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Privacy policy of the Lidl website and the Lidl App

1. Contact details of the controller and the Data Protection Officer

The company Lidl Malta Limited, having registered office at Vassallo Business Park, Burmarrad Road, Naxxar NXR 6345, Malta, which may be contacted via e-mail at the address privacymt@lidl.com.mt (hereinafter also referred to as "**Lidl Malta**" or "**Lidl**") and the company Lidl Stiftung & Co. KG, having registered office at Stiftsbergstraße 1, 74172 Neckarsulm, Germany, which may be contacted via e-mail at the address privacy@lidlplus.com.mt (hereinafter also "**Lidl Stiftung**") hereby provide the following information on the processing of personal data (hereinafter also "**Privacy policy**") pursuant to articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter also "**GDPR**") and the national legislation on data protection namely, the Maltese Data Protection Act (Chapter 586 of the Laws of Malta) and any subsidiary legislation issued under the same as may be amended from time to time, in relation to the processing of your personal data carried out through the website www.lidl.com.mt, all its subdomains, some associated websites and the Lidl App (hereinafter also "**Services**").

Based on the foregoing, the processing activities described in this Privacy policy are considered to be carried out either together as joint controllers or in the capacity of independent controllers by Lidl Stiftung and Lidl Malta, depending on the role assumed in each specific case. The respective roles are indicated for each processing activity described below.

The Data Protection Officer of Lidl Malta may be contacted at the postal address indicated above or via e-mail at dpo@lidl.it. The Data Protection Officer of Lidl Stiftung may be contacted at the postal address indicated above or via e-mail at privacy@lidlplus.com.mt. Please do not use the above e-mail addresses for non-privacy related issues (e.g. job applications or general Customer Service inquiries).

If you have any questions about our website or the Lidl App, you may contact our Customer Service via the dedicated contact form.

To exercise your rights concerning the processing of your data (see section 15), you may contact Lidl at the e-mail address privacymt@lidl.com.mt.

2. Involvement of third parties as data processors

Unless otherwise stated, the recipients or categories of recipients named below act as data processors. They are carefully selected and contractually bound in accordance with article 28 GDPR. This means that they may only process personal data on the basis of our instructions and not for purposes other than those stated.

3. Transfers to recipients in third countries

Under certain circumstances, it may be necessary for us to transfer your personal data to recipients in a third country or several third countries outside the European Union (EU) and the European Economic Area (EEA).

The EU Commission has certified some third countries as having a level of data protection comparable to the GDPR by means of an adequacy decision. You can find an overview of third countries with an adequacy decision here. For service providers based in the USA, this only applies if they are certified in accordance with the EU-US Data Privacy Framework.

If there is no adequacy decision, we secure the transfer by other measures. These can be, for example, binding company regulations, standard contractual clauses of the European Commission, certifications or recognised codes of conduct.

Unless otherwise stated below, the transfer to a third country takes place either on the basis of an adequacy decision or one of the measures listed above. If you have any questions, please contact the Data Protection Officer.

4. Accessing our Services

Data controller

The processing of your personal data in the context of your navigation within our Services is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

Purposes of data processing/legal basis

When you access our Services automatically and without your intervention, your browser/device sends the following:

- IP address of the requesting web-enabled device used,
- date and time of access,
- name and URL of the retrieved file,
- website/app from which access is made (referrer URL),
- browser you are using and, if applicable, the operating system of your web-enabled computer,
- name of your access provider.

Our server stores these data temporarily in a log file for the following purposes:

- ensure a smooth connection set-up,
- ensure convenient/appropriate use of our website/app,
- evaluate system security and stability.

If you have consented in your browser or in the operating system or other setting in your device to geolocalisation, we use this feature to offer you individualized services related to your current location (e.g. the location of the nearest store). We only process your location data in this way for this function.

The processing of the aforementioned personal data is necessary as essential in order to provide the service requested by you through the features available within our Services (article 6, paragraph 1, letter b) GDPR), to protect our systems and prevent unauthorised access (article 6, paragraph 1, letter f) GDPR) and fulfil the obligation to comply with the applicable legislation (article 6, paragraph 1, letter c) GDPR).

Recipients/categories of recipients

For the aforementioned purposes, your personal data may be transferred to the following categories of recipients: (i) third-party suppliers of assistance and advice for Lidl Malta and Lidl Stiftung with reference (e.g.) to the following sectors: technological, accounting, administrative, legal, insurance, including specialized providers of IT security and network infrastructure services to defend against cyberattacks, malicious access and to ensure system security; (ii) companies of the group to which Lidl Malta and Lidl Stiftung belong; (iii) subjects and authorities which right of access to personal data is recognized by law, regulations or provisions issued by the competent authorities.

Depending on the specific case, these recipients will process such personal data as data controllers or processors.

Storage period/criteria for determining the storage period

The data is stored for a seven-day period, with the exception of the log files pertaining to the website https://recipes.lidl.com.mt which are stored for a period of 90 days and then deleted. Storage for a further period is nevertheless required in the event of legal claims, specific requests from the competent authorities, or for the fulfillment of a legal obligation. However, your browsing data may be further retained in accordance with the cookie policy provided under section 8 of this Privacy policy. Geolocation data are deleted upon the termination of the browsing session within our Services. The security measures (designed to defend against cyberattacks and malicious access and to ensure system security) do not involve the permanent storage of personal data.

5. Contact form, email contact, telephone calls, social media and customer surveys

Data controller

Within the context of Customer Service requests and/or customer surveys relating to products/services offered by Lidl Malta, your personal data are processed by Lidl Malta.

If your contact request concerns the website and/or the Lidl App, your personal data will be processed by Lidl Malta together with Lidl Stiftung as joint data controllers.

If your contact request is submitted as a registered Lidl Plus user, your personal data will be processed by Lidl Malta on behalf of Lidl Stiftung.

Purposes of data processing/legal basis

Personal information that you provide to us when filling out contact forms, by phone or submitted by e-mail, post, fax, via social media or messaging services is of course treated confidentially. For this purpose we may process, for example, your name, surname, e-mail address, mailing address, telephone number.

We use your data solely for the purpose of processing your inquiry, resolving complaints and disputes, verifying the quality of the assistance services offered and promoting their improvement, as well as for complying with applicable legal obligations.

The processing of the aforementioned personal data is necessary as essential in order to provide the service you requested through our contact form, by phone or submitted by e-mail, post, fax, via social media or messaging services (article 6, paragraph 1, letter b) GDPR) and fulfil the obligation to comply with the applicable legislation (article 6, paragraph 1, letter c) GDPR).

Furthermore, to ensure high quality standards in the handling of your request during telephone conversations, your spoken communications with the operator are transcribed into text format in real-time, without the audio of the conversation being recorded. This temporary transcription is immediately analysed by an Artificial Intelligence system to automatically generate a summary of your request. The legal basis for generating this temporary transcription and the related summary is Lidl's legitimate interest in optimizing and improving the efficiency of the service provided to its customers (Article 6, paragraph 1, letter f) of the GDPR). Should you wish to object to this specific processing, we invite you to end the telephone conversation and reach out to our Customer Service using the alternative contact channels made available to you (e.g., online contact form, postal address, social media, messaging services and e-mail).

