

GLOBAL PRIVACY & RECORDS POLICY

POLICY STATEMENT

We are committed to complying with all privacy laws and regulations in the markets in which we operate. We respect our associates, customers, suppliers, and other individuals by promoting the privacy and appropriate record retention of personal information entrusted to us. Personal information includes information concerning an identified or identifiable individual.

WHAT TO DO

PROVIDE REASONABLE NOTICE, as applicable, about the collection, use, and sharing of personal information.

OFFER INDIVIDUALS CHOICES, where appropriate, regarding the collection, use, and sharing of their personal information.

LIMIT PERSONAL INFORMATION collected and stored to the minimum necessary for the business purpose for which the information is needed.

PROVIDE INDIVIDUALS REASONABLE ACCESS to their personal information and an opportunity to correct inaccurate information, where applicable.

ESTABLISH CHANNELS OF COMMUNICATION through which individuals can ask questions or seek clarification regarding the handling of their personal information.

CONSULT WITH YOUR COMPLIANCE OR LEGAL DEPARTMENT before transferring personal information across national borders.

APPLY APPROPRIATE SECURITY and access controls for personal information and ensure its destruction is secure when no longer needed or subject to a company retention schedule.

PROVIDE NOTICE, where appropriate, when the security of highly sensitive personal information is compromised.

STORE BUSINESS AND PERSONAL INFORMATION in a reliable manner and retain only as long as necessary for business and legal purposes in compliance with a defined retention schedule.

WHAT TO LOOK FOR

COLLECTION OR USE of personal information without appropriate notice to the individual to whom it belongs.

COLLECTION OR USE of more personal information than is necessary to accomplish a business purpose.

UNAUTHORIZED ACCESS TO OR INAPPROPRIATE SECURITY CONTROLS for personal information.

SHARING PERSONAL INFORMATION with unaffiliated third-parties without appropriate contractual controls.

TREATING PERSONAL INFORMATION in any way that violates an applicable law or any company policy.

Asking Questions and Reporting Violations

To ask a question about this policy or to report a suspected violation of this policy, please contact a member of Management, the Compliance department, or the Legal department.

You may also report suspected violations by contacting Walmart's Global Ethics Helpline:

1-800-963-8442

Web: www.walmartethics.com or Email: ethics@wal-mart.com

Reports to the Ethics Helpline are always confidential, and if you choose, you may report your concern anonymously.

Additional specific country contact information can also be found on www.walmartethics.com.

In the U.S., you may also use the U.S. Compliance Hotline for questions: 1-800-530-9923