we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or consumer need for it to be retained.

## 8. What are your rights?

As a data subject, you have a number of rights over how the data is processed and can exercise these rights, which can be exercised at any time, being the following:

- **The right to object.** The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling, under the terms of GDPR. Namely, when personal data are processed for the purposes of direct marketing, the data subject has the right to object at any time to the processing of personal data concerning him or her for the purposes of such marketing (e.g. receiving emails from us or potential opportunities);
- **The right to be informed.** You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. Therefore, we're providing you with the information in this Notice.
- **The right to access and rectification.** You have the right to access, correct or update your personal data at any time. We understand the importance of this and should you want to exercise your rights, please contact us.
- **The right to data portability.** The personal data you have provided us with is portable. This means it can be moved, copied or transmitted electronically under certain circumstances.
- **The right to be forgotten.** Under certain circumstances, you have right to request that we delete your data. If you wish to delete the personal data we hold about you, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements. If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it.

- **The right to restrict processing.** Under certain circumstances, you have the right to restrict the processing of your personal data.
- **The right to lodge a complaint with a Supervisory Authority.** You have the right to lodge a complaint directly with any local Supervisory Authority about how we process your personal data.
- **The right to withdraw consent.** If you have given your consent to anything we do with your personal data (i.e., we rely on consent as a legal basis for processing your personal data), you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). You can withdraw your consent to the processing of your personal data at any time by contacting us with the details provided below.
- **Rights related to automated decision-making.** You have the right not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects on you. In particular, you have the right to obtain human intervention, express your point of view, obtain an explanation of the decision reached after an assessment and challenge such a decision.

Any further information or advice about your rights can be obtained through the supervisory authority, which in Portugal is the Comissão Nacional de Proteção de Dados, and whose data are as follows: Rua de São Bento, n.º 148 – 3.º, 1200-821 Lisboa | Tel.: +351 213928400 | Fax: +351 213976832 | email: geral@cnpd.pt.

## 9. How do you contact GALLO?

If you have any questions or concerns about GALLO's Privacy Notice or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please do so by sending an email to [Privacy@galloww.com](mailto:Privacy@galloww.com) or submitting a request through the "Contact Us" form on GALLO website.

When a privacy question or access request is received, GALLO has a dedicated team that triages the contacts and makes every effort to answer your questions. All contacts receive a response. If you are unsatisfied with the reply received, you may refer your complaint to the relevant Supervisory Authority in your Country.

## 9. How do we keep this notice up to date?

GALLO will update this Privacy Notice when necessary to reflect customer feedback and changes in our products and services. When we post changes to this statement, we will revise the "last updated" date at the top of this Notice. If the changes are significant, GALLO will provide a more prominent notice (including, for certain services, email

notification of Privacy Notice changes). GALLO will also keep prior versions of this Privacy Notice in an archive for your review.

GALLO will not reduce your rights under this Privacy Notice without your consent.

## **11. Additional Privacy Terms or Notices**

In addition to this Privacy Notice, there may be specific campaigns or promotions which will be governed by additional privacy terms or notices. GALLO encourage you to read these additional terms or notices before participating in any such campaigns or promotions as you will be required to comply with them if you participate. Any additional privacy terms or notices will be made prominently available to you.