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**Thank you very much for your interest in Lidl Plus.**

## **High level Data Protection overview for Lidl Plus**

### **Who we are?**

We are Lidl Stiftung & Co. KG, Stiftsbergstraße 1, 74167 Neckarsulm, Germany (in the following “Lidl Stiftung”, “we” or “us”) and the operator of the customer service program Lidl Plus. We are responsible for the processing as well as for the protection of your personal data in Lidl Plus.

### **What is Lidl Plus?**

Lidl Plus is aimed at consumers who wish to receive personalised information about our offers, promotions as well as products and services from selected partners and other companies belonging to Lidl Group. We will determine your interest profile based on your purchase behaviour, usage of our App and of other digital services of the Lidl Group.

### **What personal data do we collect from you?**

We collect your personal data that you provide when you sign up for Lidl Plus. Furthermore, we collect your purchase and usage behaviour in connection with Lidl Plus and other digital services of the Lidl group used by you.

### **Why do we collect this personal data and for what purposes do we use it?**

We process your personal data mainly to fulfil the contract concluded with us with your completed registration, i.e., to determine your possible interests based on your purchasing and usage behaviour with regard to the products and services of the Lidl group and to provide you with personalized information and offers. If you have given your consent, we will send you information tailored to you about current Lidl promotions and offers via email, push notifications or SMS.

Furthermore, we also have a legitimate interest in making your experience in connection with Lidl Plus as easy and efficient as possible.

### **Who do we pass on your personal data to?**

In some cases, we pass on your personal data to service providers who have been commissioned by us in writing and are regularly checked by us. These companies never pursue their own purposes with your personal data. Furthermore, your personal data may be passed on to national companies at Lidl in order to present relevant content for you or to run a competition organised by the respective national company, provided you have given the consent.

If we transfer personal data to recipients in the countries outside of the European Economic Area (EEA) we ensure that the adequate level of data protection is provided by measures such as binding corporate rules, standard contractual clauses, certifications mechanism or recognised codes of conduct.

## How long do we store your personal data?

Your personal data will be anonymised as soon as we no longer have a purpose for it. As a rule, we store your personal data for the duration of your participation in Lidl Plus. If you have been inactive for 24 months, we will inform you about the pending deletion.

## What rights do you have in relation to the processing of your personal data?

If you wish to access or receive a copy of your personal data stored with us, we will of course provide this free of charge. You have the right under the respective legal conditions to have incorrect data corrected. Furthermore, you can have your personal data deleted, restrict the processing and the transmission of your personal data and object the processing based on legitimate interest or public interest. You can also revoke consent given in the context of Lidl Plus. You have the right to lodge a complaint with the responsible supervisory authority.

We kindly ask you to read our Privacy Policy below, where you can find more information about how we process your data. You can contact our Data Protection Officer at the above mentioned postal address or at: [privacy@lidlplus.com.mt](mailto:privacy@lidlplus.com.mt).

## Privacy Policy Lidl Plus

Lidl Plus is a loyalty programme (hereinafter referred to as “**Service**” or “**Lidl Plus**”) of the Lidl Group that is operated by the Lidl Stiftung & Co. KG, Stiftsbergstraße 1, 74167 Neckarsulm, Germany (hereinafter referred to as “**Lidl Stiftung**”, “**we**”, “**us**”). The Lidl Stiftung processes the data required for the purposes of the service insofar as responsible entity as the data is raised, collected, analysed and forwarded to Lidl Malta Ltd. (hereinafter referred to with Lidl Stiftung as “**Lidl Companies**” or “**Lidl**”). Some data processing requires the involvement of the Lidl-Group (hereinafter referred to as “**group of companies**” [*insert hyperlink here*]).

Insofar as the Lidl organisations receive data through the service on the basis of your voluntary consent and inform you about current offers and specials by Lidl, they act themselves as responsible entity in relation to data protection law.

