

Lidl Plus privacy policy

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1. Overview

Lidl Plus is a Loyalty program (hereinafter referred to as “ **services** ” or “ **Lidl Plus** ”), which provides you with tailored offers and discounts from the companies within [Lidl’s corporate group](#) as well as from selected partners.

In order to use certain online services within the Lidl group of companies, you will need to register for Lidl Plus, (“**online services**”, such as online stores, Click & Collect Service, Apps, etc.). Please note that some functions are only available via **the Lidl App**. For example, you will need to identify yourself with Lidl App at checkout, so that your purchases in our Lidl stores are included in your Lidl Plus profile.

2. Contact details for the responsible person and the data protection officer

With exception for deviations as mentioned in it the following is the Lidl Stiftung & Co. KG, Stiftsbergstraße 1, 74172 Neckarsulm, Germany (“**Lidl Stiftung**”, “**we**”, “**us**”) as responsible for the treatment of your personal data with respect within Lidl Plus.

Lidl's Stiftung can be reached via the address above or via dataskydd@lidlplus.se.

3. Purpose, legal basis and recipients

3.1 Lidl Plus registration and account management

Purpose of processing/legal basis

After you have registered, you can use Lidl Plus for all our linked online services with the same username and password as you have for your Lidl Plus account. You will also have access to your account details, purchase history and all other Lidl Plus features via your Lidl Plus account.

The following data are handled during **Lidl Plus registration**:

- first name
- surname
- date of birth
- Email address
- mobile number
- password
- title (optional)
- gender (optional)
- address (optional)

We ask to know your date of birth because you must be eighteen years of age to be allowed to use Lidl Plus (see number 4.2.1 [in the general terms and conditions](#)) and certain specific products (such as alcoholic beverages).

It is optional to enter your address and surname in your Lidl Plus account. However, this data will be necessary for the use of certain functions.

If you have registered in the Lidl app for Lidl Plus, we will also process data linked to your selected store. In addition to the above mentioned data, we also receive information via any online services you have used, such as your previously stored payment methods and your purchase history. You can then download this data from your Lidl Plus account.

We process data collected in connection with registration for the following purposes:

- communication with you
- verify your identity as the account holder (for example, if your password has been reset)
- transfer of your purchase & user behavior to your customer profile

Additionally, we use your email address to send you a notification when a new device is using your account.

The following data is processed to ensure the registration/login process:

- Email address and mobile phone number
- IP address
- mouse movements
- time spent on the registration page
- online identifier as device ID
- browser information (browser name and version)
- name and version of the device's operating system, where the browser is installed
- your device's network location at login
- date and time of the registration/login attempt
- information whether the registration/login attempt was successful or not.

If you wish to use our Lidl payment service Pay (see number below [3.9](#)) so-called “two-factor authentication” will be integrated into the login procedure. When registering your Lidl Plus account, a verification code will be sent to the mobile phone number or email address, that you registered to your account with Lidl Plus. This ensures that only you have access to your account, even if an other party has knowledge of your password. Two-factor authentication can be switched off at any time via our customer service. If this happens, it will not be possible to use your Lidl Pay anymore.

The legal basis for the above processing is Article 6(1)(b) and (f) of the General Data Protection Regulation (GDPR). This means that we process your personal data for the purpose of providing contractual services. Our legitimate interest in processing is based on the purpose described above.

Receiver / different types of receivers

If you log in to online services as a Lidl Plus user, we will forward the data to the respective online service operator, which is necessary to provide the service you have requested. Depending on the service offered, this data is as follows:

- Verified login details (for example, email address, password, mobile number),
- Contact details (for example, name, address, date of birth),
- Saved payment methods
- Information entered and saved by you in "About me" under account information.

We also disclose your contact information to companies within the Lidl group, with whom you come into contact in connection with customer service matters.

3.2 Store visit

Purposes of processing / legal basis

If you use Lidl Plus, you can identify yourself at the checkout when you visit the store. In these cases, we collect the following data:

- The store you visited,
- goods you purchased or returned such as type, quantity, and price,
- coupons that you redeemed,
- receipt with total the sum on the purchase,
- the payment date and use payment method

When you make purchases in Lidl stores, you collect digital points that you can redeem for Lidl Plus vouchers. To redeem the vouchers, all collected points that belong to your customer number are added together. Returned goods are also taken into account when calculating the points.