In the event of requests for assistance relating to non-food and/or textile products, regardless of whether you wish to make use of the legal warranty or are interested in purchasing spare parts, we inform you that your personal identification and contact data will be transmitted to the technical assistance centre specifically appointed by us which will contact you to handle your request for assistance in the best possible way. The said data transfer takes place for the sole purpose of handling your request for assistance for products purchased at Lidl (article 6, paragraph 1, letter b) GDPR).

In order to verify your identity as a customer or user and to process your requests to our Customer Service in the best possible way, we may also use the personal data you have already provided by yourself within the scope of your use of the Lidl App and/or within your subscription to the loyalty program Lidl Plus. The legal basis for this processing is article 6, paragraph 1, letter f) GDPR. Lidl Malta's legitimate interest in the processing of your personal data arises from our intention to answer your request as efficiently as possible, thereby maintaining and promoting customer satisfaction.

In order to allow the verification of the quality of the assistance services offered by Lidl and its business partners specifically appointed as Data Processors, some calls to Customer Service may be recorded. Any personal information you may provide during the telephone call and included in the recording will be processed by Lidl and its business partners exclusively for the purpose of verifying the quality of the assistance services offered, improving the quality of Customer Service processes, and more

effectively guiding the training of the persons authorized to process the data who are entrusted with such services. To ensure your privacy, Lidl has introduced specific protection measures, such as, for example, the alteration of voices within the telephone conversation (so-called "morphing"). The legal basis for data processing in the event of recording Customer Service calls is provided by article 6, paragraph 1, letter f) of the GDPR, as it constitutes a legitimate interest of Lidl to promote the improvement of the service provided to customers. Should you wish to object to this specific processing, we invite you to end the telephone conversation and reach out to our Customer Service using the alternative contact channels made available to you (e.g., online contact form, postal address, social media, messaging services and e-mail).

If you participate in one of our customer surveys, you do so on a purely voluntary basis. No information from these anonymous surveys is stored which will enable a connection to the participants to be established. We only store the date and time of your participation. Any personal information which you provide when answering to our survey questions is considered to be given voluntarily and in accordance with the provisions of the GDPR. Please do not insert any names or similar information into free text fields which could allow a connection to you or other persons to be established. Should you request to be contacted by our Customer Service and therefore provide your personal data such as name, surname, e-mail address or telephone number, these data will be processed for the exclusive purpose of fulfilling your request. For this specific data processing, article 6, paragraph 1, letter b) GDPR applies as the legal basis. For more information in this regard, please read the specific privacy policy for the said customer survey.

Recipients/categories of recipients

For the abovementioned purposes, your personal data may be transferred to the following categories of recipients: (i) business partners who will provide you with technical assistance for non-food and / or textile products in order to process your request (legal warranty or purchase of spare parts); (ii) where necessary, contracting parties (e.g. suppliers, where inquiries are product-specific) in order to process your inquiry (in these cases, not included under i) above, your inquiry will be anonymized in advance to ensure that the third party cannot relate it to you. If sharing your personal data is necessary in an individual case, we will inform you of this), (iii) third-party suppliers of assistance and advice for Lidl Malta and Lidl Stiftung with reference (e.g.) to the following sectors: technological, accounting, administrative, legal, insurance, IT, call centre services (e.g. IN&OUT S.p.A., viale Bramante 29, Fiumicino, Roma, Italy), (iv) companies of the group to which Lidl Malta and Lidl Stiftung belong; (v) subjects and authorities whose access to personal data is established by law, regulation or provisions issued by the competent authorities. Depending on the specific case, these recipients will process such personal data as data controllers or processors.

As far as surveys are concerned, these are usually used for internal evaluations only. Any personal information that may be provided during the survey will not be passed on to third parties, except in the event of a request for any litigation, requests from the competent authorities or pursuant to applicable law.

Storage period/criteria for determining the storage period

All the personal data that you provide us in inquiries (suggestions, praise or criticism), when filling out contact forms, by phone or submitted by e-mail, post, fax, via social media or messaging services will be stored as long as necessary to pursue the purposes set out in this Privacy policy and will be deleted, as a general rule, no later than 90 days after the final response is sent, or anonymized, unless their retention is necessary for a longer period due to a critical nature or importance of the specific request or except for the case in which storage for a further period is required for any claims, requests by the competent authorities or for compliance with a legal obligation.

In our experience, we generally receive no further inquiries to our responses after 90 days. However, in the event of a critical nature or importance of the specific request (e.g. formal complaints), our company policies provide for a retention period of up to 3 years after the final response is sent, while if you exercise your rights as a data subject, your personal data will be stored for a period of 5 years from our response, as evidence of the completeness of the information provided to you and of compliance with legal requirements. We also provide for a 10-year retention period after the final response is sent for requests made in connection with a product recall or product liability.

Regarding calls to Customer Service, the real-time text transcription is stored solely for the duration of the operator's intervention, in order to allow the proper handling of your request. The automatic summary of your request, however, will be deleted or anonymized based on the retention periods described above.

The retention period of the personal data that you may provide in the context of customer surveys is indicated in advance by means of the specific privacy policy for the said survey. However, data may be stored for a further period if required for any claims, requests from the competent authorities or for compliance with a legal obligation.

6. Prize draws

Data controller

The data controller for the processing in connection with the organisation of competitions is Lidl Malta.

Purposes of data processing/legal basis

You have the option of taking part in various Lidl Malta prize draws through our website, our newsletter or via the Lidl App. The personal data collected in the context

of the prize draw will be indicated by Lidl Malta when you sign up to the draw. Unless otherwise specified in specific data protection policies for the prize draw in question or if you have not given us additional express consent, the personal data you provided to us when entering the prize draw will be processed exclusively to execute the prize draw (e.g. determination of the winner(s), notification of the winner(s), sending of the prize) and to comply with applicable law obligations.

The processing of the aforementioned personal data is necessary as essential in order to allow your participation in the prize draw (article 6, paragraph 1, letter b) GDPR) and fulfil the obligation to comply with the applicable legislation (article 6, paragraph 1, letter c) GDPR). The data may also be processed in the event that it is necessary to exercise or defend a right of Lidl Malta and/or third parties (Article 6, paragraph 1, letter f) GDPR).

Further details are provided in the specific privacy policy for the prize draw.

Recipients/categories of recipients

For the aforementioned purposes, your personal data may be transferred to the following categories of recipients: (i) third-party suppliers of assistance and advice for Lidl Malta with reference, for example, to the technological sector (e.g. (e.g. agency that takes care of hosting participant data as well as managing competition procedures) and legal sector (e.g. law firms); (ii) companies of the group to which Lidl Malta belongs; (iii) third party suppliers involved in the awarding of prizes (e.g. travel agency, car dealerships), (iv) subjects and public authorities whose right of access to personal data is recognised by law, regulations or provisions issued by competent authorities (e.g. The Malta Gaming Authority). Depending on the specific case, these recipients will process such personal data as data controllers or processors.