This Privacy Policy applies to the processing activities done by Lidl Stiftung as the controller. The data protection officer of the Lidl Stiftung can be contacted at the above-mentioned postal address or at: [privacy@lidlplus.com.mt](mailto:privacy@lidlplus.com.mt).

The service is aimed at consumers (hereinafter “**users**” or “**you**”), who wish to receive personalised information from Lidl Stiftung about offers and promotions from Lidl Plus and offers, products and services from selected partners and Lidl Companies, which correspond as closely as possible to your interests. The basis for determining the relevant interests is the purchasing and usage behaviour with regard to the products and services of the Lidl Companies, which is explained in more detail below.

With Lidl Plus you can enjoy a variety of services that are especially tailored to you. These include, among other things, offers specially tailored to your needs and desires, participation in competition games and exclusive discount and special offers when shopping in the store and online in the selected online shops of the Lidl Group. Depending on where and to what extent you are using the service, Lidl Stiftung forwards your details to certain Lidl Companies to be able to provide you with the relevant service.

## **1. What data about your person do we collect and which communication channels do we use for this?**

### **1.1. Registration for Lidl Plus**

As part of the registration process, we request the following customer data: first name, second name, date of birth, e-mail address, mobile phone number and preferred Lidl store. It is optional to provide us: salutation, gender and your home address (street, house number, post code, city and country). To set the preferred store the geo localisation function of your mobile device can be used.

### **1.2. Data from My Lidl**

If you have voluntarily provided certain information about your circumstances and interests as well as the birth date of your child in your My Lidl Account, we also collect this information within the framework of Lidl Plus.

### **1.3. Store Visits**

When you identify yourself during your store visit at either the cash register, we record the store you visited, the products purchased according to amount, type and price, the coupons used, the receipt total as well as time of payment process and payment type. With the allocation of your purchase to your customer account we pursue the purpose stated in paragraph 2, e.g., to be able to make you offers especially adapted to your preferences and interests as well as offer participation in specials.

At the till you can identify yourself either with your digital customer card or with the mobile phone number provided at registration

### **1.4. Customer Service**

When you contact the customer service of Lidl Companies, we use the data that you supply in this context.

### **1.5. Use of the App**

When using the Lidl Plus app we collect information about the store where you buy. In addition, we collect information about all contents viewed in the app such as activated coupons, your notification settings, the participation in lotteries, viewed articles and your selected main store. We also collect information about your interaction with the app such as visited sections, the screens seen during each session, the number of clicks and scrolls. Additionally, we process your customer Id (Loyalty ID), information about the operating system version you use, the device identification, the system language and the chosen country as well as the app version used by you.

Your login details are stored and used to carry out the login. So that you do not have to log in again every time you open the app, your login details are saved in the app (encrypted) until you log out of the account.

Digital till receipts can be saved to your end device or be forwarded directly by Messenger, insofar you permit the app access to your photos/ media. The camera of your mobile end device can be used for scanning QR coupons if you give the relevant permission.

As part of the app, we conduct surveys and collect information about your purchasing behaviour, your app usage and personal circumstances as well as interests in connection to other Lidl Companies. The participation in the surveys is voluntary.

### **1.6. Partner Offers**

Via Lidl Plus you also receive the option to avail of special offers from selected partners. To avail of some of these offers you must identify yourself as Lidl Plus customer with your digital customer card. In this case the relevant cooperation partner informs us about the utilisation of the relevant special offer including the information linked to it (e.g. time, amount, place) so that we can adapt our offers even more to your interests.

In the event that a special offer shall be granted within Lidl Plus for contracting services of our cooperation partners, the latter will provide us with your contact details (email address and telephone number) so that we can correctly assign the offer to your account.

