

# UNFI CANADA PRIVACY POLICY

**Effective Date: April 26, 2021**

We value the privacy of our customers' information and we are always striving to make our customer experience better. This Privacy Policy describes our information practises and, in particular, how we collect, use and share the Personal Information that we gather through our Services, as defined below. If you have any questions about this Privacy Policy or our information practises, please contact us through the options provided below.

**BY USING OUR SERVICES, YOU CONSENT TO THE INFORMATION PRACTISES AND OTHER TERMS AS DESCRIBED IN THIS PRIVACY POLICY. YOU SHOULD READ THIS PRIVACY POLICY CAREFULLY. WE RECOMMEND PRINTING AND KEEPING A COPY FOR YOUR FUTURE REFERENCE. WE MAY ADD TO, DELETE OR CHANGE THE TERMS OF THIS PRIVACY POLICY FROM TIME TO TIME BY POSTING A NOTICE OF THE CHANGE OR AN AMENDED PRIVACY POLICY ON THIS WEBSITE. YOUR CONTINUED USE OF THE SERVICES IS DEEMED TO BE ACCEPTANCE OF SUCH CHANGES.**

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## **Who We Are**

We are UNFI Canada. We supply natural food products to retailers in Canada and also operate the e-commerce site [www.unfi.ca](http://www.unfi.ca). This privacy policy applies to the Services (defined below) provided by UNFI.

## **Definitions**

When we use the term "**Services**" in this Privacy Policy, we mean the websites, mobile apps, and other digital properties that are owned and operated by UNFI that link to this Privacy Policy.

When we use the term "**Personal Information**" in this Privacy Policy, we mean any information about an identifiable individual. For example, this includes your name,

business address, phone number, email address and any other information that we tie to these elements.

Personal Information does not include anonymous “aggregated information,” which is information that we collect about a group or category of persons or services. It also does not include “de-identified information,” which is information from which we or our agents have removed information that can be used to specifically identify a person. This Privacy Policy does not apply to our collection, use, or disclosure of aggregated or de-identified information.

## **How We Collect and Use Personal Information**

We collect Personal Information through our Services. There are five categories of information that we collect through the Services:

### **1. Information You Provide**

We collect Personal Information you provide, for example when you enter the information into form fields on our Services. For example, we may collect:

- contact information, such as your name, business address, email address and phone number, which we use to administer your account and the Services, communicate with you and authenticate you as a user;
- demographic information, including age, product preferences and other interests and likes, which we use to better understand and analyze our customer population, support our operations including inventory and product management, to deliver relevant offers and ads, and to improve our products and services including the Services;
- communication preferences, including marketing preferences, which we use to manage how we engage with you;
- transaction history, which we use to tailor our communications to you;
- enquiries you make, including the content of your voice and text messages, which we use to respond to your enquiries;
- online purchase information, including payment card information, purchase details and other transaction information, which we use to process purchases you make online, improve our e-commerce platform and your customer experience and contribute to our marketing efforts, for example, by analyzing information about what products are viewed, what products you put into and take out of your shopping cart, when you browse items but do not make a purchase and other interactions you have with our online product displays and descriptions; and
- with your permission, information from your device’s applications, such as the camera to allow you to scan barcodes to add items to your shopping list or your contacts to allow you to update your information.

### **2. Information Collected Automatically**

We use various technologies to collect other types of data that do not directly reveal your identity (“**Other Information**”). If we associate Other Information with Personal Information, we will treat the combined information as Personal Information in accordance with this Privacy Policy.

These technologies include the following:

**Logging Functionality:** As is true of most websites, we gather certain information automatically and store it in log files. This information may include IP addresses, browser type, Internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data. We generally only use this data for purposes such as security, fraud detection, and protecting our rights.

**Cookies and Other Data Collection Technologies:** We and our subsidiaries, and service providers use cookies, web beacons, and similar technologies to manage our websites and email messages and to collect and track information about you and your activities online over time and across different websites and social media channels. In addition, we use local shared objects (or Flash cookies) to collect and store information about your preferences and how you interact with our websites and mobile applications. These technologies help us to recognize you, customize or personalize your shopping experience, store items in your online shopping list between visits, and analyze the use of our Services and solutions to make them more useful to you. These technologies also allow us to aggregate demographic and statistical data and compilations of information, which may or may not include Personal Information, and provide this information to our service providers.