Storage period/criteria for determining the storage period

Your personal data processed in the context of the prize draw will be stored as long as necessary to pursue the purposes set out in this Privacy policy. After the end of the prize draw and the identification of the winners, the personal data of participants are deleted, except in cases where the storage for a further period is required for any claims, requests from the competent authorities or for compliance with a legal obligation. In case of material prizes, the data of the winners are stored for the duration of the statutory warranty in order to arrange for rectification or replacement if there is any defect in the prize.

7. Sending of marketing and advertising communications

Data controller

The processing of your personal data as part of sending of marketing and advertising communications is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

Purposes of data processing/legal basis

On our website, in our Lidl App, on the websites or in the mobile apps of our business partners and via embedded content on our social media presences/profiles, you have the opportunity to subscribe and receive marketing and advertising communications from Lidl Stiftung, Lidl Malta and/or our business partners, by e-mail and other electronic communication channels (e.g. SMS, WhatsApp, push notifications).

If you subscribe to our marketing and advertising communications, we use your e-mail address and, in certain cases, your name and surname to send you information about products, services, promotions, prize draws and news from our shops, the Lidl Plus loyalty program and travel offers, as well as to conduct customer satisfaction surveys (see section 7.2 "Advertising content"), taking into account your user profile (see section 7.1 "Personalised user profile").

In order to ensure that no errors have been made when entering the email address, we use the double opt-in procedure. After you have entered your email address in the registration field, we will send you a confirmation link. Only when you click on this confirmation link will your email address be added to our mailing list. We will do the same with your mobile phone number if you have provided it to us as part of the Lidl Plus registration process.

If you have requested our marketing and advertising communications service, the processing of your personal data as set out above is necessary as it is essential to provide you with communications relating to products and services offered by us and the business partner identified above. The legal basis for the processing shall therefore be your express consent provided under article 6, paragraph 1, letter a) GDPR.

You may decide to withdraw your consent by unsubscribing from the marketing and advertising communications at any time. This shall not affect the lawfulness of processing based on consent before its withdrawal. You may find the link to unsubscribe at the end of each newsletter and in your Lidl App account. If you would like to contact us regarding your cancellation request, you can contact the Customer Service of Lidl Malta via the contact form. When you unsubscribe, we consider your consent to the creation of this personalised user profile and the receipt of marketing and advertising communications based on it to be withdrawn.

Recipients/categories of recipients

For the aforementioned purposes, your personal data may be transferred to the following categories of recipients: (i) third-party suppliers of assistance and advice for Lidl Malta or Lidl Stiftung with reference (e.g.) to the following sectors: technological, marketing and advertising networks; (ii) companies of the group to which Lidl Malta and Lidl Stiftung belong. If external processors are commissioned for the dispatch of the marketing and advertising communications, these are bound by contract pursuant to article 28 GDPR.

Storage period/criteria for determining the storage period

If you do not confirm your registration via the double opt-in procedure, your data will be deleted after 7 days.

If you unsubscribe from marketing and advertising communications, your data will be deleted from the corresponding distribution lists within 72 hours for technical reasons. We would like to point out that in exceptional cases, advertising material may still be sent or advertising campaigns displayed temporarily even after we have received your objection. This is technically due to the necessary lead time for adverts and does not mean that we have not implemented your objection.

Your registration data and records of your requests and the aforementioned operations will then be stored for 10 years as proof that we have complied with legal requirements.

Further data processing for marketing purposes

Furthermore, we process data concerning you for marketing purposes using cookies and similar technologies as described in section 8 below in more detail.

7.1 Personalised user profile

With your consent, the data controllers record your user behaviour within the websites and the Lidl App, that is:

- Lidl Malta Limited
- Lidl Stiftung & Co. KG

The evaluation of user behaviour includes in particular the following information:

- Activated links,
- Time of opening.

In addition, if you are only a registered Lidl Plus user, the evaluation of user behaviour also includes:

- Used areas of the respective website, mobile app or newsletter,
- Time, duration and frequency of use,
- Participation in surveys,
- Redeemed vouchers,
- Purchase data,Frequency and timeliness of your in-store purchases when using Lidl Plus.

We use this data to create personalised user profile by associating your name and/or email address or mobile phone number with your personal data, in order to be able to better tailor advertising to your personal interests via newsletters, SMS, WhatsApp, push notifications, on-site, in-app and print advertising, and to improve our offers and digital presence.

To this end, we may also supplement your usage profile with information about your age and gender from your Lidl Plus account.

If you have completed the "About me" section in the loyalty program Lidl Plus, this data will also be used to tailor our services to your interests. The legal basis for this is article 6, paragraph 1, letter b) GDPR.

7.2 Advertising content

The content of our marketing and advertising communications includes information about offers, discount promotions, prize draws, news, products and services (e.g. streaming, photo, electricity and gas, car services, newspapers and magazines, children's books, fitness and nutrition, telecommunications, travel offers, recipes, customer satisfaction surveys, the opportunity to submit product reviews) from our stores, websites, the Lidl App, as well as the cooperations offered there by Lidl and its changing cooperation partners (e.g. Lidl Plus partner benefits). These are currently in particular:

- Lidl Malta Limited. (in-store, www.lidl.com.mt),
- Lidl Stiftung & Co. KG (www.lidl.com.mt, www.lidlplus.com.mt).

7.3 Push notifications

Purposes of data processing/legal basis

To receive regular updates on news, offers and promotions, you can sign up to receive push notifications.

To do this, you will need to confirm the request from your device to receive push notifications. The registration time and a push token or your device ID will be stored. This data is used to send push notifications and as proof of activation.

The Lidl App will only use push notifications if you enable push notifications when installing the app or later in the settings of your device. You can deactivate the receipt of push notifications at any time in the Lidl App or in the device settings.

We statistically analyse push notifications to determine if and when push notifications have been viewed and clicked. This enables us to determine the presumed interests of the recipients and thus optimise the push messages.

The legal basis for processing your data to send push messages is your consent in accordance with article 6, paragraph 1, letter a) GDPR.

Recipients/categories of recipients

If external processors are commissioned to send push notifications, these are bound by contract pursuant to article 28 GDPR.

Storage period/criteria for determining the storage period

Your data will be stored as long as you have activated push notifications.

8. Use of cookies and similar technologies to process usage data

Cookies and other similar technologies (hereinafter also referred to jointly as “cookies”) to process usage data are technical tools used to collect or store

information during your browsing. Specifically, cookies are small text files that are sent to and stored on your device (e.g. laptop, tablet, smartphone or similar) when you visit our website (www.lidl.com.mt), all its subdomains, some associated websites and/or the Lidl App. These files are stored and then retransmitted to the same websites, subdomains and/or Lidl App on your next visit. Cookies and other similar technologies do not cause any damage to your device, do not contain viruses, trojans or other types of malware. In the cookie, information is stored which is related to the specific device you use. This does not mean though, that we are directly informed about your identity. The other similar technologies for processing usage data are in particular the pixel tracker, the local storage, the session storage and the cache storage. The other similar technologies used for processing usage data include storage systems such as local storage, session storage and cache storage (also based on saving data on the device), as well as tools such as pixel trackers. Furthermore, for the delivery of personalised advertising, a so-called "tag" (included hereafter under the term "cookies and other similar technologies") may be used within our Services: this is a fragment of code integrated into our systems through which your usage data is collected.

