

## Website Privacy and Data Use Policy

**Last updated August 11, 2017**

This Website Privacy & Data Use Policy contains information regarding FCL's practices with respect to the collection, use, retention, storage and disclosure of Personal Information.

The following defined terms are used within this Policy:

**"Affiliates"** means all subsidiaries or affiliates of FCL such as Co-op Refinery Complex, and FCL Enterprises Inc.

**"FCL"** means Federated Co-operatives Limited.

**"Personal Information"** means information about an identifiable individual. This includes information such as an individual's name, home address, telephone number, personal e-mail address, and personal Twitter or other social media address. Personal Information also includes demographic information such as an individual's gender, age, nationality and other characteristics when that information could be combined with other Personal Information. Personal Information may also include information regarding an individual's product interests, purchasing history and financial information. In some cases, information that appears to be anonymous may be Personal Information if it can be easily linked to an individual to create a profile about that person. An individual's business address, title, and business telephone number are not Personal Information when used for business purposes.

**"Policy"** means this Website Privacy & Data Use Policy.

**"Retail Member"** – means the retail co-operatives that are member owners of FCL.

**"Service Providers"** means other companies and individuals who provide FCL with services but who are not employees, Retail Members or Affiliates of FCL.

**"Sites"** means the following websites: [www.coopconnection.ca](http://www.coopconnection.ca);  
[www.cooppromotions.com](http://www.cooppromotions.com); [www.letstalkcoop.ca](http://www.letstalkcoop.ca); [www.storebrands.coop](http://www.storebrands.coop);  
[www.coopfood.ca](http://www.coopfood.ca); [www.coopfuel.ca](http://www.coopfuel.ca); [www.coophome.ca](http://www.coophome.ca); [www.coopag.ca](http://www.coopag.ca); [www.fcl.crs](http://www.fcl.crs);  
[www.connectwithcoop.ca](http://www.connectwithcoop.ca); [crs.coopconnection.ca](http://crs.coopconnection.ca)

**"user"** means an identifiable individual who provides Personal Information to FCL through the Site(s) or otherwise.

FCL may update this Policy without prior notice, and any changes will be effective immediately upon the posting of the revised Policy on the Site(s).

## Quick Links

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### 1. Application of this Policy

This Policy applies to Personal Information that FCL collects through the Site(s) and when users contact FCL. It does not apply to other websites and social media (for example, Twitter, Facebook, and YouTube) operated by FCL's Retail Members or when an individual contacts one of FCL's Retail Members. To review the privacy policies applicable to FCL's Retail Members, please visit the website of the applicable retail co-operative.

Please read this Policy and the [Terms of Use](#) carefully. By using FCL's Site(s), users are agreeing that they understand the terms of this Policy and the Terms of Use.

### 2. Information FCL collects

FCL collects information when users provide it to FCL. FCL also collects information about users through automated technologies on FCL's Site(s) and from third parties. When FCL links information to users that was collected through automated technology, FCL treats that information as Personal Information.

#### *A. Information that users provide*

FCL, its Affiliates and Service Providers collect Personal Information from users when users provide it. For example, a user might provide FCL with their Personal Information when they e-mail FCL, telephone FCL, sign up for an e-mail newsletter, submit comments, submit a resume or job application, participate in a promotion, survey or other feature of the Site(s), communicate or interact with FCL through FCL's Site(s) or a social media site such as Facebook or Twitter. If users do not want their Personal Information collected by FCL, they should not submit it.

## ***B. Automated information and cookies***

When users visit or interact with the Site(s), FCL, its Affiliates or Service Providers may use technologies that automatically collect information about how a user accesses, navigates and leaves the FCL Site(s). For example, FCL, its Affiliates or its Service Providers will collect information on what other website the user came to before visiting the Site(s), what browser type and operating system the user is using, the Internet protocol (IP) address the user is accessing the Site(s) from, the pages the user is navigating through and what website the user goes to after visiting FCL's Site(s). In general, FCL does not associate this type of information with other Personal Information about a user except in the case of an investigation into FCL's website security.

FCL's Site(s) may also use cookies. Cookies are data files that are placed on the device a user utilizes to access FCL's Site(s). These cookies are used to remember a user's language preference and to facilitate a user's navigation of FCL's Site(s). FCL may also use technologies such as web beacon technologies (sometimes referred to as pixel tags and clear GIFs). These are transparent images that provide FCL, its Affiliates or its Service Providers with information about whether a page or e-mail has been viewed or forwarded and may communicate with servers of FCL, its Affiliates, or its Service Providers in order to obtain images and other content and to relay information about the IP address being used to access FCL's Site(s) and information about a user's browser. FCL may use cookies and web beacons to present advertisements to users that FCL thinks may be of interest to a user. Although the information FCL collects through cookies and web beacons is typically not combined with information that would identify a user, there is the potential for this information to be associated with a user and, therefore, FCL treats it as Personal Information.

