

Loblaw Companies Limited

Privacy Code

At Loblaw Companies Limited and its subsidiaries and divisions, including President's Choice Financial (collectively, "Loblaw", "we", "us", "our"), the protection of personal information has always been of great importance. Loblaw is committed to maintaining the accuracy, confidentiality, integrity and security of your personal information. This Privacy Code is based on the requirements of the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), as well as applicable provincial privacy laws and is part of our commitment to ensuring that personal information in our possession is protected and is only collected, used and disclosed in accordance with applicable laws.

Certain subsidiaries and divisions of Loblaw Companies Limited may develop a privacy policy (each a "Privacy Policy"), to explain in greater detail how they collect, use and disclose personal information in accordance with this Privacy Code. An example of such a policy is the Privacy Policy that applies to President's Choice Financial products and services (which Privacy Policy is available online at www.pcfincancial.ca). In addition, some providers of products and services are companies with whom we have a co-venture relationship and in those cases, the co-venturer's privacy policy applies to the collection, use and disclosure of your personal information by that co-venturer.

What is personal information?

Personal information is any information about an identifiable person, other than certain business contact information. It can include such things as a person's home address, date of birth, social insurance number, medical and financial information. The type of personal information that is collected from you also depends on the nature of the transaction. Here are some examples of the type of personal information we collect, use and/or disclose:

Retail: In stores, Loblaw will collect and use such personal information as is necessary to process your transaction, including verifying your identity when required. You may be asked to provide personal information when returning products which information is only used in the protection of Loblaw's business. You may also be asked to provide your prescription and non-prescription use, home address and telephone number, date of birth, health insurance information and the name of your health care provider in order to receive prescription services from us.

Online: Loblaw asks for your name, address, email address, and other personal information when you create an account online. You will also be asked for personal information when you make an online purchase (so that we can process your order) and when you enter [contests](#); and if your personal information is to be used for other purposes, your consent will be obtained.

The 10 Privacy Principles

1. **Accountability** – Loblaw is responsible for personal information under its control, including any personal information disclosed to third parties for handling or administrative purposes. Loblaw has designated a national Privacy Officer and other privacy officers at the local, area, subdivision or division specific level, who are accountable for Loblaw's compliance with this Privacy Code, with any Privacy Policy that applies to you and with privacy legislation.

2. **Identifying Purposes** – The purposes for which personal information is collected will be identified by Loblaw at or before the time the information is collected, unless such purposes are obvious. When we intend to use your personal information for a purpose not identified to you when the information was collected, we will identify the new purpose to you prior to use.

With your consent, we collect personal information about you for various purposes, including the following:

- To verify your identity and protect each party from error and fraud
- To verify your eligibility for, and to provide you with, products and services
- To track and analyze your use of products and services (including the number of transactions by type, product code information, brand, etc.), shopping patterns, and the channels you use to obtain those products and services, to help us serve you better, and to provide you with information about other products and services which Loblaw believes may be of interest to you
- To manage and develop Loblaw's business and operations
- To generate statistics and aggregate reports for internal use
- To meet legal and regulatory requirements
- To fulfill any other purpose set out in the Privacy Policy of any subsidiary or division of Loblaw Companies Limited that applies to you.

3. **Consent** – Loblaw will only collect, use or disclose your personal information with your knowledge and consent, except where otherwise required or permitted by law. Consent means voluntary agreement to the collection, use and disclosure of personal information for defined purposes. Loblaw will not, as a condition of the supply of a product or service, unreasonably require you to consent to the collection, use or disclosure of information beyond what is required in the circumstances. The way in which consent is obtained may vary depending on the circumstances and the type of personal information involved.

Consent may be express (given orally, electronically or in writing) or implied (provided by an action or inaction), and can be provided directly by you or by an authorized representative. For instance, in a Loblaw pharmacy, with some medications, we will ask for written consent to provide your personal information for the purpose of providing direct mailings to assist you with your medication. On the other hand, when you provide us with your personal information and prescription drug plan information for the purpose of processing insurance payment of prescription drug costs by third parties, this constitutes implied consent. In the same way, when you order flowers for delivery, certain basic information will be collected from you and this also will constitute implied consent for Loblaw to use that information for the purpose of processing your order and delivering the flowers.

Refusal or Withdrawal of Consent: You may refuse to consent or you may withdraw your consent to the continued collection, use or disclosure of your personal information or tell us that you do not wish to receive any marketing communications from us at any time on sufficient notice to Loblaw. We will do our best to accommodate your request, subject to legal or contractual restrictions, current industry standards and our technical abilities. Your withdrawal of consent may result in Loblaw becoming unable to provide or continue to provide you with certain services, products or benefits, and in such case you will be given notice of the implications of the withdrawal of your consent so that you can make an informed decision. Due to printing and distribution schedules, you may continue to receive some communications that were in process before we received your request. If you have a product or service with a subsidiary or division of Loblaw Companies Limited or with a co-venturer, you also may have to refuse to consent or withdraw your consent with that subsidiary, division or co-venturer.

4. **Limiting Collection** – Loblaw will only collect personal information which is necessary for the purposes identified and will only collect such information by lawful means.

Collection of Information over the Phone: We may monitor and / or record your telephone discussions with our representatives for our mutual protection, to establish a record of the information you provide, to take or verify instructions from you, to maintain quality service levels, and to assist in staff training. If you are not comfortable with having your telephone calls recorded, you will, where possible, have the option of communicating with us by other means.

5. **Limiting Use, Disclosure and Retention** – Personal information will not be used for purposes other than those for which it was collected without your consent.

