

# PRIVACY POLICY

Issue Date:  
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## CORPORATE PROCEDURE

At Weston Foods, we respect your privacy and take great care in protecting your personal information. As a leading baking company with operations spanning across North America, we interact with thousands of business partner representatives (including suppliers, vendors, distributors and retailers) to deliver delicious products to millions of customers every year, to respond to your inquiries or requests and to manage our business. Through these interactions, our customers and business partner representatives entrust us with their personal information and rely on us to ensure its responsible collection and use.

To do so, we have committed to the following principles:

1. We will be transparent about how we handle your personal information and our privacy practices
2. We will use your personal information to enhance your customer experience and provide more relevant information to you
3. We will protect your personal information and handle it responsibly

We also want to be transparent about how you can help manage your privacy and information, so you can make informed decisions.

Below is the full Weston Foods Privacy Policy for more information.

**If you a California consumer, you may have more rights under the California Consumer Protection Act (“CCPA”), as detailed in our [California Notice](#). For more detail on our practices related to interest-based advertising, please see our [Interest-Based Advertising Notice](#).**

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## 1. Scope and Application

This policy applies to any personal information (as defined below in the section entitled [How We Define Personal Information](#)) collected by WF Bakery Inc. and its subsidiaries (collectively, “Weston Foods”, “we”, “us” or “our”) from or about our customers or business partner representatives, including individuals who visit our bakeries, offices, or other facilities, browse our websites, use our mobile applications, apply for a job at Weston Foods or contact us about our products, programs, promotions, contests or events.

In this policy, we describe what personal information we collect; how we use, share and manage it; how you can access, update and/or correct your personal information; the privacy choices available to you; and the specific privacy notices relating to certain programs that provide you with more information.

### A. What Does This Privacy Policy Include?

This policy describes how we handle your personal information, specifically, what information we collect, and how we collect, use, share, protect and store it. We also explain your privacy choices and how you can exercise those choices. This policy applies to you when you visit one of our websites, use our mobile applications, sign up to be a part of any of our programs, promotions, contests or events, or inquire about or purchase our products.

The term “policy” also includes the ABC Bakers Children’s Online Protection and Privacy Act Notice (<https://www.abcbakers.com/coppastatement/>) and the ABC Bakers Privacy Policy (<https://www.abcbakers.com/privacypolicy>) (collectively, the “ABC Bakers Policies”). In the event of any conflict between the ABC Bakers Policies and the Weston Foods Privacy Policy, the ABC Bakers Policies will prevail with respect to any matter related to the administration of the ABC Bakers Girl Scouts Cookie Program.

Please note that specific privacy notices and/or additional terms and conditions may apply to how we are collecting and managing your information when you engage with some of our programs, products, promotions, contests and/or events. Those specific privacy notices and/or terms and conditions will apply together with this policy. For example: You are required to accept terms and conditions when you enter into a contract to purchase products from Weston Foods or enter a promotional contest administered by Weston Foods. Those terms and conditions apply together with this policy.

## B. How We Define Personal Information

“Personal information” is any information that identifies you or could be reasonably associated with you. The personal information we collect may include contact information such as your name, email address, home address, and phone numbers, as well as information about the specific products that you purchase from us, information provided to us in connection with our products and/or information collected when you interact with us online or visit our bakeries, offices, or other facilities.

### 2. What Type of Personal Information Do We Collect and How?

#### A. What Type of Personal Information We Collect

We limit the collection of personal information to what is reasonably required to fulfill the purposes for which it was collected. Depending on the nature and context of your interaction with us, we may collect your name and contact information, employment application information, payment information, browsing activity and other technical information collected automatically on our websites or mobile applications, video footage captured from video surveillance (CCTV) cameras in our bakeries or offices, and other information you may provide to us.

**[Learn more about the categories of personal information we may collect \(click to expand\)](#)**

#### B. How We Collect Personal Information

We collect personal information, as defined below, in a variety of ways, including: directly from you, from third parties, through video surveillance (CCTV) at our bakeries, offices, or other facilities, if you visit us, and when you use our websites or mobile applications.

