

# CANADIAN TIRE PRIVACY CHARTER

## 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. The Canadian Tire Privacy Charter ("**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. This Privacy Charter applies to our customer personal information practices in our stores, on our websites, mobile applications and through other interactions with you.

Our policies and practices have been designed to comply with the *Personal Information Protection and Electronic Documents Act (PIPEDA)* and provincial private sector privacy acts. Our Privacy Charter may be amended from time to time. A copy of the most current version of our Privacy Charter may be obtained on our website 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 privacy questions (**FAQs**) is also available on our website to provide you with examples of 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 Financial Services Limited, Canadian Tire Bank, Canadian Tire Real Estate Limited, Mark's, FGL Sports Ltd., Canadian Tire Petroleum and PartSource. Canadian Tire also includes any successors or subsidiaries of the above-listed companies. Canadian Tire 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 about an identifiable individual. Personal information includes your name, address, age, income, date of birth, gender, financial information and credit records, as well as your opinions, preferences and purchase patterns.

## 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 in order to:

- process and administer your payment for the purchase of products or services, if you purchase online or use a debit or credit card for the purchase in one of our stores;
- process your application for a product, provide a service, or administer the Canadian Tire loyalty reward program or other loyalty or preferred customer programs that may exist from time to time (each a “**Loyalty Program**”);
- better understand your product and services needs and to offer relevant information, products, services, rewards and programs to meet those needs, including sending you (and others on your behalf) communications by way of postal mail, e-mail, facsimile, telephone, text message, or other type of electronic message;
- determine your interest and eligibility for, and where appropriate provide you with, products, services, rewards and programs;
- administer the delivery, return or exchange of products, services, rewards and programs to you;
- track and analyze your purchases, other transactions, shopping patterns, account activity, and payment history for marketing analysis purposes or tailoring promotional offers to you;
- track and analyze website use to provide a better customer experience such as customized offers and advertisements;
- conduct surveys and analysis for research, statistical and product development purposes (information will be de-identified to the extent possible);
- verify your identity and protect against error and fraud;
- manage and assess our risk;
- assess and update your credit-worthiness on an ongoing basis ;
- process, service, analyze and audit your relationship with us, including collecting any money you owe us;
- support promotions and contest administration;
- perform tests to implement or modify systems;
- comply with applicable legal, regulatory and self-regulatory requirements;
- process and respond to your application for employment;
- respond to your questions, comments or requests to customer service; and
- achieve other purposes as may, from time to time, be permitted or required by law.

We may also collect contact information about your friends and family members when you participate in one of our refer-a-friend programs. In these instances, we may send a message to your friend or family member on your behalf. Please ensure that you only submit email addresses of individuals with whom you have a personal or family relationship and who would want to receive the message from you.

**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. The method of obtaining consent may depend 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) is generally obtained to collect, use or disclose sensitive personal information.

## **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, notify current and new customers of products, services, rewards and special offers they might enjoy. We may also provide your personal information to Canadian Tire affiliates or other third-party marketing partners (“**Marketing Partners**”), including 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, facsimile, telephone, text message 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 as set out in Section 10 below. Your request will be promptly processed but may not be 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.

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

If you decide to withdraw or refuse your consent, our ability to communicate with you 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.

We may transfer your personal information to entities outside Canadian Tire, such as our vendors, suppliers and agents who assist us in serving you (“**Service Provider**”). 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). Canadian Tire retains your personal information as long as it is required for our business relationship or as required by law.

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 other 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.

#### **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.

#### **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 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.

#### **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, an issue can be resolved simply by telling us about it and discussing any issues.

### **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 3475 Superior Court, Oakville, ON L6L 0C6 - Re: Privacy Inquiries

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).