8.1 Data controller

The processing of your personal data collected by means of so-called cookies and other similar technologies is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

In addition to the above, please refer to the remainder of this paragraph for further information regarding individual cookies and the allocation of data controller responsibilities.

8.1.1 Data controller for the use of cookies for self-promotion purposes

On our website and within the Lidl App, we use both “first-party cookies”, which are installed directly by us (or by data processors acting on our behalf), and “third-party cookies”, that are set by third parties other than us.

First-party cookies are used for our own independent purposes strictly related to the operation of the website and the provision of our Services.

Third-party cookies, on the other hand, are used for advertising purposes both within the lidl.com.mt domain and the Lidl App, as well as across third-party digital media (outside of our Services), such as other websites, apps, smart TVs and the like. As part of this collaboration, and subject to your consent, we use technologies provided by our partners to analyse your browsing behaviour. The data collected may be matched with information already held in our partners’ databases in order to enhance the personalization of advertising content.

For certain personal data processing activities associated with the use of marketing cookies we act jointly with Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“**Meta**”) within the meaning of article 26 of the GDPR and have entered into a joint controller agreement with Meta

(https://de-de.facebook.com/legal/controller_addendum, for more information on these third-party cookies, please see the list of cookies under “marketing” in our Cookie policy). In this agreement, we have agreed with Meta that we will provide you with the necessary information regarding data processing, and that Meta is responsible for ensuring the rights of data subjects following the conclusion of the joint controllership arrangement (i.e., for all data processing carried out by Meta after we have transferred the data to Meta). We use the so-called “Meta Pixel” within the Lidl website and Meta’s “Facebook Custom Audience” service in the Lidl app.

In the Lidl App, your personal data is also partly processed by the advertising partner The UK Trade Desk Ltd., c/o The Trade Desk, Inc., 42 N. Chestnut Street, Ventura, CA 93001, USA ("TTD") as a separate controller for displaying personalised advertising and measuring success. In order to be able to link your usage behaviour with you, the pseudonymised identifiers (e.g. MAID, hashed email address and/or telephone number) are forwarded to TTD based on your consent. In TTD's privacy policy you will find further information on data processing and how you can exercise your rights as a data subject.

8.2 We also use Microsoft Advertising and Microsoft Clarity Services of the provider Microsoft Ireland Operations Limited (Microsoft), One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland as well as Google Advertising of the provider Google Ireland Limited (Google), Gordon House, Barrow Street, Dublin 4, Ireland. Microsoft and Google also process your data as part of the Microsoft Advertising and Google Ads Services - either entirely (Microsoft) or partially (Google) - under their own, independent, controllership. **Purposes/data processing**

8.2.1 General presentation

The use of cookies serves the following purposes, depending on the category of the cookie or other technology:

- Technically necessary: These are cookies and similar technologies without which you cannot use our Services (for example, to display our Services correctly, including font and colour, to provide the functions you have requested and to take your settings into account, to save your registration in the login area, etc.).
- Convenience: These technologies allow us to take into account your preferences to offer you the best user experience on our Services. For example, your preferences allow us to display our web pages in a language that is appropriate for you. It also helps us to avoid showing you offers that may not be available in your area.
- Statistics: These technologies enable us to compile pseudonymised or anonymous statistics on the use of our Services.

- Marketing: This allows us and other Controllers (see above) to show you and other user suitable advertising content within our Services and in third-party apps or websites, in a format that is as relevant as possible. This personalization is based on the analysis of pseudonymous usage behavior (e.g. by measuring areas clicked, etc.) and information from your customer account (age, gender, purchasing behavior within our Services; if applicable, store shopping data from the Lidl Plus service). Your usage behavior can also be tracked via various websites, apps, browsers, Services or end devices by using a user ID as an unique identifier, e.g. hashed e-mail address (see section 8.4 of this Privacy policy for details on the data processed therefor). We may also optimise our advertising measures on this basis. If you are a user of the Lidl Plus service, this information may also be included in your advertising profile, for example to identify suitable advertising channels.

You can find an overview of the cookies and other similar technologies used, including the respective processing purpose, the storage period and any third-party provider involved, here.

8.2.2 Selected Services

Google Analytics/Firebase

We use the analytics tools Google Analytics 4 and Google Firebase in our Services. In this context, pseudonymous user profiles are created, and cookies and similar technologies are used. The information collected in this way about the use of our Services (e.g., the IP address of the accessing computer, time of access, referrer URL, and information about the browser and operating system used) is processed by Google on our behalf to evaluate the use of the Services and to compile reports on Service activity. Based on the insights from these analyses, we continuously optimize the offerings within the Services and tailor them to meet user needs.

The IP address processed by Google Analytics and Google Firebase is automatically truncated. In this process, the last three digits of your IP address are replaced with a "0," which prevents identification. In addition, we use the "Google Signals" feature to supplement the statistical reports we generate with a cross-device analysis of visitor traffic. This includes, for example, cross-device reports for Google users who are signed in. Google Signals applies only to users who are signed in to a Google Account. Through Google Signals, we receive general demographic information (gender, age group), potential interests, and, where applicable, information on whether Lidl stores have been visited. For more information on how to customize your Google ad settings, visit https://support.google.com/ads/answer/2662856.

Google Ads

We use the Google Ads service to design, statistically record, optimize and display advertising content in line with requirements. To this end, we use Google Ads both to measure the success of advertisements and for remarketing purposes.

Using Google Ads, we track, in particular, how many users were directed to one of our Services after clicking on an ad, or who performed a specific defined action within our Services (e.g., placing an order). However, we do not receive any information that would allow us to identify you personally. The information collected is used for statistical analysis to optimize our ads. In addition, data that we collect for statistical purposes through the use of Google Analytics and Google Firebase is also shared with Google Ads for use in the advertising purposes described above. The sharing and use of this data depend on your individual consent choices and the advertising preference settings within your Google Account.

- **Remarketing**

By using Google Ads, we can also recognize that our Services have been visited and subsequently play targeted advertisements within the Google environment (e.g. search engine, YouTube or Gmail) or other websites on which Google Ads content is integrated.

On the one hand, we use the Google Ads remarketing pixel, which collects information about your usage behavior and enables us to address you again on other websites with content that is relevant to you. On the other hand, we use the "Customer Match" function. This involves us transmitting lists of hashed user data (e.g. names, e-mail addresses, addresses or other customer-specific identifiers) to Google. Google then compares whether and to what extent the transmitted user data matches existing Google account holders. This allows target groups to be created that can be used for the control of target group-oriented advertisements and campaigns (so-called remarketing or retargeting). Once these target groups have been matched and created, the personal data is deleted by Google.