**[Learn more about how we may collect personal information \(click to expand\)](#)**

### 3. How Do We Use Personal Information?

Unless otherwise permitted or required by law, we use your personal information for the following purposes:

#### A. Providing Products

We may use your personal information in order to respond to your product inquiries, orders and requests, which includes providing you with a quote for a product, verifying your identity, processing payments and other transactions, and fulfilling

your product requests, inquiries, and purchases (including arranging for delivery of products).

## B. Operational Purposes

We may use your personal information for operational purposes such as managing our organization (preventing or reducing operational risk, as well as for purposes relating to information, system or network security), managing our websites and mobile applications, and processing applications for jobs.

**[Learn more about how we may use your personal information for operational purposes \(click to expand\)](#)**

## C. Communicating With You

We use your personal information to communicate with you in a variety of ways:

- providing you with information and updates about our products, promotions, contests and events;
- responding to your inquiries;
- taking or verifying instructions from you;
- if we have your consent, informing you in a variety of ways (e.g., email, telephone, SMS) about products, special offers, promotions, contests or events that may be of interest to you; and
- delivering interest-based advertisements relating to our products or third party products that may be of interest to you.

If you no longer wish to receive commercial electronic messages, please let us know by following the unsubscribe directions provided in every commercial electronic message. For more information, see [How Do I Change My Privacy Choices?](#)

## D. Conducting Market Research

We may use your personal information in order to conduct market research by tracking and analyzing current or previously collected information to improve or to develop new products, programs, promotions, contests or events, and to better understand our customer base. When doing so, we generally will use your information in an aggregated format or with direct personal identifiers removed. The information we use for market research may include:

- Website or mobile application activities (e.g., purchases via app, email bounce backs, click-throughs, and content on social media);
- Account activity; and

- The methods used to apply for or to access or use our programs, products, promotions, contests or events.

## E. Conducting Data Analytics

We may use your personal information in order to conduct data analytics for business purposes, such as:

- managing and developing our business and operations;
- improving our programs and products (e.g., improving our websites and mobile applications);
- understanding customer needs and preferences and customizing how we tailor and market products to our customers based on their interests; and
- measuring the effectiveness of our marketing.

When doing so, we generally will use your information in an aggregated format or with direct personal identifiers removed.

### 4. How Do We Share Personal Information?

We may share your personal information within our group of companies or with our service providers (companies operating on our behalf) and other third parties (companies with which we provide products) for the purposes described in this policy and in accordance with applicable law.

We do not sell your personal information to any organization or person; the only exception to this would be if we sell or transfer any part of our business.

**[Learn more about how we may share your personal information \(click to expand\)](#)**

### 5. How Do We Manage Consent?

By making arrangements to purchase our products or otherwise submitting information to us in connection with our programs, contests, promotions, events or products, you are providing your consent to the collection, use and disclosure of personal information as set out in this policy. In some cases, your consent may be “implied” i.e., your permission is assumed based on your action or inaction at the point of collection, use or sharing of your personal information.

If required by law, we will obtain consent when we want to use personal information for a new purpose or for a purpose other than those stated at the time of collection in this policy or in the terms and conditions of a specific program, product, contest, promotion or event you signed up for, participated in or purchased. Your consent

can be withdrawn at any time, except in limited circumstances, including circumstances in which legal or regulatory requirements prohibit the withdrawal of consent or withdrawal is contrary to your contractual obligations with us. For information on how to manage your privacy preferences, please see [How Do I Change My Privacy Choices?](#)

If you choose not to provide us with certain personal information or if you withdraw your consent, where such withdrawal is available, we may not be able to offer you the programs, products, contests, promotions, events or information that you requested or that could be offered to you.

## 6. How Do I Change My Privacy Choices?

We want you to clearly understand your choices and make informed decisions about your privacy options. There are several options available for you to manage your privacy preferences, including, for example: managing your preferences within your account(s), contacting us directly, changing your browser settings on your device, and/or, where available, using third party unsubscribe functionality.

