



PRIVACY POLICY

Effective Date: August 24, 2017.

General

This Privacy Policy applies to information we collect when you use the downloadable program for mobile and portable devices known as “Econo TOGO” whereby customers can buy their items from Econo ToGo (the “Application”), mobile applications (“app(s)”), or services that post a link to this Privacy Policy (collectively, the “Service”). This Privacy Policy describes how Supermercados Econo, Inc., Sábana Abajo Industrial Park 1428, Calle Río Danubio, Carolina, PR 00984 (“ECONO,” “Company,” “we,” or “us”) collects, uses and shares Service-related information about you. This Privacy Policy does not apply to information or data about you collected as received outside of the Service except to the extent it is combined with information or data collected by us via the Service.

By using our Service, you agree to our [Terms of Service](#) and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy.

Collection of Information

Information You Provide to Us

We collect information you provide directly to us via the Service, such as when you register, create an account profile, subscribe to our emails, mobile messages, push notifications, participate in a sweepstakes, contest, promotion, survey, or poll, communicate with us, request customer support, buy from ECONO any of our products, goods or services or otherwise communicate with us through the Service.

The types of information we may collect includes Personal Information/Personal Data. “Personal Information/Personal Data” is information that can be used to identify you (whether alone or in combination), such as your first and last name, email address, zip code/post code, billing address, shipping address, phone number, payment card information, tax information, social security number, user name and password, photo, and any other personally identifiable information you choose to provide. It also may include sensitive information, such as business, health, and family information. As permitted by applicable law, unless otherwise provided in this Privacy Policy or in our statements at the point of collection, (i) non-Personal Information/ Personal Data (“non-personal information”) may be used and shared without obligation to you; and (ii) Personal Information/Personal Data may be de-identifiable or otherwise made into non-personal information. We may give you the opportunity to provide us with information about you, your family and your interests in your account profile and otherwise, which if not linked to your Personal Information/Personal Data would be non-personal information. However, to the extent

we combine this with your Personal Information/Personal Data collected via the Service, we will treat that combine data as Personal Information/Personal Data under this Privacy Policy.

Information We Collect Automatically

We, our service providers and Third-Party Services (defined below) may automatically collect certain information about you when you access or use our Service. This information, which may in some cases be considered Personal Information/Personal Data under applicable law, may include demographic information; IP address; browser/device/hardware type; operating system characteristics; information about your use of our Service; and data regarding network connected hardware (e.g., computer or mobile device), such as unique device identifiers, type, model, version, MAC address, device or session ID, error related data status, capability, confirmation, functionality, performance data, and connection type. This information may also include clickstream data, which is information about the page-by-page paths you take as you browse through the Service.

The methods that we, our service providers and Third-Party Services may use to automatically collect such information in connection with our Service include:

- **Log Information:** Information about your use of our Service, such as the type mobile device you use, access times, pages viewed, your IP address and the referring link through which you accessed our Service.
- **Information Collected by Cookies and Other Tracking Technologies:** We and third parties may use cookies, web beacons (also known as “tracking pixels”) and other currently now existing or hereafter developed tracking technologies (“Tracking Technologies”) to collect information about you when you interact with our Service or emails, or third party sites and services, including information about your use, browsing, and purchasing behavior. We and third parties may combine this information with other information about you and use it for various purposes, such as improving our Service and your online experience, providing you with more relevant content, offers and ads, recognizing you across devices, understanding which areas and features of our Service are popular, counting visits, understanding campaign effectiveness, tailoring our communications with you, determining whether an email has been opened and links within the email have been clicked, detecting and preventing fraud and misuse, and for other business purposes. Tracking Technologies you may encounter in connection with the Service include:
 - **Cookies:** Cookies are data files that are placed on a computer when it is used to visit a website. These cookies may be used for many purposes, including, without limitation, tracking user preferences or web pages visited while using our Service. Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies, but note that doing so does not necessarily affect third party flash cookies used in connection with our Service. For more information about disabling flash cookies, see <http://www.adobe.com/products/flashplayer/security>. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Service. For example, cookies allow us to store items in your cart between visits. In addition, please be aware that if you choose to block or delete cookies, some advertising preferences that are dependent on cookies may not be able to be respected.

