



## **PRIVACY POLICY**

(External)

Last Updated: January 1, 2023

Pattison Food Group Ltd. ("PFG") adheres to the philosophy that our customers are one of our greatest assets and we will earn their trust. We operate our business with this philosophy in mind.

### **1. Introduction**

#### **A. When Does this Privacy Policy Apply?**

This Privacy Policy governs the collection, use and/or disclosure of Personal Information from external sources during the course of PFG's business. It applies to the business activities of PFG, agents and affiliates in carrying out those activities. PFG may change and update this Privacy Policy at any time without notice. Revised versions of this Privacy Policy will be made available on our websites as well as from Customer Service in our stores and will be effective from the date of release.

This Privacy Policy does not apply to any third party websites linked from our websites, which will be governed by their own privacy policies.

#### **B. What is Personal Information?**

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

#### **C. What is Personal Health Information?**

We recognize that personal health information (PHI) is one of the most important types of Personal Information. This Privacy Policy also applies to the PHI we collect through our pharmacies. PHI refers to Personal Information that is related to a person's health or the provision of health services to them. Examples are: medical histories, test and laboratory results, mental health conditions, insurance information and other Personal Information that our pharmacists use to provide quality care and to meet our legal and professional requirements.

### **2. PFG Privacy Principles**

PFG has adopted 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 and for designating at least one representative responsible for its compliance with such principles.
2. **Identifying Purposes** - The purpose for which Personal Information is collected shall be identified on or before the time the Personal Information is collected.
3. **Consent** - The consent of an individual is required for the collection, use or disclosure of Personal Information unless otherwise permitted by law.
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 identified purpose(s) for which it was collected, unless otherwise allowed by law. Such Personal Information shall also only be retained for 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.

### **3. How We Manage Consent**

PFG only collects, uses and/or discloses Personal Information with your consent, or as otherwise required or permitted by law. By providing PFG with Personal Information, you agree and consent that PFG may collect, use and/or disclose such Personal Information in compliance with this Privacy Policy, as expressly authorized by you, or as permitted or required by law.

#### **A. Websites**

During your initial visit to any of PFG's websites, upon enrolment in More Rewards, registering for an online shopping account, or visiting our subscription website(s), you may be asked to indicate whether you wish to receive promotional communications from PFG. If you consent, we may send you emails such as those containing information on new products, services, events and/or promotions relating to PFG, and we may ask you about your satisfaction with any of PFG's products or services. There is no obligation to receive these communications, and you can unsubscribe at any time.

#### **B. Social Media**

When interacting with PFG via Facebook, Twitter, Instagram and/or similar social networks, PFG may collect, use and/or disclose Personal Information that you provide or disclose to us,

in accordance with this Privacy Policy. Social networks also have their own privacy policies, terms and conditions.

### **C. More Rewards program**

When you enroll in our More Rewards customer loyalty program (“More Rewards”), you provide us with certain Personal Information and consent to us using it to administer the More Rewards program, as well as your membership. You may also expressly consent to receiving promotional More Rewards emails from PFG.

#### **How Do I Withdraw Consent?**

You can withdraw your consent at any time to us collecting, using and/or disclosing your Personal Information. If you withdraw your consent, PFG will no longer be able to deliver certain services to you. Withdrawing consent from the More Rewards program will affect your membership and your ability to participate in the program, including your access to “card prices” and collecting More Rewards points. [Download Withdraw Consent form here.](#)

#### **How Do I Unsubscribe?**

When you receive commercial and/or promotional emails, text messages or other electronic messages from PFG, you may choose to stop receiving future messages by using the “unsubscribe” link or “STOP” process provided in the message.

You may also request to stop receiving marketing materials from PFG by postal mail by filling out the “Opt-Out” form and returning it to PFG’s Customer Service Team. [Download Opt-Out form here.](#)

## **4. Why We Collect, Use and/or Disclose Personal Information**

PFG collects, uses, and/or discloses Personal Information in order to manage its business; to provide efficient services to its customers; and as required or permitted by law, such as:

- to respond to and communicate with you regarding inquiries about PFG’s business;
- to answer questions or notify customers of issues with an item they’ve purchased – for example, if it is recalled;
- to provide information about products and services offered by PFG, including contests, giveaways, events and/or sweepstakes;
- to administer the More Rewards program;
- to process transactions on the appropriate More Rewards card;
- to determine the identity of persons placing, receiving online orders on PFG’s on-line shopping website and to respond to and communicate regarding orders placed;
- to understand the needs of our customers and their preferences;
- to establish and maintain a business relationship with our customers;
- to provide customers with ongoing quality service;
- to manage and develop PFG’s business and operations;
- to meet any legal and regulatory requirements;
- for PFG’s day to day business administration;
- to help ensure customers are prescribed and dispensed the proper medication and that fits their individual needs;
- to 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 PFG can charge the correct price on prescribed medications;
- risk management purposes; and
- any other purpose PFG may indicate to you from time to time.

