

Karl's Meat Market Ltd Privacy Policy

Effective Date: April 20, 2020

At Karl's Meat Market Ltd, we respect your privacy and take great care in protecting your [personal information](#). As a local Canadian retailer, we have many customers interacting with us each week – in our stores and through our websites and mobile applications. Through these interactions, our customers entrust us with their personal information.

Canadians rely on us to safeguard this information and ensure its responsible collection and use.

To do so, we have committed to the following principles:

1. We will be transparent about how we handle your personal information and our privacy practices
2. We will use your personal information to benefit you and enhance your customer experience
3. We will protect your personal information and handle it responsibly

We also want to be transparent about how you can help manage your privacy and information, so you can

make informed decisions.

Below is the full Loblaw Privacy Policy for more information.

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1. Scope And Application

This policy relates to the customer personal information collected by Karl's Meat Market Ltd in Canada, as well as website, mobile applications and banners. Throughout this policy, we collectively refer to the company as "Karl's Meats", "we", "us" or "our".

In this policy, we describe what personal information we collect; how we use, share and manage it; how you can access, update and/or correct your personal information; the privacy choices available to you; and the specific privacy notices relating to certain programs and services that provide you with more information. Please also refer to any privacy statements available at our location, websites or mobile applications available to you at the time your personal information is collected.

A. What Does This Privacy Policy Include?

This policy describes how we handle your [personal information](#), specifically, what we collect, and how we collect, use, share, protect and store it. We also explain your [privacy choices](#) and how you can exercise those choices. This policy applies to you when you visit our website, sign up for our mailing list, contests or events, apply for or purchase our products, or receive our services.

Please note that specific privacy notices and/or additional terms and conditions may apply to how we are collecting and managing your information when you engage with some of our programs, products, services, promotions, contests and/or events. Those specific privacy notices and/or terms and conditions will apply together with this policy.

For example:

You are required to accept terms and conditions when you register for our *PC Optimum* loyalty program. Those terms and conditions apply together with this policy.

2. What Type Of Personal Information Do We Collect And How?

We limit the collection of personal information to what is reasonably required to fulfill the purposes for which it was collected. We collect personal information, as defined below, in a variety of ways, including: directly from you, through in-store technologies, and when you are interacting with us online or through our mobile applications.

A. How We Define Personal Information

“Personal information” is any information that identifies you or could be reasonably associated with you.

The personal information we collect may include contact information such as your name, email address, home address, and phone numbers, as well as information about the specific products and services that you purchase in our retail stores or from us online, information provided to us in connection with our programs, products and/or services and/or information collected automatically when you interact with us online or visit our retail stores.

B. How We Collect Personal Information

We collect personal information in the following ways:

Directly From You

You may provide personal information to us in our stores, by mail, by email, over the telephone, through our

websites or mobile applications or in any other direct manner.

For example:

When you voluntarily share information about yourself with us, we will collect that information in order to provide

you with our programs, products or services, respond to your inquiry, or for any other purpose disclosed to you at that time.

From Technologies Used At Our Locations

We may collect personal information through various types of technologies used in our stores (e.g., grocery). These can include our point-of-sale systems, video surveillance or other similar types of technologies (including, for example, anonymous video analytics which allows us to track the number of individuals in our stores and consider certain demographic information about our customer base on an anonymous basis) which we may use from time to time.

For example:

- We use video surveillance in areas surrounding our stores, pharmacies, kiosks, pavilions, bank machines, parking lots and other locations: for security purposes, to protect against theft, to prevent damage to our properties, and to prevent fraud.
- We may also use anonymous video analytics to help manage our stores, understand our customer base and improve customer experience.

Through Our Websites And Mobile Applications

We may collect certain types of information electronically when you interact with our websites, email, mobile applications, social media accounts, online advertising, or through the use of our or a third party's technologies, which include [cookies](#) and [other technologies](#) such as Data

Management Platforms (DMPs). This information helps us understand what actions you take on our websites and mobile applications and allows our website and mobile applications to work correctly.

We may combine this information with other information collected in-store or online such as your online and in-store transaction history. We do this to support our customer understanding using website and mobile analytics and to provide you with more tailored advertising and marketing campaigns. This includes serving interest-based advertising to you, subject to your right to withdraw consent, as detailed in our [Interest-Based Advertising and Media Notice](#).

For example:

- We use your location or language preference to auto-select features when you visit our websites and mobile applications.
- We use your online and/or in-store purchase history to provide you with interest-based advertisements on products that you purchase frequently.
- We collect, combine and categorize your personal information on an aggregated basis to identify online and offline purchasing patterns to help us analyze our businesses to better serve customers.

The technologies we use include:

- **Cookies**, which are small text files that are saved on your computer when you visit a website so that information can be saved between visits, such as your login credentials or language preferences.