The legal basis for this is Article 6(1)(b) of the GDPR. This means that we process the above-mentioned data on the basis of the contractual relationship between you and us.

In order to prevent financial damage to the companies in the Lidl Group, we analyze your shopping behavior and thus prevent possible fraud. In particular, we evaluate whether and how often goods are returned. The legal basis for this is Article 6(1)(f) GDPR. Our legitimate interest in processing is based on the purposes described above.

In the event of product recalls, we will check whether you have purchased the affected product so that we can notify you of the recall. This procedure aims to protect your health (Article 6.1 d) GDPR) and is based on our legitimate interest in notifying you of any product recalls (Article 6.1 f) GDPR).

3.3 Determine your product interests and create personalized advertising

Purposes of data processing / legal bases

Through Lidl Plus we assess which products, campaigns and services may be of potential interest to you. The assessment happens particularly on basis of following data:

- store purchases (for example, purchased or returned goods, specifying type, quantity and price)
- demographic information (for example, age, gender, place of residence),
- saved data in the Lidl Plus account
- information about living conditions and interests, saved in the “about me” section
- activated and/or redeemed coupons
- participation in lotteries and promotions
- utilization of offers from partners as described in points 3. 7 (for example time, quantity, location),
- use Lidl Plus features
- using our Lidl payment service Pay.

In addition, the following data is processed from the online services to identify your interests:

- Usage data for the Lidl app, e.g.
 - visited App sections
 - showed articles
 - operating system version

- identification of unit
- system language and selected country
- used version of the Lidl app
- Tracking data e.g.
 - Advertising identifier (iOS IDFA, Android Advertising ID or Huawei ID, email address, address, mobile phone number)
 - IP/MAC Address
 - HTTP Headers,
 - Unique ID from the unit
 - instructions on how to use the apps and websites (links clicked, areas visited, duration and frequency of use, number of clicks and scrolled text),
 - instructions on how to use the apps and websites (links clicked, areas visited, duration and frequency of use, number of clicks and scrolled text),
 - App and Event Tokens,
- Data from the online services of companies that are part of the Lidl group, such as:
 - participation in surveys and competitions
 - purchase frequency
 - web tracking data from online services
- Your consumer behavior in connection with the marketing of online services, for example
 - the time of opening the newsletter
 - links and areas clicked on
 - of use duration and frequency

We use methods based on mathematical statistics to identify your interests. For this purpose, your personal data will also be compared with data from other customers. Based on this comparison, we can assess which products and campaigns are relevant to customers with comparable interests.

We use such insights to provide you and other customers using the online services with the best possible personalized advertising with optimal offers and discounts. When possible, you will receive personalized information [about products](#), promotions, lotteries, new services, customer surveys and the latest news about offers in streaming, stores, online stores, flowers, photos and travel offers. We use these insights to optimize the use of the Lidl Plus program.

The legal basis for this is Article 6(1)(b) GDPR. This means that we process the above-mentioned data basis on the contractual relationship between you and us.

Receiver / different types of receivers

In addition, we may disclose the information described in this paragraph to other companies within the Lidl group or to third parties, provided that a legal basis exists (in particular through your consent to the use of tracking technology via our online services).

3.4 Optimization of marketing measures, store network and store design

Purposes of data processing/legal basis

If you provide us with your address during the registration process or at a later time via your Lidl Plus account, we will use it to optimize our marketing (e.g. distribution of flyers, poster advertising) and to develop our store network.

The processing of such data will take place on the basis of legitimate interest. Our legitimate interest is to optimize our various sales channels (Article 6.1 f) GDPR.

3.5 Google reCaptcha

Purposes of processing/legal basis

To protect our registration/login procedures from attacks and abuse by automated software (so-called “bots”), we use Google reCaptcha. Bots can attempt to gain access to customer account passwords or sabotage the website's functions through mass data transfers.

Google reCaptcha detects whether the website is being used by a human user or a bot. This is done by analyzing user behavior (time spent on the page and mouse movements). The IP address is read by Google, which determines whether it has previously been considered to belong to a bot. If the IP address has belonged to a bot according to previous checks, Google provides us with this information. We save such IP addresses to prevent future sabotage attacks. The analysis begins as soon as you open the registration page.

The legal basis for the processing is Article 6(1)(f) GDPR. Our legitimate interest arises as a result of the above-mentioned purposes.

