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Data protection information for the Lidl website and the Lidl app

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

Unless otherwise stated below, Lidl Sweden KB, Org.nr 969667-6312, Box 6087, 175 06 Järfälla, (" Lidl Sweden ") and Lidl Stiftung & Co. KG, Stiftsbergstraße 1, 74172 Neckarsulm (" Lidl Stiftung ", together with Lidl Sweden " we ", " us ") are jointly responsible for processing your data on the website www.lidl.se and in the Lidl app (" Services ").

The data protection officers for Lidl Sweden and Lidl Stiftung can be contacted at the above-mentioned postal addresses or via dataskydd@lidl.se.

2. Processors

Unless otherwise stated, the recipients or categories of recipients listed below are processors. They are each carefully selected, and we have entered into agreements with them and they are contractually obligated 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 specified in the agreement.

3. Transfer to recipients in third countries

In 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)/European Economic Area (EEA).

The European Commission has determined that certain third countries have a level of data protection comparable to the GDPR, those countries have then received a so-called adequacy decision. You can find an overview of the **third countries that have received an adequacy decision** here. For service providers headquartered in the US, the adequacy decision only applies if they are certified under the EU-US Data Privacy Framework.

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

Unless otherwise stated below, the transfer from third countries will take place either on the basis of an adequacy decision or on one of the grounds set out above. If you have any questions, you can contact our Data Protection Officer.

4. Using our services

Purpose of data processing/legal basis

When you use our services, your browser will automatically and without your intervention send the following information to our server;

- The IP address of the device being used,
- Date and time of access,
- Name and URL of the downloaded file,
- Website/application from which access is made (referrer URL),
- Web browser and, if applicable, operating system of your device,

Name of your access provider

The data will be temporarily stored in a **log file** for the following purposes:

- Ensuring smooth connection configuration,
- Ensure a comfortable use of our website/application,
- Evaluate system security and stability.

If you consent to geolocation on your device, we process your location data in real time when you use certain features of our services (e.g. displaying the location of the nearest Lidl store in the store search function).

The legal basis for the processing is Article 6(1)(f) GDPR. Our legitimate interest lies in providing an accurate presentation of our services, in protecting our systems and in preventing unauthorized access to our website. If the presentation serves to prepare a contract, the legal basis for data processing is Article 6(1)(b) GDPR.

Storage time/criteria for determining storage time

The log files are stored for a period of seven days and are then automatically deleted.

5. Contact forms, email contact, phone calls, social media and customer surveys

Purpose of data processing/legal basis

We process personal data that you provide to us when you fill out contact forms, by telephone, by email or via social media exclusively for the purpose of processing your request.

If you participate in one of our customer surveys, this is done on a voluntary basis. In these anonymous surveys, no information is stored that allows conclusions to be drawn about the participants. Only the date and time of your participation will be saved. You can enter your information using free text fields or by sharing screenshots. You can also voluntarily agree to be regularly invited to user studies. These are primarily telephone interviews, written surveys or tests on the usability of our applications. For this purpose, we store your first name, last name and email address. Any personal information that you additionally provide in surveys or user studies will be considered voluntarily provided and will be stored in accordance with the GDPR. When using the free text fields and sharing screenshots, please refrain from transmitting personal data about yourself or other persons.

The legal basis for the processing is legitimate interest, Article 6.1 f) and contract, Article 6.1 b) GDPR. Our and your (legitimate) interest in this processing is the purpose of being able to answer your inquiries, resolve any problems that may arise and thus maintain and promote your satisfaction as a customer or user of our website. If we ask for your consent as part of a customer survey or user study, consent, Article 6.1 a) GDPR constitutes the legal basis. You can revoke this consent at any time with future effect. More information on this can be found in the privacy notice for customer surveys or user studies. The legal basis for processing data protection inquiries is legal obligation, Article 6.1 c) GDPR, as this is necessary to comply with legal obligations.

If you identify yourself as a Lidl Plus customer, the responsible Lidl company will receive your contact details in order to process your customer service request. The legal basis for this is a contract, pursuant to Article 6(1)(b) GDPR.

Recipients/categories of recipients

When responding to your inquiries and conducting customer surveys, your data will also be processed on our behalf by administrators from customer service and customer survey departments.