We have entered into a data processing agreement with Google for the use of Google Ads Customer Matching in accordance with article 28 GDPR. Through this agreement, Google guarantees that it will process the personal data in accordance with our instructions and guarantee the protection of data subject rights.

You can find more information on how Google uses the personal data it receives through the integration of services and on the setting options to customize your ads experience here, while information on how to control the ads currently shown to you and on data collection can be found here. Finally, you can find further information by reading Google's privacy policy.

Microsoft Advertising

We also use Microsoft Advertising to record how many users have accessed one of our Services after clicking on an advertisement or have carried out a certain defined action within our Services (e.g. execution of an order). However, we do not receive any information with which we can identify you personally. The information obtained is

used for a statistical evaluation to optimize advertising. We use the "Microsoft Clarity" function to track and visualize user interactions.

We also use the Microsoft Ads service to collect information that allows us to track target groups using remarketing lists. Microsoft Ads can be used to recognize that the Services have been visited and an advertisement can be displayed when Microsoft networks are used later.

Meta Business Tools

- **Meta Pixel**

We use Meta's "Meta Pixel" for analytics purposes. The Meta Pixel is a JavaScript code that enables us to track visitor activity on websites where the pixel is deployed. Among other things, the Meta Pixel collects IP addresses, browser information, source and destination pages, and referrer data, which are also stored in a cookie. In addition, the pixel detects which activities were performed on the website, such as click behavior.

With the help of the Meta Pixel, we can use measurement tools and analytics services to see how you interact with our ads on Facebook or Instagram - for example, when you click on a link in an ad that leads to our website. This gives us a better understanding of how successful our campaigns on Facebook and Instagram are and allows us to continuously optimize them. The pixel also allows us to recognize you as a visitor to our website. Based on this information, we can display the ads we run on Facebook and Instagram only to users who are likely to be interested in our offerings; either because they have previously visited our website or because they exhibit certain characteristics (e.g., interests in specific topics or products, as determined by the websites they have visited). By transmitting this information, we enable Meta to provide ad delivery and ad targeting.

- **Custom Audiences**

Meta's "Facebook Custom Audience" feature enables us to create target audiences and to design and display personalised advertisements on Facebook tailored to their needs.

This involves uploading lists of user data to Facebook. Facebook then compares whether the transmitted user data matches data from Facebook users and then creates target audiences that can be used to target adverts on Facebook. With Custom Audience, we ensure that only people who have previously visited our app or are interested in our products are shown adverts on Facebook. Facebook also uses the data for its own advertising purposes and for the advertising purposes of third parties.

8.3 Categories of personal data processing

Within the scope of the use of cookies and similar technologies, depending on the purpose, the following categories of personal data are processed:

Technically necessary:

- User settings to retain input across multiple subpages (e.g. selecting your preferred store in the store finder);
- Authentication data to identify a user after login in order to gain access to authorised content on subsequent visits (e.g. access to the data from Lidl Plus);
- Security-related events (e.g. detection of frequently failed login attempts);
- Data required to play multimedia content (e.g. play of (product) videos selected by the user);
- Information to display our Services correctly, including font and colour, to provide the functions you have requested and to take your settings into account, such as the choices you have made regarding cookies and similar technologies, to save your registration in the login area, etc.

Convenience:

- User interface customisation settings that are not linked to a permanent identifier (e.g. language selection or the specific display of search queries or maps in the store finder).

Statistics:

- Pseudonymised user profiles with information about the use of our websites. These include in particular:
    - Browser type/version,
    - operating system used,
    - previously visited page (referrer URL),
    - host name of the accessing computer (IP address),
    - Timestamp,
    - user ID, and
    - events triggered on the website (surfing/browsing behaviour).
- The IP address is anonymized, **so that it cannot be traced back to your person**.
- We only merge the user ID with other data from you (e.g. name, e-mail address, etc.) with your express consent. The user ID itself does not allow us to draw any conclusions about your person.

Marketing:

- Pseudonymized user profiles with information about the use of our website. These include in particular:
    - IP address (anonymised, so that it cannot be traced back to your person),
    - Individual user ID (including cookie identifier) or other identifiers (email address in hashed form, mobile telephone number and mobile phone number in hashed form, address and address in hashed form, the IP/MAC address in anonymised form); we only merge the user ID with other data from you (e.g. name, email address, age, gender, purchasing

behavior within the Services, etc.) with your express consent for marketing purposes. The user ID alone does not allow us to draw any conclusions about your person. We may share the user ID and the associated user profiles with third parties via the providers of advertising networks,
    - potential product interests,
    - access information,
    - device identifiers,
    - device/browser settings,
    - mouse/scroll movements,
    - triggered events within the Services (surfing behaviour).
- For in-app analysis and the display of personalised advertising, we use the following advertising identifiers in addition to the above-mentioned individual user ID and other identifiers:
    - (i) the IDFA (Identifier for Advertising) for iOS devices or (ii) the Android advertising ID or (iii) the Huawei ID and a fingerprint of your end device (additionally: time of access, country, language, local settings, operating system and version as well as the app version). We also include user device and web activity information as well as app and event tokens in this analysis. This data is processed exclusively on a pseudonymised/anonymised basis.
    - You can reset or deactivate the IDFA or Google GAID, the Android advertising ID and the Huawei ID at any time via your operating system. In the event that the IDFA is not available, we use the SkAdNetwork (Apple's attribution API) to assign the installations of our app to an advertising campaign.
- The fact that you are a Lidl Plus user and your store purchasing data from the Lidl Plus loyalty program.

Specific to the Lidl App

In order to display interest-based information to you, we must be able to associate the above information with you as an individual. For this purpose, we establish a link to your customer number from the time you complete your registration for the loyalty program Lidl Plus. Your consent to the provision of personalised information also covers this processing activity.

8.4 Legal basis/Recipient/Storage period

Legal bases

The legal basis for the use of convenience, statistical and marketing cookies and of similar technologies is your consent in accordance with article 6, paragraph 1, letter a) GDPR in conjunction with regulation 5, paragraph 1, S.L. 586.01 (Processing of Personal Data (Electronic Communications Sector) Regulations). The legal basis for the use of technically necessary cookies and similar technologies is article 6, paragraph 1,

letter b) GDPR, i.e. we process your data to provide our services in the course of initiation or performance of the contract.

We base the data processing for Facebook Custom Audience on the consent you have provided, which may be revoked at any time with future effect, in accordance with article 6, paragraph 1, letter a) GDPR.

Facebook bases the processing of data for Meta Pixel and Custom Audience on the consent of Facebook users in accordance with article 6, paragraph 1, letter a) GDPR and the legitimate interests of Facebook in accordance with article 6, paragraph 1, letter f) GDPR, in order to ensure accurate and reliable reports and accurate performance statistics for Facebook advertisers. You can find more information on this in Facebook's privacy policy or here. You can contact Meta's Data Protection Officer here.

