Walmart Canada Corporate Policy Number: CLEG-04 Revised: May 26, 2014

# Wal-Mart Canada Corp. Privacy Statement

# Walmart Privacy Policy - Highlights

### Scope:

This policy applies to customer information we collect in Canada at Walmart retail stores and through our website <u>www.walmart.ca</u>.

Walmart has specific Privacy Statements for its personal information practices relating to the Pharmacy and Vision Centre operations in our retail stores. These Privacy Statements are available at each Pharmacy and Vision Centre.

Walmart also has a specific Privacy Statement for Walmart Canada Bank.

## Information We Collect:

We collect your information from the following sources:

- Information you give us, such as during customer service operations, surveys, and online registrations,
- Information from other sources, such as companies that help us to update our records, and
- Information automatically collected when you visit our websites, such as via cookies.

# How We Use and/or Disclose Your Information:

- Walmart uses your information to provide products and services and to support core business functions. These uses include order or service fulfillment, internal business processes, marketing and advertising, authentication, loss and fraud prevention, public safety and legal functions.
- We may combine all the information we collect. We may disclose your information within our corporate family of companies.
- We may disclose your personal information to other third parties under the following limited circumstances:
  - o with service providers or suppliers that help with our business operations or joint products.
  - o with your consent.
  - when necessary to protect the safety, property, or other rights of Walmart, customers, or associates, to detect and prevent fraud, or when otherwise required or permitted by law.

# Your Choices:

• We want to communicate with you in ways you want to hear from us. Examples include email newsletters, special offers, and new product announcements. You can provide us with your marketing preferences by contacting Customer Service. See the Contact Us section below.

# How to Contact Us:

Customer Service - for store experience, marketing preferences, product questions and general feedback/questions.

Email Privacy Office - for privacy or Walmart Privacy Policy feedback/questions.

## Important Information:

- We recognize the importance of privacy and believe it is a matter of trust.
- We are committed to providing you a fair and timely response to any privacy concern or question you bring to us.

# Website Privacy Policy – Full Policy

Walmart recognizes the importance of our customers' privacy. We believe that privacy is more than an issue of compliance, it is one of trust. We strive to manage your personal information based on our basic belief of respect for the individual. This policy describes:

- How and why we collect your personal information.
- How your information is used and protected.
- When and with whom we disclose your information.
- The choices you can make about how we collect, use, and disclose your information.

# Notice and Scope of Our Privacy Practices

Our goal is to provide clear, prominent, and easily accessible information about our privacy practices. This policy applies to customer information obtained by Walmart in connection with its operations, both in stores and online, in Canada.

Walmart has specific Privacy Statements for its personal information practices relating to the Pharmacy and Vision Centre operations in our retail stores. These Privacy Statements are available at each Pharmacy and Vision Centre

Walmart has a specific Privacy Statement for Walmart Canada Bank.

# Our Pledge of Accountability

Walmart expects our associates and business partners to manage your personal information properly and maintain your trust. We have designated associates who are accountable for compliance with this privacy policy.

# Information We Collect

We collect personal information about you to deliver the products and services you request and to help improve your shopping experience. We strive to limit the amount of personal information collected to support the intended purpose of the collection.

### Information You Give Us

We collect personal information from you in a variety of ways when you interact with Walmart, both in stores and online. Some examples are when you:

- Create an account on one of our websites;
- Register for, view or participate in an online webcast event provided on behalf of Walmart;
- Make an online or in-store purchase from us;
- Use a gift registry;
- Conduct a transaction where we collect information, including when required by law (such as hunting and fishing licenses);
- Request customer service or contact us;
- Submit a Walmart related story, testimonial, rating or review, or other user-generated content that may be posted on the site;
- Participate in a contest, sweepstake, promotion, or survey; or
- Otherwise submit personal information to us along with any related content of the communication.

Personal information is information that identifies, or could be reasonably associated with you. The personal information we collect may include contact and payment information like your name, email and physical addresses, phone numbers, and credit and debit card information. When you ask us to ship an order, we may collect information you provide us such as the name, address, and phone number of recipients. For certain transactions, we may be required to collect information to comply with legal requirements, or may collect information for the purposes of detecting fraud.

### Information from Other Sources

We may receive personal information about you from other sources as well. Examples of these sources are entities that can help us correct or supplement our records, improve the quality or personalization of our service to you, and help prevent or detect fraud. In addition, we may collect information from consumer reporting agencies or other service providers if you obtain certain financial products.

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We operate cameras in our stores for security and operational purposes, such as to measure traffic patterns. Except for security purposes, we do not use these cameras to identify you personally.