Most Internet browsers allow you to remove or manage cookie functions and adjust your privacy and security preferences. For information on how to do this, access the “help” menu on your Internet browser, or visit <https://www.aboutcookies.org/how-to-control-cookies/>. Please note, however, that disabling our cookies may result in your inability to take full advantage of all of the features of our Services. To manage Flash cookies please visit Adobe’s website.

**Analytics:** We use analytics providers such as Google Analytics to help us evaluate and measure the use and performance of our Services. We may also use the analytics provider FullStory to measure website usage statistics. Data about the general attributes of your device may also be collected when you use the mobile application. To opt out of the aggregation and analysis of data collected about you on our website by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout> and download and install the Google Analytics Opt-out Browser Add-on. For more information on the services provided to us by FullStory, visit <https://www.fullstory.com/legal/privacy-policy>. To opt out of the aggregation and analysis of data collected about you on our website by FullStory, visit <https://www.fullstory.com/optout/> to opt out of FullStory.

**Do Not Track (DNT):** DNT is a privacy preference that you can set in certain web browsers. When you turn on the DNT, the browser may send a signal or other message to web services requesting that they not track you. Currently, our web servers do not recognize or respond to DNT signals. Our websites and mobile applications may continue to collect information in the manner described in this Privacy Policy.

### **3. Information We Obtain from Third Party Sources**

We collect Personal Information from a number of third-party sources.

**Supplemental Information:** We may receive additional Personal Information from third-party sources that we may append to existing customer information, such as email and address verification. We use this supplemental information to better understand our customers, deliver relevant offers and advertising, and improve our operations, Services and our advertising and marketing campaigns.

### **4. Location Information**

We collect location information through the Services so we can offer you certain location-based services (such as delivering advertisements that are relevant to your particular location and conducting analytics to improve our Services). The way in which we collect location information is different depending on whether you are accessing the Services through a website or a mobile application.

If you are accessing the Services through a website, we use various technologies, including IP lookup, to detect your location so that we can automatically show you the closest location to your area, rather than some random location. Depending on browser type, your browser may inform you that the Site would like to collect your location and request your permission to do so. If you allow it, location information is then collected and may be stored locally on your device. If you decline the collection of location information, your location is not collected, and you must manually enter your location.

If you are viewing our content on a social media platform, location information may be collected by the third-party platform. We do not control the collection, use or disclosure of location information on social media platforms. To opt out of location information sharing, please set your preferences within your social profile settings or follow the instructions on the social media platform.

If you are using a mobile app, you will be prompted to provide your consent for us to collect your location information. If you decline to allow us to collect your location information, you must manually type-in your preferred store or location so that we can show you the local store or send offers that are available in your area.

If you allow us to collect your location information, we collect precise location information. Whether and to what extent we can collect this information is controlled by your operating system, but the methods of collection typically include GPS, cellular network location and

other location-based services. Depending on the operating system, we typically receive the location of your mobile device expressed as latitude and longitude, as well as the date and time. Please note that the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider.

If you elect to allow the mobile app to collect location information while the mobile app is running in the background, you will have enabled continuous location collection. This allows us to show you offers and advertisements relevant to current location and help you find our locations nearest to you. We also use this location information to conduct analytics and improve our operations as well as the Services themselves.

You can turn off location collection through your device settings or by deleting our mobile app from your device.

### **Additional Uses of Personal Information**

In addition to the uses described above, we may use your Personal Information for the following purposes:

- Operating our business, delivering our products and services, managing your accounts and programs, and for any other lawful, legitimate business purposes for which you have given your express consent or for which your consent may be inferred;
- Contacting you to respond to your requests or enquiries;
- Processing and completing your transactions including, as applicable, order confirmation, enrollment in our programs, processing payments for online purchases and delivering products or services;
- Providing you with newsletters, articles, product or service alerts, new product or service announcements, savings awards, event invitations, and other information that are tailored to your interests or purchase behaviour;
- Contacting you about programs, products, or services that we believe may be of interest to you, or sharing with you special offers from other companies;
- Providing you with programs, promotional information, offers, and other information that are personally tailored to your interests and purchase behaviour;
- Conducting market research, surveys, and similar enquiries to help us understand trends and customer needs across product categories or customer groups;
- Administering our programs including allowing you to create and maintain customer profiles, analyzing your interactions with us, presenting customized offers, and improving our products, services, programs, and other offerings;
- Evaluating your shopping experience or existing products and services, or to create new items;

- Alerting you about a product safety announcement or recall or correction of an offer, promotion, or advertisement;
- Administering sweepstakes and promotions that we may choose to run or contacting you regarding a contest prize;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website or data systems; or to meet legal obligations;
- Enforcing our Terms of Use and other agreements; and,
- Sending you text messages or push notifications when you sign up for one of our messaging programs. These messages may be sent by automated means. You may opt out of a text message program by following the instructions in the “**Opt-Out Choices**” section below.