For example, cookies allow you to log in quickly when you visit our sites.

- **Other technologies**, such as DMP services and analytics engines, which pull usage data from multiple sources and help manage and collect this data to use for personalization, interest-based advertising,

customizing content and other methods to gain insights into our customers' needs and preferences. We may use Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies to analyze your use of our websites, to create reports about visitor activities for us and to provide further services associated with the use of the websites and the Internet. Although this information is collected through your Google ad settings, it is not provided to us in a personally-identifiable format. You may delete or disable certain of these technologies at any time via your browser. However, if you do so, you may not be able to use some of the features on our websites or mobile applications. To learn more about the privacy choices available to you, please visit [How Do I Change My Privacy Choices?](#)

3. How Do We Use Personal Information?

We use your personal information to provide you with our programs, products and services, to manage our business operations, to communicate offers and information we think might interest you, to generally enhance your customer experience with us, and as permitted or required by law.

We use your personal information for the following purposes:

A. Providing Programs, Products And Services

We use your personal information in order to provide you with our programs, products and services, which include:

- Providing you with a quote for a program, product or service;
- Verifying your identity;
- Determining your eligibility for a program, product or service;
- Processing your applications;
- Creating, administering, and maintaining your accounts (such as for loyalty or warranty programs);
- Processing your transactions and returns, online or in store;
- Fulfilling your product and service requests, inquiries, and purchases;
- Providing you with healthcare services such as pharmacy, dietitian and optician services. For more information

see our [Health Privacy Notice](#); and

- Providing you with financial services such as credit card, bank account or insurance services. For more information see our [President's Choice Financial Privacy Notice](#) and [Insurance Privacy Notice](#).

B. Managing Our Businesses

We use your personal information for many business reasons, which include:

- Deploying and managing our information technology applications and systems, including managing our websites;
- Managing and facilitating the use of our websites and mobile applications, which may include using [cookies](#) and other similar technology;
- Enabling your participation in contests, promotions, surveys, chats, seminars or workshops;
- Maintaining the security of the public and our customers, employees and property;
- Protecting parties from errors and fraud;
- Monitoring and investigating incidents and managing claims;
- Meeting our legal and regulatory obligations.

C. Communicating With You

We use your personal information to communicate with you in a variety of ways:

- Providing you with information and updates about our programs, products, services, promotions, contests and events;
- Responding to your inquiries;
- Taking or verifying instructions from you;
- If we have your consent, informing you in a variety of ways (e.g., email, telephone, SMS, direct mail) about programs, products, services, special offers, promotions, contests or events that may be of interest to you;
- Delivering interest-based advertisements relating to our products and services or third party products and services that may be of interest to you. For more information see our [Interest-Based Advertising and Media Notice](#); and
- Subject to your right to withdraw consent, If you no longer wish to receive commercial electronic messages, please let us know by following the unsubscribe directions provided in every commercial electronic message. For more information see [How Do I Change My Privacy Choices?](#)

D. Conducting Market Research

We may use your personal information in order to conduct market research by tracking and analyzing current or previously collected information to improve or to develop new products, services, programs, promotions, contests or events, and to better understand our customer base. When doing so, we generally will use your information in an aggregated format or with direct personal identifiers removed. The information we use for market research may include:

- Purchase history (e.g. the number and amount of transactions by type, location/store of purchase, product code information, brand, quantity purchased, date, time, payment method used, promotional offers used in connection with the transaction, etc.);
- Website or mobile application activities (e.g. offers viewed, opt-out preferences, email bounce backs, click-throughs, content on social media, and IP addresses);
- Account activity, balances and payment history;
- Use of mobile devices interacting with our websites or mobile applications (e.g. use of features, and duration, frequency, type and location of calls and text messages); and
- The methods used to apply for or to access or use our programs, products, services, promotions, contests or events.

E. Conducting Data Analytics

We may use your personal information in order to conduct data analytics for business purposes, such as:

- Managing and developing our business and operations;
- Improving our programs, products, and services (e.g. improving our websites and mobile applications);
- Understanding customer needs and preferences and customizing how we tailor and market products and services to our customers based on their interests; and
- Measuring the effectiveness of our marketing.

When doing so, we generally will use your information in an aggregated format or with direct personal identifiers removed.

4. How Do We Share Personal Information?

We may share your personal information within our company or with our service providers (companies operating on our behalf) and other third parties (companies with which we provide programs, products or services) for the purposes described in this policy and in accordance with applicable law. We do not sell your personal information to any organization or person; the only exception to this would be if we sell or transfer any part of our business. We will not share your personal information outside of our company, except as indicated below.

A. Service Providers

In the course of providing our programs, products, services, promotions, contests and events we may share personal information with our service providers. These service providers help us operate our business, technology systems and applications, internal procedures, infrastructure and advertising and marketing. They provide services to us such as data hosting, contest administration, email deployment, marketing, sales and processing or analysis of personal information. We require these service providers to limit their access to and/or use of personal information to what is required to provide their services and to comply with our privacy requirements.