If necessary to process your request, the information you provide may be passed on to companies within the Lidl group. If another issue arises as part of your customer service issue, we will use the information you previously collected for this matter so that you do not have to provide your information again.

In order to process your complaint, it may also be necessary to forward your contact details to our service partners, who will contact you regarding the further processing of your case (e.g. to make an appointment for collection or repair). We will inform you of the name of the specific service partner as part of our communication. The transfer of data is necessary to fulfill warranty claims and thus to implement the contractual relationship with you in accordance with Article 6(1)(b) GDPR.

Storage time/criteria for determining storage time

All personal information that you provide to us in response to inquiries (suggestions, praise or criticism) will be deleted or anonymized by us no later than 90 days after the final response has been provided. Our past experience has shown that there are usually no further inquiries after 90 days. If you assert your data protection rights, your personal data will be stored for 3 years after final feedback to prove that we have met the legal requirements. The storage period for personal data collected in customer surveys will be communicated in advance as part of the specific customer survey.

6. Competitions

Responsible person

Lidl Sweden Limited Partnership, Corporate ID No. 969667-6312, Box 6087, 175 06 Järfälla, is responsible for the processing in connection with competitions.

Purpose of data processing/legal basis

You have the opportunity to participate in various competitions via our website www.lidl.se, via our newsletter or via the Lidl app. Unless otherwise stated in the respective competition, the personal data you provide to us as part of your participation in the competition will be used exclusively for the processing of the competition (e.g. to determine the winner, notify the winner, send the prize).

The legal basis for data processing in connection with competitions is Article 6(1)(b) GDPR.

Recipients/categories of recipients

The data will only be forwarded to Lidl Stiftung for storage in your Lidl Plus profile and if this is necessary for the processing of the competition (e.g. sending the prize via a logistics company).

Storage time/criteria for determining storage time

After the competition has ended and the winners have been announced, the participants' personal data will be deleted. In the case of non-cash prizes, the winners' data will be stored for the period of time for which the statutory warranty claims apply in order to be able to handle repairs or replacements in the event of a defect.

7. Sending marketing

Purpose of data processing/legal basis

You can subscribe to our marketing communications on our website, in our mobile applications, partner company websites and through so-called embedded content through our social media. If you have expressly consented to receive our Lidl marketing (email, SMS, WhatsApp, push notification), we will use your email address or mobile phone number and, if applicable, your name to send you information (see the section " **Advertising content"**) taking into account your user profile (see the section " **Personalized user profile"**).

To ensure that no errors were made when registering the email address, we use the so-called double opt-in procedure. After you have entered your email address in the registration field, we will send you a confirmation link in advance. Only when you click on this confirmation link will your email address be added to our email 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.

You can revoke your consent to receive marketing, including the creation of personalized user profiles, at any time with future effect, at the end of each newsletter, in your Lidl Plus account or via our customer service, see contact form here. If you unsubscribe, we will consider it as if you have revoked your consent to the creation of your personalized user profile and the receipt of the newsletter.

The legal basis for the above-mentioned processing is legitimate interest, Article 6(1)(f) GDPR or, if there is corresponding consent, Article 6(1)(a) GDPR. The processing of existing customer data for our own advertising purposes or for advertising purposes for third parties is a legitimate interest within the meaning of the first-mentioned provision.

Recipients/categories of recipients

Recipients include social media platforms, advertising partners and specialized service providers who process personal data on our behalf in accordance with our instructions.

If external processors are used to carry out marketing, we have entered into agreements with them and are contractually obligated in accordance with Article 28 GDPR.

Storage time/criteria for determining storage time

If you withdraw your consent for marketing or object to certain marketing, your data will be deleted from relevant (e- mail) distribution lists within 48 hours (for technical reasons).

If you object, the relevant contact address will be blocked from further marketing processing. We would like to point out that in exceptional cases, advertising materials or advertising campaigns may still be sent temporarily even after your objection has been received. This is due to the necessary technical lead time for advertisements and does not mean that we will not implement your objection.

Your registration details will then be stored for ten years to prove that we have met legal requirements.

If you register for the newsletter via a social media platform, the respective social media platform's privacy notice also applies.

