

Loyalty Privacy Notice

Effective Date: March 13, 2019

1. General Information About This Notice

- This notice applies to our [PC Optimum](#) loyalty program and our [PC Insiders](#) paid subscription program and provides information on how we collect, use and share your personal information if you are a member of one or both of these programs.
- The *PC Optimum* program is a loyalty rewards program offered by President's Choice Services Inc., an affiliate of Loblaws Inc. The program is available through participating retail locations and websites operating under the Loblaws Inc. and Shoppers Drug Mart Inc. banners ("Participating Stores"), and certain other locations or third party program participants ("Program Participants") identified on pcoptimum.ca. Participating Stores include stores such as Loblaws, Real Canadian Superstore, No Frills, Shoppers Drug Mart, Pharmaprix, Shoppers Home Health Care and Murale.
- Our *PC Optimum* loyalty program gives you the opportunity to earn and redeem *PC Optimum* points and rewards at Participating Stores or with Program Participants that offer redemption.
- Members of the *PC Optimum* loyalty program are also eligible to join our paid subscription program, *PC Insiders*, which allows access to additional *PC Optimum* points and offers, among other benefits.
- Both programs are governed by their own terms and conditions in addition to the Loblaw Privacy Policy. If there is any inconsistency between this notice and the [Loblaw Privacy Policy](#), the Loblaw Privacy Policy will prevail.

2. What Information Do We Collect?

We understand the responsibility that comes with collecting, using, and sharing your personal information, and we are committed to protecting your privacy. "**Personal information**", as used in this notice and the Loblaw Privacy Policy, is any information that identifies you or could be reasonably associated with you.

The personal information we collect through your participation in these programs may include contact information such as your name, email address and home address, phone numbers, as well as information about the specific products and services that you purchase through our websites, mobile applications and in-store.

We collect personal information about members of our *PC Optimum* and *PC Insiders* programs in a variety of ways, including:

- Directly from members when registering for and participating in these programs (e.g., when you create your *PC Optimum* and/or *PC Insiders* account online);
- Through in-store technologies (e.g., through our point-of-sale system when you are purchasing products in-store); and
- When interacting with us online or through our mobile applications (e.g., when visiting the *PC Optimum* and *PC Insiders* websites, we may use cookies to help us personalize your webpage).

For more information on how we collect your personal information, please visit the [Loblaw Privacy Policy](#) and review the sections "How Do We Collect Personal Information?".

3. How Do We Use This Information?

The *PC Optimum* program tailors your rewards to match the food and products that you buy most or that we think may interest you. Our loyalty program aims to generally understand your needs and preferences and customize how we tailor and market products and services to you accordingly.

We use your personal information to provide you with our programs, products and services, to manage our business, to communicate offers and information we think you will be interested in, to give you a better shopping experience in-store and through our websites and mobile applications, and as permitted or required by law.

A few examples of how we use your personal information for these programs include:

- Administering and maintaining your *PC Optimum* points within your account;
- Processing your transactions and returns, online or in-store;
- Redeeming your *PC Optimum* points;
- If we have your consent, informing you about special offers and promotions that are relevant to you based on your interests, preferences and/or purchasing habits;
- Subject to your right to withdraw consent, providing you with offers or services based on the approximate location provided by your mobile device (also called “location- based advertising”); and
- Serving you with interest-based advertisements on products and services that we think may be of interest to you, subject to your right to withdraw consent as detailed in our *Interest-Based Advertising and Media Notice*.

For more information on how we use your personal information, please visit the [Loblaw Privacy Policy](#) and review the section “How Do We Use Personal Information?”.

4. How Do We Share This Information?

We may share your personal information within our group of companies or with service providers who operate on our behalf. These service providers may include subcontractors or third parties that help us operate our business, technology systems, internal procedures, infrastructure and marketing. We may share your personal information with a third party organization in order to process a transaction or manage our programs on our behalf. We may also share or disclose your personal information with third parties for other limited purposes permitted by law.

For more information about how we share your personal information, please visit the [Loblaw Privacy Policy](#) and review the section “How Do We Share Personal Information?”.

5. What Are Your Privacy Choices?

Information on how to manage your privacy choices is available in the section “How Do I Change My Privacy Choices?” of the [Loblaw Privacy Policy](#).

6. Who Can You Contact With Questions About This Privacy Notice?

If you have privacy questions relating to this notice, you can contact our Loblaw Privacy Office at loblawprivacy@loblaw.ca.