### **1.7. Online Shop/other digital services**

If you have registered for the Lidl online shop or any other apps, websites or digital services operated by a company belonging to the group of companies such as, click and collect services, flower shop, travel booking, online receipts, photograph services, Mr. Cuisine app, Lidl Home app, Lidl Liddle Club, they inform us about your use of the digital services including the type, quantity and price of the products you have purchased and/or booked online, the coupons you have redeemed, the voucher amount and the time of the payment process and the type of means of payment used, the delivery method you chose and your customer behavior on such platforms.

### **1.8. Newsletters of other service providers**

Additionally, if you gave your consent to receive the newsletter of the online shop or of any other services described in the previous paragraph and operated by the group of companies we can receive information from said companies about your user behaviour in relation to that newsletter, including such information like the time of opening of the newsletter, the links or areas clicked by you, duration and frequency of use.

### **1.9. Analysis of User Behaviour / Cookies**

When using the app, we create user segmentation profiles for the purposes of statistical analysis and assign these, if possible, to your person or your e-mail address or customer number. Unless this data is technically necessary to ensure the functionality of the app, we also collect and we use this data only if you have consented to our tracking technologies (see also paragraph 2 of this Privacy Policy). This includes the following data processing activities:

The following purposes are pursued with the analysis:

- Optimization of our service and its functions,
- Improving our offer and marketing of products of the Lidl companies via (advertising) campaigns,
- Displaying interest-based advertisements (e.g., via push messages and advertising banners on third-party services).

In order to be able to display interest-based information to you, it is necessary to be able to assign the aforementioned analysis to you as a person. For this purpose, we establish a connection to your customer number from the time the registration is completed. Your consent to the provision of personalized information also covers this processing step.

The app also uses A/B Testing, Analytics, Cloud Messaging, Crashlytics, Dynamic Links, In-App Messaging, Performance, Predictions and Remote Config. These are analytics services provided by Google. We have concluded a processing agreement with Google (see also sections 2 and 3.1 of this data protection policy).

For this analysis and the displaying of personalized advertising, we use the following advertising identifiers: (i) IDFA (Identifier for Advertising = advertising identification for iOS devices) or (ii) the Android advertising ID or (iii) Huawei ID, the IP-/ MAC address, the HTTP header as well as a fingerprint of your end device (additionally: time of access, country, language, local settings, operating system and version as well as app version). In addition, we include user device- and web activity information, as well as app and event tokens in this analysis. The processing of this data takes place exclusively on a pseudonymised basis. You can at any time deactivate or set back the IDFA, the Android advertising ID and the Huawei ID through your operating system. In the event that IDFA is not available, we use SkAdNetwork, Apple's attribution API, to attribute installations of our app to an advertising campaign. The legal basis is your consent (see also section 2 of the data protection policy).

### **Google Ads Customer Matching**

We use the "Google Ads Customer Matching" service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter "Google") in the Lidl Plus app. In this process, lists with user data are sent to Google servers with the help of the tracking technologies used by us. Google then compares whether the transmitted user data matches data from Google customers and then creates target groups that can be used for the display of advertisements. The advertisements can be displayed within the Google network (YouTube, GMail or within the search engine) as well as across devices (so-called remarketing or retargeting).

We have concluded a processing agreement with Google for the use of Google Ads Customer Matching pursuant to Art. 28 (3) GDPR. Through this contract, Google assures to process the personal data as instructed on behalf and to ensure the protection of the rights of the data subject.

The personal data will be deleted after the purpose has ceased to exist.

Information on how personal data is used by Google, which is transmitted to Google via the integration of the services, and regarding your settings options for personalized advertising and data collection, can be found here and here. General information on data processing by Google can be found in Google's privacy policy.

### **Meta/Facebook**

We use the "Facebook Custom Audience" service of Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter "Meta" or "Facebook") in the Lidl Plus app. Facebook Custom Audience enables us to form target groups and to design and play out personalized ads on Facebook according to needs.