Loblaw may disclose your personal information, including as follows:

- With your consent;
- To carefully select third party service providers that perform services for us or on our behalf and that we have confirmed use security and privacy standards comparable to ours;
- To help us collect a debt or enforce an obligation owed to us by you; or
- As otherwise required or permitted by law.

Personal information will be retained only as long as reasonably necessary for the fulfillment of the purposes for which it was collected or as required by law. All destruction or removal of personal information from our records is done securely with due regard to the sensitivity of the information concerned.

Loblaw will not sell, trade, rent or lease your personal information to any organization, for any purpose.

6. **Accuracy** – Loblaw will make reasonable efforts to ensure that personal information of individuals is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used, but we also rely on you to provide us with any changes to your personal information, and in particular to your contact information.
7. **Safeguards** – Loblaw uses security measures appropriate to the sensitivity of the information in order to protect personal information in any media and format against loss or theft and against unauthorized access, disclosure, copying, use or modification.
8. **Openness** – Loblaw makes information about its policies and practices relating to the management of personal information available to you, including by posting the current version of the Privacy Code on our website at www.loblaw.ca.

9. **Individual Access** – Upon receipt by Loblaw of your written request, you will be informed, within a reasonable time following such request, of the existence, use and disclosure of your personal information and will be given access to that information. Loblaw will need to verify your identity before providing you with the personal information we hold about you. If you have a disability, then upon request, we will make reasonable accommodations to provide you with your personal information in an alternative format.

Loblaw may not be able to provide you with access to your personal information where the information cannot be disclosed for reasons of security or commercial confidentiality, where the information is protected by legal privilege or when access is prohibited by law. If Loblaw cannot provide access, Loblaw will inform you of the reasons why access has been denied, except when Loblaw is prohibited from doing so by law.

Loblaw may charge a reasonable fee to cover the cost of providing the information to you. If a fee is charged, Loblaw will inform you of the approximate cost of providing the information to you prior to processing your request and will provide you with the opportunity to withdraw your request.

You may challenge the accuracy and completeness of the information and have it amended as appropriate. Please see “Contact us” below.

10. **Challenging Compliance** – You may contact us with any questions, complaints or suggestions with respect to Loblaw’s compliance with this Privacy Code. If a complaint is found to be justified, appropriate measures will be taken including, if necessary, amending our practices and procedures. Please see “Contact us” below.

A note about contests

For any contest conducted, sponsored or authorized by Loblaw, your personal information will be collected, used and disclosed as follows:

1. For contests in which entry is automatic, for example, when you complete a financial transaction that earns an automatic entry into a contest, your personal information will also be collected and used for the purposes of administering the contest.
2. For contests in which you choose to enter by supplying your personal information, unless the contest rules clearly state otherwise, the personal information you supply when entering the contest will be used only for the administration of that contest.
3. In some cases, you may also be given the opportunity to request or agree to receive information from us at the time you enter the contest, in which case your personal information may also be used to supply you with the information you have requested or agreed to receive.
4. Contest winners must also agree to the use of certain of their personal information, such as their name, address and photograph, in any publicity concerning the contest.

Additional contest rules may apply.

For contests sponsored and administered by a manufacturer (whether or not jointly sponsored or authorized by Loblaw), your personal information will be collected, used and disclosed in accordance with the information provided to you about the contest.

A note about our websites

When you visit our websites, you do not have to provide us with any personal information. However, certain non-identifying information may be collected automatically. We do not consider this information to be personal information. For example, our web server may collect the internet protocol (“IP”) address and the name of the Internet Service Provider (“ISP”) associated with the computer from which you accessed the website, the type and version of web browser and operating system that you are using, and the address of the website that you visited prior to our website. If your web browser is configured to accept cookies, either temporary cookies (which remain on your system until you exit your current browser window) or permanent cookies (which remain on your system until you manually disable or delete the cookie using your browser software) may be placed on your computer. A “cookie” is a small piece of information that our web server automatically sends to your browser for storage on your computer, which then permits our web server to recall information about your settings (such as the settings of your web browser and language preference) as a part of the anonymous information. Please note that portions of our website will not function if you do not accept cookies.

For your convenience, our websites may contain links to other websites operated by third parties. Any such websites are wholly independent from our websites and we have no control over those websites and their operators, including their privacy policies and practices. Before providing any of your personal information on any such other website, you should review their policies on privacy and security.

Contact us:

Step 1:

To access personal information about you that is held by a subsidiary or division of Loblaw Companies Limited that has a Privacy Policy or if you have any questions, complaints or suggestions with respect to such Privacy Policy, please refer to the contact information contained in that Privacy Policy.

Step 2:

To access your personal information as held by Loblaw or if you have any questions, complaints or suggestions that could not be addressed by a subsidiary or division of Loblaw Companies Limited, you may contact the Loblaw Privacy Officer:

By mail: Loblaw Privacy Officer
1 President’s Choice Circle
Brampton, ON L6Y 5S5
Phone: 1.800.525.7868

By email: loblawprivacy@loblaw.ca

Step 3:

If you are not satisfied with our response to your complaint regarding our compliance with this Privacy Code or regarding any of our policies and practices with respect to our handling of personal information, a complaint may be made to the Federal Privacy Commissioner, 112 Kent Street, Ottawa, ON K1A 1H3, 1.800.282.1376 or to the provincial privacy commissioner of the province where the personal information was collected or is stored. More information, including contact information for the provincial privacy commissioners, can be obtained at the federal privacy commissioner's website, www.privcom.gc.ca.

Loblaw reserves the right to modify this Policy at any time.

For the most current version, go to: www.loblaw.ca