**OUR PRIVACY POLICY**

**LAST UPDATED MAY 10, 2022**

**Thank you for visiting our website for Thrifty Winnipeg’s. We are committed to providing a safe and personalized shopping experience. This commitment includes using your personal information to fulfill those goals and respecting and protecting the privacy of your personal information.**

**This privacy policy describes the types of information we collect from and about you when you visit our website available at www.thriftywinnipeg.ca ("Site"). This privacy policy also explains how Thrifty Winnipeg may collect, use and share your personal information, as well as your ability to control certain uses of it.**

**FREQUENTLY ASKED QUESTIONS**

**Q: How does Thrifty Winnipeg collect information?**
**A:** Thrifty Winnipeg may collect information from or about you in a number of ways and for the purposes set out below (details of which are provided in the table under the heading “[**Information We Collect, Use and Share**](https://www.thebay.com/PrivacyLegalInfo.html#policy13)”). Please note that if you decline to provide any of the requested information (whether or not required), you may not be able to take full advantage of the Services and their features or make a purchase from us:

**From Thrifty Winnipeg's Interactions with You:** We collect information from and about you and your transactions and other interactions with us. This may include, when you visit our Site, use the Services, create an online account with us, make a purchase, sign up for our emails, participate in contests or other promotions, participate in a product review, survey, or other similar programs, send a gift or virtual gift card to a person, sign up for our Gift Registry or Thrifty Winnipeg Rewards loyalty program, join a clientele list, sign up for personal shopping or otherwise contact us. The personal information we collect may include your name, address, email address, telephone number, or other contact information, loyalty program membership information, birthday, other demographic information, your interests, and preferences.

If you make a purchase from us, we may also collect a credit or debit card number or other financial information, CVV, and billing address. In addition, if you make a purchase from one of our registered suppliers within a section of a Thrifty Winnipeg store that is licensed by a third party) (each a "Product or Service"), we and our affiliates may each collect information such as your name, billing address, shipping address, telephone number, email address and payment or gift card information. Any such information is subject to this Privacy Policy if we collect or have it and subject to our privacy policy if our affiliates collects or has it.

**Information You Provide About a Third Party:** If you send someone else a communication from the Services (such as sending a gift or virtual gift card), we may collect information such as that person's name, telephone number, email, and/or shipping address for the purposes of facilitating the sending of the gift or virtual gift card.

**Automatically on the Site or App:**We, or third parties working on our behalf may use cookies, web beacons/pixel tags, log files, and other technologies to collect certain information about visitors to our Site or App, users of our online Services, and interactions with our emails and online advertisements, and to allow Thrifty Winnipeg to keep track of analytics and certain statistical information. For example, we may collect information such as your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address, location information, mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App. Collecting this information, and linking it with certain personal information, helps us to tailor our Site and App and personalize and otherwise enhance your online shopping experience by saving your preferences while you are visiting a particular Site or App, and to help identify Site or App features, promotions, advertisements, and offers that may be of particular interest to you and retarget online and mobile advertisements to you across computers or devices you may use.

**From Third Party Sources:** We may acquire information from other sources to update or supplement the information that you provide or that we collect automatically (such as information to validate or update your address or other demographic information), or when you connect with the company through a third party (including through social networks) based on your registration and privacy settings on those third party sites.

**Combination of Information:** We may combine the information we receive from or about you, including information you provide to us and information we automatically collect through the Site or App, as well as information across other computers or devices that you use, with information we collect or receive about you from other online and offline sources, or from other third party sources.

**Interest-Based Advertising and Analytics:** We may work with third party advertising companies that use their own tracking technologies (such as cookies, web beacons, pixel tags, log files, flash cookies, or other technologies) on our Site and App and other websites and apps in order to provide you with tailored advertisements on our behalf. These third parties collect information about your activity across your different devices on our Site and App and third-party websites and apps (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you on third party websites and apps. This information may also be used to evaluate the effectiveness of our online advertising campaigns.

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We may also use services provided by third-party platforms (such as social media and other websites) to serve targeted advertisements on such platforms to you or others, and we may provide a hashed version of your email address or other information to the platform provider for such purposes. To opt-out of the use of your information for such purposes, please send a request using any of the methods set out under the heading “Whom do I contact if I have additional questions or concerns about this policy?” below.