For this purpose, lists with user data are uploaded to Facebook - via our tracking technologies. Facebook then compares whether the submitted user data matches data from Facebook users and then creates target groups that can be used to target ads on Facebook. With Custom Audience, we ensure that ads are only displayed on Facebook to people who have previously visited our app or are

interested in our products. Facebook also uses the data for its own advertising purposes and for third-party advertising purposes.

People remain in a Custom Audience for a maximum of 180 days. After 180 days, people who belong to the Custom Audience of the website are removed if they do not visit the website again.

We are joint controllers with Facebook regarding the use of Facebook Custom Audience according to Art. 26 GDPR. We have entered into a joint responsibility agreement to determine the respective responsibilities for fulfilling the obligations under the GDPR. According to this agreement, we are responsible for informing data subjects, while Facebook is responsible for fulfilling requests regarding data subjects' rights under Art. 15 to 21 of the GDPR. However, within the framework of joint responsibility, you can in principle assert your data subject rights against each of the joint controllers.

Facebook bases the processing of data on the consent of Facebook users pursuant to Art. 6 para. 1 p. 1 lit. a GDPR and the legitimate interests of Facebook pursuant to Art. 6 para. 1 p. 1 lit. f GDPR to ensure accurate and reliable reports or accurate performance statistics for Facebook's advertisers. You can find more information about this in Facebook's privacy information or here. You can contact Facebook's data protection officer here.

You can object to the use of the Custom Audiences service globally on the Facebook website. After logging in to your Facebook account, you will be taken to the Facebook Ads settings.

### **Withdrawal of your consent**

**If you would like to withdraw your tracking consent during your use of Lidl Plus, you can do so at any time with effect for the future and manage the tracking after completing registration via the opt out within the app under “More” → “Legal information” → “Data sharing”.**

### **1.10. Map services**

In this app you have the possibility to use the map service of the operating system of your mobile device. Thus, interactive maps can be displayed directly in the app and you have the possibility to use the map function comfortably to find e.g. Lidl stores in your area.

In order to use the functions of the map services, it is necessary to process your IP address within the framework of Internet communication. This is usually processed on a server of the respective operating systems. We have no influence on the concrete data processing by providers of the operating systems. Further information on the purpose and scope of data processing can be found in the provider's privacy policy. There you will also find further information about your rights and settings to protect your privacy.

Addresses and privacy policies of the providers:

- Google Maps: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, <https://www.google.com/policies/privacy/>. Additional terms of use for Google Maps / Google Earth can be found at [https://maps.google.com/help/terms\\_maps.html](https://maps.google.com/help/terms_maps.html).
- Apple Inc., One Apple Park Way, Cupertino, California. Apple Maps Terms of Use can be found at <https://www.apple.com/legal/internet-services/maps/terms-en.html>. Apple's Privacy Policy can be found at <https://www.apple.com/legal/privacy/en-ww/>.
- Huawei Map kit: Aspiegel SE, 1F, Simmonscourt House, Ballsbridge, Dublin D04 W9H6, Ireland. <https://developer.huawei.com/consumer/en/hms/huawei-MapKit/>. Huawei Privacy Policy can be found at: <https://www.huawei.com/en/privacy-policy>

### **1.11. Links to other websites and apps**

Our app includes links to other websites and apps that are operated by one of the Lidl Companies, or of our selected partners described above or from other third parties. When you click on one of the in-app banners of the featured products you will be redirected to the website/app or to your respective app store. The links may also include special tracking technologies which will allow the operators of said websites/apps to understand and to measure where the user learnt about them. We encourage you to review the corresponding privacy policy of each website/app you will be redirected to in order to understand what information will be processed about you by the operator. When redirecting you to any of these website/apps, we process your personal data in order to comply with your (technical) request to visit the respective app or website (Article 6, paragraph 1, letter b) GDPR), as well as based on the operator's legitimate interest in carrying out advertising (Article 6, paragraph 1, letter f) GDPR).

