

## PRIVACY CHARTER

The Canadian Tire Privacy Charter ("**Privacy Charter**") is our commitment to you. It is our organization-wide policy on how all companies in the Canadian Tire family protect your personal information.

### Policy on Privacy of Customer Personal Information

Canadian Tire is committed to protecting the privacy and security of your personal information obtained by reason of your customer relationship with Canadian Tire. A customer relationship may be established with us by way of your shopping at a store within our family of companies, visiting our websites, installing our mobile applications, joining our loyalty reward program or other loyalty or preferred customer programs that may exist from time to time (each a "**Loyalty Program**"), through your banking interactions with us or engagement with our financial products and services, or your other interactions with us.

The Privacy Charter explains the types of customer personal information we collect, how it is used, and the steps we take to ensure your personal information is handled appropriately. Our policies and practices have been designed to comply with federal and provincial private sector privacy legislation. The Privacy Charter may be amended from time to time. A copy of the most current version of the Privacy Charter may be obtained on our websites or by contacting us ([See "Contact Information" below](#)). We encourage you to review the current Privacy Charter from time to time. A list of frequently asked questions (**FAQs**) is also available on our website to provide you with answers to commonly asked questions about how your personal information may be collected, used and disclosed.

### Who is Canadian Tire?

For purposes of this Privacy Charter, "Canadian Tire" means Canadian Tire Corporation, Limited and its family of companies including Canadian Tire Retail, Canadian Tire Services Limited, Canadian Tire Bank, Canadian Tire Real Estate Limited, Party City, Mark's, FGL Sports Ltd., Canadian Tire Petroleum, PartSource, and all other subsidiaries of the Canadian Tire Corporation, Limited. Canadian Tire also includes any successors or subsidiaries of the above-listed companies.

Canadian Tire Corporation, Limited and its family of companies operates as one company. As such, data collected through any of the family of companies may be shared with Canadian Tire Corporation, Limited, and between the family of companies in a manner that is consistent with our Privacy Charter.

Canadian Tire stores, Party City stores, and certain Mark's and FGL stores are owned and operated by independent dealers or franchisees. Canadian Tire gas bars are operated under license by independent retailers. As independent businesses within the Canadian Tire family of

companies, these dealers, franchisees, and retailers are responsible under applicable laws for adopting their own privacy policies to protect your personal information in a manner consistent with this Privacy Charter.

## **What is Personal Information?**

Personal information is information that can be used to identify an individual. Personal information includes, but is not limited to, your name, address, age, income, date of birth, gender, biometric information, financial information and credit records, as well as your opinions, preferences and purchase patterns.

We collect different categories of personal information depending on how you interact with us.

### **Types of personal information we collect:**

- **Information You Give Us:** You may provide us with information through your request for services or the use of our products or services. This includes, but is not limited to, information you provide through participation in our Loyalty Program, the use of our financial services, the use of our digital platforms and mobile applications, or the purchase and use of any products or services we offer. We may receive and store any information you provide in order for us to complete a transaction or provide you with our products or services. You can choose not to provide certain information to us, but you may not be able to take full advantage of all of our products or services as a result of the limited information made available to us.
- **Information Collected Automatically:** Certain products, such as smart devices, may automatically collect personal information when in use to optimize your experience with the product. We also automatically collect and store certain types of information about your use of our websites and apps, including information about your interaction with content and services. This may include, but is not limited to, tracking cursor movements to determine purchasing patterns and shopping behaviours. We may use “cookies” or other unique identifiers and technologies such as “tracer tags”, “pixels”, or “web beacons” to collect this information when you visit our websites. The information collected through these technologies may include Internet Protocol (IP) addresses, components of the website you have clicked on or engaged with and website settings. Cookie preferences can be controlled through your browser to notify you when you receive a cookie or to not accept certain cookies. You can learn more about cookies and similar technologies in the FAQs.

We may also use automated decision-making tools and practices as a part of our day-to-day operations to assist us in making our business decisions. Automated decision-making involves the use of technology to make a decision with limited or no human involvement. For more information about our use of automated decision-making, please contact us ([See “Contact Information” below](#)).

- **Information from Other Sources:** We may receive information from third parties who provide us with services. This includes, but is not limited to, our advertising and social media partners and platforms, security or fraud prevention service providers and identity verification service providers.

We apply our Privacy Principles to all personal information in our care, regardless of how the information was obtained. You may contact us ([See “Contact Information” below](#)) if you have any questions about how we collect, use, and disclose your personal information.

## **Privacy Principles:**

### **1. We are accountable to you**

Canadian Tire is responsible for all personal information in its custody and under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. To achieve this objective, Canadian Tire has developed and implemented this Privacy Charter as part of our overall privacy framework.

