



PRIVACY POLICY AND PRIVACY NOTICE

Last Updated: September 2019

A. Introduction

Save-On-Foods Limited Partnership ("SOF"), which operates the More Rewards program, adheres to the philosophy that our customers are our greatest asset and we will earn their trust. We build our business with this philosophy in mind.

"Personal Information" is information about an identifiable individual, such as name, date of birth, gender, home address, personal phone number, personal email address, Internet Protocol (IP) address, personal interests and shopping preferences. In this policy, we explain what happens to the Personal Information we collect and how it is used and/or disclosed.

The privacy policy applicable to your transaction either at our stores or at our on-line shopping website is the privacy policy in effect on the date of your transaction and is available for your review at our stores or our online website(s). Third party websites linked from our website(s) will be governed by their own privacy policies.

This privacy policy governs SOF, its customers, employees, agents and affiliates in collecting, using and/or disclosing Personal Information during the course of SOF's business. SOF may change and update this privacy policy and privacy notice at any time without notice.

B. Privacy Principles and Privacy Policy

SOF adopts privacy practices consistent with the Canadian Standards Association's Model Code for the Protection of Personal Information. This code contains ten (10) fair information principles generally described as follows:

- 1) Accountability – An organization is responsible for Personal Information under its control designating a representative(s) responsible for its compliance with such principles.
- 2) Consent - The consent of an individual is required for the collection, use or disclosure of Personal Information unless otherwise permitted by law.
- 3) Identifying Purposes - The purpose for which Personal Information is collected shall be identified on or before the time the Personal Information is collected.
- 4) Limiting Collection of Personal Information - The collection of Personal Information shall be limited to that which is necessary for the identified purposes.
- 5) Limiting Use, Disclosure and Retention of Personal Information - Personal Information shall only be used or disclosed for the purpose for which it was collected unless otherwise allowed by law. Such Personal Information shall also only be retained as long as is necessary for the fulfillment of such identified purposes.
- 6) Accuracy - Personal Information collected shall be as accurate, complete and up to date as is necessary for the identified purposes.

- 7) Safeguards and Safekeeping - Personal information shall be secured at a level appropriate to the sensitivity of the Personal Information.
- 8) Openness - An organization shall make available information about its practices pertaining to the management of Personal Information.
- 9) Individual Access - An individual shall be informed of the existence, use and disclosure of their Personal Information and shall be given access to such Personal Information. Such individual shall be entitled to query the accuracy and completeness of the Personal Information as well as have such Personal Information amended.
- 10) Challenging Compliance - An individual shall be entitled to challenge concerns they may have with respect to an organization's compliance with the fair information principles contained herein.

C. Consent

SOF respects its customers' privacy and accordingly SOF collects, uses and/or discloses Personal Information with the customers' ("you" and "your") consent and otherwise as required or permitted by law. By providing SOF with Personal Information, you agree and consent that SOF may collect, use and/or disclose such Personal Information as authorized by you and within the parameters as permitted or required by law.

You can withdraw your consent for your Personal Information being collected, used and/or disclosed at any time. You may choose not to receive any of SOF's promotional and informational materials on products, services, contests, sweepstakes and/or events offered by SOF or its operating divisions, including, but not limited to, Save-On-Foods or Save-On-Foods Pharmacies. If you withdraw your consent, SOF will no longer be able to deliver certain services to you.

During your initial visit to any of SOF's websites, you are asked to indicate whether you wish to receive communications from SOF. There is no obligation on you to receive SOF's communications. However when you consent to receiving communications from SOF, we may contact you via email to provide you with information on new products, services, events and/or promotions available through SOF and we may ask you about your satisfaction with any of SOF's products or services.

When customers receive marketing and/or promotional emails, text messages or other electronic messages from SOF, customers may at any time choose to unsubscribe from any or all of SOF's promotional and/or marketing materials. Customers who receive promotional and/or marketing materials sent directly from a Save-On-Foods store and/or SOF by mail may also request to be withdrawn from the list of people receiving such materials by filling out the following form(s) from SOF's Customer Service Team and returning them to SOF. [Download forms here \[NOTE TO IT: Upload forms to website and update link\].](#)

When interacting with SOF via Facebook, Twitter, Pinterest and/or similar social networks, SOF may collect, use and/or disclose Personal Information that you provide or disclose to SOF, in accordance with this policy. Social networks have their own privacy policies, terms and conditions.

D. How we collect Personal Information

SOF collects personal information:

- Directly from its customers. You may provide Personal Information to us in person at our stores, by mail, email, over the telephone (calls to our Call Centre may be recorded), applications for More Rewards program, entering into contests or sweepstakes directly

controlled and managed by SOF or by its third-party suppliers, pharmacy prescriptions through SOF websites or at Save-On-Foods Pharmacies, and/or otherwise.

- Through MR Program partners. When you present your MR Card at a program partner for purposes of earning or redeeming points, certain personal and transactional information is collected for updating your MR Points balance.
- Through SOF Technology. This technology includes cookies on SOF's websites, as well as usage of SOF's websites and in-store networks. Cookies track browsing activity on a website. Cookies on SOF websites provide SOF with information about users' visits to the website and their browsing history.
- Through website, social media accounts and mobile applications. Whenever you share information about yourself across these applications and interact with us, SOF will collect Personal Information.
- Through closed-circuit television cameras ("CCTV"). SOF has CCTVs throughout its stores (with some visibility of adjacent public sidewalk and parking lot areas) and retains recordings for risk management purposes. CCTV images may also be used and/or disclosed as part of a criminal investigation where required by law or court order.