Further processing for marketing purposes

We also process data about you for marketing purposes using cookies and similar technologies, which are described in more detail in <u>Section 8</u>.

7.1 Personalized user profile

With your consent, we and the following operators of Lidl websites and Lidl apps as well as senders of Lidl newsletters record your user behavior:

- Lidl Stiftung & Co. KG,
- Lidl Sweden KB

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

- use areas of the respective website, mobile apps or newsletters,
- activated links,
- Opening time,
- products selected or added to the shopping cart,
- Time, duration and frequency of use,
- Participation in surveys,
- redeemed deposit coupons,
- Purchase data,
- Frequency and timeliness of your store purchases if you use Lidl Plus.

We use the above mentioned data to create personalized user profiles. We do this by assigning your person and/or email address or mobile phone number with the above data, in order to better tailor and personalize the marketing content to your needs. Any marketing takes place via newsletters, SMS, WhatsApp /push messages as well as on-site and print advertisements. We also do this to be able to coordinate interests and improve our offers and our digital presence.

We may also enrich this usage profile with information about your age and gender if you have given us your consent to do so.

If you have filled in the "About me" section in Lidl Plus, this data will also be used to tailor our services to your interests. The legal basis for this is Article 6(1)(b) GDPR (contract between Lidl Stiftung and you).

7.2 Ad content

The content of our marketing communications includes information about promotions, products and services (e.g. offers, discount campaigns, competitions, Lidl Plus program benefits, streaming offers, services, surveys, product reviews) from our website, the Lidl app, the store and from the operators of Lidl websites and Lidl apps. These are currently in particular:

- Lidl Stiftung & Co. KG,
- Lidl Sweden KB

7.3 Push notifications

Purpose of data processing/legal basis

To receive recurring information about news, offers, promotions and reminders about uncompleted orders, you can register to receive push notifications .

To do this, you must confirm that your device asks you to receive push notifications. The login time and a push token or your device ID are then saved. This data is used to send push notifications and provide proof of registration.

The Lidl app only uses push notifications if you enable push notifications in the settings on your device when you install the app or at a later time. You can deactivate the receipt of push notifications in the Lidl app at any time .

We statistically evaluate push notifications to determine whether and when push notifications were displayed and clicked on. This allows us to determine the presumed interests of the recipients and thus optimize the push notifications.

The legal basis for the processing of your data to display push notifications is your consent in accordance with Article 6.1 a) GDPR.

Recipients/categories of recipients

If external processors are used to deliver push notifications, we have entered into contracts with them and they are contractually obligated in accordance with Article 28 GDPR.

Storage time/criteria for determining storage time

Your data will be saved as long as you have push notifications enabled.

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

When you use cookies and similar technologies to process usage data (in particular local storage), when you visit our website (www.lidl.se) and some of the websites embedded there (in particular account.lidl.com) and the Lidl app (together: "these services"), files are stored locally on your device (laptop, tablet, smartphone, etc.). Sometimes a so-called tag is used to display personalized advertising, which is integrated into these services (hereinafter referred to as "similar technology for processing user data"). This is a code that collects user data.

8.1 Responsibility

Lidl Sweden and Lidl Stiftung are jointly responsible for most of the processing in connection with the use of so-called cookies and other similar technologies (hereinafter referred to as "cookies") to process usage data on these services.

In addition to this, the responsibilities are as follows:

8.2 Responsibility for cookies for our own marketing purposes

For some of the data processing in connection with marketing cookies for our own marketing (see cookies under the category "Own marketing" in our cookie notices), in addition to us, the following are also involved in the processing: Meta Platforms Ireland Limited , 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (Facebook) and TikTok Information Technologies UK Limited , Kaleidoscope , 4 Lindsey Street , London, EC1A 9HP, United Kingdom (TikTok). They are joint controllers with us pursuant to Article 26 GDPR.

For our own marketing purposes, we use cookies and perform related processing. We may combine this with your age, gender and your user behavior on the website or in the Lidl app to create a profile.

In addition, in this context, data about you in the Lidl app is 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 an independent data controller for the purpose of displaying personalized advertising and for measuring outcomes. In order to be able to associate your user behavior with you, the identifiers (MAID, hashed email address and/or hashed phone number) are forwarded to TTD on the basis of your consent. You will find further information about the processing and how you can exercise your rights as a data subject in TTD's privacy notice.