### **2. Why we collect your personal information**

Canadian Tire identifies the purpose for which your personal information is collected. We do this before or at the time the information is being collected. We may collect, use and disclose your personal information for:

- **Administrative and operational purposes in order to:**
  - process and administer your payment for the purchase of products or services if you make a purchase online or in one of our stores;
  - process your application for a product and/or provide a service, such as the administration of the Loyalty Program or a financial product;
  - assess and update your creditworthiness on an ongoing basis;
  - process, service, analyze and audit your relationship with us, including collecting any money you owe us;
  - administer the delivery, return or exchange of products, services, rewards and programs to you;
  - support promotions and contest administration;
  - perform tests to implement or modify systems;
  - process and respond to your application for employment; and,
  - respond to your questions, comments or requests to customer service;
- **Marketing, advertising, and research in order to:**

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- better understand your product and service needs and to offer relevant information, products, services, rewards and programs, and advertising to meet those needs, including sending you communications by way of postal mail, e-mail, telephone, text message, or other type of electronic message;
  - solicit feedback to provide product insights to share with other customers, for product reviews, to improve our products and services, and to generate review content for our website;
  - track and analyze your purchases, other transactions, shopping patterns, account activity, and payment history for marketing analysis purposes, and to tailor promotional offers to you or provide you with relevant advertisements through our advertising partners and platforms;
  - track and analyze website use, including through the use of cookies, pixels, tracer tags or web beacons, to provide a better customer experience such as customized offers and advertisements; and,
  - conduct surveys and analysis for research, statistical and product development purposes (information will be de-identified to the extent possible);
- **Security and fraud prevention purposes, and to manage our business risks in order to:**
    - verify your identity and protect against error and fraud; and,
    - manage and assess our business risk;
  - **Compliance with legal and regulatory requirements in order to:**
    - comply with applicable legal, regulatory, and self-regulatory requirements; and, achieve other purposes as may, from time to time, be permitted or required by law.

Your personal information may be used in automated decision-making practices for the identified purposes. For more information about the automated decision-making practices that we use you can contact us ([See "Contact Information" below](#)).

**By providing your information to Canadian Tire, you consent to Canadian Tire using your personal information for the purposes outlined above.**

Withdrawal of consent to collect, use and disclose your personal information may restrict our ability to provide you with some products and services, such as the privileges and opportunities of being a member of a Loyalty Program.

### **3. We obtain your consent to collect, use or disclose your personal information**

Canadian Tire obtains your consent to collect, use or disclose your personal information, except as otherwise permitted by law. Consent may be oral or written, express or implied. We may rely

on implied consent to collect, use, or disclose your personal information in circumstances where a customer relationship already exists or the purpose of using the personal information is reasonably apparent to you. Your express consent (verbal, written or electronic agreement) is generally obtained to collect, use or disclose sensitive personal information such as your financial information, biometric information or information about minors. The method of obtaining consent may depend on the circumstances and the sensitivity of the information and will be appropriate to the type of personal information being collected, used or disclosed.

### **Consent for minors**

We do not knowingly collect, use, or disclose the personal information of minors under the age of 13 without the prior express consent of a parent or guardian. If a minor under the age of 13 and under your guardianship has provided us with their personal information without your consent, you may contact us to request that the personal information be removed ([See “Contact Information” below](#)).

### **Benefits you receive through consent**

Canadian Tire is a growing network of interrelated businesses offering a unique mix of products and services. We want to give you exceptional customer service and additional value which is facilitated by sharing your information within Canadian Tire and across our various businesses. This sharing enables us to better understand our customers, and notify current and new customers of products, services, rewards and special offers they might enjoy. With your consent, we may also provide your personal information to Canadian Tire affiliates or other third-party marketing partners (“**Marketing Partners**”), including advertising and social media partners and platforms, and marketing partners under a Loyalty Program, so that they can notify you directly of products, services, rewards and special offers that may be of interest to you. These notices may be given to you by postal mail, e-mail, telephone, text message, social media or other form of electronic message using the contact information that you provide to us.

### **“Opting-out” or withdrawing your consent**

If you decide that you do not want to receive marketing offers for products and services, you may always withdraw or refuse your consent by clicking on the unsubscribe link in our email communications or by contacting us ([See “Contact Information” below](#)). Your request will be promptly processed but may not be processed in time to remove you from promotions already in progress. Please note that even if you have opted out of receiving marketing communications, we may still contact you for purposes of administering your account and sending you transactional or operational messages to complete a transaction.

### **The consequences of withdrawing or refusing consent**

If you decide to withdraw or refuse your consent, our ability to communicate with you about upcoming promotional offers may be diminished. For example, we will generally not be able to tell you about price discounts, rewards, customized balance transfer offers, contests, or other products and services that may be of value to you.

#### **4. We limit collection of your personal information**

Canadian Tire collects the information required to provide products and services to you and as otherwise outlined in this Privacy Charter. If the personal information we require is collected for a reason other than as outlined in this Privacy Charter, your consent will be obtained before or at the time the information is collected or as otherwise permitted by applicable law. Canadian Tire will collect personal information by clear, fair and lawful means.

#### **5. We limit use, disclosure and retention of your personal information**

Canadian Tire uses and discloses your personal information for the purposes for which it was collected, except with your consent or as otherwise required or permitted by applicable law. We do not sell or rent personal information.

#### **Data Transfers with Third Parties**

We may transfer your personal information to entities outside Canadian Tire, such as our vendors, suppliers and agents (“**Service Provider**”) who require the information in order to perform a service for us. When your personal information is transferred to a Service Provider, we require them to protect the information in a manner that is consistent with this Privacy Charter. Our Service Providers may be located outside of Canada and may be required to disclose your personal information under the laws of their jurisdiction. You may contact us for information about our policies and practices regarding Service Providers to whom we have transferred your personal information and their locations (see “Contact Information” below).