In addition, we may also use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the Site (such as the pages most read, time spent, search terms and other engagement data) in order to better understand who is using the Site or App, how people are using the Site or App, and how to improve the effectiveness of the Services, user experience and related Site content. These third parties may use cookies and other tracking technologies. To opt-out of Google Analytics, see “What are my Tracking Options?” below.

**Q: What are my Tracking Options?**
**A:** Certain parts of the Site and App require cookies. You can set your browser or operating system settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain features on the Site or App or take full advantage of all of our offerings. Please refer to your web browser's or operating system's website or "Help" section for more information on how to delete and/or disable your browser or operating system from receiving cookies or controlling your tracking preferences.

Our system will respond to Do Not Track requests or headers where it is technically feasible. We may use cookies or other technologies to deliver more relevant advertising and to link data collected across other computers or devices that you may use. To understand your choices for receiving more relevant advertising or to manage your settings, please review the information below:

* For more information about interest-based advertising on your desktop or mobile browser and to understand your options, including how you can opt-out of receiving interest-based ads from third-party advertising companies participating in the Digital Advertising Alliance of Canada (DAAC) Self-Regulatory Program for Online Interest-Based Advertising, please visit the DAAC website at [**https://optout.aboutads.info/?c=3&amp;lang=en**](https://optout.aboutads.info/?c=3&lang=en).
* To learn more about interest-based advertising in mobile apps and to opt out of this type of advertising by third-party advertising companies that participate in the DAAC’s AppChoices tool, please download the version of AppChoices for your device at [**https://youradchoices.ca/appchoices/**](http://youradchoices.ca/choices).
* Please note that even if you opt-out of interest-based advertising by a third party, these tracking technologies may still collect data for other purposes including analytics and you will still see ads from us, but the ads will not be targeted based on behavioural information about you and may therefore be less relevant to you and your interests.
* For more information about Google Analytics or if you wish to prevent your data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available at [**https://tools.google.com/dlpage/gaoptout/**](https://tools.google.com/dlpage/gaoptout/). You can also obtain additional information on Google Analytics’ data privacy and security at the following links: [**https://policies.google.com/technologies/partner-sites**](https://policies.google.com/technologies/partner-sites) and [**https://support.google.com/analytics/topic/2919631**](https://support.google.com/analytics/topic/2919631)
* On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising.

**Q: How does Thrifty Winnipeg use the information collected?**
**A:** Thrifty Winnipeg may use the information we collect from and about you for any of the following purposes:

* To validate, confirm, verify, deliver, install, and track your order (including to process payment card transactions, arrange for shipping, handle returns and refunds, maintain a record of the purchases you make, and contact you about your orders, including by telephone) or to service products you purchased from us.

* To enhance your online shopping experience, including as a way to recognize you and welcome you to the Site or App or when you call our customer service.
* To send you information, newsletters, promotional materials and other offerings from Thrifty Winnipeg or on behalf of our partners and affiliates.
* To provide you with customized Site or App content, targeted offers, promotions and advertising on the Site or App, through other third party sites or apps, or via email, text messages, or App push notifications that are offered by Thrifty Winnipeg or other marketing partners that might be of interest to you.
* To improve our sites, products/services, customer service, and customer shopping experience.
* To use your data in an aggregated non-specific format for analytical and demographic purposes.
* To protect the security or integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, claims and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users.
* To contact you when necessary or requested, including responding to your questions and comments and providing customer support.
* As otherwise described to you at the point of data collection.
* As otherwise permitted or required by law for our own internal purposes to improve our performance as a retailer and to uphold the Thrifty Winnipeg image and brand.
* For external purposes where we believe those external purposes are consistent with the Thrifty Winnipeg brand image or allow for a Thrifty Winnipeg style experience to extend beyond our stores, sites, or Services.

**Q: What information does Thrifty Winnipeg sell or share with others?**
**A:** Thrifty Winnipeg will never sell or rent your personal information to third parties. Thrifty Winnipeg shares personal information with others to be able to improve our service and offerings to you and to enable the extension of the Thrifty Winnipeg brand and experience beyond our stores, sites, or Services. In addition, Thrifty Winnipeg may share personal information we collect from and about you in the following ways:

**Thrifty Winnipeg Family of Companies:** We may share collected information with companies affiliated with Thrifty Winnipeg.