We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on third-party platforms. We may do this by providing a hashed version of your personal information to the third-party platform provider for matching purposes.

### **How We Share and Disclose Personal Information**

We share your Personal Information with third parties only in the ways described in this Privacy Policy.

**Service Providers:** We share your Personal Information with third-party service providers who complete transactions or perform services on our behalf or for your benefit, such as for administering programs, payment processing, marketing, analytics, or to verify customer data, such as mailing addresses.

**Affiliates:** We may share your information with affiliated legal entities within the UNFI family of companies for purposes and uses described in this Privacy Policy. For example, we may have a separate legal entity that provides products in one region, and UNFI may be the legal entity operating the website or mobile app, and UNFI would share Personal Information of website or mobile app users with the legal entity that provides products for that region.

**Third-Party Mobile App Providers:** With your knowledge and consent, the Services may gather and transfer your information, including location information, from and to other applications, functions and tools within your mobile device.

**Legal Process, Safety and Terms Enforcement:** We may disclose your Personal Information to legal or government regulatory authorities in response to their requests for such information or to assist in investigations. We may also disclose your Personal Information to third parties in connection with claims, disputes or litigation, as and when required by law, or if we determine its disclosure is necessary to protect the health and

safety of an individual, or to enforce our legal rights or contractual commitments that you have made.

**Business Transfers:** Your Personal Information may be disclosed as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction. In such case, we will comply with the confidentiality and use restrictions for business transactions as required by applicable law.

**Bankruptcy:** In the event of an insolvency, bankruptcy, or receivership your Personal Information may be disclosed or sold as part of the reorganization or liquidation process.

### **Your Ad Choices**

We support the self-regulatory principles of the Digital Advertising Alliance (“DAA”). We work with a variety of advertisers, advertising networks, advertising servers, and analytics companies (“Ad Partners”) that use different technologies to collect data about your use of the Services (such as pages visited, ads viewed or clicked on) in order to deliver relevant advertising.

These technologies may include the placement on our Services of cookies or web beacons, and other data collection technologies by these Ad Partners to track how our Services are being used, to track where users go and what they do after their leave our Services, and to link various devices you may use, and to serve you more relevant ads. These advertisements may appear on our Services or other websites, mobile apps, or platforms that you visit.

Please note that this Privacy Policy does not cover the practices of our Ad Partners. UNFI does not have control over these third-party technologies or the information contained in them. For more information about how Ad Partners use the information collected by the technologies on our Services and about your options not to accept cookies placed by some of these companies on our Services, please visit the DAA’s opt-out page [www.aboutads.info/choices/](http://www.aboutads.info/choices/) or the DAAC’s opt-out page <https://youradchoices.ca>. You may also opt out of additional third-party advertising networks by going to the Network Advertising Initiative’s website <http://www.networkadvertising.org> and following the directions. Google provides certain choices related to their services. For more information, please visit <https://adssettings.google.com/>.

The opt-outs described above are device- and browser-specific and may not work on all devices. If you choose to opt-out through any of these opt-out tools, this does not mean you will cease to see advertising. Rather, the ads you see will just not be based on your interests. In addition, when you opt out using one of these methods, our Ad Partners will continue to collect information for any other purpose permitted by the DAA’s rules. You can opt out of future information collection from our Services by ceasing use of the Service or in the case of an application, uninstalling the application.

### **Children’s Privacy**

Our Services are not directed to, and we do not intend to, or knowingly, collect or solicit Personal Information online from children under the age of 13. We encourage parents or guardians to participate in and monitor their children's online activity. If a child under 13 has provided Personal Information to us, we encourage the child's parent or guardian to contact us (see the "**Contact**" section below) to request that we remove the information from our systems. If you are under the age of 13, do not provide us with any Personal Information either directly, on any website bulletin boards, or by other means.