For our own marketing in our services, we also use Microsoft Advertising and Microsoft Clarity from the provider Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland (Microsoft) and the provider Google's advertising service Google Ireland. Limited , Gordon House, Barrow Street , Dublin 4, Ireland (Google). Microsoft and Google also process your data under their own responsibility as part of Microsoft and Google advertising services.

We use the service "Facebook Custom Audience " from Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter "Meta", "Facebook") in the Lidl app. In this respect, we and Meta are joint data controllers in accordance with Article 26 GDPR.

8.3 Purpose/treatment

8.3.1 Cookie categories

We place cookies on your device through which the information below is recorded and then processed for the purposes stated below.

- **Technically necessary:** These are cookies and similar technologies without which you cannot use our services (e.g. to display our services correctly, including fonts and colors, to provide the features you request and to take your preferences into account, to save your login in the login area, etc.).
- Preferences: By using these technologies, we can take into account your preferences to provide you with the best user experience when using our website and the Lidl app. For example, your settings allow us to display our services in a language that suits you. This also helps us avoid showing you products that may not be available in your region.
- Statistics: These technologies allow us to create pseudonymous statistics about the use of our services. This allows us, for example, to determine how we can better adapt our website or the Lidl app to users' habits. We use your IP address as well as online identifiers, log files and, based on your network, your location to prevent abuse and to prevent and detect possible security breaches and other prohibited or illegal activities. For example, if you log in from a new/unknown device, we may notify you of such a login attempt.
- Marketing for our own marketing purposes: This allows us and other responsible parties (see above) to display appropriate advertising content based on analysis of your user behavior and information from your customer account (age, gender, if applicable, store purchase data from the Lidl Plus service). Your user behavior can also be tracked across different websites, apps, browsers or devices using a user ID (unique identifier).

Further information about the purpose of processing <u>can</u> be found in the cookie preference manager.

8.3.2 Featured services

Google Ads Customer Match:

We uses the "Google Ads Customer Match" service from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (below called "Google"). Using the tracking technologies we use, lists of user data are sent to Google servers. Google then compares whether the submitted user data matches data from Google customers and then creates audience groups that can be used to target ads. The ads can be displayed within the Google network (YouTube, Gmail or within the search engine) as well as across devices (so-called remarketing or retargeting).

We have entered into an agreement with Google for the use of Google Ads. Customer Match in accordance with Article 28(3) GDPR. Through this agreement, Google guarantees that it will process the personal data in accordance with instructions and ensure that the rights of the data subject are protected.

You can find information about how Google uses personal data transmitted to Google through the integration of the services, as well as your setting options for personalized advertising and data collection here and here</

Meta/Facebook:

Facebook Custom Audience enables us to form target groups and to design and display personalized ads on Facebook based on needs.

Lists of user data are uploaded to Facebook. Facebook then compares whether the uploaded user data matches data from Facebook users and then creates audiences that can be used to target ads on Facebook. With Custom Audience ensures that ads on Facebook are only shown to people who have previously visited our app or are interested in our products. Facebook also uses the data for its own marketing purposes and for third-party marketing purposes.

Additional selected data processing in connection with self-promotion:

With your consent, we use special technologies from partners so that we can record your browsing behavior and show you advertising tailored to you on our website, the Lidl app or our partners' platforms (Facebook, TTD, Instagram , Threads and TikTok). Our partners may also compare the data collected on these services with their own data sets.

Microsoft Advertising and Google Advertising may be used to display targeted advertisements across Microsoft and Google networks (e.g. in search engines and email programs), optimize them, and track users' activities on our website if they have reached our website through advertisements. Microsoft Clarity may be used to track and visualize users' interactions with our services.

We also use Microsoft and Google advertising services to collect information that allows us to track target groups using remarketing lists. Microsoft Advertising and Google Advertising can recognize that these services have been visited and an ad can be played when the Microsoft or Google network is used at a later time. The information is also used to create conversion statistics, that is, to record how many users access these services after clicking on an ad. This tells us the total number of users who clicked on our ad and were redirected to these services. However, we do not receive any information that can be used to identify users.