**Co-Marketing Partners:** Certain areas of the Services may be provided to you in association with third parties, such as companies that provide products and services, conduct joint sales programs, contests, promotional campaigns, and other jointly sponsored events. Such Services will identify the third party. If you elect to register for any products and/or services provided during the Services, you either will be providing your information to both Thrifty Winnipeg and such third party, or Thrifty Winnipeg might share your information directly with such third party for that third party to fulfill their products and our products and services directly with you.

**Other Third Parties:** Thrifty Winnipeg may share your information with select partners, affiliates, and other third parties that we believe may have offers or be of interest to you in support of your customer experience with us or others or to extend the Thrifty Winnipeg brand experience beyond our sites, and Services. We may also share your information with third party vendors when you purchase products or services offered by such third parties on our website for the purposes of fulfilling the order.

**Fraud Detection and Prevention:** When you make a purchase, we may share your personal information with our fraud prevention partner to help us detect and prevent fraudulent transactions. This personal information may include your first and last name, shipping and billing address, email address, partial payment card information, transaction-level details, as well as your IP address and other information about your device (“Thrifty Winnipeg Customer Data”). Our fraud prevention partner will incorporate Thrifty Winnipeg Customer Data into its fraud protection technology and combine such data with other customer data our fraud prevention partner receives from its clients as well as other third-party data sources to help its clients detect and prevent fraudulent transactions. For more information about the manner in which our fraud prevention partner treats your personal information or how to access, update or delete the personal information maintained by our partner.

**Legal Disclosures; Safety:** Thrifty Winnipeg and its service providers may disclose the information we receive from and about you to comply with a legal obligation; to provide information to law enforcement and other governmental authorities in accordance with applicable law (which may include lawful access by Canadian, US or other foreign governmental authorities, courts or law enforcement agencies), and when we believe in good faith that the law requires or permits it. We also reserve the right to share information with legal authorities and other companies for fraud protection debt collection and credit risk reduction, to detect any technical or security vulnerabilities, to enforce our Terms & Conditions or other applicable policies, or to otherwise protect the rights, property, safety, or security of third parties, users of the Services, Thrifty Winnipeg, or the public.

**Sale of Business:**During the normal course of our business, we may sell or purchase assets. In the event of a proposed or completed merger, acquisition or sale of all or a part of a business owned or operated by Thrifty Winnipeg by another entity, information we have collected about you may be transferred as an asset to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against a business owned or operated by Thrifty Winnipeg, such information may be considered an asset of the company and may be sold or transferred to third parties. Should a sale or transfer occur, we will use reasonable efforts to require that the transferee use personally information provided through the Services in a manner that is consistent with this Privacy Policy.

**Thrifty Winnipeg Credit Card Accounts:**We may share your information with the financial institution that issues Thrifty Winnipeg credit card accounts to provide you with a promotional offer for a credit card, help maintain and service your account and for other purposes set out in the "Credit Card Application" section, under "What information does Thrifty Winnipeg collect" for more information.

**Thrifty Winnipeg Financial Services:**When you apply for insurance through Thrifty Winnipeg, we may share information with third party insurance companies and service providers. The insurance products arranged for by Thrifty Winnipeg Financial Services are underwritten by third party insurance companies and service providers.

**Service Providers:** We use third-party “service providers” to perform certain services on our behalf when the information is necessary for them to perform their duties such as sending communications, hosting the Site, operating certain of its features or to manage and analyze data and our advertising effectiveness. These third-party service providers are prohibited from using personal information for any other purpose and are contractually required to comply with all applicable laws and requirements, which may include Payment Card Industry Data Security Standards if they are processing or transmitting payments for the Thrifty Winnipeg and its affiliates.

**Aggregate or Anonymous Non-Personal Information:** We may also share or sell aggregate or anonymous information with or to our affiliates, agents, service providers, business partners, or other third parties for their marketing or analytics uses or for other lawful purposes. This type of non-identifiable and aggregate information cannot be used to identify you personally.

**Q: How can I access or update my information?**
**A:** If you have registered for an account, you may also view and update your account information by logging into the "[**Your Account**](https://www.thebay.com/account/)" section of the Site or App. Once logged in, you can view or update your name, address, telephone number or email address.

You may also request access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law, by emailing us at online@thriftywinnipeg.ca. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records.