**[Learn more about how you can exercise your privacy choices \(click to expand\)](#)**

## 7. How Do We Protect and Store Personal Information?

We take the security of your personal information very seriously and are committed to protecting your privacy by using a combination of administrative, physical, and technical safeguards. Your personal information may be stored in foreign jurisdictions, in which case it will be subject to foreign laws. We store your personal information for as long as it is necessary to provide you with our programs and products and for a reasonable time thereafter, or as permitted or required by law.

### A. How We Protect Personal Information

To protect your personal information, we maintain administrative, technical, and physical safeguards in our bakeries, offices, digital properties, information storage facilities, and other facilities that are appropriate to the sensitivity of the information. By having these safeguards, we aim to avoid the loss, misuse, unauthorized access, disclosure, or modification of your personal information that we hold. These safeguards also apply when we dispose of or destroy your personal information.

### B. Where We Keep Personal Information

We use all reasonable safeguards, including contractual requirements with our service providers, to protect your personal information wherever it is used or stored.

In general, we store, access and use personal information in Canada and the United States. Some of our service providers may access, process or store your personal information outside of your province, state, territory or country in the course of providing their services to us. In that case, the personal information is subject to the law of the jurisdiction in which it is used or stored, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

### C. How Long We Keep Personal Information

We will store your personal information for as long as necessary to fulfill the purposes for which it was collected, except where otherwise required or permitted by law. Once no longer required, your personal information will be securely destroyed or anonymized (so the information no longer identifies you).

### 8. How Do I Request Access to My Personal Information?

Under applicable privacy law, you may have the right to access the personal information we hold about you, subject to any legal restrictions. Upon request, we will provide you with access to your personal information within a reasonable timeframe, in compliance with applicable laws. It is your responsibility to provide accurate, correct and complete information. If you notice any errors in your personal information or need to update it, please let us know through the steps outlined below. Some of the personal information we hold about you is accessible to you through your online account(s). You can access and update or correct your personal information by logging into your account(s) and making updates to your profile information and your preferences. For personal information that is not available through your online account(s), you can request access or correction by contacting the Privacy Office, through email or postal address (for contact information, see [Whom Do I Contact With Privacy Questions?](#)).

### 9. How Do I Know if There Are Changes to the Privacy Policy?

We may make changes to this policy from time to time. Any changes we make will become effective when we post a modified version of the policy on this webpage. If we make any significant changes to the policy, we will post a notice on our websites. By continuing to purchase our products or participate in our programs, promotions, contests or events after the modified version of the policy has been posted, you are accepting the changes to the policy, subject to any additional requirements that may apply. If you do not agree to the changes in our policy, it is your responsibility to stop purchasing our products or participating in our programs, promotions, contests or events. It is your obligation to ensure that you read, understand and agree to the latest version of the policy. The “Effective Date” at the top of the policy indicates when it was last updated.

## 10. Whom Do I Contact With Privacy Questions?

If you have any questions about how we handle your personal information, please contact our Privacy Office at the address noted below. If you are inquiring about a product or are participating in a promotion, contest or event that is offered by us with a third party, the third party may hold your personal information. If you have any questions or concerns, we will direct you to the appropriate party so that you may make inquiries as to that party's privacy policies and practices.

Weston Foods Privacy Office

[privacy@westonfoods.com](mailto:privacy@westonfoods.com)

1425 The Queensway

Etobicoke, Ontario M8Z 1T3

## California Notice

This California notice supplements the Policy set forth above with respect to specific rights granted under the California Consumer Privacy Act (“CCPA”) to California consumers and households with regard to “personal information.” If you are a California consumer, please review the following information about our privacy practices surrounding how and why we collect, use, disclose and share your personal information and the rights you may have under the CCPA.