Google bases its independent processing of personal data in the context of Google Ads on consent pursuant to article 6, paragraph 1, letter a) GDPR. This involves the use of Google's so-called "consent mode," through which Google fulfills its obligation under the Digital Markets Act to obtain consent for the processing of personal data for advertising purposes in its capacity as a "gatekeeper" (a dominant provider of an online platform).

Recipients/categories of recipients

As part of the data processing using cookies and similar technologies to process usage data, we may use specialist service providers, in particular from the online marketing sector. They process your data on our behalf as data processors, are carefully selected and contractually bound in accordance with article 28 GDPR and act as data processors for us, unless they are named as (joint) controllers in this Privacy policy.

As part of our cooperation with Google Ireland Limited, Meta Platforms Ireland Limited, The UK Trade Desk Limited and Microsoft Ireland Operations Limited, the above-mentioned data is generally also processed on servers in the USA and the UK for statistical and marketing purposes (see further explanations on third country transfers under section 3 of this Privacy policy).

Storage period/criteria for determining the storage period

The storage period for cookies can be found in our cookie policy. If "persistent" is specified in the "lifespan" column, the cookie is stored permanently until the corresponding consent is withdrawn.

When using Google Analytics 4 and Google Firebase, the personal data collected is deleted after 14 months.

Your data can remain in a Facebook Custom Audience for a maximum of 180 days. After 180 days, your data belonging to the website's custom audience will be removed if you do not visit the website again.

We delete information that we process as a result of the use of cookies and similar technologies in our own systems (e.g. advertising profiles) in accordance with the storage period for cookies, which you can view in our cookie policy.

8.5 Cancellation/opt-out option/further information

You can withdraw/adjust your consent for future processing at any point, without impacting the lawfulness of the processing based on the consent until the moment of withdrawal, e.g. via preference management. You may also notify your withdrawal either to us or to those jointly responsible with us.

Website

You can also block the technologies explained here by rejecting certain or all cookies in the cookie setting in your browser. We would like to point out that you may then not be able to use all the functions of these Services. To understand how to set them up, you can consult the following links:

Google Chrome

Mozilla Firefox

Microsoft Edge

Safari browser

For information on how to manage cookies through other browsers, it is useful to consult the online help files. If this information is not sufficient, we advise you to consult the "Help" section of the browser for more details.

Additionally, our site includes third party content. These third parties may use, with prior consent (where necessary), their own cookies as part of the content integrated on our site. Although these cookies are included in the overview of the cookies and other technologies used, we have no access to these cookies and we are in no way (joint) data controllers.

You can withdraw/adjust your consent for future processing at any point, without impacting the lawfulness of the processing based on the consent until the moment of withdrawal. Simply click here and make your selection.

Lidl App

If you wish to withdraw your consent to tracking in the Lidl App, you can do so at any time for future processing at any point, without impacting the lawfulness of the processing based on the consent until the moment of withdraw, by doing so after completing registration via the opt-out in the app under "Account" → "Legal information" → "Tracking".

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 settings for Facebook adverts.

You can deactivate personalised advertising with Microsoft and Google or set it individually. Details can be found on the respective support page:

- Microsoft: https://account.microsoft.com/privacy/ad-settings/signedout
- Google: https://support.google.com/My-Ad-Center-Help/answer/12155451.

You can also find setting options for personalised advertising at https://youradchoices.com/ and here.

Further information on data processing by the companies listed below and on exercising your rights as a data subject can also be found in the following data protection policies:

- Meta (Facebook): https://www.facebook.com/privacy/explanation
- Google: https://policies.google.com/privacy?hl=en&gl=en
- Microsoft: https://privacy.microsoft.com/en-us/privacystatement
- The UK Trade Desk: https://www.thetradedesk.com/privacy

You can find an overview of the cookies and other similar technologies used, including the respective processing purpose, the storage period and any third-party provider involved here. Further details on processing can also be found in the preferences manager.

9. Map services

Data controller

The processing of your personal data within the scope of the map services is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

9.1 Bing Maps

Purposes of data processing/legal basis

On our website we use the services offered by Bing Maps, a service of Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA. In this way you can view and use the interactive maps directly from our website to find, for example, the Lidl stores closer to you. To use the Bing Maps functions, it is necessary to consent in your browser or operating system or in other settings on your device to so-called geolocation.

The use of Bing Maps serves to provide an attractive presentation of our offers and an easy method of finding the places indicated by us on the website. This constitutes a legitimate interest within the meaning of article 6, paragraph 1, letter f) GDPR.

As part of browsing our website, the Bing Maps provider, i.e. the Microsoft Corporation, receives the information if you access the relevant page on our website. To use the functions of Bing Maps, your IP address is usually processed on Microsoft server in the USA. We have no possibility to influence the processing carried out through Bing Maps.

Further information on the purpose and scope of data processing by Bing Maps can be found in the Microsoft privacy policy. There you will also receive further information about your rights and the setting options to protect your privacy.

9.2 Use of Map Services in Our App

Purposes of data processing/legal basis

In our app, you have the option of using the map service of your mobile device's operating system to find Lidl stores in your local area, for example. This allows interactive maps to be displayed directly in the app.

In order to be able to use map services, it is necessary to process your IP address. This is usually processed on a server of the respective operating system provider. We have no influence over the specific data processing. Further information on the purpose and scope of data processing can be found in the privacy policy of the respective provider. There you will also find further information about your rights and settings to protect your privacy.

Providers, addresses, privacy policies and terms of service:

- Google Maps
  - Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland,
  - Privacy policy: https://www.google.com/policies/privacy/,
  - Terms of service: https://maps.google.com/help/terms_maps.html,
  -
- Apple Maps
  - Apple Inc, One Apple Park Way, Cupertino, California, USA,
  - Privacy policy: https://www.apple.com/legal/privacy/en-ww/,
  - Terms of service: https://www.apple.com/legal/internet-services/maps/terms-en.html,
- Huawei Map kit
  - Huawei Aspiegel SE, 1F, Simmonscourt House, Ballsbridge, Dublin D04 W9H6, Ireland,
  - Privacy policy: https://www.huawei.com/en/privacy-policy,
  - Terms of service: https://developer.huawei.com/consumer/en/hms/huawei-MapKit/.

The use of map services is based on our contractual relationship with you, article 6, paragraph 1, letter b) GDPR, as well as on our legitimate interest within the meaning of article 6, paragraph 1, letter f) GDPR in presenting our offers in an attractive manner and making it easy to find the locations specified by us in the app. If you use the map services in the Lidl App or have agreed to geolocalisation in the settings of your mobile device via the "give permissions" dialogue, we use this function to be able to offer you individual services based on your current location. In particular, we process your GPS and network-based location for the "store search" and "partner benefits

search" functions, in order to show you the stores closest to you. We do not store geolocalisation data permanently.