### **1.12. Newsletter/ Push Notifications/ SMS**

In addition, we collect information about your user behaviour in relation to the newsletter and other information that we send you as push messages or SMS, store and if possible, assign it to you or your e-mail address or customer number. In relation to this we collect information about time of opening the message and the links or areas clicked by you, selected products, time, duration, and frequency of usage.

We also collect and use this data only if you have consented to this (see also paragraph 2 of this Privacy Policy).

### **1.13. Special categories of personal data**

Not included in the analysis of your above listed personal data are special categories of personal data in the sense of Article 9 Paragraph 1 GDPR (e.g., information about your health or religion).

## **2. For what Purpose and on what legal Basis do we process your Personal Data?**

We collect the data listed under paragraph 1 to be able to offer you the relevant services of Lidl Plus.

### **2.1. Purpose of Communication, Identification and Protection of your Customer Profile**

The customer master data collected as part of the registration serves the communication with you as well as the clear assignation of your shopping and user behaviour to your customer profile.

If, as part of using our app or in the settings of your mobile end device, you consented to the so-called geo-localisation per dialogue "allow permissions", we use this function to be able to offer you individual services related to your location. We especially process your location and network based as part of the function "store locator", "Charging stations locator" and "Partner offers locator" to be able to display the closest stores to you. Geolocation data are not stored permanently by us.

As part of your registration, we ask for your birth date (see paragraph 1 above). Firstly, your participation presupposes that you are at least 18 years old (see paragraph 2 of terms of conditions). Secondly, for reasons of protecting children, there are age limits for advertising certain products (i.e. advertising for alcoholic drinks will not be directed towards children).

Especially we use your e-mail address to protect you from unauthorised access of third parties, by sending you an e-mail alert e.g. when there is access to your account by a strange device, i.e. a device that has not previously been used to access the Lidl Plus app. In addition, we use your purchase behaviour from the online shop for fraud prevention.

Processing of this kind takes place based on legal regulations that allow us to process personal data insofar as it is required for using a service or fulfilling a contract (Article 6, paragraph 1, letter b) GDPR), and because we have a primary legitimate interest in making the use of the app as easy and efficient as possible (Article 6, paragraph 1, letter f) GDPR).

In the event of product recalls, we check whether you have purchased the affected product to be able to inform you about the recall. For this purpose, we use the information about the products you have purchased (compare above "**Store Visits**").

The processing is carried out to protect your health (Article 6, paragraph 1, letter d) GDPR), and because we have a legitimate interest in informing you about any product recalls (Article 6, paragraph 1, letter f) GDPR).

## **2.2. Purpose of Optimizing advertising measures, the store network and store design**

When your address details are available to us, we use these for optimizing advertising measures (especially leaflet distribution, poster advertising) and for optimizing the store network and design. Providing details of your address is voluntary. This data is processed based on our legitimate interest in the optimisation of sales channels (Article 6, paragraph 1, letter f) GDPR).

## **2.3. Purpose of Determining your Product Interests**

To grant you the advantages of the Lidl Plus membership and present you and other customers with the best possible individual offers and carry out targeted customer surveys, we would like to get to know you better. For this we first determine, on the basis of all the personal data listed in section 1, in particular your transaction data from Lidl Plus as well as information that we receive from the Lidl online store or other apps, websites or digital services described above, which products, specials and services could be interesting and relevant to you. We use mathematical-statistical methods to determine this correlation. For this purpose, your personal data is compared with the data of other customers. On the basis of this comparison, we can then deduce which other products and promotions, that other customers with comparable interests have been interested in, could also be of interest to you and other customers.

Using this information, we can draw your attention to e.g., discount specials for your favourite products in the Lidl Plus app and on the website of the respective online shop or the individual digital service, for example, offer you special advantageous prices, discount coupons and other benefits for you, and inform you about attractive offers as part of assortment specials.