For example:

Personal information collected from contest participants may be shared with our contest administrator to contact selected participants.

B. Sale Or Transfer Of Business Or Other Transaction

We may decide to sell or transfer all or part of our business to a related company or to a third party, to merge with another entity, to insure or securitize our assets, or to engage in another form of corporate or financing

transaction (including the proceedings of insolvency or bankruptcy), corporate reorganization, share sale, or other change in corporate control. If your personal information is required in connection with any such transactions, we will comply with the legal requirements for the disclosure of personal information.

C. Other Permitted Reasons

Canadian law permits or requires the use, sharing, or disclosure of personal information without consent in specific circumstances (e.g., when investigating and preventing suspected or actual illegal activities, including fraud, or to assist government and law enforcement agencies). These circumstances include situations when permitted or required by law or when necessary to protect our group of companies, our

employees, our customers, or others. If this happens, we will not share more personal information than is reasonably required to fulfill that particular purpose.

D. With Your Consent

Other than the purposes listed above, we may, with your implied or express consent, share or disclose your personal information outside of our group of companies, in accordance with applicable law.

5. How Do We Manage Consent?

By subscribing to our programs, products and services and/or submitting information to us in connection with using our programs, products and services, you are providing your consent to the collection, use and disclosure of personal information as set out in this policy. In some cases, your consent may be “implied” i.e. your permission is assumed based on your action or inaction at the point of collection, use or sharing of your personal information. We will obtain consent when we want to use personal information for a new purpose or for a purpose other than those stated at the time of collection in this policy or in the terms and conditions of a specific program, product, service, contest, promotion or event you signed up for, participated in or purchased. Your consent can be withdrawn at any time, except in limited circumstances, including legal or regulatory requirements or as a result of your contractual obligations with us. For information on how to manage your privacy preferences, please see [How Do I Change My Privacy Choices?](#)

For example:

If you choose not to provide us with certain personal information or if you withdraw your consent, where such withdrawal is available, we may not be able to offer you the programs, products, services, contests, promotions, events or information that you requested or that could be offered to you.

6. How Do I Change My Privacy Choices?

We want you to clearly understand your choices and make informed decisions about your privacy options. There are several options available for you to manage your privacy preferences, including, for example: managing your preferences within your account(s), contacting us directly, changing your browser settings on your device, and/or, where available, using third party unsubscribe functionality.

A. Within Your Account(s)

If you have an account with us (e.g., *PC Optimum* account), you can update your preferences where customer preference options are available through the relevant program, product or service.

B. When You Register Or By Contacting Us Directly

You may opt-in to:

- Receiving email or SMS marketing communications at the time that you register for our programs, products or services, enter our contests or promotions or any time thereafter through your online account(s)

You may opt-out of:

- Receiving email communications from the sender, by clicking “unsubscribe” within any marketing email you receive, through your online account (if you have created one);
- Receiving surveys by following the unsubscribe instructions provided in the email; and
- Receiving interest-based advertisements from us and our client advertisers as detailed in our [Interest-Based Advertising and Media Notice](#).

Please note the following regarding withdrawal of consent or changes in your privacy preferences:

- Even if you have opted out of receiving marketing communications from us, we may still contact you for transactional purposes, in compliance with applicable laws (e.g., 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 order status, shipment, or refunds; and
- It may take some time for all of our records to reflect changes in your preferences (e.g., if you request that you not receive personalized marketing communications from Karl’s Meats, your preference may not be captured for a promotion already in progress).

C. Changing Your Browser Settings On Your Device

We use technologies to enhance your customer experience and present offers to you, including interest based advertisements (see our [Interest-Based Advertising and Media Notice](#)). For example, technologies such as cookies allow us to recognize when you use or return to our websites, providing you with a more seamless experience. You may delete or disable certain of these technologies at any time via your browser. However, if you do so, you may not be able to use some of the features of our websites.

Please refer to your browser instructions or help screen to learn more about how to block, delete and

manage cookies on your computer or mobile device. You can also use the quick links below, based on the browser type that you are using: [Internet Explorer](#), [Google Chrome](#), [Firefox](#), and [Safari](#).

D. Using Third Party Unsubscribe Functionality

We may use third parties (e.g., web companies or social media platforms) that use certain technologies to analyze your browsing behaviour as you visit our websites. You can manage your privacy preferences with respect to certain third parties, such as Google, by using the unsubscribe functionality within their platforms. Please note that disabling, blocking or deleting some of these technologies, such as cookies, may cause you to lose the functionality of certain features on our websites and mobile applications.