### **Automated Information Collection**

We receive and store certain types of information when you interact with our websites, emails, and online advertising. Our purpose is to allow the websites to work correctly, to evaluate use of the website, and to support website analytics and marketing campaigns. Some examples include:

- We may collect technical information such as your internet protocol address, your computer's operating system and browser type, the address of a referring website, if any, and the path you take through our web pages. If you make a purchase online, we may also use and share this information for the purposes of detecting and preventing fraud.
- We use both persistent and session "cookies" on our website to recognize you as you use or return to our sites. This is done so that we can provide a continuous and more personalized shopping experience for you. A cookie is a small text file that your browser may store when you view a web page or certain types of content-rich e-mails. Persistent cookies help us remember your information and settings for future visits to our website (such as your language preferences). Session cookies help us remember your information and settings during your current visit to our website (such as the items in your shopping cart) and will expire after you close your browser.
- We may also use web beacons. Beacons allow us to know if a certain page was visited, an email was
  opened, or if ad banners on our website and other sites were effective.

In addition, third parties (such as networks, data exchanges, and other service providers) may also collect information about your activity on our website and on third-party websites using third-party cookies and other web-based technologies. The information collected by these third parties may be used to tailor ads you see both on our website and on third-party websites. To opt out of receiving tailored advertising, see Your Choices below.

### **Social Media**

We may offer you the opportunity to engage with our content on or through third-party social networking websites, plug-ins and applications. When you engage with our content this way, you may allow us to have access to certain information associated with your social media account, (e.g name, username, e-mail address, picture) to deliver the content or as part of the operation of the website, plug-in or application. We may use this information to confirm your identity and to personalize your experience on our website and on the third-party social networking websites, plug-ins and applications.

# How We Use Your Information

Walmart uses your information to offer and provide our products and services and to support our core business functions. These include order or service fulfillment, internal business processes, marketing, authentication, loss and fraud prevention, public safety and legal functions. Some examples include:

- To fulfill your requests for products and services and communicate with you about those requests;
- To register and service your account;
- To administer surveys, sweepstakes, contests, and promotions;
- To provide customer service and alert you to product information, including recalls;
- To help us improve and customize our service offerings, websites, and advertising;
- To send you information about our products, services, and promotions; and
- To protect the security or integrity of our websites and our business.

To accomplish these purposes, we may combine personal and non-personal information we collect online with offline information, including information from third parties. We may transfer or disclose your information within our corporate family of companies for these purposes.

### How We Disclose Your Information Outside Walmart

We disclose your personal information with your prior consent or under the following limited circumstances.

#### **Service Providers**

We may disclose or otherwise make available personal information about you to service providers that help with our business operations. Examples are webcast hosting providers, shipping vendors, billing and refund vendors, payment card processors, and companies that help us improve our product and service offerings and our websites. Your personal information may be stored and processed by our service providers in the United States or other locations where the service providers or Walmart maintain facilities. We require our service providers to keep your information secure. In addition, our service providers may not use or disclose personal information for any purpose other than providing the services on our behalf.

#### Legal Requirements and Protection of Our Company and Others

We may disclose your information in other limited circumstances. These include situations when the sharing is necessary to protect the safety, property, or other rights of Walmart, our customers, our associates, or any other person, or where otherwise required or permitted by law. Examples include protecting the health or safety of customers, or addressing crimes committed on Walmart property. Walmart may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable law. If you make a purchase online, we may disclose information to certain third parties, including payment card processors and issuers for the purposes of detecting and preventing fraud on Walmart properties (including our websites) and the properties of other merchants. This information may include your name and contact information, shipping information, information collected from your computer or device such as an IP address or device ID, and information about your purchase. Walmart may disclose your personal information to entities located outside of Canada in connection with any of the foregoing.

#### **Marketing Purposes**

From time to time with your consent, we may disclose information with carefully selected companies who may offer you products and services of interest. You may opt in to this sharing under the "Your Choices" section below.

### **Business Transfers**

We may transfer any information we have about you in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Walmart or as part of a corporate reorganization or stock sale or other change in corporate control.

### Your Choices

### Data Collection, Use, or Disclosure

Walmart collects, uses, or discloses your personal information consistent with this policy. The method of obtaining consent is appropriate for the type of personal information being collected, used, or disclosed.

### **Marketing Preferences**

We want to communicate with you in ways you want to hear from us. Examples are newsletters, special offers, and new product announcements. We use the following standards for marketing communications:

• We use an opt-in standard for e-mail, phone and text messages. We also use an opt-in standard for sharing personal information with third parties for marketing purposes. Opt-in means we will only conduct the activity with your express consent.

If you provide your e-mail address to opt-in to receiving promotional and informational e-mails, you will be
given the opportunity to give your express consent to receive these commercial electronic messages. This
consent is sought by Walmart Canada Corp. 1940 Argentia Road, Mississaugga, Ontario, L5N 1P9. You
may withdraw your consent by using the "unsubscribe" link located at the bottom of all promotional
messages you receive from us, or by contacting us using the contact information listed below.

You can provide us with your marketing preferences, or change your marketing preferences, by contacting Customer Service. Please see the Contact Us section below.

If you contact us by email or mail, please be sure to include your full name, the types of communications you would like to receive or not receive, and your related contact information. For instance, if you would like to opt out of mail, include your mailing address. Please allow sufficient time for your preferences to be processed. It may take up to 10 days to process your requests related to email and 4-6 weeks for other requests.

