# OUR PRIVACY POLICY

## LAST UPDATED JANUARY 15, 2021

Thank you for visiting our website for Hudson’s Bay Company ULC ("Hudson’s Bay"). We are committed to providing a safe and personalized shopping experience. This commitment includes using your personal information to fulfill those goals and respecting and protecting the privacy of your personal information.

This privacy policy describes the types of information we collect from and about you when you visit our website available at [**www.thebay.com**](https://www.thebay.com/) ("Site"), use our mobile application ("App"), visit or make a purchase at our stores (each a "Store"), or otherwise contact or interact with us in any other way (collectively "Services"). This privacy policy also explains how Hudson’s Bay may collect, use and share your personal information, as well as your ability to control certain uses of it.

**FREQUENTLY ASKED QUESTIONS**

[**How does Hudson’s Bay collect information?**](https://www.thebay.com/PrivacyLegalInfo.html#policy1)

[**What are my Tracking Options?**](https://www.thebay.com/PrivacyLegalInfo.html#policy2)

[**How does Hudson’s Bay use the information collected?**](https://www.thebay.com/PrivacyLegalInfo.html#policy3)

[**What information does Hudson’s Bay share with others?**](https://www.thebay.com/PrivacyLegalInfo.html#policy4)

[**How can I access, update, or remove my information?**](https://www.thebay.com/PrivacyLegalInfo.html#policy5)

[**What choices do I have about receiving communications from Hudson’s Bay?**](https://www.thebay.com/PrivacyLegalInfo.html#policy6)

[**What about children's privacy?**](https://www.thebay.com/PrivacyLegalInfo.html#policy7)

[**What about security?**](https://www.thebay.com/PrivacyLegalInfo.html#policy8)

[**What about other websites?**](https://www.thebay.com/PrivacyLegalInfo.html#policy9)

[**For how long and where is my data stored?**](https://www.thebay.com/PrivacyLegalInfo.html#policy10)

[**What if I live outside of Canada?**](https://www.thebay.com/PrivacyLegalInfo.html#policy11)

[**How does Hudson’s Bay communicate changes to this Policy?**](https://www.thebay.com/PrivacyLegalInfo.html#policy12)

[**Whom do I contact if I have additional questions or concerns about this policy?**](https://www.thebay.com/PrivacyLegalInfo.html#policy13)

**Q: How does Hudson’s Bay collect information?**

**A:** Hudson’s Bay may collect information from or about you in a number of ways and for the purposes set out below (details of which are provided in the table under the heading “[**Information We Collect, Use and Share**](https://www.thebay.com/PrivacyLegalInfo.html#policy13)”). Please note that if you decline to provide any of the requested information (whether or not required), you may not be able to take full advantage of the Services and their features or make a purchase from us:

**From Hudson’s Bay's Interactions with You:** We collect information from and about you and your transactions and other interactions with us. This may include, but is not limited to, when you visit our Site or Stores, use the Services, create an online account with us, make a purchase, sign up for our emails, participate in contests or other promotions, participate in a product review, survey, or other similar programs, send a gift or virtual gift card to a person, sign up for our Gift Registry or HBC Rewards loyalty program, join a clientele list, sign up for personal shopping or otherwise contact us. The personal information we collect may include your name, address, email address, telephone number, or other contact information, loyalty program membership information, gender, birthday, age, other demographic information, your interests, and preferences.

If you make a purchase from us, we may also collect a credit or debit card number or other financial information, CVV, and billing address. In addition, if you make a purchase at a designer boutique, restaurant, salon or other similar service offered within a section of a Hudson’s Bay store that is licensed by a third party) (each a "Boutique Service"), we and the Boutique Service may each collect information such as your name, billing address, shipping address, telephone number, email address and payment or gift card information. Any such information is subject to this Privacy Policy if we collect or have it and subject to the Boutique Service’s privacy policy if the Boutique Service collects or has it.