For this purpose, you will receive (if possible personalized) information about products, promotions, competitions, new services and news from the [streaming-, branch-, online shop-, flower, photo- and travel offer](#) and for surveys.

By measuring your app usage (see above), we also gain general insights into the optimization of our Lidl Plus app and the success of our advertising campaigns. In addition, we provide our advertising partners with statistically processed, anonymous data (based on your app usage as well as your



purchased products) on the success of their advertising campaigns for billing purposes and to optimize their marketing campaigns. Our advertising partners cannot trace this information back to you personally.

Furthermore, personalised user profiles under assigning your person and/or e-mail address will be used to better tailor a possible advertising approach, in particular in the form of newsletters, to your personal interests and to improve the web offers. This usage profile then also includes information about your use of Lidl Plus.

These processing operations are carried out on the basis of statutory provisions that allow us to process personal data insofar as it is necessary for the use of a service or the performance of a contract (Article 6, paragraph 1, letter b) GDPR).

Provided you have given the appropriate consent, information that we have read from your terminal device can also be included in this profile. In these cases, we process your personal data on the basis of Article 6, paragraph 1, letter a) GDPR. This applies to the data processing described above under "Online Shop", "Analysis of User Behaviour" and "Newsletter/ Push Notifications/ SMS", as well as the transfer of data to our advertising partners for the playout of (advertising) content on third-party services.

In addition to increasing the informative value of the profile, we also use these findings to optimise the Lidl Plus app and our other online services, provided that this is covered by your consent. The legal basis for this is also Article 6, paragraph 1, letter a) GDPR.

#### **2.4. Purpose of optimizing our store and online offers**

If you participate in our voluntary surveys, we use this information to optimize our store and online offers. We process this data because we have an overriding legitimate interest in aligning our offers as closely as possible with your interests (Article 6, paragraph 1, letter f) GDPR).

#### **2.5. Purpose of receiving marketing communications**

If you have given us your express advertising consent, we will also send you information about the program benefits, e.g., details about the program, information about new program partners and partner benefits, special customer promotions and (if possible, personalized) information about products, promotions, competitions, new services and news from the streaming-, store-, online shop-, flower-, photo- and travel-offers by e-mail, SMS or push notifications.

This direct address takes place because you have given us the corresponding consent (Article 6, paragraph 1, letter a) GDPR).

#### **2.6. Purpose of location and time-based Coordination**

We process and use your personal data in relation to the location and time of your shopping to be able to provide you with time- and location-based advertising, e.g., by push messaging to your mobile or by SMS. If your preferred shopping day is for example the Saturday, we can especially inform you about the existing sales specials for this weekday. In addition, we can present you with a regional specific offer, if we are informed about in which region you prefer to do your shopping.

Push notifications are messages that are sent from the app to your device and are prioritized there. The app uses push notifications if you have agreed to receive push notifications when installing the

app or at any time during use of the app in your device settings. You can deactivate the reception of push notifications at any time.

If we analyse place and time of your shopping, this serves the usage of a service or fulfilment of a contract (Article 6, paragraph 1, letter b) GDPR) and because we have a primary legitimate interest in adapting our offers as best as possible to the conditions of time and place (Article 6, paragraph 1, letter f) GDPR).

## **2.7. Purpose of processing customer requests**

Personal data that you provide us with when you contact customer service, e.g., via our contact form, will of course be treated confidentially. We use your data exclusively for the purpose of processing your inquiry and to handle and answer your privacy right requests.

In order to be able to process your customer service inquiries in the best possible way, we also make the data provided above available to other Lidl Companies. This means that it is not necessary to record and store this data again in order to process your inquiries. The Lidl Companies use your data exclusively for the purpose of verifying you as a customer or user and processing your inquiry.

The legal basis for processing your data is Article 6, paragraph 1, letter b) GDPR, as this is necessary to process your request, as well as Article 6, paragraph 1, letter f) GDPR. Our and your concurrent (legitimate) interest in this data processing results from the goal of answering your inquiries, solving any problems that may arise and thus maintaining and promoting your satisfaction as a customer or user of our service or those of other Lidl Companies.