We may share certain personal information (including your name, email address, phone number, shipping and billing address, transaction-level details, account information and purchase history, IP address and other information about your device and activity on our site (“**Fraud Prevention Data**”) with our fraud prevention partner to help us detect and prevent fraudulent transactions. As a Service Provider, our fraud prevention provider will use the Fraud Prevention Data to train and improve its products and will combine the Fraud Prevention Data with information it receives from third-party data sources and other clients to assist those clients with the detection and prevention of fraudulent transactions on their platforms. For more information about the manner in which our fraud prevention partner treats your personal information, or for instructions on how to access, correct or delete the personal information maintained by our fraud prevention partner, see their [Privacy Policy](https://www.signifyd.com/privacy/) at <https://www.signifyd.com/privacy/>.

We may share personal information (including your name, account number, address, social insurance number, telephone number, date of birth, employment history, purchase history and outstanding balances) with our third-party collection agencies as a part of a file transfer for their services. As a Service Provider, the collection agencies that we work with review this information to assist us in collecting any outstanding balances on delinquent accounts.

We may also use third parties such as ad networks, social media and other advertising companies and platforms to serve more relevant advertisements on our websites and apps, and on other websites or apps, and to better understand our customers. We may provide a hashed version of your email address or other non-sensitive information to the platform provider for such purposes. As a Service Provider, these companies may use cookies, pixels, tracer tags or web beacons to report certain information about your visits to our websites and other websites and apps (such as web pages you visit and your response to ads) in order to measure the effectiveness of our marketing campaigns and to deliver ads that are more relevant to you, both on and off our websites and apps. These companies may also use your personal information in automated decision-making practices to serve you with ads that may be more relevant to you.

In the event that Canadian Tire, any of its affiliated companies, brands or substantially all of their assets are acquired by an unrelated third party, your personal information may be one of the transferred assets. By providing your personal information to us, you agree that we may disclose your personal information, on a confidential basis, to any prospective transferee and its professional advisors for the purposes of their due diligence investigations, the completion of any such transaction and the continued operation of the acquired business.

Canadian Tire, our various businesses within the Canadian Tire family of companies and Service Providers may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required or permitted by applicable Canadian or international law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

### **Residents of Quebec**

In accordance with Quebec private sector privacy legislation, Canadian Tire assesses personal information that is being transferred outside of Quebec to ensure that the information receives adequate protection. As a company with operations across Canada, Canadian Tire Corporation, Limited and its family of companies may transfer your information outside of Quebec to better serve you as a customer.

### **Data Retention Practices**

Canadian Tire retains your personal information for as long as it is required for the identified purpose or as required by law. Personal information that is no longer required to be retained is destroyed in a safe and secure manner in accordance with our policies.

## **6. We keep your personal information accurate**

We want to keep your personal information up-to-date, accurate and relevant for its intended use. We rely on you to let us know if your address, telephone number or other information you provide us changes, so that we may provide you with the best possible service. If you would like to update your personal information, you can do so by contacting us (see “Contact Information” below).

## **7. How we protect your personal information**

The security of your personal information is important to us. We have implemented appropriate technical, physical and administrative safeguards and security measures such as data encryption, access controls and policies and procedures that are designed to protect your personal information. All of our Service Providers are required under their contracts with us to maintain your confidentiality and may not use your information for any unauthorized purpose. When we are required by law to provide information, we take reasonable steps to verify the lawful authority for the collection and we disclose only the information that is legally required. We review our procedures and security measures regularly to ensure that they are properly administered and remain effective and appropriate for the sensitivity of the information.

## **8. We are open about our privacy practices**

We are committed to providing you with understandable and easily available information about our policies and practices related to management of your personal information. If you would like to learn more about our policies and practices, you can do so by contacting us (see “Contact Information” below).

## **9. You can access your personal information stored by us**

You have the right to access, update and correct inaccuracies in your personal information in our custody or control. To access your personal information, a request must be submitted in writing to us (see Contact Information below). We will respond to your request for access or information in a reasonable time. There may be times when we are unable to fulfill your request - for example, if providing access to your personal information would reveal confidential commercial or proprietary information or personal information about someone else (and we are unable to separate your data), or if we are prohibited by law from disclosing the information. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records.

## **10. We respond to your questions, concerns and complaints about privacy**

Canadian Tire responds in a reasonable time to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures. We will investigate and respond to any concern you have regarding the handling of your personal information. In most cases, a question, concern or complaint can be resolved through discussion with our team.

### **Contact Information**

You may contact us:

- By calling our Customer Relationship Contact Centre at 1-866-846-5841
- By e-mail at [privacyinquiries@ctfs.com](mailto:privacyinquiries@ctfs.com)
- By mail at 2180 Yonge Street, P.O. Box 770, Station K, Toronto, ON M4P 2V8 – Re:

### **Privacy Office**

If your questions, concerns and complaints have not been resolved to your satisfaction or if you have further questions, you can contact Canadian Tire's Chief Privacy Officer by mail at: Chief Privacy Officer c/o Canadian Tire Corporation, Limited, 2180 Yonge Street, P.O. Box 770, Station K, Toronto, ON M4P 2V8 or by email at [privacyoffice@cantire.com](mailto:privacyoffice@cantire.com).