**Q: What choices do I have about receiving communications from Thrifty Winnipeg?**
**A:** To receive promotional offers from the Thrifty Winnipeg Family of Companies, you can sign up on our Site or App, when you register for an account or make a purchase. We provide our customers with the opportunity to "opt out" of receiving emails other than those for purposes directly related to placement, processing, fulfillment or delivery of a product order or your transactions with us. We provide you with the following options if you prefer to "opt out" of receiving information or materials that we think may be of interest to you:

* **Email Promotional Offers:** At all times, you have the option of "opting out" of receiving promotional emails from the sender only by clicking the "unsubscribe" link in any of the promotional emails you receive.
* **Mobile Alerts and Text Messages:** Thrifty Winnipeg may communicate via mobile text messages to customers who opt-in to the Thrifty Winnipeg Mobile Alerts program, or otherwise solicit us to receive text messages. For the Thrifty Winnipeg Mobile Alerts program, users can opt-in online or by texting a keyword to Thrifty Winnipeg in response to an invitation. Number of messages may vary. No purchase necessary. Recurring automated messages will be delivered to the phone number you provide at opt-in. Message and data rates may apply. Your instructions to limit the use of your information will be processed as soon as reasonably practicable.
* **Push Notifications:** When you use the App, you may receive push notifications. If you prefer not to receive push notifications, you may adjust your settings on your mobile device to control whether you want to receive these alerts.
* **Other Contact:** In all cases, you may contact us here or for privacy related matters contact us at online@ thriftywinnipeg.ca

If you receive marketing communications from one or more companies within the Thrifty Winnipeg and our affiliates, you must opt-out individually from each of the companies from which you are receiving company-specific marketing communications.

**Q: What about children's privacy?**
**A:** Protecting children's privacy is important to us, and the Site and App are not intended for children under the age of thirteen. We do not direct the Site or App to, nor do we knowingly collect any personal information from, such children. If Thrifty Winnipeg learns that a child under the age of thirteen has provided personal information to the Site or App, it will use reasonable efforts to remove such information from its files.

**Q: What about security?**
**A:**We have taken certain physical, administrative, operational, and technical steps to safeguard the information we collect from and about our customers and Site visitors. While we make every effort to help ensure the confidentially, integrity and availability of our network and systems, we cannot guarantee our security measures. When you enter information such as credit card information on our forms, we encrypt the transmission of that information.

**Q: What about other websites?**
**A:** Our Site or App may include links to third-party websites or apps that are not affiliated with Thrifty Winnipeg. These websites or apps may send their own cookies to visitors, collect data or solicit your information. The privacy policies of these other websites or apps may be very different from our policy. We are not responsible for the privacy practices of these other websites or apps and cannot guarantee the security of any personal information you provide to or that is collected by such third party sites or apps.

**Q: For how long and where is my data stored?**
**A:** Your personal information may be stored for as long as is reasonably necessary to perform the purposes listed under "How does Thrifty Winnipeg collect and use the information?" and as otherwise required to meet our legal obligations. For example, if you make a purchase, we will store any personal information associated with that purchase as long as required to fulfill the order and meet our legal obligations, process any returns if applicable, provide customer service and support an enhanced shopping experience, remember your preferences for future interactions, or be able to provide you with tailored offers or services. The servers and databases in which information may be stored or processed by Thrifty Winnipeg and its affiliates and service providers may be located in the U.S., Canada or other jurisdictions outside the country from which you accessed the Services and in a country where the data protection and other laws may differ from your country of residence. In the event personal information is transferred to the U.S. or other foreign jurisdictions, it will be subject to the laws of that jurisdiction and may be disclosed to or accessed by the courts, law enforcement and governmental authorities in accordance with those laws.

**Q: How does Thrifty Winnipeg communicate changes to this Policy?**
**A:**Any changes to our Privacy Policy will be noted on the home page of the Site and App with a link to the revised Privacy Policy. Your continued use of the Site or App following posting of changes to these terms will mean you accept these changes. If we change our practices in a way that requires revising the Privacy Policy in a material way, we will update it here with the date of change of the policy.

**Q: Whom do I contact if I have additional questions or concerns about this policy?**
**A:** If you have any questions or concerns regarding our privacy practices or about the manner in which our service providers treat your personal information, or to request a copy of this Privacy Policy in another format, please feel free to contact Thrifty Winnipeg via email at online@ thriftywinnipeg.ca