E. Personal Health Information

We recognize that personal health information ("PHI") is one of the most important types of Personal Information. PHI includes the recorded information about an identifiable individual that is related to their health or the provision of health services to the individual. Examples of PHI are: medical histories; prescriptions; test and laboratory results; mental health conditions; insurance information; and other Personal Information that our pharmacists use to provide you quality care and to meet our legal and professional requirements. This privacy policy applies to PHI we collect through our pharmacies in the same manner as other Personal Information.

We use your PHI to deliver pharmacy services to you, filling prescriptions and ensuring you are prescribed the correct medication for your needs. We use your contact information, such as your address and phone number, to verify your identity, to answer questions, or notify you about your medication – for example, if it is recalled by the manufacturer.

F. Why we collect, use and/or disclose Personal Information

SOF collects, uses and/or discloses Personal Information to manage its business, to provide efficient services to its customers and employees and as required or permitted by law, including, for the following purposes:

- to respond to and communicate regarding inquiries about SOF's business;
- to deposit loyalty points on to the appropriate More Rewards card;
- to provide information about products and services offered by SOF, including contests, giveaways, events and/or sweepstakes;
- to understand the needs of its customers and their preferences in order to establish and maintain a commercial relationship and to provide its customers with ongoing quality service;
- to manage and develop SOF's business and operations;
- to meet any legal and regulatory requirements;

- for SOF's day to day administration;
- to engage in business transactions, where appropriate, for purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing;
- to dispense medication correctly and properly and where appropriate, provide counselling/advice regarding prescriptions;
- to provide pharmacy-related information to other health care providers;
- to manage medical records;
- to obtain and process payments for prescription medications and pharmacy services;
- to connect with private health insurance providers and/or the provincial drug benefit program, where necessary, so SOF can charge the correct price on prescribed medications;
- to determine the identity of persons placing, receiving online orders on SOF's on-line shopping website and to respond to and communicate regarding orders placed;
- risk management purposes; and
- any other purpose SOF may indicate to you from time to time.

G. To whom we disclose your Personal Information

SOF may disclose Personal Information to third party agents, contractors and/or its affiliated companies that provide services on SOF's behalf with respect to the permitted uses stated above and who have agreed with SOF to keep your Personal Information confidential, including software developers (website developers and hosts), data processing providers, document management providers and office service providers. Access to Personal Information in those instances is limited to the Personal Information necessary to deliver the required services to SOF.

SOF may disclose or share Personal Information to designated individuals or entities, including, but not limited to:

- parents, caregivers, provincial drug benefit program and/or private health insurance providers and other governmental entities, as permitted by law;
- government institutions that have proven their lawful authority to obtain Personal Information from SOF; and
- comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of Personal Information.

SOF may also disclose or share Personal Information to designated individuals or entities as permitted by law.

If you prefer SOF to not share or disclose your Personal Information as described above, please contact SOF's Customer Care Support Team at 1-800-242-9229 or send an email to customer_care_support@saveonfoods.com. In particular, other than as permitted or provided by law, and subject to contractual restrictions/obligations of SOF and Personal Information that is required by SOF to properly and efficiently administer SOF's day to day activities, you always have the option to instruct us not to use your Personal Information beyond providing you with the service(s) or information you requested. In such event, however, SOF may no longer be able to provide certain service(s) or information to you.

H. Storage, Retention, Access and Deletion

At SOF, we make a conscious effort to secure and safeguard Personal Information. We securely store physical files containing Personal Information with access protocols in place. All of SOF's network drives and storage devices are protected in secure facilities by industry-approved security protocols, and have restricted access so only those individuals with proper permission have access thereto. In the event that SOF becomes aware that a security breach has resulted in any of your personal information being accessed by an unauthorized third party, we will notify you if the information is likely to result in significant harm.

Any Personal Information in the custody and control of SOF will be retained as long as necessary to fulfill SOF's purposes of collecting, using and/or disclosing Personal Information, subject to applicable law. Any Personal Information relating to More Rewards or the Save-On-Foods online shopping programs are retained until you terminate your participation in the program. Personal Information collected for risk management activities are retained for a period of 90 days or such period of time as SOF deems appropriate, unless further required for law enforcement or similar purposes, in which case the pertinent information is retained until the matter is resolved.

As permitted by law, you can, at any time, request confirmation that SOF holds any of your personal information, and you may also request access to your Personal Information that SOF may have and receive a copy in electronic format. SOF will give you access to your eligible Personal Information within such time as required by law after you make the request.

You may also request a correction or completion of your Personal Information controlled by SOF. SOF will take appropriate steps to verify the identity of anyone making a request.

I. Contact Us

If you have any questions or concerns about our privacy practices or our privacy policy, please contact our Vice President, Legal, who is our designated Privacy Officer:

Don Eng, Vice-President, Legal
Save-On-Foods
19855-92A Avenue
Langley, British Columbia,
V1M 3B6

Phone: 604-881-3668 Fax: 604-888-8521
Email: don_eng@saveonfoods.com