**Credit Card Application:** You may also be required to provide certain information when you apply for a Hudson’s Bay MasterCard® or the Hudson’s Bay private label credit card. We and the credit provider may be required to collect your name, address, email address, phone number, and other information needed to assess your credit worthiness and verify your identity, such as social insurance number (optional), income, and employer information. We require this information to process your application, operate your account, and provide you with credit services. If you choose to link to the credit provider's or other third party site, they may have privacy policies that differ from our own and may make their own choices about privacy practices. You therefore should refer to their privacy policies to understand how they collect and handle your information and what kinds of choices you have.

**Information You Provide About a Third Party:** If you send someone else a communication from the Services (such as sending a gift or virtual gift card), we may collect information such as that person's name, telephone number, email, and/or shipping address for the purposes of facilitating the sending of the gift or virtual gift card.

**Automatically on the Site or App:** We, or third parties working on our behalf may use cookies, web beacons/pixel tags, log files, and other technologies to collect certain information about visitors to our Site or App, users of our online Services, and interactions with our emails and online advertisements, and to allow Hudson’s Bay to keep track of analytics and certain statistical information. For example, we may collect information such as your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address, location information, mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App. Collecting this information, and linking it with certain personal information, helps us to tailor our Site and App and personalize and otherwise enhance your online shopping experience by saving your preferences while you are visiting a particular Site or App, and to help identify Site or App features, promotions, advertisements, and offers that may be of particular interest to you and retarget online and mobile advertisements to you across computers or devices you may use.

**From Third Party Sources:** We may acquire information from other sources to update or supplement the information that you provide or that we collect automatically (such as information to validate or update your address or other demographic information), or when you connect with the company through a third party (including through social networks) based on your registration and privacy settings on those third party sites.

**Combination of Information:** We may combine the information we receive from or about you, including information you provide to us and information we automatically collect through the Site or App, as well as information across other computers or devices that you use, with information we collect or receive about you from other online and offline sources, or from other third party sources.

**Interest-Based Advertising and Analytics:** We work with third party advertising companies that use their own tracking technologies (such as cookies, web beacons, pixel tags, log files, flash cookies, or other technologies) on our Site and App and other websites and apps in order to provide you with tailored advertisements on our behalf. These third parties collect information about your activity across your different devices on our Site and App and third-party websites and apps (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you on third party websites and apps. This information may also be used to evaluate the effectiveness of our online advertising campaigns.

We work with third party advertising companies that use their own tracking technologies on our Site and App and other websites and apps in order to provide you with tailored advertisements on our behalf. These third parties collect information about your activity across your different devices on our Site and App and third-party websites and apps (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you on third party websites and apps. This information may also be used to evaluate our online advertising campaigns.

We may also use services provided by third-party platforms (such as social media and other websites) to serve targeted advertisements on such platforms to you or others, and we may provide a hashed version of your email address or other information to the platform provider for such purposes. To opt-out of the use of your information for such purposes, please send a request using any of the methods set out under the heading “Whom do I contact if I have additional questions or concerns about this policy?” below.

In addition, we may also use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the Site (such as the pages most read, time spent, search terms and other engagement data) in order to better understand who is using the Site or App, how people are using the Site or App, and how to improve the effectiveness of the Services, user experience and related Site content. These third parties may use cookies and other tracking technologies. To opt-out of Google Analytics, see “What are my Tracking Options?” below.

**Q: What are my Tracking Options?**

**A:** Certain parts of the Site and App require cookies. You can set your browser or operating system settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain features on the Site or App or take full advantage of all of our offerings. Please refer to your web browser's or operating system's website or "Help" section for more information on how to delete and/or disable your browser or operating system from receiving cookies or controlling your tracking preferences.