### **How To Access or Update Your Information**

You have the right to request that UNFI disclose to you the Personal Information it collects, uses, and discloses about you and to receive an accounting of the third parties to whom UNFI has disclosed your personal information.

Requested information will be provided to you free of charge, unless the information you seek is extensive or UNFI will have to incur costs to prepare the information in a useable format, in which case we may charge you a reasonable fee to provide the requested information. We shall advise you in advance of the costs to provide the requested information and you have the option to withdraw your request.

You may also review your Personal Information that is readily accessible through our Services or contact us to request that it be updated by contacting us (see the "**How to Contact Us**" section below).

There are certain exceptions to your right to access your Personal Information. UNFI will state in its response if an exception applies.

#### Right of Correction

You have the right to request that UNFI and our service providers correct or supplement any Personal Information about you that you can demonstrate is inaccurate or incomplete.

#### Retention

We will retain your Personal Information for as long as your account is active or as long as necessary to fulfil the purposes for which it was collected, unless a longer period is required by law. We will retain and use your Personal Information as necessary to comply with our legal obligations or data retention policies, resolve disputes and enforce our agreements.

#### Submitting Requests

You can submit your request regarding your Personal Information by emailing us at [privacypolicy@unfi.com](mailto:privacypolicy@unfi.com).

#### Verifying Requests

UNFI provides an email address: [privacypolicy@unfi.com](mailto:privacypolicy@unfi.com) to submit requests. UNFI must verify that the person requesting information or deletion is the individual about whom the request relates to process the request. To verify identity, we may request up to three pieces of Personal Information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the individual whose personal information is the subject of the request.

Making a verifiable individual request does not require you to create an account with us. We will only use Personal Information provided in your request to verify your identity and will delete any identification information you provide after processing the request. UNFI reserves the right to take additional steps as necessary to verify the identity of individuals where we have reason to believe a request is fraudulent.

### **Contact for More Information**

If you have any questions or concerns regarding your rights under this Privacy Policy, you may contact us as described below.

### **Links to Other Websites**

For your information and convenience, our Services contain links to websites operated by third parties. Our website may also include features like buttons and widgets hosted by other companies (for example, the Twitter “Tweet” button). These features may collect your IP address, which page you are visiting on our Services, and may set a cookie to enable the feature to function properly.

We use Google Maps with our Find a Location feature. By using our Find a Location feature, you are bound by Google Maps/Google Earth Additional Terms of Service [https://maps.google.com/help/terms\\_maps/](https://maps.google.com/help/terms_maps/), including Google’s Privacy Policy <https://policies.google.com/privacy>.

This Privacy Policy does not apply to, and we are not responsible for, the practices of third parties that collect your Personal Information. We encourage you to review the privacy policies of those third parties to learn about their information practises.

### **Updates to the Privacy Policy**

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Information, we will notify you by prominently posting notice of the changes on the Services and updating the effective date above. Your continued use of the services is deemed to be acceptance of such changes.

If you do not wish to permit changes in our use of your Personal Information, you must notify us prior to the effective date of the planned changes.

## **Managing Communication Preferences**

If you have provided us with your consent, we may send you email messages, direct mail offers, push notifications or other communications regarding products or services depending on the method of communication selected. You may ask us not to do so when you access our websites or mobile applications or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

**Printed Materials:** To opt out of receiving printed marketing materials at your postal address, such as advertisements, flyers, or postcards, please write to us at the address below. Please be sure to include your name and mailing address exactly as they appear on the printed marketing materials you received.

**Emails:** To opt out of receiving marketing communications via email, please send an unsubscribe request to the email address below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

**Text Messages:** If you have consented to receive text messages, you may opt out of receiving them by using the method provided in the text message or by contacting us at the address below.

**Push Notifications:** To opt out of receiving push notifications, please set your preferences within your device setting menu.

## **How To Contact Us**

If you have any questions or comments about this privacy policy or other privacy-related matters, you may contact us in the following ways:

**Mailing Address:**

Lynette Stocker  
Sr. Privacy Manager  
11840 Valley View Road  
Eden Prairie, MN 55344

**Email Address:** [privacypolicy@unfi.com](mailto:privacypolicy@unfi.com)