Users should reference [Cookies, advertising and how to opt-out](#) for more information on how FCL uses cookies and web beacons and how users may opt-out.

## ***C. Information from third parties***

FCL may collect or receive information about a user from third parties. For example, if a user is on another website, including FCL's Retail Members websites and social media sites operated by or for FCL's Retail Members, and a user opts-in to receive information from FCL, FCL may receive information about a user.

## **3. Children and Minors**

The Site(s) are not directed to or suitable for children under 13. FCL does not knowingly collect Personal Information from anyone under 13 years of age. If FCL becomes aware that FCL has unknowingly collected personally identifiable information from a child under the age of 13, FCL will delete this information from FCL's records or, if that is not reasonable, FCL will take reasonable available steps to de-identify the information. Children who are over the age of 13 but under the age of majority in the jurisdiction in which they reside should not provide FCL with Personal Information without their parent's or guardian's consent.

#### **4. Uses of the information FCL collects**

FCL uses information collected from a user for business purposes. For example, FCL uses Personal Information:

- to respond to a user's inquiries and provide a user with information, such as information on Retail Members;
- to register a user for FCL programs
- to assist in optimizing a user's experience with FCL by collecting information regarding a user's product preferences and purchasing history;
- to assist with any consumer safety notifications;
- to monitor product quality and to communicate with users about the quality of FCL's products;
- to provide users with newsletters and other advertising;
- to provide users with features on FCL's Site(s), such as community forums or interactive features; and
- to identify participants in contests and promotions.

If a user submits a job application or resume to FCL, FCL will collect the information that a user provides to FCL to determine whether the user would be a suitable candidate for a job at FCL. FCL may retain this information in FCL's files for a reasonable period of time after a user submits it in the event a future position becomes available, unless a user requests FCL not to do so.

In addition, FCL uses information in order to learn about FCL's customers in order to improve FCL's Site(s) and to develop new products and services. For example, FCL uses information received from automated technologies to determine how many visitors visit areas of FCL's Site(s), how long they remain on FCL's Site(s), and whether they use the hyperlinks FCL provides. Users may also reference [Cookies, advertising and how to opt-out](#) for more information on how FCL uses cookies and web beacons and how users may opt-out.

#### **5. How FCL obtains consent**

Users consent to the collection, storage and use of their Personal Information when they provide it to FCL or they provide it to a third party and give the third party permission to send that information to FCL. The purposes for the collection of Personal Information that users provide to FCL are usually stated or implicit in the context in which a user gives it to FCL or a third party acting on FCL's behalf. If FCL wants to make additional uses of a user's Personal Information, FCL will ask the user for their express consent. For example, if a user provides FCL with their e-mail address so that FCL can provide the user with a newsletter, FCL obtains the user's implied consent to use the user's e-mail address for providing the user with FCL's newsletters. If a user provides FCL with their e-mail address when they make an inquiry, FCL obtains their implied consent to use it for the purposes of responding to their inquiry. FCL may ask the user for their opt-in consent to use their e-mail for other purposes.

FCL uses opt-out consent for cookies and web beacons and other automated information. If a user does not want FCL to collect or use this information, they should not visit FCL's Site(s). In addition, a user may opt-out by using browser settings that will not accept cookies or setting their e-mail application to not download images. In addition, users may opt-out of certain on-line advertising. Users may reference [Cookies, advertising and how to opt-out](#) for more information.

## **6. How FCL shares information**

FCL may share information that it collects about users in the following circumstances:

### ***A. Affiliates and Service Providers providing services to FCL or on FCL's behalf***

FCL's Affiliates and Service Providers provide services to FCL and may provide services to users on FCL's behalf. FCL may share a user's Personal Information or information that FCL has collected through automated means on FCL's Site(s) with FCL's Affiliates and Service Providers. For example, FCL's Affiliates and Service Providers may host FCL's Site(s), analyze data collected from FCL's Site(s), provide customer service on FCL's behalf, provide and manage social media sites on FCL's behalf, administer FCL's promotions, provide marketing or promotional assistance, post FCL's advertisements, and collect user's feedback on FCL's Site(s) and advertisements.

### ***B. Aggregated or de-identified information***

FCL does not sell or rent user's Personal Information to third parties. However, FCL may share information in aggregated statistics and de-identified form with third parties without a user's consent.

### ***C. When a user specifically agrees to FCL sharing their information***

In some situations, a user may specifically agree to FCL sharing their information. For example, if a user provides FCL with their contact information, e-mail address, Facebook account, or Twitter account for the purposes of signing up for information or marketing offers from an Affiliate or third party, FCL may share their Personal Information for that purpose. A user's Personal Information will be subject to the privacy policy and business practices of FCL's Affiliate or third party.