Our system will respond to Do Not Track requests or headers where it is technically feasible. We may use cookies or other technologies to deliver more relevant advertising and to link data collected across other computers or devices that you may use. To understand your choices for receiving more relevant advertising or to manage your settings, please review the information below:

* For more information about interest-based advertising on your desktop or mobile browser and to understand your options, including how you can opt-out of receiving interest-based ads from third-party advertising companies participating in the Digital Advertising Alliance of Canada (DAAC) Self-Regulatory Program for Online Interest-Based Advertising, please visit the DAAC website at [**https://optout.aboutads.info/?c=3&amp;lang=en**](https://youradchoices.ca/en/tools).
* To learn more about interest-based advertising in mobile apps and to opt out of this type of advertising by third-party advertising companies that participate in the DAAC’s AppChoices tool, please download the version of AppChoices for your device at [**https://youradchoices.ca/appchoices/**](http://youradchoices.ca/choices).
* Please note that even if you opt-out of interest-based advertising by a third party, these tracking technologies may still collect data for other purposes including analytics and you will still see ads from us, but the ads will not be targeted based on behavioural information about you and may therefore be less relevant to you and your interests.
* For more information about Google Analytics or if you wish to prevent your data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available at [**https://tools.google.com/dlpage/gaoptout/**](https://tools.google.com/dlpage/gaoptout/). You can also obtain additional information on Google Analytics’ data privacy and security at the following links: [**https://policies.google.com/technologies/partner-sites**](https://policies.google.com/technologies/partner-sites) and [**https://support.google.com/analytics/topic/2919631**](https://support.google.com/analytics/topic/2919631)
* On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising.

**Q: How does Hudson’s Bay use the information collected?**

**A:** Hudson’s Bay may use the information we collect from and about you for any of the following purposes:

* To validate, confirm, verify, deliver, install, and track your order (including to process payment card transactions, arrange for shipping, handle returns and refunds, maintain a record of the purchases you make, and contact you about your orders, including by telephone) or to service products you purchased from us.
* To enhance your online shopping experience, including as a way to recognize you and welcome you to the Site or App or when you call our customer service.
* To send you information, newsletters, promotional materials and other offerings from Hudson’s Bay or on behalf of our partners and affiliates.
* To provide you with customized Site or App content, targeted offers, promotions and advertising on the Site or App, through other third party sites or apps, or via email, text messages, or App push notifications that are offered by Hudson’s Bay or other marketing partners that might be of interest to you.
* To improve our sites, products/services, customer service, and customer shopping experience.
* To use your data in an aggregated non-specific format for analytical and demographic purposes.
* To protect the security or integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, claims and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users.
* To contact you when necessary or requested, including responding to your questions and comments and providing customer support.
* As otherwise described to you at the point of data collection.
* As otherwise permitted or required by law for our own internal purposes to improve our performance as a retailer and to uphold the Hudson’s Bay image and brand.
* For external purposes where we believe those external purposes are consistent with the Hudson’s Bay brand image or allow for a Hudson’s Bay style experience to extend beyond our stores, sites, or Services.

**Q: What information does Hudson’s Bay sell or share with others?**

**A:** Hudson’s Bay will never sell or rent your personal information to third parties. Hudson’s Bay shares personal information with others to be able to improve our service and offerings to you and to enable the extension of the Hudson’s Bay brand and experience beyond our stores, sites, or Services. In addition, Hudson’s Bay may share personal information we collect from and about you in the following ways:

**Hudson’s Bay Family of Companies:** We may share collected information within the family of companies affiliated with Hudson's Bay. This includes Saks Fifth Avenue, Saks Fifth Avenue OFF 5TH, and any future additions to the companies owned or operated by Hudson’s Bay Company (all together the “Hudson’s Bay Family of Companies,” “we” “us” or “our”).

**Co-Marketing Partners:** Certain areas of the Services may be provided to you in association with third parties, such as companies that provide products and services, rewards programs, conduct joint sales programs (such as our Boutique Services in our stores), contests, promotional campaigns, and other jointly sponsored events. Such Services will identify the third party. If you elect to register for any products and/or services provided during the Services, you either will be providing your information to both Hudson’s Bay and such third party, or Hudson’s Bay might share your information directly with such third party for that third party to fulfill their products and our products and services directly with you.

**Other Third Parties:** Hudson’s Bay may share your information with select partners, affiliates, and other third parties that we believe may have offers or be of interest to you in support of your customer experience with us or others or to extend the Hudson’s Bay brand experience beyond our sites, stores, and Services. We may also share your information with third party vendors when you purchase products or services offered by such third parties on our website for the purposes of fulfilling the order.