8.4 Cookies – type of data

When you use cookies and similar technologies to process user data, the following types of personal data are primarily processed, depending on the purpose:

Technically necessary:

- User input to retain selected data across multiple subpages (e.g. selecting your preferred store in the "store search" feature);
- Authentication data to identify a user after registration to access authorized content on subsequent visits (e.g. access to Lidl Plus customer account);
- security-related events (e.g. detection of frequent failed login attempts);
- data required to play multimedia content (e.g. play (product) videos selected by the user);
- Information to display our website correctly, including fonts and colors, to provide the features
 you want and to consider your settings such as your choices regarding cookies and similar
 technologies, to save your registration in the login area, etc.

Preferences:

• User interface customization 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 locator).

Statistics:

- Browser type/version,
- operating system used,
- the previously visited page (referrer URL),
- The hostname of the accessing computer (IP address; this is regularly anonymized so that it is generally impossible to identify you as a person),
- Time of server request,
- individual user ID and events that have occurred on the website (surfing behavior). We only combine the user ID with other data from you (e.g. name, email address, etc.) with your explicit consent (see, for example, section 7 of this data protection notice). We cannot draw any conclusions about you based on the user ID itself.

Marketing – our own advertising:

- Information about the use of our website, in particular:
 - o IP address (this is regularly anonymized so that no conclusions can be drawn about you as a person),
 - unique user ID (including cookie identifiers) or other identifiers (email address, phone number, address); We only combine user IDs with other information from you (e.g. name, email address, age, gender, etc.) with your explicit consent. We cannot draw any conclusions about you based solely on user IDs. We may share user IDs and associated usage profiles with third parties via ad network providers.
 - Potential product interests,
 - Access to information,
 - Device identifier,
 - Information about device and browser settings,
 - Mouse/scrolling movements,
 - Events that occurred on the website (browsing behavior).
- We use the following advertising identifiers for in- app analysis and personalized advertising: (i) IDFA (Identifier for Advertising) for iOS devices or (ii) Android advertising ID or (iii) Huawei ID, IP/MAC address, HTTP header and email address Address, phone number, address and a unique ID of your device (in addition: Access time, country, language, local settings, operating system and version and app version). In addition, we include information about user device and web activity as well as app and event tokens in this analysis. This data is processed exclusively on a pseudonymous basis. You can reset or deactivate the IDFA or Google GAID, Android advertising ID and Huawei ID at any time via your operating system. In the event that

IDFA is not available, we use SkAdNetwork (Apple's Attribution API) to attribute our app installations to an advertising campaign.

Store purchase data from the Lidl Plus loyalty program

Especially for the Lidl app:

In order to be able to show you interest-based information, it is necessary to be able to assign the above-mentioned information to you as a person. For this purpose, we establish a link to your customer number from the moment you complete the Lidl Plus registration. Your consent to the provision of personalized information also covers this processing step.

8.5 Legal basis/recipient/storage period

Legal basis:

The legal basis for the use of preference, statistical and marketing cookies is your consent in accordance with Article 6.1 a) GDPR and in accordance with Chapter 9, Section 28 of the Electronic Communications Act (2022:482). The legal basis for the use of technically necessary cookies is Article 6.1 f) GDPR, which means that we process your data for our legitimate interest in being able to provide a functioning website.

Facebook bases the processing of data for Facebook Custom Audience on the consent of Facebook users in accordance with Article 6(1)(a) GDPR and Facebook's legitimate interests in accordance with Article 6(1)(f) GDPR to provide Facebook with accurate information and to ensure reliable reports and/or accurate performance statistics. You can find more information about this in <u>Facebook's data protection information or here</u>. You can contact Facebook's data protection officer <u>here</u>.

Recipients/categories of recipients:

As part of the processing using cookies and similar technologies to process user data, we may use specialized service providers, in particular in the field of online marketing. They process your data on our behalf as processors. They are carefully selected and we have concluded contracts with them and they are contractually obligated in accordance with Article 28 GDPR. All companies listed as providers in our cookie notices, unless they have been listed as (joint) data controllers in this privacy notice, act as processors on our behalf.