10. Protection against automated access (Captcha services)

Data controller

The processing of your personal data within the scope of Google reCAPTCHA is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

Purposes of data processing/legal basis

To protect our websites and applications from misuse, automated access (e.g., by bots), and spam, we use so-called CAPTCHA services to identify human users. When you access protected areas (e.g., contact forms, login areas), technical data such as connection, environmental, and interaction data (e.g., IP address, mouse movements, time spent on the page) are analyzed. Depending on the service used, this may involve a computational task on your device or an analysis of your user behavior.

The processing of data is thus carried out on the basis of article 6, paragraph 1, letter f) GDPR, as we have a legitimate interest in the security of our IT systems and in preventing mass requests.

Recipients/categories of recipients

As part of our protection against automated access, we engage specialized IT service providers (processors) who provide us with the services mentioned above.

In connection with the use of certain services, the data mentioned above is generally also processed on servers in the United States (see the separate explanations regarding transfers to third countries in Section 3).

Storage period/criteria for determining the storage period

The collected data is stored only as long as necessary for the purposes of fraud detection and IT security, generally for up to 50 days.

11. Links to other websites and apps

Data controller

The processing of your personal data within the scope of providing you with links to other websites and apps is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

Purposes of data processing/legal basis

Our Services contain links to other websites and apps operated by other group companies, selected business partners or other third parties. If you click on one of these links, for example in the Lidl App via an in-app banner, you will be redirected to the website/app or to your respective app store. The links may also contain special tracking technologies that enable the operators of the websites/apps mentioned to understand and measure where the user has learnt about them. Please note that

neither Lidl Stiftung nor Lidl Malta nor any other company belonging to the group to which the companies belong are data controllers for any processing carried out on the websites/apps of third parties. We recommend that you check the relevant terms and conditions, cookie policy and privacy policy of each website/app you are redirected to in order to understand what information about you is processed by the operator.

If we redirect you to one of these websites/apps, we process your personal data in order to fulfil your (technical) request to visit the respective app or website (article 6, paragraph 1, letter b) GDPR) and on the basis of the operator's legitimate interest in carrying out advertising (article 6, paragraph 1, letter f) GDPR).

12. Access to functions and sensors on your mobile device

Data controller

The processing of your personal data within the scope of accessing functions and sensors on your mobile device is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

Purposes of data processing/legal basis

Location data

If you have agreed to enable geolocation when using the Lidl App or in the settings of your mobile device, we use this function to be able to offer you individual services based on your current location. In particular, we process your GPS and network-based location as part of the "store search" function in order to show you the stores closest to you.

Photos/media/files on your mobile device/USB memory contents (read, change, delete)

If you create a shopping list via the Lidl App, these will be saved directly in the memory of your mobile device or on a connected storage medium, depending on the installation location of the app and the available storage space.

Camera (taking pictures and videos)

The camera on your mobile device is used to scan QR codes.

WLAN connection information

The Lidl App uses your mobile device's WLAN connection to establish a connection to **the Internet.**

Other device functions or device sensors

By accessing the other device functions and device sensors of your mobile device, the Lidl App is able to retrieve data from the Internet and process error messages. Finally, if you have given your consent, the Lidl App can send you push notifications to inform you about current offers and promotions.

The legal basis for the processing of your location data is your consent in accordance with article 6, paragraph 1, letter a) GDPR.

13. Embedded third-party content

Data controller

The processing of your personal data related to embedded third-party content is carried out by Lidl Malta and Lidl Stiftung as joint data controllers.

Purposes of data processing/legal basis

We have integrated YouTube videos into our website, which are available at https://www.youtube.com and can be played directly from the Services. These are all integrated in "extended data protection mode", i.e. no data about you as a user is transferred to YouTube (Google LLC) if you do not playback the videos. This will only occur if you have given your explicit consent.

If you provide such consent, the content will be made available, and YouTube (Google LLC) will receive information about your visit to our site, along with the technically necessary usage data in this context. As a result, YouTube may implement its own tracking technologies. We have no influence over the data processing by the third-party provider YouTube (Google LLC).

The legal basis for this is your consent in accordance with article 6, paragraph 1, letter a) GDPR. Your consent is voluntary and includes both the loading of YouTube content and the transfer of data to YouTube (Google LLC).

For the transfer of your data to the United States, an adequate level of data protection is ensured through the provider's certification under the adequacy decision adopted by the European Commission (EU-U.S. Data Privacy Framework).

Further information on the purpose and scope of data collection and its processing by YouTube (Google LLC) can be found in the provider's privacy policy. There you will also find further information on your rights in this regard and setting options to protect your privacy. Address and privacy policy of YouTube: Google LLC, 1600 Amphitheatre Parkway. Mountain View, CA 94043, USA; https://policies.google.com/privacy?hl=en.

If you have given your consent to the automatic playback of YouTube videos, you can withdraw your consent at any point, without impacting the lawfulness of the processing based on the consent until the moment of withdrawal. Once you deactivate the toggle switch in the settings below, your consent will be requested again the next time you access one of our pages containing a YouTube video.

I do consent to the processing of my personal data for the playback of YouTube videos, as described in this section.

14. Purchase in our stores

Data controller

The data controller for the processing of your personal data relating to your purchases made in our stores is Lidl Malta.

14.1 Age check

When selling products with age restriction (e.g. alcoholic beverages, food products containing alcohol, video games, video material regardless of the medium, pyrotechnic articles), we process your personal data — as displayed on your identity document — solely for the purpose of verifying your age (article 6, paragraph 1, letter c) GDPR).

Your personal data will be processed by authorized personnel specifically trained to verify age in case of doubt, through the mere display of an identity document. It is specified that the data will not be transmitted to third parties nor stored under any circumstances.

14.2 Security cameras

When you visit our stores, we may occasionally process your personal data for the prevention and detection of criminal offences (article 6, paragraph 1, letter f) GDPR), for the protection of our customers, employees and property.

The use of a video surveillance system, where necessary and provided for, will be indicated by clearly visible signs.

The images are kept for up to 7 days, without prejudice to specific requirements for longer retention in the event of a specific request by the judicial authorities or the police and, in the event of criminal offences, for the time strictly necessary to investigate the criminal offences and to protect the rights of defence of the persons affected.

Any request to download CCTV footage must be sent as soon as possible to Lidl Malta Customer Service at cctv@lidl.com.mt.

The downloading of images requires the intervention of specialised providers, carefully selected and contractually bound in accordance with article 28 GDPR.

Please understand that both Lidl Malta Customer Service and the aforementioned providers operate during business hours and that the download of images requires the intervention on site of qualified personnel, therefore the request for any download of images must be sent as soon as possible to the aforementioned contact details of Lidl Malta in order to be fulfilled.

Furthermore, in the event that the request is made pursuant to article 15 GDPR (right of access of the data subject), please note that the personal data (e.g. faces, number plates) of any third parties present in the footage will be obscured in accordance with the applicable legislation.

For more information in this regard, including your rights, please read the specific privacy policy, which is available on request.