Please be aware that, even if you have opted out of receiving marketing communications from us, we may still contact you for transactional purposes. Some examples are contacts for customer service, product information, service or reminder notices, or recalls. We may also need to contact you with questions or information regarding your order, such as regarding order status, shipment, or refunds.

### **Online Operations and Advertising**

You may exercise choices related to our online operations and advertising. For instance, you can choose to browse our websites without accepting cookies Please know that cookies allow us to recognize you from page to page, and they support your transactions with us. Without cookies enabled, you will still be able to browse our websites, but will not be able to complete a purchase or take advantage of certain website features.

To learn more about cookies, including how to refuse cookies on your computer, follow these links:

- <u>Microsoft Internet Explorer</u>
- Mozilla Firefox
- All About Cookies
- Adobe Flash Cookies

# How to Access and Update Your Information

Walmart takes reasonable steps to keep your personal information accurate and complete. You can access or update your personal information, including contact or account information, in the following ways:

- If you have created an account at one of our websites, log into your account. Once you do, you will be able to enter and update your own contact information and payment information, as well as contact information for recipients you have designated.
- Contact us at the email or postal address listed in the "Contact Us" section at the bottom of this policy. Please include your current contact information, the information you are interested in accessing, and your requested changes. We will provide you the personal information requested if reasonably available, unless it infringes on the privacy of other individuals and subject to reasonable limitations provided by law and internal procedures. Otherwise we will describe the types of information we typically collect. We will provide access and make changes you request, or will provide an explanation of what actions we will be able to take with regard to the request.
- If you need help accessing your information related to a service provided by a third party, we will assist you
  by referring you to the third party. Please contact us via the "Contact Us" section below.
- If you need assistance accessing records relating to your Vision Centre, Pharmacy or Bank-related information, please visit the section below related to 'Privacy Protections for Specific Types of Information.'

## How We Secure Your Information

Securing your information is a company priority. Whether you are shopping online, or in our stores, we use reasonable security measures to protect the confidentiality of your personal information.

### **Online Protections**

Your account information is protected by the password you use to access your online account. Please keep this password confidential. We also use a technology called Secure Sockets Layer (SSL). If your browser is capable of SSL (and most are), your account information will be protected during transport across the internet. When you enter a secure portion of a website, which is any page containing any of your account information, an image of a closed lock or solid key should appear in the bottom bar of your browser window. If you click on this image, a small pop-up window displaying website security information will appear. This display indicates that your personal information is transmitted in encrypted form to a Walmart web server, not to an unauthorized server.

### Hard Copy and Electronic Storage Protections

Personal information that is maintained in our offices or stores is subject to physical, administrative, and technical controls as well. Hard copies of sensitive personal information are maintained in locked locations or cabinets with similar restrictions for electronic storage. When dispose of, the information is shredded, destroyed, erased, or otherwise made unreadable.

# Privacy Protections for Specific Types of Information

### **Pharmacy and Vision Centre**

When you use our Pharmacies or Vision Centres, you may provide us with your health information so that we may process your request. We understand the sensitive nature of such information and respect your privacy by keeping it confidential in accordance with laws and our policies. Our privacy policies for personal health information describe how we protect the information and how you can access it. The policies are provided to you by the Pharmacy or Vision Centre at the time of first service, and can be requested at any time at your local Walmart.

### **Financial Products and Services**

When you obtain financial products and services from us, we may collect and use certain financial-related information. We understand the sensitive nature of this information as well and protect it in accordance with laws and our policies. Financial products and services include money orders, money transfers, credit card offerings, bill payment and cheque cashing.

We protect payment card information we collect during transactions. We comply with industry standards that require safeguards for handling and securing customer information. These include using secure networks, encryption or other protection of cardholder data, physical and technical access controls, monitors and tests of security systems, and information security policies.

### Privacy of Children Online

We are committed to protecting children's online privacy. Our website is a general audience website not geared towards children. In order to protect the privacy of children, Walmart websites do not knowingly collect personal information from children under the age of 13 without prior parental consent. Please contact us via the "Contact Us" section of this policy if you believe we may have collected information from your child and we will work to delete it.

# International

As a global company, Walmart has separate privacy policies for its international offices. Personal information about our customers may be processed and stored in the United States or any other country in which Walmart or our service providers maintain facilities. Globally, Walmart requires our family of companies to protect your personal information, regardless of where it is stored, in accordance with local laws and our policies.

# Changes to our Privacy Policy

Please check our privacy policy periodically for changes. We will also notify you of significant updates and will post the date it was last updated at the bottom of the privacy policy.

# Contact Us

Email <u>Customer Service</u> - for store experience, marketing preferences, product questions and general feedback/questions.

### **Contacting the Privacy Office**

Please feel free to contact the privacy office with any questions or comments about this policy or about how your information is handled by email at <u>caprivacy@wal-mart.com</u> or by mail to the Privacy Officer c/o Walmart Canada Corp. 1940 Argentia Road, Mississauga, Ontario, L5N 1P9.

Effective: May 26, 2014