The legal basis for processing your requests under data protection law is Article 6, paragraph 1, letter c) GDPR, as this is necessary to comply with our legal obligation to process your request.

## **2.8. Purpose of providing the app**

We process the data collected in the course of using the app so that our app can function properly. In particular, we need this information so that the app can save your preferred settings, such as country and language, so that we can quickly solve technical problems and so that you can access certain areas. This data is not used to create user profiles.

The legal basis for the use of the technologies required for this purpose is Article 6, paragraph 1, letter b) GDPR and Art. 25 Par. 2 TTDSG. We process your data for the provision of our services in the course of processing the contract.

The use of maps services is based on our contractual relationship with you, Article 6, paragraph 1, letter b) GDPR as well as on our legitimate interest of an appealing presentation of our offers and making it easy to find the locations we have indicated in the App. This constitutes a legitimate interest within the meaning of Article 6, paragraph 1, letter f) GDPR.

## **2.9. Purpose of fraud prevention**

In order to prevent economic damage to Lidl, we analyze their shopping behavior using the Lidl Plus app for fraud prevention purposes. In particular, we also evaluate whether and how often items are returned. The legal basis for this is Art. 6 Par. 1 f) GDPR. Our legitimate interest follows from the described purposes of the processing.

### **3. To whom do we forward your personal Data?**

In the event of justified requests from authorities, we will pass on the requested data. We also make your personal data available to third parties as follows:

#### **3.1. Disclosure to service providers**

In part we use service providers to process your data. The companies working for us in this way are carefully selected and contracted in writing. They are bound by our instructions and are controlled before starting data processing and subsequently on a regular basis. These companies never pursue their own purposes with your personal data within the scope of their activities for us.

In connection with this we forward your details to receivers who:

- provide storage capacity, databank systems or similar things,
- provide technical support,
- consulting services in the marketing field.

In connection with the use of Meta services, data is transferred to Meta (see section 1.9 of this privacy policy).

#### **3.2. Disclosure to operators of the connected Lidl services**

Within the Lidl Companies (see paragraph 1 above) we forward the following data to the relevant national company under the conditions described above:

- Your product preferences determined for the targeted presentation of content relevant to you.
- If you participate in a sweepstake or contest ("Campaign") organized by the Lidl Companies, we transmit the data fields listed in the Terms of Use of the Campaign (e.g., customer number (Loyalty ID), phone number, email address, date of birth, etc.).
- Insofar as it is necessary to process an inquiry via our customer service, we also pass on the above-mentioned data to those Lidl companies with whom you contact in the context of customer service inquiries. Furthermore, it may be necessary for us to pass on extracts of your inquiry to contractual partners (e.g., suppliers in the case of product-specific inquiries) in order to process your inquiry.
- If fraud is suspected or Lidl suffers economic damage, we will pass on the requested data on your purchase/return behavior to the Lidl companies.

Only if you gave your consent to the Lidl online shop or any other digital services, apps, websites of companies belonging to Lidl Companies such as click and collect services, flower shop, travel booking, online receipts, photograph services, Mr. Cuisine app, Lidl Home app, third part benefits website etc. to analyse your use of Lidl Plus app and/or the linking of data from Lidl Plus with data from the aforementioned Lidl services, including the type, quantity and price of the products you have purchased in Lidl stores and your user behaviour in relation to our newsletter, including such information like the time of opening of the newsletter, the links or areas clicked by you, duration and frequency of use, we will make that information available to the corresponding national company.