### ***D. Business Mergers or Acquisitions***

FCL may sell or purchase assets. If another entity acquires FCL, or all or a portion of FCL's assets, information that FCL collected from users may be shared with that entity. The information will be shared for the purpose of that entity considering whether to enter into the transaction and also to complete the transaction. Should such a sale or transfer occur, FCL will use reasonable efforts to direct that entity to use the user's information in a manner that is consistent with this Policy and the purposes for which the information was originally collected. Also, if any bankruptcy or reorganization proceeding is brought by or against FCL, a user's

information may be considered an asset of FCL's and as such may be sold or transferred to third parties in those proceedings.

#### ***E. Other legally required or permitted disclosures***

FCL may also disclose the Personal Information of users in the following circumstances: (a) if such disclosure is necessary for FCL to receive legal advice; (b) to collect a debt from a user; (c) if FCL is required to disclose a user's Personal Information in order to comply with any legal obligation or the decision of a judicial authority; (d) if disclosure is requested by an investigatory body, law enforcement official or governmental authority which has lawful authority to request the disclosure of the information in respect of an investigation; (e) if FCL has reasonable grounds to believe that the information relates to a breach of an agreement or contravention of a law; or (f) where FCL is otherwise permitted to do so by applicable law.

### **7. How FCL stores and protects Personal Information**

FCL retains the Personal Information of users to fulfill the purposes for which it was collected. FCL maintains and also requires its Service Providers to maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of Personal Information. For example, FCL uses password protection where appropriate and limits access to staff, employees, Affiliates and Service Providers who need to have access to it for the purposes for which it was collected and who have acknowledged their obligations to protect the Personal Information. When FCL transfers Personal Information, FCL uses encryption where appropriate. FCL cannot, however, guarantee the security of Personal Information held or transferred by it.

If a user is located in Canada, they should be aware that information FCL collects may be transferred to and processed in the United States and other countries in which FCL Service Providers have operations. Although FCL requires Personal Information being handled by its Service Providers to be protected to comparable levels of security as would be required in Canada, the privacy laws in these other jurisdictions may not be as comprehensive as or equivalent to those in Canada.

### **8. Links to external content**

FCL's Site(s) may link or direct a user to other websites, services or external content resources which are outside of FCL's control. Once a user has left FCL's Site(s), FCL cannot safeguard and is not responsible for the protection and privacy of any Personal Information which a user provides on other websites. These other websites may send their own cookies to a user's device and may independently collect data or solicit Personal Information. Please review the applicable terms of use and privacy policies for those other websites.

### **9. Cookies, advertising and how to opt-out**

FCL, or its third-party advertising Service Providers, may use cookies, web beacons and other technologies. FCL uses these technologies to gather statistics about a user's use of FCL's Site(s),

whether the user has opened e-mail advertising from FCL and for other marketing purposes, including delivering advertising to the user.

If a user would prefer not to accept cookies, most browsers will allow the user to: (i) change their browser settings to notify the user when they receive a cookie, which lets the user choose whether or not to accept it; (ii) disable existing cookies; or (iii) set their browser to automatically reject any cookies. A user may also set their e-mail options to prevent the automatic downloading of images that may contain technologies that would allow FCL to know whether the user has accessed FCL's e-mail and performed certain functions with it.

## **10. Accessing Personal Information**

If a user wishes to verify, correct, or update any of their Personal Information collected by FCL or its Service Providers or Affiliates acting on FCL's behalf and that FCL has received from these Service Providers or Affiliates, the user may do so by contacting FCL at the following address: [privacy@fcl.ca](mailto:privacy@fcl.ca) FCL may request Personal Information from the user in order to authenticate the user's identity before providing the user with access to their Personal Information or complying with any request to correct or update their Personal Information.

Please also note that in some cases FCL may legally deny the user access to the information that FCL has collected about the user. For example, this may occur where the information is subject to solicitor-client privilege or consists of references to other persons or proprietary information that cannot be severed.

FCL may routinely delete certain records that contain Personal Information in accordance with its' record-keeping practices. Although FCL will make efforts to comply with any request that a user may make to destroy Personal Information about the user that is not otherwise required by FCL to fulfill legal requirements or to protect FCL's interests, the user should be aware that it is not always possible to completely remove or delete all of the user's Personal Information from FCL's databases without some residual copies of data because of backups, archival systems and other reasons. FCL will not, however, continue to use a user's Personal Information for active purposes once the user has requested FCL not to do so.

## **11. How to contact FCL**

If a user has any questions or comments about this Policy, FCL may be contacted at: [privacy@fcl.crs](mailto:privacy@fcl.crs)