

## OFG's Privacy Policy

### **A. Introduction**

As part of the Overwaitea Food Group, a division of Overwaitea Food Group Limited Partnership ("OFG"), we adhere to the philosophy that our customers are our greatest asset. We built our business and our websites with this philosophy in mind.

Personal Information is information about an identifiable individual, such as name, date of birth, gender, home address, personal phone number, personal email address, Internet Protocol (IP) address, personal interests and shopping preferences ("Personal Information"). In this policy, we explain what happens to the Personal Information we collect and how it is used, shared and/or disclosed.

It is possible to browse our websites without providing any Personal Information. This will not affect the convenience or functionality of using our websites. The links we post to third party websites are not governed by OFG's privacy policy. These linked websites will be governed by their own privacy policies and as such OFG is not responsible for any collection, use and/or share of Personal Information occurring from the linked websites. You should read the privacy policies relating to linked websites.

This privacy policy governs OFG, its customers, employees, its agents and its affiliates in collecting, using and/or disclosing Personal Information during the course of OFG's business. OFG has the right to change and update this privacy policy at any time without notice.

For OFG on-line shopping websites, the privacy policy applicable to your transaction is the privacy policy in effect on the date of your transaction. Each time you place an order with OFG's on-line shopping websites, please ensure to read the privacy policy applicable to and governing the transaction.

### **B. Consent**

OFG respects its customers' and team members' privacy and accordingly OFG collects, uses and discloses Personal Information with the customers' and team members' ("you" and "your") consent and otherwise as required or permitted by law. By providing OFG with Personal Information, you agree and consent that OFG may collect, use and/or disclose such Personal Information, as authorized by you and within the parameters as permitted or required by law.

During your initial visit to any of OFG's websites, you are asked to indicate whether you wish to receive communications from OFG. There is no obligation on you to receive OFG's communications. However when you consent to receiving communications from OFG, we may contact you via email, postal mail or telephone to provide you with information on new products, services, events and/or promotions available through OFG and we may ask you about your satisfaction with any of OFG's products or services.

You can withdraw your consent at any time. You may choose not to receive any of OFG's promotional and informational materials on products, services, contests, sweepstakes and/or events offered by OFG or its operating divisions, including, but not limited to, Save-On-Foods. If you withdraw your consent, OFG will no longer be able to deliver certain services to you.

When customers receive marketing and/or promotional emails from OFG, customers may at any time, choose to 'UNSUBSCRIBE' from any or all of OFG's promotional and/or marketing materials. Customers who receive promotional and/or marketing materials sent directly from a Save-On-Foods store and/or

OFG by mail may also request to be withdrawn from such materials by filling out the following form(s) from OFG's Customer Service Team and returning them to OFG. [Download the form here.](#)

When interacting with OFG via Facebook, Twitter, Pinterest and/or similar social networks, OFG may collect, use and/or disclose Personal Information that you provide or disclose to OFG, in accordance with this policy. Social networks have their own privacy policies, terms and conditions. OFG's privacy policy does not govern your usage of social networks.

More Rewards Visa Card ("MRVC") customers must follow the specific steps set forth on the MRVC website to withdraw consent. Withdrawing consent from MRVC will affect your eligibility to use the MRVC and/or to collect More Rewards points.

### **C. How do we collect Personal Information?**

- Directly from the customers. This can be in person, by mail, email, over the telephone (calls to our Call Centre may be recorded), and applications for More Rewards program, contests and otherwise through OFG websites.
- OFG Technology. This includes cookies on OFG's websites, usage of OFG's websites, including where and what users physically clicked on or viewed. Cookies track browsing activity on a website. Cookies on OFG websites provide OFG with information about users' visits to the website and the browsing history.
- Website, social media accounts and mobile applications. Whenever you share information about you across these applications and interact with us, OFG will collect Personal Information.
- Closed-circuit television ("CCTV"). OFG has CCTVs throughout its stores and parking lots for security purposes. CCTV images are collected primarily for risk management purposes, but may also be used and/or disclosed as part of a criminal investigation, where required by law or court order.

### **D. Why do we collect, use and/or disclose Personal Information?**

OFG collects, uses and discloses Personal Information to manage its business, to provide efficient services to its customers and as required or permitted by law, including for the following purposes to:

- respond to and communicate regarding inquiries about OFG's websites;
- respond to and communicate regarding orders placed on OFG's on-line shopping website;
- determine the identity of persons placing and receiving online orders on OFG's on-line shopping website;
- deposit loyalty points on to the appropriate More Rewards card;
- provide information about products and services offered by OFG, including contests, giveaways, events and/or sweepstakes;
- understand the needs of customers and their preferences in order to establish and maintain a commercial relationship and to provide customers with ongoing quality service;

- manage and develop OFG’s on-line business and operations;
- meet any legal and regulatory requirements;
- manage, effectively operate and develop OFG’s business;
- engage in business transactions, where appropriate, for purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing;
- dispense medication correctly and properly and where appropriate, provide counselling/advice regarding prescriptions;
- provide pharmacy-related information to other health care providers;
- manage medical records;
- obtain and process payments for prescription medications and pharmacy services;
- connect with private health insurance providers and/or the provincial drug benefit program, where necessary, so OFG can charge the correct price on prescribed medications; and
- any other purpose OFG may indicate to you from time to time, including risk management activities.