## PRIVACY STATEMENT

Our privacy statement provides a quick reference to the key privacy points of the Privacy Charter. It also provides you information on your choices and important contact information.

<p><b>Scope</b></p>	<ul style="list-style-type: none"> <li>• Canadian Tire is committed to protecting and caring for your personal information. This statement highlights how Canadian Tire Corporation, Limited and its family of companies collects, uses and discloses your personal information. Canadian Tire means Canadian Tire Corporation, Limited and its family of companies including Canadian Tire Retail, Canadian Tire Services Limited, Canadian Tire Bank, Canadian Tire Real Estate Limited, Party City, Mark's, FGL Sports Ltd., Canadian Tire Petroleum, PartSource and all other subsidiaries of the Canadian Tire Corporation, Limited. Canadian Tire also includes any successors or subsidiaries of these companies.</li> <li>• This statement applies to our customer personal information practices in our stores, on our websites, mobile applications and through our other interactions with you.</li> </ul>
<p><b>Personal Information Collected</b></p>	<ul style="list-style-type: none"> <li>• Personal Information is information that can be used to identify you, including but not limited to, your name, address, email address, age, income, date of birth, gender, biometric information, financial information and credit records, as well as your opinions, preferences and purchase patterns.</li> <li>• We obtain information directly from you when you apply for or purchase a product or a service, interact with our financial products and services, or enroll in the Canadian Tire loyalty reward program or other loyalty or preferred customer programs that may exist from time to time (each a Loyalty Program). We also obtain information automatically and from other sources through your other interactions with us, such as surveys, website activities, call monitoring and contests.</li> <li>• Canadian Tire Corporation, Limited and its family of companies operates as one company. As such, data collected through any of the family of companies may be shared with Canadian Tire Corporation, Limited, and between the family of companies in a manner that is consistent with our Privacy Charter.</li> <li>• We may obtain information with your consent from third parties, such as your credit history which is obtained from credit bureaus, or information from our advertising and social media partners and platforms.</li> </ul>
<p><b>Use of Cookies, Pixels, Tracer Tags, Web</b></p>	<ul style="list-style-type: none"> <li>• When you use our websites or engage with us through our digital platforms, we may use “cookies” or other unique identifiers and technologies such as “tracer tags”, “pixels”, or “web beacons” to automatically collect certain information about you. The information collected through these technologies</li> </ul>

<p><b>Beacons, and Similar Technologies</b></p>	<p>may include Internet Protocol (IP) addresses, components of the website you have clicked on or engaged with and website settings. Cookie preferences can be controlled through your browser to notify you when you receive a cookie or to not accept certain cookies. You can learn more about cookies and similar technologies in the FAQs.</p>
<p><b>Consent</b></p>	<ul style="list-style-type: none"> <li>• We obtain your consent to collect, use or disclose your personal information, except as otherwise permitted by law. Consent may be oral or written, express or implied. We may rely on implied consent to collect, use, or disclose your personal information in circumstances where a customer relationship already exists or the purpose of using the personal information is reasonably apparent to you. Your express consent (verbal, written or electronic agreement) is generally obtained to collect, use, or disclose sensitive personal information. The method of obtaining consent may depend on the circumstances and the sensitivity of the information and will be appropriate to the type of personal information being collected, used, or disclosed.</li> <li>• We do not knowingly collect, use, or disclose the personal information of minors under the age of 13 without the prior express consent of a parent or guardian.</li> <li>• If you decide that you do not want to receive marketing offers for products and services, you may always withdraw or refuse your consent by clicking on the unsubscribe link in our email communications or by contacting us.</li> </ul>
<p><b>Uses</b></p>	<ul style="list-style-type: none"> <li>• Your personal information is only used or disclosed for the purpose for which it was collected or as otherwise permitted or required by law.</li> <li>• We do not sell or rent personal information. We only transfer your personal information within Canadian Tire and to current or future partners including our Service Providers.</li> <li>• We use your personal information for administrative and operational purposes, such as to process and administer your payment for the purchase of products or services, or administer a service related to a Loyalty Program or our financial products.</li> <li>• We use your personal information in order to process your application for a product, service or Loyalty Program and administer delivery of products, services and loyalty rewards.</li> <li>• We use your information for marketing, advertising, and research purposes to better understand your product and service needs and to offer relevant information, products, services and rewards to meet those needs, as well as to improve our products, services and website. Your purchases and other transactions, shopping patterns, account activity and payment history are</li> </ul>