Receiver / different types of receivers

By using the Google reCaptcha service, the above-mentioned data will also be subject to data processing via Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA. We have no influence on Google's processing and handling of the data. You can find more information about Google's data processing here: <https://policies.google.com/privacy>.

3.6 Competitions

Purposes of processing/legal basis

As a Lidl Plus user, you can participate in various competitions. Unless otherwise specified, your personal data will be processed in connection with your participation in the implementation of the competition (for example, when the winner is selected, get notified of their prize and has their prize sent to them) and to collect information about your interests as set out in section 3.3.

The legal basis for this is Article 6(1)(b) GDPR, i.e. we process the above-mentioned data on the basis of the contractual relationship between you and us.

Receiver / different types of receivers

In addition to the above-mentioned determination of your interests and to create personalized marketing, your data will only be transferred to companies within the Lidl group or to third parties, to the extent necessary for the implementation of the competition (for example, by delivering the prize via a logistics company).

3.7 Offers from partners

Purposes of data processing / legal basis

Lidl Plus gives you the opportunity to take advantage of offers and discounted prices from selected partners. Some of these offers require you to identify yourself as a Lidl Plus customer with your digital customer card to take advantage of them. In such a case, the partner will inform us of the special offer used and provide us with relevant information (such as time, number, location).

If special offers are used within Lidl Plus through agreements with our partners, we receive your contact details from them (such as email address and mobile number). We do this so that we can make the correct offer available to your account.

We use the information about your use of offers from our partners to determine your interests and to provide you with personalized marketing as described above.

The legal basis for this is Article 6(1)(b) GDPR, i.e. we process the above-mentioned data on the basis of the contractual relationship between you and us.

Receiver / different types of receivers

To the extent that you wish to take advantage of offers from partners via Lidl Plus, we only pass on the information that proves that you are a Lidl Plus user to the partner, so that the partner can ensure that you will get access to the offer.

3.8 E-mobility

Purposes of data processing / legal basis

In order to charge at one of Lidl's charging stations, you must first identify yourself with Lidl Plus. If you have not yet registered your address with Lidl Plus, you will be asked to enter a billing address so that payment can be made. When charging, the following data linked to your customer number will be processed:

- date for the charge
- the charge scope (kWh)
- charging performance (kW)
- charging start and end (time),
- what kind of charging connector is used

We use information about the use of the stores' charging stations to identify your interests and to be able to show you personalized marketing, as described above.

The legal basis for this is Article 6(1)(b) GDPR. This means that we process the above-mentioned data on the basis of the contractual relationship between you and us.

Receiver / different types of receivers

If you select a charging station and a contact via Lidl Plus from the E- Mobility services, we forward your customer data to Lidl's customer service, Lidl Sverige KB in order to enable charging. The legal basis for the provision of data is Article 6(1)(b) GDPR.

3.9 Lidl Pay

Purposes of data processing / legal basis:

As a Lidl Plus user, you can choose to register your credit or debit card via our mobile payment service " Lidl Pay " and conveniently make your payments (for example in Lidl stores) via mobile phone. To register and use Lidl Pay, it is necessary to enter the credit or debit card number, CVV/CSV code and the card's expiration date. This information is generated, encrypted and saved directly in the PCI-DSS and PCI 3DS certified systems on our payment platform. Your personal data is compared with the information of the company that issued the card. This will ensure that you are the rightful owner of the credit/debit card.

At a successful Lidl Pay registration, the payment platform sends us a token as confirmation, which we then link to your customer account.

The legal basis for this is Article 6(1)(b) of the GDPR, i.e. we process the above mentioned data on the basis of the contractual relationship between you and us.

Receiver / different types of receivers

Your credit or debit card details are passed on to the respective companies in the Lidl group the moment you use Lidl Pay in a Lidl store to enable payment. The data will be processed by that company for its own purposes (such as for tax reasons).

To enable payment in accordance with the applicable provisions of Directive (EU) 2015/2366 ("PSD 2"), applicable national laws and Regulation (EU) 2018/389, we exchange specific information (such as personal data about you, the transaction and your payment behavior) with your credit institution or with the issuer of your payment instrument (credit or debit card) using our own service providers.

Processing is conducted based on Article 6(1)(b) GDPR (payment execution) and on the basis of Article 6(1)(c) GDPR (compliance with the aforementioned legal obligations).