## **5. How We Collect Personal Information**

### **A. Directly from you**

Your Personal information will be collected when you use your More Rewards card or account at a store or business, when you provide your Personal Information to us at stores, by mail, email, calls to our Customer Service Call Centre, by applying for membership in the More Rewards program, entering into contests or sweepstakes directly controlled and managed by PFG or by its third-party suppliers, filling pharmacy prescriptions through PFG websites or at PFG Pharmacies, and other direct interactions.

### **B. Through PFG Technology**

PFG technology includes cookies on PFG's websites, as well as other data collected from your use of PFG's websites and in-store networks. Cookies track browsing activity on a website. Cookies on PFG websites provide PFG with information about your visits to the website and your browsing history.

### **C. Through website, social media accounts and mobile applications**

PFG will collect the Personal Information you share with us through these applications and/or interactions.

### **D. Through closed-circuit television cameras ("CCTV")**

PFG 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 police investigation where required by law or a court order.

## **6. To Whom We Disclose Your Personal Information**

### **A. Third-Parties**

PFG may disclose Personal Information to its third party agents, contractors and/or affiliated companies that provide services to PFG with respect to the permitted uses stated above. These third parties have contractually agreed with PFG to keep your Personal Information confidential, including software developers (website developers and hosts), data processing providers, document management providers and office service providers. Third parties will only have access to the Personal Information that is necessary to deliver the services to PFG.

### **B. Designated Entities**

PFG may disclose or share Personal Information in certain lawful circumstances, including but not limited to the following:

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

PFG takes the security of Personal Information seriously and uses industry-approved practices to safeguard it. In the event that PFG becomes aware that any of your Personal Information has been accessed by an unauthorized third party, we will notify you if we determine that such access is likely to result in significant harm to you.

### **What If You Don't Want Your Personal Information Disclosed?**

If you do not want PFG to disclose your Personal Information as described in this Privacy Policy, please contact PFG's Customer Care Support Team at 1-800-242-9229 or send an email to [customer\\_care\\_support@PattisonFoodGroup.com](mailto:customer_care_support@PattisonFoodGroup.com). In particular, other than as permitted or provided by law, and subject to contractual restrictions/obligations of PFG and Personal Information that is required by PFG to properly and efficiently administer PFG's day to day activities, you always have the option to instruct us to stop disclosing your Personal Information beyond what is necessary to provide you with the service(s) or information you requested. In such event, however, PFG may no longer be able to provide certain service(s) or information to you. [Download the "Withdraw Consent" form here.](#)

## **7. Storage, Retention, Access, Correction, and Deletion of Personal Information**

### **A. Storage**

PFG securely stores all physical Personal Information in its possession using appropriate access protocols. All of PFG's network drives and electronic storage devices are protected in secure facilities by industry-approved security protocols, and we have restricted access to Personal Information to only those individuals who have a business need for it.

### **B. Retention**

PFG will retain Personal Information for only as long as is necessary to fulfill PFG's purposes set forth above, subject to applicable law.

PFG may retain any Personal Information relating to More Rewards or the PFG online shopping programs as is required for the administration of those programs.

Personal Information collected by PFG for risk management activities is retained for a period of 90 days, or such period of time as PFG deems appropriate. If your Personal Information is required for law enforcement or similar purposes, it will be retained until the matter is resolved.

### **C. Access**

As permitted by law, you can request confirmation that PFG holds your Personal Information, and you may also request access to Personal Information that PFG may have

and receive a copy in electronic format. After you submit a request, PFG will give you access to, or a copy of, your eligible Personal Information within such time as required by law. [Download Request For Personal Information form here.](#)

**D. Correction or Deletion**

You may also request that PFG correct or delete your Personal Information in our possession. PFG will take appropriate steps to verify the identity of anyone making such a request. [Download Amend Personal Information form here.](#)

**8. Contact Us**

If you have any questions or concerns about this Privacy Policy or PFG's privacy practices, please contact our designated Privacy Officer:

Pattison Food Group  
19855-92A Avenue  
Langley, British Columbia, V1M 3B6  
ATTN: Privacy Officer

Email: [Privacy@PattisonFoodGroup.com](mailto:Privacy@PattisonFoodGroup.com)