- **Web Beacons:** Small graphic images called web beacons, also known as “Internet tags” or “clear gifs,” in our web pages and email messages. We may use web beacons or similar technologies for a number of purposes, including, without limitation, to count the number of visitors to our Service, to monitor how users navigate the Service, and to count how many emails that we sent were actually opened or how many particular articles or links were actually viewed.
- **Embedded Scripts:** An embedded script is programming code that is designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from our web server or a third party with whom we work, is active only while you are connected to the Service, and is deleted or deactivated thereafter.
- **Location-identifying Technologies:** GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate (sometimes precisely) you, or make assumptions about your location, for purposes such as verifying your location and delivering or restricting content based on your location. If you have enabled GPS or use other location-based features on the Service, your device location may be tracked.
- **Fingerprinting:** Collection and analysis of information from your device, such as, without limitation, your operating system, plug-ins, system fonts, and other data, for purposes of identification and/or tracking.
- **Device Recognition Technologies:** Technologies, including application of statistical probability to data sets, as well as linking a common unique identifier to different device use (e.g., Facebook ID), which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user or household) (“Cross-device Data”).
- **In-App Tracking Methods:** There are a variety of Tracking Technologies that may be included in mobile applications, and these are not browser-based like cookies and cannot be controlled by browser settings. Some use device identifier, or other identifiers such as “Ad IDs” to associate app user activity to a particular app and to track user activity across apps and/or devices.

Information we automatically collect about you, such as how you interact with our Service, may be combined with your Personal Information/Personal Data. To the extent we associate any such automatically-collected information with Personal Information/Personal Data about you collected via the Service, we will treat the combined information as Personal Information/Personal Data under this Privacy Policy.

We, our service providers and other third parties may associate Tracking Technologies with your device when you visit the Service that permits tracking of your online activities across time and different services, and associate different devices you use, for purposes including to send you product promotions that are aligned with your purchase trends and/or interests identified through automatically-collected information. We are giving you notice of the Tracking Technologies and your choices regarding them so that your consent to encountering them is meaningfully informed.

Information We Collect From Other Sources

We may also obtain information about you (such as email, address, demographic information and Cross-device Data) from other sources and combine that with information we collect about you. To the extent we receive information about you from a third-party source and we combine the information we receive from these third party sources with your Personal Information/Personal Data we collect via the Service, we will treat that combined information as Personal Information/Personal Data under this Privacy Policy. We are not responsible for the accuracy of

the information provided by third parties or how such third parties collect, use and share such information.

Advertising & Analytics Services and Online Tracking

We may engage third parties, such as Google's DoubleClick, and others, to serve advertisements on our behalf across the Internet, to provide us with additional data about you (including Cross-device Data and demographic information) and to provide analytics about the use of our Service. In addition, we may participate in online advertising networks and exchanges that display relevant advertisements to our Service visitors based on their interests as reflected in their browsing of the Service and certain third-party sites participating in the same networks and exchanges. These entities may use cookies, web beacons, pixels, embedded scripts, and other Tracking Technologies to automatically collect information about your use of the Service, such as your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Service and other websites and better understand your online activity.

This means that some information about your browsing of the Service and certain third-party locations and services may be shared with these companies for the purpose of delivering content, offers and ads to you on the Service and certain third party locations and services, and ECONO may receive from some of these companies information about third party locations and services that you have visited and other information about you, including Cross-device Data. This information may be used for marketing purposes and the practice is sometimes termed "interest-based advertising" or "retargeting" to indicate that information from one retailer is used to suggest to you relevant products offered by another retailer. We may also work with third parties to serve ads to you as part of a customized campaign on other websites or platforms. We may also use this data to provide you with more relevant content and offers on our Service and in our communications to you.

These and other third parties may also collect information about your online activities over time and across different websites when you use our Service.