	<p>tracked and analyzed for marketing purposes and for making promotional offers to you.</p> <ul style="list-style-type: none"> <li>• We also use your information for security and fraud prevention purposes, to manage our business risks, and to comply with legal and regulatory requirements.</li> <li>• Your personal information may be used in automated decision-making practices for the identified purposes.</li> <li>• For a full list of why we collect your personal information, see our Privacy Charter and FAQ.</li> </ul>
<p><b>Data Transfers and Retention</b></p>	<ul style="list-style-type: none"> <li>• We may transfer your Personal Information within Canadian Tire and to third party Service Providers who assist us in serving you, such as vendors, suppliers, and agents; however, we require them to protect your information in a manner consistent with our Privacy Charter. Our service providers may be located outside of Canada and may be required to disclose personal information under the laws of their jurisdiction.</li> <li>• For residents of Quebec, Canadian Tire assesses personal information that is being transferred outside of Quebec to ensure that the information receives adequate protection. As a company with operations across Canada, Canadian Tire Corporation, Limited and its family of companies may transfer your information outside of Quebec to better serve you as a customer.</li> <li>• We may transfer your personal information to our third-party fraud prevention partners to help us detect and prevent fraudulent transactions. Please see our <a href="#">Privacy Charter</a> for more information.</li> <li>• We may share your personal information with our social media and advertising partners and platforms to enable us to better understand our customers to serve more relevant ads to you and/or others on social media and other platforms, and to help us improve our advertising practices. These partners may use your personal information in automated decision-making practices to serve you with ads that may be more relevant to you.</li> <li>• Canadian Tire retains your personal information for as long as it is required for our business relationship or as required by law. Personal information that is no longer required to be retained is destroyed in a safe and secure manner in accordance with our policies.</li> </ul>
<p><b>Choices</b></p>	<ul style="list-style-type: none"> <li>• You may access, update or correct your personal information that we have in our custody or control by submitting a written request to us.</li> </ul>

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	<ul style="list-style-type: none"><li>• If you decide that you do not want your personal information used or shared for marketing products and services to you, you may opt out of receiving promotional offers and contests at any time by calling us toll-free at 1-866-846-5841.</li></ul>
<b>Important Information</b>	<ul style="list-style-type: none"><li>• For full details of Canadian Tire’s privacy policy and frequently asked questions concerning our privacy policy, go to <a href="http://www.canadiantire.ca">www.canadiantire.ca</a> to view our Privacy Charter and the FAQs.</li></ul>
<b>How to Reach Us</b>	<ul style="list-style-type: none"><li>• By calling our Customer Relationship Contact Centre at 1-866-846-5841</li><li>• By e-mail at <a href="mailto:privacyoffice@cantire.com">_privacyoffice@cantire.com</a></li><li>• By mail at 2180 Yonge Street, P.O. Box 770, Station K, Toronto, ON M4P 2V8 – Re: Privacy Office</li></ul> <p>If your questions, concerns and complaints have not been resolved to your satisfaction or if you have further questions, you can contact: Canadian Tire’s Chief Privacy Officer by mail at Chief Privacy Officer c/o Canadian Tire Corporation, Limited, 2180 Yonge Street, P.O. Box 770, Station K, Toronto, ON M4P 2V8 or by email at <a href="mailto:privacyoffice@cantire.com">privacyoffice@cantire.com</a>.</p>

## PRIVACY FAQ

Canadian Tire knows that our customers trust us with their personal information, and we intend to continually earn that trust by treating your personal information with care. Canadian Tire has a [Privacy Charter](#) which explains how we collect, use and disclose the customer personal information in our care. The Privacy Charter and these frequently asked questions are available on our website, [www.canadiantire.ca](http://www.canadiantire.ca) under **Privacy Policy** or on request.

### 1. Who is Canadian Tire?

Canadian Tire is Canadian Tire Corporation, Limited and its family of companies. Canadian Tire also includes any successors or subsidiaries of the Canadian Tire Corporation, Limited and its family of companies.

Canadian Tire stores, Party City stores, and certain Mark's and FGL stores are owned and operated by independent dealers or franchisees. Canadian Tire gas bars are operated under license by independent retailers. As independent businesses, these dealers, franchisees, and retailers are responsible under applicable laws for adopting their own privacy policies to protect your personal information in a manner consistent with our Privacy Charter.

Canadian Tire Corporation, Limited and its family of companies include:

- Canadian Tire Retail;
- Canadian Tire Services Limited;
- Canadian Tire Bank;
- Canadian Tire Real Estate Limited;
- Party City;
- Mark's/L'Équipeur;
- FGL Sports Limited., including Sport Chek, Sports Experts, Atmosphere, Pro Hockey Life, and Trio Hockey;
- Canadian Tire Petroleum; and
- PartSource.

Canadian Tire Corporation, Limited and its family of companies operates as one company. As such, data collected through any of the family of companies may be shared with Canadian Tire Corporation, Limited, and between the family of companies in a manner that is consistent with our Privacy Charter.

### 2. What is “personal information”?

Personal information is information that can be used to identify an individual. Personal information includes, but is not limited to, name, address, email address, age, income, date of birth, gender, biometric information, financial information and credit records, as well as your opinions, preferences, behavioural and purchase patterns.

### 3. **Why do we need your personal information?**

You do not have to provide us with personal information to purchase merchandise, but in certain instances, we need your personal information in order to do business with you. The following are some examples of the personal information that our Retail Services, Financial Services and the Canadian Tire loyalty reward program or other loyalty or preferred customer programs (each a “Loyalty Program”) need and the reasons why this information is needed. The following also includes examples of how we collect and use demographic information, and how information is used in smart device products under our owned brands.