For example, Google Analytics uses cookies to analyze your browsing behaviour on our websites. This information is not provided to us in a personally identifiable format and is collected through your ad settings on your device or browser. If you would like to opt out of Google's ad settings, please go to www.google.com/settings/ads or use the Google opt out browser add-on located at

<https://tools.google.com/dlpage/gaoptout>. We also may embed links to other websites, including social media websites, on our websites. For more information about social media plug-in protocols, such as "Like" buttons on Twitter, Facebook or Instagram and their impact on your privacy rights, please visit the appropriate social media help centre (e.g., Facebook's Help Center at <https://www.facebook.com/help/>).

7. How Do We Protect And Store Personal Information?

We take the security of your personal information very seriously and are committed to protecting your privacy by using a combination of administrative, physical, and technical safeguards. These measures include multi-factor authentication, masking, encryption, logging and monitoring, described below. We store your personal information for as long as it is necessary to provide you with our programs, products, and services and for a reasonable time thereafter, or as permitted or required by law.

A. How We Protect Personal Information

To protect your personal information, we maintain administrative, technical, and physical safeguards in our stores, pavilions, kiosks, offices, digital properties, and information storage facilities. By having these safeguards, we aim to avoid the loss, misuse, unauthorized access, disclosure, or modification of your personal information that we hold. These safeguards also apply when we dispose of or destroy your personal information.

For example, where appropriate, we use the following safeguards:

- **Multi-Factor Authentication**, which is a method of confirming your identity by using more than one way to authenticate you, such as asking for your password and a code that is sent to your email address or phone number;
- **Masking**, which is the process of obscuring your information so that the structure remains the same but the content is no longer identifiable;
- **Anonymization**, which is the process of altering your data so that it can no longer be used to identify you personally;
- **Encryption**, which is the process of obscuring your information in order to make it unreadable without the use of a code or a key; and
- **Logging and Monitoring**, which is the process of tracking, recording and monitoring

B. Where We Keep Personal Information

We use all reasonable safeguards, including contractual requirements with our service providers, to protect your personal information wherever it is used or stored. In general, we store, access and use personal information in Canada. Some of our service providers may access, process or store your personal information outside of your province, territory or Canada in the course of providing their services to us. When we engage a service provider that operates outside of Canada, personal information may be stored, processed, accessed or used in another country. In that case, the personal information is subject to the law of the jurisdiction in which it is used or stored, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

C. How Long We Keep Personal Information

We will store your personal information for as long as necessary to fulfill the purposes for which it was collected, except where otherwise required or permitted by law (e.g., healthcare providers must retain patient records in accordance with their statutory retention obligations). Once no longer required, your personal information will be securely destroyed or anonymized (so the information no longer identifies you).

8. How Do I Request Access To My Personal Information?

Under Canadian privacy law, you have the right to access the personal information we hold about you, subject to any legal restrictions. Upon request, we will provide you with access to your personal information within a reasonable timeframe, in compliance with applicable laws.

It is your responsibility to provide accurate, correct and complete information. If you notice any errors in your personal information or need to update it, please let us know through the steps outlined below.

Some of the personal information we hold about you is accessible to you through your online account(s). You can access and update or correct your personal information by logging into your account(s) and making updates to your profile information and your preferences.

For personal information that is not available through your online account(s), you can request access by contacting the applicable Privacy Office, through email or postal address (for contact information, see [Who Do I Contact with Privacy Questions?](#)).

To access your personal health information, please contact your healthcare provider directly. Similarly, to access your personal information collected by a third party, please contact that third party directly.

If you are unsatisfied with our response to your access and/or correction request, or how we handle your personal information, please contact the appropriate Privacy Office. For contact information, see [Who Do I Contact with Privacy Questions?](#). If the Privacy Office is unable to address your concern to your satisfaction, you may bring the matter to the attention of the appropriate Privacy Commissioner. Some of our activities are subject to the jurisdiction of the [Office of the Privacy Commissioner of Canada](#); other activities are subject to the jurisdiction of the Privacy Commissioner of your province or territory of residence.

9. How Do I Know If There Are Changes To The Privacy Policy?

We may make changes to this policy from time to time. Any changes we make will become effective when we post a modified version of the policy on this webpage. If we make any significant changes to the policy, we will post a notice on our websites. By continuing to participate in our programs, and/or use our services or purchase our products after the modified version of the policy has been posted, you are accepting the changes to the policy, subject to any additional requirements which may apply. If you do not agree to the changes in our policy, it is your responsibility to stop participating in our programs, and/or using our services or purchasing our products. It is your obligation to ensure that you read, understand and agree to the latest version of the policy. The “Effective Date” at the top of the policy indicates when it was last updated.

For all other privacy related questions:

Karl's Privacy Office:

Phone: 604-859-9011

Email: Karlsmeatmarket@gmail.com

Address:

Karl's Meat Market Ltd

2621 W. Railway

Abbotsford, BC