As part of our partnership with Google Ireland Limited, Meta Platforms Ireland Limited, The UK Trade Desk Limited, Microsoft Ireland Operations Limited and TikTok Information Technologies UK Limited, the above-mentioned data is usually also stored for statistical and marketing purposes processed on servers in the USA and the UK (see separate explanations on third country transfers under <u>Section 3</u>).

Storage period/criteria for determining the storage period :

You can find out how long cookies are stored in our cookie information. If "Permanent" is specified in the "lifetime" column, the cookie will be stored permanently until consent is revoked.

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

8.6 Withdraw consent/ opt-out option /further information

You can withdraw your consent at any time, for example via the preference manager. You can choose to withdraw your consent either to us or to the person responsible together with us.

Website:

You can also prevent the techniques explained here by setting the appropriate cookie settings in your browser to reject some or all cookies. We would like to point out that in this case you may not be able to use all the features of these services.

Lidl app:

If you wish to withdraw your consent to tracking in the Lidl app, you can do so at any time with effect for the future by doing so after completing registration via opt-out in the app under "More" à "Legal information" à "Tracking".

You can opt out of using Custom The Audiences service globally on <u>the Facebook website</u>. After logging into your Facebook account, you will be taken to Facebook's ad settings.

You can disable personalized advertising on Microsoft and Google or set it up individually. Details can be found on their respective support pages:

- Microsoft: https://help.ads.microsoft.com/#apex/3/se-se/51029
 and https://account.microsoft.com/privacy/ad-settings/signedout.
- Google: https://support.google.com/My-Ad-Center-Help/answer/12155451.

Settings options for personalized advertising are also available at https://youradchoices.com/ and here.

Further information about data processing by the companies below and how you exercise your data protection rights can also be found in the following data protection guidelines:

- Meta (Facebook): https://www.facebook.com/privacy/policy/
- TikTok: https://www.tiktok.com/legal/privacy-policy-row
- Microsoft: https://privacy.microsoft.com/sv-se/privacystatement
- Google: https://policies.google.com/privacy?hl=se
- UK Trade Desk: https://www.thetradedesk.com/de/privacy

You can find an overview of information about the individual cookies and similar technologies used, along with their respective purposes, storage period and any third-party providers involved, here. You can also find further information about the processing in the settings manager.

9. Map services

9.1 Bing Maps

Purpose of data processing/legal basis

On this website we use maps from Bing Maps, a service provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA. This allows us to display interactive maps directly on the website and allows you to easily use the map function, for example to find Lidl stores near you.

The use of Bing Maps is in the interest of providing an attractive presentation of our offers and making it easy to find the places we indicate on the website. This represents a legitimate interest within the meaning of Article 6(1)(f) GDPR.

By visiting our website, the provider of Bing Maps, Microsoft Corporation, receives the information that you have visited the corresponding sub-page of our website. In order to be able to use the functions of Bing Maps, your IP address is processed as part of internet communication. This is usually processed on a Microsoft server in the USA.

We have no influence on the specific processing carried out by Bing Maps . Further information on the purpose and scope of processing by Bing Maps can be found in <u>Microsoft's privacy notice</u>. There you will also find further information about your rights and setting options to protect your privacy.

9.2 Google Maps, Apple Maps, Huawei Map kit

Purpose of data processing/legal basis

In our app you have the option to use the map service of the operating system on your mobile device, for example to find a Lidl store near you. This allows interactive maps to be displayed directly in the app .

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

Addresses and privacy notice for the suppliers:

Google Maps

- o Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland,
- Privacy Notice: https://www.google.com/policies/privacy/,
- o Terms of Use: https://maps.google.com/help/terms_maps.html ,

Apple Maps

- o Apple Inc., One Apple Park Way, Cupertino, California,
- Privacy notice: https://www.apple.com/legal/privacy/se/
- o Terms of Use: https://www.apple.com/legal/internet-services/maps/terms-se.html

Huawei map set

- Huawei Aspiegel SE, 1F, Simmonscourt House, Ballsbridge, Dublin D04 W9H6, Ireland
 Huawei
- o <u>Privacy Notice</u>: <u>https://www.huawei.com/en/privacy-policy</u>
- o Terms of Use: https://developer.huawei.com/consumer/en/hms/huawei-MapKit/

The use of map services is based on our contractual relationship with you, Article $6.1\,b$) GDPR and on our legitimate interest in providing an attractive presentation of our offers and in making it easy to find the locations we specify in the app . This represents a legitimate interest within the meaning of Article 6. If you use the map services in the Lidl app or have consented to so-called geolocation in the settings of your mobile device via the "Allow access" dialog box, we use this function to offer you individual services based on your geographical location. We process your location based on GPS and networks, in particular for the search functions "store search", "e- charging station search " and "partner offers". We do not permanently store the geolocation data .