#### Retail Services and Loyalty Programs

Most of the information collected about you for retail services is very basic information that we need to complete a purchase, provide you with a refund or exchange or process and keep track of transactions. Examples of information that may be collected to complete an in-person purchase, or refund may include things such as your name, address, telephone number, and a description of the item requested or purchased.

Generally, we request your address and phone number only if the item you purchased will be sent to you at a later date, or if you are receiving a refund.

If you make a purchase, we collect personal information such as your name, address, email address, phone number, and credit card information. For details about the information we collect on our websites, see question 11 below on “cookies”.

#### Financial Services

Banks and financial institutions require certain information in order to open credit-related accounts and deposit accounts. For example, name, address and date of birth are required to identify you and process your application; information about your background (for example, occupation) and financial circumstances like assets, income, other financial commitments, are required to determine if you are eligible for products and services; credit reports and other information are required to assess and update your credit worthiness; and, transactional and payment patterns are required to identify credit risk, fraud risk, and suspicious activities and to fulfill regulatory obligations.

Depending on the financial product, some information is required by law. For example, your name, address, date of birth, employment information and details of government issued identification documents are required under anti-money laundering and anti-

terrorist financing regulations, and your social insurance number (SIN) is required for reporting purposes under the Income Tax Act.

#### Demographic Information

We may use personal information in an aggregated, de-identified form about our customers to improve our services, to study trends, for statistical analysis, to develop products and programs, for marketing purposes and/or for industry reporting purposes. We may share such aggregated, de-identified information with members of the Canadian Tire family of companies, our partners, our agents, and service providers, including our advertisers and social media partners and platforms.

#### Smart Devices

Smart devices, such as NOMA iQ products, which are connected to other devices or networks through Bluetooth, near field communication (NFC) or Wi-Fi for example, may collect personal information in order to provide you with device functionality or features. Smart devices may be connected to device management apps that allow you to control and manage your smart devices. These apps collect personal information during set up and while in use to operate. Different devices may collect different information. For example, a smart light bulb may collect information about the lighting schedule you have set for the connected devices. A smart power bar may collect information about when the device is on or off.

### **4. When do we ask for your Social Insurance Number (SIN)?**

#### Financial Services

When you apply for products such as a deposit account or GIC, we are required to collect your SIN for reporting purposes under the Income Tax Act.

We may also ask for your SIN for other purposes, however, providing your SIN for other purposes is optional. Your SIN is used by credit bureaus/consumer reporting agencies to distinguish you from others with a similar name and to provide us with more accurate and timely credit bureau/consumer reporting agency information. We do not treat you differently because you choose not to disclose your SIN for these purposes.

### **5. When do we need a credit bureau report?**

If you are applying for a credit-related product or service through our financial services, we need a credit bureau report on you to determine your credit-worthiness and the appropriateness of granting you credit. We will also continue to obtain credit reports, from time to time, to update your credit-worthiness in order to administer the credit facility or loan. The credit/consumer reporting system relies on the accuracy and completeness of the information provided to credit bureaus/consumer reporting

agencies. As such, during the term of a credit facility or loan, we will collect, use, or share your personal information with the credit bureaus/consumer reporting agencies to support and maintain the integrity of the credit/consumer reporting system. However, if an account is closed voluntarily with no balance remaining on the account, we will stop providing the related account information to the credit bureaus.

## **6. How do we obtain your consent to use your personal information?**

We obtain your consent in different ways depending on the circumstances and the sensitivity of the information. Consent may be oral or written, express or implied. Your express consent (verbal, written or electronic agreement) will generally be obtained to collect, use, or disclose sensitive personal information such as your personal financial information. We may rely on implied consent to collect, use or disclose your personal information in circumstances where a customer relationship already exists or the purpose of using the personal information is reasonably apparent to you.

We do not knowingly collect, use, or disclose the personal information of minors under the age of 13 without the prior express consent of a parent or guardian.

In certain circumstances, the law permits or requires that we collect, use or share your personal information without your consent. For example, we may provide your personal information in response to a search warrant, or other legally valid inquiry. We may also provide your personal information to an investigative body in the case of a breach of an agreement or a contravention of law, to realize on security pledged for a loan, or to investigate or prevent loss or harm to persons or property.

## **7. What information do we need from you?**

In order to provide you with products or services, administer your account and provide you with exceptional customer service, there is certain personal information that our Retail Services (for example, Canadian Tire Retail, Mark's, Canadian Tire Petroleum, FGL and Partsource), Financial Services (for example, Canadian Tire Financial Services Limited and Canadian Tire Bank) and Loyalty Program may need from you. The following are some examples of the information that we may need from you and the reasons why this information is needed.

### Retail Services

Mark's has created an online database on marks.com. Customers may register on the database to enable tracking of on-line purchases at www.marks.com. Registration is entirely voluntary, and customers may correct their information or remove themselves from the database at any time. Mark's may also collect personal information about employees of various companies who are Mark's corporate clients. For example, a company may contract with Mark's to supply all of its employee uniforms. When the

employee of a corporate client makes his or her purchase, Mark's collects information about the nature of that employee's purchases and may provide that information to the employer.