The descriptions of our data practices in this Privacy Policy does not cover any third party activities of third parties' use of information that such third parties themselves may have collected from you (e.g., type of browser, operating system, domain name, day and time of visit, page(s) visited, Cross-device Data, etc.) or the methods used by the third-parties to collect that information (e.g., cookies, web beacons and clear gifs). Some third parties, however, may offer you choices regarding their Tracking Technologies.

Note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, ECONO currently does not alter its practices when it receives a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit <http://www.allaboutdnt.com>.

Use of Information

We may use your Personal Information/Personal Data for various purposes, including to:

- Personalize Offers;
- Facilitate and improve your online experience;
- Process your registration with our Service, including verifying that your Personal Information/Personal Data is active and valid;
- Manage your online account(s), including sales, orders, payments, returns, exchanges, and others;
- Respond to your comments, questions and requests and provide customer service;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Communicate with you about products, services, offers, promotions, coupons, newsletters, rewards and events and provide news and information we think will be of interest to you (for information about how to manage or opt out of these communications, please see the Your Choices section below).
- Improve our Service or other ECONO websites, mobile applications, marketing efforts, products and services;
- Personalize your online experience and provide advertisements, content or features that match your profile and interests;
- Monitor and analyze trends, usage and activities;
- Process and deliver contest, promotion and sweepstakes entries and rewards;
- Process and track your redemption of digital coupons and associate those redemptions with your account;
- Link or combine with information we get from others to help understand your needs and provide you with better service;
- Contact you regarding your use of our Service and, in our discretion, changes to our policies;
- Provide you with notices related to our Service and other ECONO websites, products and services;
- Conduct research and analysis, including focus groups and surveys, on our Service and other ECONO websites, products and services;
- Prevent fraudulent transactions and monitor against threats;
- Carry out any other purpose to the extent not prohibited by applicable law and not inconsistent with our statements disclosed elsewhere in this Privacy Policy or at the time you provide your Personal Information/Personal Data; and
- With your consent or at your direction, in our sole discretion, we may also use aggregated and other non-personal information as permitted by applicable laws.

Sharing of Information

Our agents, vendors, consultants and other service providers (“service providers”) may have access to, or receive from us, your Personal Information/Personal Data, and other information about you, to carry out work on our behalf; however, we do not authorize our service providers to use your Personal Information/Personal Data for any purpose other than to provide this assistance.

In addition, we may share Personal Information/Personal Data about you as follows:

- With our business partners, affiliates and other third parties for purposes of sending their own marketing;
- To the maximum extent permitted by applicable law, in response to i) subpoenas or other legal process or if in our good faith opinion such disclosure is required or permitted by law; or (ii) at the request of governmental authorities conducting an investigation;

- To defend the Terms of Service or other policies applicable to our Service;
- To protect the rights, property, life, health, security and safety of us or any third party;
- To the maximum extent permitted by applicable law, we may also use IP addresses, mobile device identifiers or any other information we collect to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies in our discretion. As permitted by applicable law, such disclosures may be carried out without notice to you;
- With our affiliates for their business purposes;
- Your redemption of digital coupons with our suppliers;
- In connection with, or during negotiations of, any proposed or actual merger, purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, amalgamation or any other type of acquisition of all or any portion of ECONO assets, financing, disposal, conveyance or transfer of all or a portion of our business to another company;
- To Third Party Services that interact with our Service, in connection with such interactions;
- For other purposes to the extent not prohibited by applicable law and not inconsistent with our statements disclosed elsewhere in this Privacy Policy, or at the time you provide your Personal Information/Personal Data; and
- With your consent or at your direction.

In our sole discretion, we may also share aggregated and other non-personal information as permitted by applicable law.

Information You Disclose Publicly or to Others

The Service may permit you to submit products, supply information, pricing strategies, ideas, photographs, user profiles, writings, music, video, audio recordings, computer graphics, pictures, data, questions, comments, suggestions or other content, including Personal Information/Personal Data (collectively, “User Content”), in association with your account and user profile. We or others may store, display, reproduce, publish, distribute or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed) and may or may not attribute it to you. Others may have access to this User Content and may have the ability to share it with third parties. Please think carefully before deciding what information you share, including Personal Information/Personal Data, in connection with your User Content. Please note that ECONO does not control who will have access to the information that you choose to make public, and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the Service or what others do with information you share with them on the Service. We are not responsible for the accuracy, use or misuse of any User Content that you disclose or receive from third parties through the Service. We are not responsible for User Content you submit to Third Party Services via our Service.