**E. To whom do we disclose your Personal Information?**

OFG may disclose Personal Information, as required or permitted by law, with its agents, third parties or its affiliated companies who have agreed with OFG to keep your Personal Information confidential. Only those agents, third parties or affiliated companies and its employees who require access to Personal Information on a “need to know basis” will be given access by OFG.

OFG may also disclose Personal Information to companies or individuals that provide services on OFG’s behalf, who have agreed with OFG to keep your Personal Information confidential, including software developers (website developers and hosts), data processing providers, document management providers and office service providers. Access to Personal Information in those instances is limited to the Personal Information necessary to deliver the required services to OFG.

OFG may disclose or share Personal Information to designated individuals or entities, including, but not limited to:

- parents, caregivers, provincial drug benefit program and/or private health insurance providers and other governmental entities, as permitted by law;
- government institutions that have asserted their lawful authority to obtain Personal Information from OFG; and
- to comply with a subpoena or warrant or an order made by a court, person or body with jurisdiction to compel the production of Personal Information.

If you prefer OFG to not share or disclose your Personal Information as described above, please write to OFG’s Customer Service Team at 1-800-242-9229 or email at [customer\\_service@owfg.com](mailto:customer_service@owfg.com). In particular, you always have the option to instruct us not to use your Personal Information beyond providing you with the service(s) or information you requested. In such event, however, OFG will no longer be able to provide certain service(s) or information to you.

**F. Storage, Retention and Access**

At OFG, we make a conscious effort to secure and safeguard Personal Information. All of OFG's network drives and storage devices are protected in secure facilities and by industry-approved anti-virus applications, firewall programs and are encrypted, so only those individuals with proper permission have access thereto. We also store physical files pertaining Personal Information in secure facilities with appropriate access protocols in place.

Any Personal Information in the custody and control of OFG will be retained as long as necessary to fulfill OFG's purposes of collecting, using and/or disclosing Personal Information, unless instructed by you to the contrary, subject to applicable law. Any Personal Information relating to More Rewards program is retained until you terminate your participation in the program. Personal Information collected for risk management activities relating to on-line purchases are retained for a period of 90 days or such period of time as OFG deems appropriate, unless further required for law enforcement or similar purposes, in which case the pertinent information is retained until the matter is resolved.

As permitted by law, you can, at any time, request access, in writing, to your Personal Information that OFG may have. OFG will give you access to your eligible Personal Information no later than 30 days after you make the request. You may also request a correction of your Personal Information controlled by OFG.

## **G. Privacy Principles**

OFG's privacy policy is based on practices consistent with the Canadian Standards Association's Model Code for the Protection of Personal Information. This code contains ten fair information principles generally described as follows:

- 1) Accountability – An organization is responsible for personal information under its control designating a representative(s) responsible for its compliance with such principles.
- 2) Consent- The consent of an individual is required for the collection, use or disclosure of personal information unless otherwise permitted by law.
- 3) Identifying Purposes- The purpose for which personal information is collected shall be identified on or before the time the personal information is collected.
- 4) Limiting Collection of Personal Information- The collection of personal information shall be limited to that which is necessary for the identified purposes.
- 5) Limiting Use, Disclosure and Retention of Personal Information- Personal Information shall only be used or disclosed for the purpose for which it was collected unless otherwise allowed by law. Such personal information shall also only be retained as long as is necessary for the fulfillment of such identified purposes.
- 6) Accuracy- Personal Information collected shall be as accurate, complete and up to date as is necessary for the identified purposes.
- 7) Safeguards and Safekeeping- Personal information shall be secured at a level appropriate to the sensitivity of the Personal Information.
- 8) Openness- An organization shall make available information about its practices pertaining to the management of personal information.
- 9) Individual Access- An individual shall be informed of the existence, use and disclosure of their personal information and shall be given access to such personal information. Such individual shall be entitled to query the accuracy and completeness of the personal information as well as have such personal information amended.

10) Challenging Compliance- An individual shall be entitled to challenge concerns they may have with respect to an organization's compliance with the fair information principles contained herein.

## **H. Contact Us**

If you have any questions or concerns about our privacy policy, please contact the General Counsel & Privacy Officer:

Don Eng, General Counsel & Privacy Officer  
19855-92A Avenue  
Langley, British Columbia, Canada, V1M 3B6  
Phone: 604-881-3668  
Fax: 604-888-8521  
Email: [don\\_eng@owfg.com](mailto:don_eng@owfg.com)

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