### **Notice at Collection and Use of Personal Information**

#### ***Information We Collect***

Depending on how you interact with us, we may collect the categories of personal information listed above in the section [What Type of Personal Information Do We Collect and How?](#)

#### ***How We Use Collected Information***

We also may use personal information from California consumers for the business or commercial purposes described above in the section [How Do We Use Personal Information?](#)

### **Our Collection, Use, Disclosure, and Sharing of Personal Information**

#### ***What Information We Have Collected, the Sources from Which We Collected It, and Our Purpose for Collecting the Information***

In the preceding 12 months, depending on how you interact with us, we may have collected the categories of personal information listed above in the section [What Type of Personal Information Do We Collect and How?](#), from the categories of sources listed in that section, and we may have used it for the business or commercial purposes identified in the section [How Do We Use Personal Information?](#) We do not sell your personal information. We do not knowingly sell the personal information of California consumers under 16 years old. In the preceding 12 months, we may have disclosed for a business purpose personal information we collect as detailed in the section [How Do We Share Personal Information?](#)

### **California Consumers’ Rights under the CCPA**

The CCPA provides California consumers with certain rights related to their personal information. This section explains those rights. If you are a California consumer and would like to exercise any of those rights, please see [How to Exercise Your CCPA Rights](#) below for more information on how to submit a request, subject to certain exemptions and other limitations under applicable law.

- **Right to Know:** You have the right to request that we disclose to you certain information regarding our collection and use of personal information specific to you over the last twelve (12) months.
- **Right to Delete:** You have the right to request that we delete certain of your personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with federal, state, local and non-U.S. laws, rules and regulations.
- **Right to Non-discrimination:** We will not discriminate against you for exercising of any rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

### **How to Exercise Your CCPA Rights**

If you are a California consumer and would like to exercise any of the CCPA rights identified above, you may submit a request by writing to [privacy@westonfoods.com](mailto:privacy@westonfoods.com) or by calling us at 1-800-590-6861.

# Interest-Based Advertising Notice

Effective Date: May 31, 2021

## 1. General Information About This Notice

- This notice is to provide our customers (“you”) with information about how we use interest-based advertising to provide tailored advertisements to you.
- Interest-based advertisements are advertisements from us that we hope you find more relevant to your interests. It is important to us that you receive advertisements relating to our products that interest you.
- We deliver interest-based advertisements to your device by using a cookie or other identifier assigned to your device.
- This notice is governed by the [Weston Foods Privacy Policy](#). If there is any inconsistency between this notice and the Weston Foods Privacy Policy, the Weston Foods Privacy Policy will prevail.

## 2. What Information Do We Collect?

In order to deliver interest-based advertisements to you on our websites, mobile applications and other third party websites such as social media platforms, we and third party advertising companies that we engage may use cookies, pixel tags, web beacons and other technologies to collect information about your visits to our websites and other websites.

The information we collect includes products, web pages or advertisements you scrolled over or clicked on or viewed on our websites or mobile applications.

For more information on how we collect your personal information, please visit the [Weston Foods Privacy Policy](#) and review the section “2. What Type of Personal Information Do We Collect and How?”.

## 3. How Do We Use This Information?

We use this information to determine whether you may be interested in our products, which helps us determine what types of advertisements may be of interest to you and then serve you with these advertisements.

For more information on how we use your personal information, please visit the [Weston Foods Privacy Policy](#) and review the section “How Do We Use Personal Information?”.

#### 4. How Do We Share This Information?

We may share your personal information within our group of companies for the purposes described in this notice or as detailed in the Weston Foods Privacy Policy, and in accordance with applicable law. We also share limited personal information (e.g., an email address) with our advertising service providers, such as Facebook and Google, for the purposes of reaching you with relevant advertisements through their advertising platforms. We do not sell your personal information to any organization or person; the only exception to this would be if we sell or transfer any part of our business.

For more information on how we share your personal information, please visit the [Weston Foods Privacy Policy](#) and review the section “How We Do Share Personal Information?”.

#### 5. What Are Your Privacy Choices?

You can manage your privacy preferences by changing your browser settings on your device, and/or using third party unsubscribe functionality (e.g., via Google or Facebook) to change your preferences within their platforms. Please note that disabling, blocking or deleting some of these technologies, such as cookies, may cause you to lose the functionality of certain features on our websites and apps.

For more information on how to manage your privacy choices, please visit the [Weston Foods Privacy Policy](#) and review the section “How Do I Change My Privacy Choices?”.

#### 6. Who Can You Contact With Questions About This Notice?

If you have privacy questions relating to this notice, you can contact our Weston Foods Privacy Office at [privacy@westonfoods.com](mailto:privacy@westonfoods.com).