The Canadian Tire and Party City websites may collect your name, email, postal code, country and phone number in order to provide you with information on upcoming sales. Mark's may collect your email address, name, address, city, province, country, postal code, gender, household income and age range in order to provide you with advance notice of upcoming promotions and exclusive offers, news of on-line and in-store special event, information on products and services and notices of contests. PartSource may collect your name, email and postal code in order to send you a monthly e-newsletter and money saving coupon offers. Our Retail Services may also collect information from you if you choose to provide us with feedback on your customer experience through our customer feedback surveys.

#### Financial Services

We need your name and address in order to prepare and send you a monthly statement for your card account.

Canadian Tire Bank is also required by law to verify the identity and background of its customers before entering into a business relationship or opening an account. Canadian Tire Bank uses third parties including credit bureaus/consumer reporting agencies for these purposes and we need your consent to do this. If you do not provide us with your consent, we cannot enter into a business relationship with you or open an account for you.

#### Loyalty Program

If you choose to enroll in one of our Loyalty Programs, the Canadian Tire Corporation, Limited and its family of companies may require your name, age, year of birth, email address, address, postal code, and phone number to complete your enrollment and to provide you with the benefits of the Loyalty Program that you have selected. The information collected will be used to authenticate your identity when you login to your Loyalty Program account. If you choose to opt into email marketing through your Loyalty Program account, the contact information that you provide may also be used to communicate with you about personalized offers, promotions, information, and services associated with your Loyalty Program account.

#### **8. Does Canadian Tire use automated decision-making practices?**

Automated decision-making involves the use of technology to make a decision with limited or no human involvement. The Canadian Tire Corporation, Limited and its family of companies may use automated decision-making as a part of our day-to-day

operations to assist us in making our business decisions. For more information about our use of automated decision-making practices, please contact the Privacy Office (see contact information in question 18 below).

**9. Why do we record our calls?**

Your customer experience is important to us which is why we train our customer service representatives on an ongoing basis. It is important for us to understand how our representatives are handling your questions and concerns. As such, if you have a telephone conversation with our representatives, we may monitor the call for training and quality control purposes. Please be aware, certain calls may be recorded for record keeping purposes. For example, your call may be recorded when you apply for a product or service or authorize us to activate or enrol you in a product or service by phone. We will inform you before proceeding with the call if it will be monitored or recorded for these purposes.

**10. Why do we use video surveillance?**

Many of our retail stores, including Canadian Tire, Mark's, PartSource, FGL and Canadian Tire Gas Bars are equipped with surveillance cameras. These cameras are in place for your safety as a customer, as well as for the safety of our employees and to protect us against shoplifting or vandalism. The video surveillance technology in use is not equipped with facial recognition technology. While Canadian Tire stores are independently owned and operated by Associate Dealers, the Corporation and the Dealers have mutually agreed to prohibit the use of facial recognition technology in Canadian Tire stores.

Stores using video surveillance post signage to notify you that cameras are in use. The information on our video systems that record your image are typically kept for a short period of time before they are overwritten with new information or deleted. They are only shared with appropriate third parties under circumstances where Canadian Tire is required or authorized by law to do so.

**11. What are "cookies" and what information is collected online?**

In general, you can visit our websites without telling us who you are or submitting any personal information. However, we collect the IP (Internet protocol) addresses of all visitors to our websites and other related information such as page requests, browser type, operating system and average time spent on our websites. We use this information to help us understand our website activity, and to monitor and improve our websites.

Cookies are small text files that contain a unique identifier which is placed on your computer when you visit a website. When you visit a website, the website saves the file

with a matching identifier. When you revisit the site days or weeks later, the site can recognize you by matching the cookie on your computer with the matching identifier in its database. We use cookies on the pages on our websites where you are prompted to log in or that are customizable. These cookies may let us know who you are and will provide us and our service providers with information (such as your language choice) that we use to personalize our websites in accordance with your preferences. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our websites, you may not be able to take advantage of all of the features of our websites.

We may also use a technology called "tracer tags", "pixels" or "web beacons". This technology allows us to understand which pages you visit on our website or what email communications you receive and open. For example, the information we collect through this technology may include the first date and time you open our email, and whether you click any links included in our email. This information helps us optimize and tailor our websites and marketing communications for you and others.

We may offer you the opportunity to engage with our content on or through third-party social networking websites, plug-ins and applications. When you engage with our content on or through third-party social networking websites, plug-ins and applications, you may allow us to have access to certain information associated with your social media account (e.g., name, username, email address, profile picture, gender) to deliver the content or as part of the operation of the website, plug-in or application. When you provide information from your social media account, we may use this information to personalize your experience on our websites and on the third-party social networking websites, platforms, plug-ins and applications, and to provide you with other products or services you may request.

## **12. Why do we share your information?**

We may need to transfer your personal information in order to provide you with the products and services you have requested. The following are examples of why our Retail Services (Canadian Tire stores, Mark's, FGL and PartSource), Financial Services (Canadian Tire Financial Services Limited and Canadian Tire Bank) and Loyalty Program need to share your information.

We may share your information with parties such as ad networks, social media and other advertising companies and platforms to serve more relevant advertisements on our websites and apps and on other websites or apps and to better understand our customers. For some partners, we may provide a hashed version of your email address or other non-sensitive information to the platform provider for such purposes.

