

# Program Privacy Policy

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## 1. Scope & Interpretation

This policy applies to Loblaw Companies Limited and its subsidiaries in Canada (collectively referred to in this document as “Loblaw”, “we”, “us” or “our”) when managing personal information in connection with the Loblaw Card Program (the “Loblaw Card Program”). The Loblaw Card Program is administered by JND Legal Administration (the “Program Administrator”) on behalf of Loblaw. Blackhawk Network (Canada) Ltd. (“Blackhawk”) will be fulfilling and distributing the cards as well as tracking their activation and use on behalf of Loblaw, and Peoples Trust Company (“Peoples”) will act as the card issuer on behalf of Loblaw. In this policy, we explain what Personal Information Loblaw, the Program Administrator, Blackhawk and Peoples will collect, and how it will be used, shared and managed in relation to the Loblaw Card Program. “Personal Information” as used in this policy means information about an identifiable individual, such as the name and date of birth of that individual, and includes non-personal information that is linked to Personal Information.

## 2. Consent

By participating in the Loblaw Card Program, you agree with and accept this policy. If you choose not to provide certain Personal Information or if you withdraw your consent, you will not be able to participate in the Loblaw Card Program.

## 3. How We Collect Personal Information

**Directly from you.** When you complete and submit a registration form, Personal Information will be collected for the purpose of implementing and administering the Loblaw Card Program. In some cases, Personal Information may also be collected for these purposes by the Program Administrator, Blackhawk or Peoples after you submit a registration form and/or when you contact them. Peoples may also collect or receive Personal Information about purchases you made with the card, such as the date of the purchase, category of purchase and the amount and the place of purchase.

**Through Technology.** When you visit the Loblaw Card Program websites, upon signing up to participate in the Loblaw Card Program or to activate your card or check your balance or transaction history, we may record user and usage data, such as where you click on a page, your internet protocol (“IP”) address and your operating system, to help us optimize the Loblaw Card Program website and generate reports. You may delete or disable certain of these technologies, such as cookies, at any time via your browser. However, if you do so, you may not be able to use some of the features of the Loblaw Card Program websites.

## 4. How Your Personal Information Will Be Used and Shared

Your Personal Information will be used to verify your eligibility to receive a \$25 Loblaw Card, communicate with you, fulfill and distribute cards, process card transactions, verify your identity, provide customer service, process claims for lost or stolen cards, reduce the risk of fraud, track and prove card activation and use, and for any other purpose authorized or permitted by law. The Personal Information submitted by you may be shared amongst Loblaw, the Program Administrator, Blackhawk and Peoples for the purposes referred to above. We will not use the Personal Information provided to participate in the Loblaw Card Program to market to you, unless we have already obtained your consent to do so. The Program Administrator, Blackhawk and Peoples will use your Personal Information only for the purpose of facilitating and carrying out the services they have been engaged to provide in connection with the Loblaw Card Program. Information pertaining to your activation and use of the Loblaw Card may be shared between and amongst Loblaw, the Program Administrator, Blackhawk and/or Peoples and with the courts in any class actions relating to an overcharge on the price of packaged bread. Your Personal Information may also be disclosed as permitted by applicable law, such as to government entities or other third parties in response to subpoenas.

## 5. Retention and Cross-border Transfer

Personal Information may be stored, accessed, or used in a country outside of Canada by Loblaw, the Program Administrator, Blackhawk and/or Peoples, or by service providers engaged by any of them, for any of the purposes identified in Section 4 above including the United States and El Salvador. Where Personal Information is located outside of Canada, it is subject to the laws of that jurisdiction which may differ from those in your jurisdiction and any Personal Information transferred to another jurisdiction will be subject to law enforcement and national security authorities in that jurisdiction. Subject to these laws, Loblaw, the Program Administrator, Blackhawk and Peoples will use reasonable measures to maintain protections of your Personal Information that are equivalent to those that apply in Canada. You hereby give your consent to such cross-border transfers (including to El Salvador and to the United States) of such Personal Information for any of the purposes set out in Section 4, above.

## 6. Answering Your Privacy and Access Questions

If you have any questions about this policy or the Personal Information that we have about you, please contact the Loblaw Privacy Office, 1 President's Choice Circle, Brampton, ON L6Y 5S5, [loblawprivacy@loblaw.ca](mailto:loblawprivacy@loblaw.ca), 1-855-416-1244.