Sweepstakes, Contests, Surveys, Polls, and Promotions

We may offer sweepstakes, contests, surveys, polls, and other promotions (each, a “Promotion”) that may require registration or for you to submit Personal Information/Personal Data. These Promotions are strictly voluntary. If you choose to enter a Promotion, your Personal Information/Personal Data may be disclosed to third parties in connection with the administration of such Promotion, such as in connection with winner selection, prize fulfilment, and as required by law, such as on a winners list. By entering a Promotion, you are agreeing to the official rules that govern that Promotion, which may contain specific requirements of you, including, except

where prohibited by law, allowing the sponsor and/or other parties to use your name, voice and/or likeness in advertising or marketing materials. ECONO may offer opportunities to enter a contest or sweepstakes or other feature that we offer jointly with a third party. As a result of your participation in such feature, your information may be shared with the third party that is jointly offering the feature, which will be disclosed at the time your information is collected.

Third Party Services

The Service may contain hyperlinks to other websites or locations of our Service, and plug-ins (e.g. Social Features discussed in the next section), third party Tracking Technologies and other third-party applications and content made available on or via our Service, that are operated by third parties (“Third Party Service(s)”). We make no representations and accept no responsibility or liability regarding the policies or business practices of such Third-Party Services and encourage you to familiarize yourself with their privacy policies before accessing them or otherwise providing them with your Personal Information/Personal Data. In some cases, we and Third Party Services may each post terms and policies on a Third Party Service, in which case our terms and policies govern us and the Third Party Service operator’s terms and policies govern them.

Except to the extent we combine information we receive from Third-Party Services with Personal Information/Personal Data we ourselves have collected via the Service, data obtained by us from a third party, even in association with the Service, is not subject to our limitations regarding Personal Information/Personal Data under this Privacy Policy, however such data remains subject to any restrictions imposed on us by the third party, if any. Otherwise, the information collected, stored, and shared by third parties remains subject to their privacy policies and practices, including whether they continue to share information with us, the types of information shared, and your choices on what is visible to others on Third-Party Services. You should read the privacy policy of each Third-Party Service as these Third-Party Services may use their own cookies, web beacons and other Tracking Technology to independently collect information about you. In addition, these Third-Party Services may solicit Personal Information/Personal Data from you.

Promotional Communications

You can opt out of receiving promotional email communications from us at any time by following the instructions provided in those communications, by logging into your account and adjusting these settings yourself or email us by using the contact information provided herein. Please note that even if you opt out of receiving promotional communications, we may continue to send you non-promotional emails, such as those about our on-going business relations. Our mobile applications may send you notifications that may include alerts, sounds, and icon badges. These push notifications or in-app messages may include both operational messages and promotional messages regarding products, services and offers that may be of interest to you. These can be configured in the app’s Settings. As with emails, even if you opt out of receiving promotional communications, we may continue to send you non-promotional push notifications, such as those about your use of the app or our on-going business relations.

Profile and Apps

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration. The Service may allow you to review, correct or update Personal Information/Personal Data, and to change your communications and interest

preferences you have provided through the Service’s registration or in your account profile, which changes may be limited to those databases. If you would like to otherwise, review, correct or update Personal Information/Personal Data you have provided us through the Service, contact us by using the contact information provided herein. We will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable (but we may retain prior information as business records).

With respect to our Application, you can prospectively stop all collection of data via the Application by uninstalling the Application. Also, you may be able to exercise specific privacy choices, such as enabling or disabling certain location-based services, by adjusting the permissions in your mobile device or in the app’s settings. However, other means of establishing or estimating location (e.g., connecting to or proximity to wi-fi, Bluetooth, beacons or our networks) may persist.

Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons. Al

Analytics, Advertising, Online Tracking and Your Choices

You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

You can learn more about the practices of third parties that associate cookies with our Service, and the choices they offer, by reviewing their privacy policies. For instance, you can learn more about the privacy practices of, and choices offered by, One Spot and AdNexus, which provide us data for, and assist us in, content and ad customization at: <https://www.onespot.com/privacy-policy/>; and <https://www.appnexus.com/en/company/platform-privacy-policy#choices>.

In addition, certain advertising networks and exchanges may participate in the Digital Advertising Alliance (“DAA”) AdChoices Program and may display an Advertising Option Icon for interest-based ads. You can learn more about the DAA AdChoices Program at <http://www.youradchoices.com/> and its opt-out program for mobile apps at <http://www.aboutads.info/appchoices>. In addition, certain advertising networks and exchanges may participate in the Network Advertising Initiative (“NAI”). The NAI has developed a tool that allows consumers to opt out of targeted advertising delivered by NAI members' ad networks. To learn more about opting out of targeted advertising or to use the tool, click here: <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of targeted advertising, you will continue to receive other types of ads. Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use of a different device or web browsers or use a non-browser-based method of access (e.g., mobile app), your NAI/DAA browser-based opt-out may not, or may no longer, be effective. We are not responsible for effectiveness of, or compliance with, any third-parties’ opt-out options or programs or the accuracy of their statements regarding their programs.

Users Outside Puerto Rico

We are based in Puerto Rico and the information we collect is governed by applicable Puerto Rico and Federal U.S. law. If you are accessing the Service from outside of the United States, please be

aware that information collected through the Service will be transferred to, and processed, and used in Puerto Rico. The data protection laws in the United States may be different from those of the country in which you are located. Your use of the Service or providing us with any information therefore constitutes your consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information/Personal Data, in Puerto Rico as set forth in this Privacy Policy. We will take reasonable care to ensure that your data is treated fairly and lawfully.

Children

Our Service is intended for a general audience and not directed to children under 13 years of age. However, some portions of our Service may be intended as appropriate for all ages, or in other words a mixed audience of users under 13 years of age and users 13 and over, or for users under 13 years of age (e.g., a separate ‘Kids’ section).

We do not intend to collect Personal Information/Personal Data as defined by the U.S. Children’s Privacy Protection Act (“COPPA”) (“Children’s Personal Information/Personal Data”) in a manner that is not permitted by COPPA, and for any children’s or mixed-use portions of our Service (if any) we will comply with COPPA. If you are a parent or guardian and believe we have collected Children’s Personal Information/Personal Data in a manner not permitted by COPPA, please contact us by using the contact information provided herein and we will remove such data to the extent required by COPPA.

Parents may want to consider commercially available parental control protections to limit what minors can access online and/or monitor their minor children’s online activities. Examples include: www.netnanny.com; www.webwatcher.com and www.sentrypc.com. We do not endorse these or other services and are not responsible for them.

Data Security

We take reasonable steps to have physical, electronic and procedural safeguards in place to help protect your Personal Information/Personal Data. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Information/Personal Data, we cannot guarantee or warrant the security of any information collected through our Service.

Changes to This Privacy Policy

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy, and in some cases, we may provide you with additional notice (such as adding a statement to the homepages of our Service or sending you an email notification). Any changes will be effective immediately upon posting of the revised Privacy Policy and your continued use of the Service indicates your consent to the Privacy Policy then posted. If you do not agree, discontinue use of the Service and uninstall Service downloads and apps. We will not treat your Personal Information/Personal Data collected under a prior Privacy Policy in a materially different manner without your consent. We encourage you to review the Privacy Policy whenever you interact with us to stay informed about our information practices and the ways you can help protect your privacy. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

Contact Us

We are always interested in what our customers have to say. If you have any questions or concerns about this Privacy Policy, please feel free to contact us at:

Supermercados Econo, Inc.
Attn: Eduardo Marxuach
Sábana Abajo Industrial Park 1428
Calle Río Danubio,
Carolina, PR 00984