If we transfer personal data to recipients in the third-party countries (countries outside of the European Economic Area) you can derive that from the information regarding data processing by our service providers described in the present Privacy Policy. Through the adoption of adequacy decisions, the European Commission determined whether such third-party country offers an adequate level of

data protection. The exact list of the country with an adequacy decision can be found here: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en). If for a third-party country no adequate protection level has been determined by the European Commission, we ensure that the adequate level of data protection is provided by other measures such as: binding corporate rules, standard contractual clauses, certifications mechanism or recognised codes of conduct. Please contact our data protection officer (Page 1) in case that you would like to obtain further information.

#### **4. How do we guarantee Confidentiality for your personal Data?**

To guarantee confidentiality of your personal data, it is prohibited to our employees working in data processing to collect, process or use personal data in any unauthorised way. Our carefully recruited employees are highly aware of data protection issues and are contractually committed to data secrecy before the start of their employment contract and this obligation continues to exist after termination of the employment relationship.

#### **5. How do we guarantee the Safety of your personal Data?**

The safety of your data is very important to us. Therefore, we maintain technical and organisational measures to protect your personal data especially from dangers in data transmission and from falling into the hands of unauthorised third parties. These measures are regularly adjusted and updated to modern technology.

#### **6. How long do we store your personal Data?**

We delete or anonymise your personal data as soon as it is no longer required for the purposes for which we process it according to the paragraphs above. Generally, we store your personal data for the duration of your participation in the service Lidl Plus. If you are inactive for 24 months, we will inform you about the pending deletion. In this case you can object to the deletion by opening or logging into the app again.

Otherwise the data is deleted after 72 hours from cancelling Lidl Plus. Within these initial 72 hours you have the option to re-instate your customer account by logging in again. The deletion process is then cancelled. If your data is required longer due to legal storage periods or to secure, assertion or enforcement of legal claims, we store your data corresponding with data protection regulations after the cancellation of Lidl Plus, as long as required in each case by law or required to fulfil the purposes.

All personal data that you send us when you contact customer service will be deleted or anonymised by us at the latest 90 days after the final reply has been given. Experience has shown that, as a rule, queries regarding our answers do not occur after 90 days. If you assert your rights as a data subject your personal data will be stored for 5 years after the final reply has been given to you as proof that we have provided you with comprehensive information and that the legal requirements have been met.

#### **7. What Rights do you have in relation to the Processing of your Data?**

Naturally, on request, we disclose the information according to Article 15 GDPR (especially the data stored about your person, the receiver or the categories of receivers to whom it is forwarded, the purpose of data storage etc.). This information is free of charge.

In addition, under the relevant legal conditions you have the right to have incorrect data corrected; or you can have your personal data deleted and restrict the processing or transmission. Further, you have the right to lodge a complaint with the responsible supervisory authority.

**In the cases where the data processing is based on Article 6, paragraph 1, letter e) or f) GDPR, or takes place for the purpose of direct marketing, you have the right to object to the processing.**

If you gave consent, you can at any time revoke it with effect for the future, e.g., within the app under "More" → "Help" → "Contact us" or (if you would like to directly deselect individual notification channels) under "More" → "Settings" → "Commercial communications" or by sending an e-mail to: [privacy@lidlplus.com.mt](mailto:privacy@lidlplus.com.mt).

If you wish to withdraw your consent to the analysis of the use of this app/ My Lidl Account, you can make the appropriate setting within the app under "More" → "Legal information" → "Data sharing".

## **8. No Obligation to provide Data**

If you provide these details yourself, you do not have the obligation to give the previously mentioned voluntary details. However, without these details we are not able to make the full Lidl Plus services based on these details available to you. Only optional data fields are marked as such.

## **9. Can we change the Privacy Policy?**

Changes to this in Privacy Policy can become necessary due to changes in legal position or conditions of data processing of Lidl Plus. If, for example, the purposes for collection, processing or usage of your personal data, or the identity of the responsible identity and categories of receiver's change, you will be informed and insofar as required we will ask for your consent.

### **Data Protection Information for Download**

You can find the Privacy Policy for the app "Lidl Plus" for download as PDF [here](#).