14.3 Payment procedure

Every time you make a card payment, we process your personal data as contained on such a card and in connection with that transaction for the sole purpose of managing the payment itself (article 6, paragraph 1, letter b) GDPR). This concerns your card data (IBAN in the case of bank cards, card number, security code, card type as well as the expiration date of the card) and the data referred to the payment (amount, date, time, identification of the card reading device, this means place, company and store where you paid, PIN and, if necessary, your signature as well as your name and surname).

The card data and the data referred to the payment will be immediately transmitted, after the card is read from the card reading terminal (through the terminal manager) by the acquirer bank to your bank. Such data may also be transmitted, in the cases determined by the law, to the law enforcement authorities and to the Financial Intelligence Units.

We do not retain your card data unless this is necessary to ensure the payment transfer. For purposes concerning the document archiving, some data referred to the payment (type of card, date, time, number of the POS terminal, authorization code, place, company, branch, amount and if necessary your signature as well as your name and surname) will be processed according to the provisions of the law to fulfil our legal obligations (article 6, paragraph 1, letter c) GDPR) and held by us for the duration of the statutory retention periods.

If you do not provide the data necessary to carry out the card payment, such payment will not be possible.

14.4 Return requests

In the context of return requests, Lidl Malta processes the personal data you voluntarily provide - specifically your name and surname - in order to handle your request and issue a refund for the returned product (art. 6, paragraph 1, letter b) GDPR), as well as to comply with applicable legal obligations (art. 6, paragraph 1, letter c) GDPR). Your personal data will be processed either on paper or using electronic means and will be stored for 10 years from the date the return procedure is completed. For these purposes, your personal data will be handled by authorised employees and/or specifically appointed data processors under article 28 GDPR. It may also be shared with third parties or authorities if required by law, regulations, or EU provisions.

For more details, please refer to our extended return privacy policy.

15. Your rights as data subject

15.1 Overview

In addition to the right to withdraw the consent you may have granted us; you also have the following rights provided the respective statutory requirements are met:

- the right of access to information about your personal data in accordance with article 15 GDPR.

- the right to rectification of inaccurate data or to have incomplete data completed in accordance with article 16 GDPR.
- the right to erasure of your data stored with us in accordance with article 17 GDPR.
- the right to restriction of processing of your data in accordance with article 18 GDPR.
- the right to data portability in accordance with article 20 GDPR.
- the right to object in accordance with article 21 GDPR.

15.2 The right of access to information in accordance with article 15 GDPR

You have the right, pursuant to article 15, paragraph 1 GDPR, upon request us to confirm whether or not we are processing personal data that concerns you and, if we are, to receive information free of charge on the personal data about you that have been stored with us. This includes in particular:

- the purposes for which the personal data are processed;
- the categories of personal data which are processed;
- the recipients or categories of recipients to whom the personal data concerning you has been disclosed or will be disclosed;
- the planned duration of the storage of your personal data or, if specific details are not possible, the criteria used to determine the period;
- the right to rectification or erasure of your personal data, to restrict the processing by us (the controller) or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- any available information about the source of the data, if the personal data are not collected from you (the data subject);
- the existence of automated decision-making, including profiling, in accordance with article 22, paragraph 1 and 4 GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organization, you have the right to be informed of the appropriate safeguards pursuant to article 46 GDPR relating to the transfer.

15.3 The right to rectification in accordance with article 16 GDPR

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of a supplementary statement.

15.4 The right to erasure in accordance with article 17 GDPR

You have the right to obtain from us the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw the consent on which the processing was based in accordance with article 6 paragraph 1, letter a) or article 9 paragraph 2, letter a) GDPR, and there is no other legal ground for the processing;
- you object to the processing pursuant to article 21, paragraph 1 or 2 GDPR, and there are no overriding legitimate reasons for processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation;
- the personal data has been collected in relation to the offer of information society services to children as referred to in article 8, paragraph 1 GDPR.

Where we have made the personal data public and are obliged to erase it, we will, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform third parties which are processing your personal data that you have requested the erasure by such third parties of any links to, or copy or replication of, that personal data.

15.5 The right to restriction of processing in accordance with article 18 GDPR

You have the right to ask us to restrict (that is, store but not further process) your personal data but only where:

- the accuracy of your personal data is contested (see the right to data rectification above), for a period enabling us to verify the accuracy of the personal data; or
- the processing is unlawful, and you oppose the erasure of your personal data; or
- we no longer need the personal data for the purposes for which they were collected but you need the personal data for the establishment, exercise or defence of legal claims; or
- you exercised Your right to object and verification of our legitimate grounds to override your objection is pending.

15.6 The right to data portability in accordance with article 20 GDPR

You have the right to ask us to provide your personal data (that you shall have provided to us) to you in a structured, commonly used, machine-readable format, or (where technically feasible) to have it 'ported' directly to another data controller, provided this does not adversely affect the rights and freedoms of others. This right shall only apply where:

- the processing is based on your consent or on a contract (article 6, paragraph 1, letter a) or b) GDPR), and
- the processing is carried out by automated means.

15.7 Right to object in accordance with article 21 GDPR

Under the conditions set out in article 21, paragraph 1 GDPR, you have the right to

object at any time to the processing of your personal data where it is based on article 6, paragraph 1, letter f) GDPR (legitimate interests), on grounds relating to your particular situation.

Where you object, we will stop processing your data unless we demonstrate compelling legitimate grounds which override your interests, rights, and freedoms, or where processing is necessary for the establishment, exercise, or defence of legal claims. In any case you also have the right to lodge complaints at any time with the competent data protection supervisory authority (see section 15.10 below).

15.8 Request for additional information from the data subject to verify their identity

As one of the security measures we implement, before being in the position to help you exercise your rights as described above, we may need to verify your identity to ensure that we do not disclose to or share any personal data with any unauthorised individuals.

15.9 Time limit for a response

We try to reply to all legitimate requests within one month from receiving them. In some particular cases (for example, if the matter is particularly complex or if you send us multiple requests), it may take us longer than a month. In such cases, we will notify you accordingly and keep you updated.

15.10 Right to lodge a complaint with the data protection supervisory authority

You have the right to lodge a complaint with a competent data protection supervisory authority at any time. For any processing under this Privacy policy you may contact the Office of the Information and Data Protection Commissioner (IDPC), the data protection supervisory authority of Malta by e-mail at idpc.info@idpc.org.mt or by telephone on (+356) 2328 7100. Alternatively, you may contact the authority of your habitual residence, place of work or where the alleged infringement occurred.

We kindly ask that you please attempt to resolve any issues you may have with us first (even though, as stated above, you have a right to contact the competent authority at any time).

15.11 Information on joint controllership in accordance with article 26 GDPR

With this Privacy policy we have outlined to you certain processing activities carried out jointly by Lidl Malta and Lidl Stiftung as joint data controllers within the meaning of article 26 GDPR. Upon your request (e.g. via the contact details set out in section 1), we will be glad to provide you with the details of the respective agreement on the aforementioned joint controllership. In order to exercise your rights as a data subject, you may contact us or - for the individual data processing concerned - our joint data controllers indicated in this Privacy policy.

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