For fraud prevention, your mobile phone number will be processed in connection with registration, authentication and payment and will be disclosed to the payment service provider. The legal basis for this is Article 6(1)(f) GDPR, where our legitimate interest is to prevent fraud.

4. To which other recipients do we disclose your personal data?

4.1 Overview

In addition to the cases mentioned in 3.1 - 3.9, your personal data will only be forwarded without your consent if the law permits this, which is the case if:

- we have a legitimate interest in forwarding your personal data for administrative purposes within the Lidl Group and your rights and interests regarding the protection of personal data within the meaning of Article 6(1)(f) of the GDPR do not prevail.

or

- We use a third party to carry out the processing, which we have selected with great care, and which has entered into contractual obligations with us, according to which this party may only handle the processing in accordance with our instructions.

4.2 Transfer of data within the Lidl group

The information provided for registration purposes will be shared within the Lidl group for internal administrative purposes, as well as for a functioning common customer service.

Such disclosure of personal data is considered justified in light of our legitimate interest in sharing the data for administrative purposes within our group of companies (Article 6(1)(f) GDPR).

4.3 Transfer of data to recipients in other countries

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

The European Commission has certified in an adequacy decision that certain third countries have a level of data protection comparable to the GDPR. An overview of third countries **with an adequacy decision** can be found [here](#). As for service providers headquartered in the US, they are only considered to have an adequate level of protection if they are certified according to the EU-US Data Privacy Framework .

If there is no adequacy decision, we ensure the transfer through other mechanisms. These may include binding corporate rules, standard contractual clauses from the European Commission, certificates or recognized codes of conduct.

Unless otherwise stated, the transfer to a third country is either based on an adequacy decision or secured by one of the mechanisms listed above. If you have any questions about this, you can contact our Data Protection Officer ([section 2](#)).

5. How long do we store your personal data?

We delete or anonymize your personal data as soon as it is no longer needed for the stated purposes. We usually save your personal data for as long as you participate in Lidl Plus. If you have not shown activity in the last 24 months or have deleted your Lidl Plus account yourself, we will notify you of the expected deletion of the data. You then have 72 hours to cancel the deletion by logging in normally. In the event that your data must be saved for a longer period according to legal requirements or to secure, assert or enforce legal claims, we will retain your data even after the account has been deleted. However, the data will only be retained for as long as the law permits it to be saved in each individual case.

Shouldn't you use Lidl Pay in 24 months, data collected via that function and the function itself are deleted. You can always re-register with Lidl. Pay whenever you want.

For security reasons, your Lidl Pay account will be automatically deleted if you enter the wrong Lidl passcode Pay five times in a row.

All personal data that you have provided to us in connection with customer service inquiries will be deleted or anonymized by us no later than 90 days after the last inquiry. In our experience, no further inquiries are usually received after 90 days. When rights holders assert their rights, personal data is stored as evidence for 3 years after the last inquiry, so that we have time to provide sufficient information and fulfill our legal obligations.

We save the log files where we record your interactions with Lidl Plus (e.g. your login, password reset, etc.) for a period of up to 90 days.

6. What rights do you have regarding the processing of your personal data?

You have the right to request information free of charge about the personal data stored about you in accordance with Article 15(1) of the GDPR.

If the legal obligations exist, you are entitled to rectification (Article 16 GDPR), erasure (Article 17 GDPR) and restriction of processing (Article 18 GDPR).

Provided that you are the one who provided the data, you have the right to request deletion of the data pursuant to Article 20 GDPR.

If the data processing is carried out on the basis of Article 6(1)(e) or (f) of the GDPR, you have the right to object in accordance with Article 21. If you object to the processing, we will only be allowed to continue the processing if we can demonstrate compelling legitimate grounds that outweigh your legitimate interests. Objections to the processing of personal data can be sent at any time to dataskydd@lidlplus.se

If the processing is based on consent in accordance with Article 6(1)(a) or Article 9(2)(a) GDPR you may withdraw your consent at any time with future effect without it affects the legality of the previous processing.

You also have the right to lodge a complaint with a data protection authority. The responsible supervisory authority is the authority in the country where you live or the country where the data controller is based.

Privacy policy when downloading documents

[Here](#) you can download the Lidl Plus privacy policy as a PDF document.