The legal basis for the data processing described above is Article 6. 1 b) and f) GDPR. The legitimate interest lies in providing an attractive presentation of our offers and in making it easy to find the locations we indicate in the app.

10. Google reCaptcha

Responsible person

Lidl Sverige KB is responsible for data processing for Google reCaptcha.

Purpose of data processing/legal basis

We use Google reCaptcha to protect your information. We primarily use reCaptcha for form submissions, when you enter competitions, and when registering for newsletters on the website . We do this to protect you from attacks or abuse by automated programs (so-called bots). For example, bots try to obtain passwords from customer accounts or limit the functionality of the website through bulk data transfers.

Google reCaptcha determines whether the interaction with the website is by a human user or a bot. For this purpose, user behavior (time on the page or mouse movements) is analyzed and the IP address is read by Google and checked to see if it could have been assigned to a bot in the past. If the IP address has already been assigned to a bot, Google sends us this information. We then store these IP addresses to defend ourselves against future attacks. This analysis starts automatically as soon as you open the registration page.

The legal basis for this data processing is Article 6(1)(f) GDPR. Our legitimate interest arises from the above-mentioned processing purposes.

Recipients/categories of recipients

When you use Google reCaptcha, the above data is also processed by Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA to provide the service. We have no influence on Google's processing and use of the data. More information about the processing carried out by Google can be found here https://policies.google.com/privacy.

11. Links to other websites and applications

Our website and the Lidl app contain links to other websites and apps operated by other Lidl companies, selected partners or other third parties. If you click on one of these links, for example in the Lidl app via a banner in the app , 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 said websites/apps to understand and measure where the user found them. We have no influence on the data processing of these websites/ apps . We recommend that you check the respective 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 to fulfill your (technical) request to visit the respective application or website (Article 6.1 b) GDPR), as well as based on the operator's legitimate interest to carry out its marketing (Article 6.1 f) GDPR).

12. Access to features and sensors on your mobile device

Purpose of data processing/legal basis

Location data

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

Photos/media/files from your mobile device/USB storage content (read, modify, delete)

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

Camera (take pictures and film)

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

WiFi connection information

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

Other device features or device sensors

Access to other device functions and device sensors on your mobile device allows the Lidl app to retrieve data from the Internet and process error messages. This also allows the Lidl app to run when it starts and the device to be deactivated from sleep mode. Finally, if you have given your consent, the Lidl app can send you so-called 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(1)(a) of the GDPR.

13. Embedded third-party content

We have integrated YouTube videos into our offer, which are available at https://www.youtube.com. These are all integrated in "extended data protection mode", which means that no data about you as a user is transmitted to YouTube unless you play the videos. Data is only transmitted when you play the videos. We have no influence on the data processing of the YouTube operator.

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

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

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

If the legal requirements are met, you also have the right to rectification (Article 16 GDPR), erasure (Article 17 GDPR) and restriction of processing (Article 18 GDPR). If you have provided us with the processed data, you have the right to data portability in accordance with Article 20 GDPR.

If data processing is carried out on the basis of Article 6(1)(e) or (f) GDPR, you have the right to **object** in accordance with Article 21 GDPR. If you object to the processing, this will only continue if we can demonstrate compelling legitimate grounds for further processing that outweigh your interest in objecting. You can object at any time by contacting dataskydd@lidl.se

If the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR, you may withdraw your consent at any time with future effect without affecting the lawfulness 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.

In this data protection notice, we have presented several situations of joint responsibility in accordance with Article 26 GDPR. Upon your request (e.g. via the contact options listed under point 1), we will be happy to provide you with the essentials of the respective joint responsibility agreement. To exercise your data subject rights, you are welcome to contact us or – where relevant – the responsible parties together with us.