We may also need to share your personal information with affiliates and/or service providers such as credit bureaus/consumer reporting agencies, data storage providers,

data and payment processors, credit card printers, cheque printers, claims processors, collection agencies, statement producers and mailing houses (i.e., to mail your statement; to provide any necessary legal communications) in order to provide certain services to you. We limit the information we share to only what is required to perform the service. We do not necessarily share your personal information with each and every type of company listed above. The personal information we share with other companies will depend on the products and services you are receiving.

Designated employees may collect, use, and exchange personal information with other financial institutions and other entities as permitted by law, such as investigative bodies and law enforcement.

There is a close relationship between Canadian Tire Financial Services Limited and Canadian Tire Bank, as such sharing is necessary between these entities in order to provide services to you. For example, Canadian Tire Financial Services Limited operates a call centre that provides call centre services to Canadian Tire Bank.

For residents of Quebec, Canadian Tire assesses personal information that is being transferred outside of Quebec to ensure that the information receives adequate protection. We will also notify you if your personal information may be transferred outside of Quebec to the extent possible, except as otherwise required or permitted by applicable law.

### **13. How can you opt-out of receiving marketing?**

You may decide that you do not want your personal information used or shared for marketing purposes. If this is the case, you may always withdraw or refuse your consent at any time by contacting us using the information set out in Section 15 below, or by clicking on the unsubscribe link in our email communications. We will process your request as soon as possible but it may not be in time to remove you from promotions already in progress. Please remember that even if you have opted out of receiving marketing communications, we may still contact you for non-marketing purposes such as fraud, collections, account maintenance and transactional and/or operational purposes.

### **14. Why do we contact you for feedback and reviews?**

We may occasionally contact you to request feedback on our performance. For example, you may be contacted with a request to complete a customer satisfaction survey, provide a product review or rate an experience.

There may also be circumstances where we might ask you to assist us and our community of customers by contributing content for our websites. This can include writing a product review, answering a product question asked by another customer or

allowing us to share a photo from a social media post that uses one of our hashtags or tags us or our products. These requests are voluntary, you never have to provide feedback, answer questions or allow us to re-post a photo if you don't want to.

**15. Do you retain my payment card number when I receive an e-receipt?**

When a purchase is made at one of our stores you may receive the option to receive an electronic copy of your receipt. If you consent to receiving an electronic copy of your receipt, an e-receipt will be emailed to the email address that you provide at the time of purchase. To enhance our customer experience, a process has been implemented at our stores to link the email address that you provide to the payment card used during the transaction. Once the email address and payment card information are linked in our system, you will receive an e-receipt for every transaction that you make at our stores with the linked payment card.

To ensure the security of your information, a non-related unique number (a "token") is assigned to the payment card and is retained in a secure system within Canadian Tire Bank as a record of your payment. Only the last four digits of your payment card number is retained in our systems to support the record of payment. We do not retain the full payment card number in any of our systems. Please also note that customer name, CVC or PIN associated with non-Canadian Tire issued credit cards are not stored in our systems.

**16. How can I request that you delete the personal information that you have about me?**

You may contact the Privacy Office as outlined in question 17 to request that your personal information be deleted from our records. It is important to note that in accordance with applicable legislation, we may be obligated to retain your information for a prescribed amount of time. As such, it may not be possible for us to immediately remove the personal information that we have about you from our records.

**17. How can you review and/or obtain copies of the personal information we have about you?**

You can request access to your personal information stored by us.

Your request must be submitted in writing to:

Canadian Tire  
2180 Yonge Street  
P.O. Box 770 Station K  
Toronto, ON  
M4P 2V8 Re: Privacy Office

Once we receive your written request, our goal is to respond to your request within thirty (30) days of receipt. If, for some reason, we are unable to respond to your request within this time frame, we will contact you and explain the reason for delay.

There may be times where the law permits us to refuse your request to access your personal information. For example, if providing access to your personal information would reveal confidential commercial or proprietary information or personal information about someone else (and we are unable to separate your data), we may be unable to fulfill your request.

If we refuse access to your personal information, we will contact you directly. If you wish, you may then choose to file a complaint with the Privacy Commissioner of Canada.

#### **18. How can you ask further questions?**

If you have further questions or concerns regarding our privacy policies or procedures, or if you would like to review, verify or amend your personal information, please do not hesitate to contact us.

You may contact us:

- by calling our Customer Relationship Contact Centre at 1-866-846-5841
- by email at [privacyinquiries@ctfs.com](mailto:privacyinquiries@ctfs.com)
- by mail at 2180 Yonge Street, P.O. Box 770, Station K, Toronto, ON M4P 2V8 - Re: Privacy Office

If your questions, concerns and complaints have not been resolved to your satisfaction or if you have further questions, you can contact Canadian Tire's Chief Privacy Officer by mail at: Chief Privacy Officer c/o Canadian Tire Corporation, Limited, 2180 Yonge Street, P.O. Box 770, Station K, Toronto, ON M4P 2V8 or by email at [privacyoffice@cantire.com](mailto:privacyoffice@cantire.com).