

## 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:**

We have updated our Privacy Policy, effective September 2023

- 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).