**Legal Disclosures; Safety:** Hudson’s Bay and its service providers may disclose the information we receive from and about you to comply with a legal obligation; to provide information to law enforcement and other governmental authorities in accordance with applicable law (which may include lawful access by Canadian, US or other foreign governmental authorities, courts or law enforcement agencies), and when we believe in good faith that the law requires or permits it. We also reserve the right to share information with legal authorities and other companies for fraud protection debt collection and credit risk reduction, to detect any technical or security vulnerabilities, to enforce our Terms & Conditions or other applicable policies, or to otherwise protect the rights, property, safety, or security of third parties, users of the Services, Hudson’s Bay, or the public.

**Sale of Business:** During the normal course of our business, we may sell or purchase assets. In the event of a proposed or completed merger, acquisition or sale of all or a part of a business owned or operated by Hudson’s Bay by another entity, information we have collected about you may be transferred as an asset to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against a business owned or operated by Hudson’s Bay, such information may be considered an asset of the company and may be sold or transferred to third parties. Should a sale or transfer occur, we will use reasonable efforts to require that the transferee use personally information provided through the Services in a manner that is consistent with this Privacy Policy.

**Hudson’s Bay Credit Card Accounts:** We may share your information with the financial institution that issues Hudson’s Bay credit card accounts to provide you with a promotional offer for a credit card, help maintain and service your account and for other purposes set out in the "Credit Card Application" section, under "What information does Hudson’s Bay collect" for more information.

**Hudson’s Bay Financial Services:** When you apply for insurance through Hudson’s Bay, we may share information with third party insurance companies and service providers. The insurance products arranged for by Hudson’s Bay Financial Services are underwritten by third party insurance companies and service providers.

**Service Providers:** We use third-party “service providers” to perform certain services on our behalf when the information is necessary for them to perform their duties such as sending communications, hosting the Site, operating certain of its features or to manage and analyze data and our advertising effectiveness. These third-party service providers are prohibited from using personal information for any other purpose and are contractually required to comply with all applicable laws and requirements, which may include Payment Card Industry Data Security Standards if they are processing or transmitting payments for the Hudson’s Bay Family of Companies. **Aggregate or Anonymous Non-Personal Information:** We may also share or sell aggregate or anonymous information with or to our affiliates, agents, service providers, business partners, or other third parties for their marketing or analytics uses or for other lawful purposes. This type of non-identifiable and aggregate information cannot be used to identify you personally.

**Q: How can I access or update my information?**

**A:** If you have registered for an account, you may also view and update your account information by logging into the "[**Your Account**](https://www.thebay.com/account/)" section of the Site or App. Once logged in, you can view or update your name, address, telephone number or email address.

You may also request access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law, by calling Customer Care at 1-800-521-2364 or contact us [**here**](https://support.thebay.com/s/contactsupport). We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records.

**Q: What choices do I have about receiving communications from Hudson’s Bay?**

**A:** To receive promotional offers from the Hudson’s Bay Family of Companies, you can sign up on our Site or App, when you register for an account or make a purchase, or contact Customer Care at 1-800-521-2364. We provide our customers with the opportunity to "opt out" of receiving emails or direct mailings other than those for purposes directly related to placement, processing, fulfillment or delivery of a product order or your transactions with us. We provide you with the following options if you prefer to "opt out" of receiving information or materials that we think may be of interest to you:

* **Email Promotional Offers:** At all times, you have the option of "opting out" of receiving promotional emails from the sender only by clicking the "unsubscribe" link in any of the promotional emails you receive or contacting us [**here**](https://support.thebay.com/s/contactsupport) to unsubscribe.
* **Direct Mail Promotional Offers:** If you would like to be removed from our Hudson’s Bay mailing list, please contact Customer Care at 1-800-521-2364.
* **Mobile Alerts and Text Messages:** Hudson’s Bay communicates via mobile text messages to customers who opt-in to the Hudson’s Bay Mobile Alerts program, or otherwise solicit us to receive text messages. For the Hudson’s Bay Mobile Alerts program, users can opt-in online or by texting a keyword to Hudson’s Bay in response to an invitation. Number of messages may vary. No purchase necessary. Recurring automated messages will be delivered to the phone number you provide at opt-in. For help, text HELP to short code 75283. To stop receiving alerts, text STOP to 75283. Message and data rates may apply. Your instructions to limit the use of your information will be processed as soon as reasonably practicable.
* **Push Notifications:** When you use the App, you may receive push notifications. If you prefer not to receive push notifications, you may adjust your settings on your mobile device to control whether you want to receive these alerts.
* **Other Contact:** In all cases, you may contact us here or for privacy related matters contact us at **privacy@hbc.com**.

If you receive marketing communications from one or more companies within the Hudson’s Bay Family of Companies, you must opt-out individually from each of the companies from which you are receiving company-specific marketing communications.

**Q: What about children's privacy?**

**A:** Protecting children's privacy is important to us, and the Site and App are not intended for children under the age of thirteen. We do not direct the Site or App to, nor do we knowingly collect any personal information from, such children. If Hudson’s Bay learns that a child under the age of thirteen has provided personal information to the Site or App, it will use reasonable efforts to remove such information from its files.

**Q: What about security?**

**A:** We have taken certain physical, administrative, operational, and technical steps to safeguard the information we collect from and about our customers and Site visitors. While we make every effort to help ensure the confidentially, integrity and availability of our network and systems, we cannot guarantee our security measures. When you enter sensitive information (such as credit card information) on our forms, we encrypt the transmission of that information.

**Q: What about other websites?**

**A:** Our Site or App may include links to third-party websites or apps that are not affiliated with Hudson’s Bay. These websites or apps may send their own cookies to visitors, collect data or solicit your information. The privacy policies of these other websites or apps may be very different from our policy. We are not responsible for the privacy practices of these other websites or apps and cannot guarantee the security of any personal information you provide to or that is collected by such third party sites or apps.

**Q: For how long and where is my data stored?**

**A:** Your personal information may be stored for as long as is reasonably necessary to perform the purposes listed under "How does Hudson’s Bay collect and use the information?" and as otherwise required to meet our legal obligations. For example, if you make a purchase, we will store any personal information associated with that purchase as long as required to fulfill the order and meet our legal obligations, process any returns, provide customer service and support an enhanced shopping experience, remember your preferences for future interactions, or be able to provide you with tailored offers or services. The servers and databases in which information may be stored or processed by Hudson’s Bay and its affiliates and service providers may be located in the U.S., Canada or other jurisdictions outside the country from which you accessed the Services and in a country where the data protection and other laws may differ from your country of residence. In the event personal information is transferred to the U.S. or other foreign jurisdictions, it will be subject to the laws of that jurisdiction and may be disclosed to or accessed by the courts, law enforcement and governmental authorities in accordance with those laws.

**Q: How does Hudson’s Bay communicate changes to this Policy?**

**A:** Any changes to our Privacy Policy will be noted on the home page of the Site and App with a link to the revised Privacy Policy. Your continued use of the Site or App following posting of changes to these terms will mean you accept these changes. If we change our practices in a way that requires revising the Privacy Policy in a material way, we will provide appropriate notice to you.

**Q: Whom do I contact if I have additional questions or concerns about this policy?**

**A:** If you have any questions or concerns regarding our privacy practices or about the manner in which our service providers treat your personal information, or to request a copy of this Privacy Policy in another format, please feel free to contact Hudson’s Bay via email at privacy@hbc.com. For all unsubscribe requests, contact us [**here**](https://support.thebay.com/s/contactsupport).

**Information We Collect, Use and Share**

The following table sets out the categories of personal information we collect, where we get it from, why it is needed, and with whom we share:

|  |  |  |  |
| --- | --- | --- | --- |
| **Category of Personal Information Collected** | **Source of information** | **Purpose for Collection** | **Categories of potential recipients** |
| **Contact information:** such as your name, address, email address, telephone numbers, or other contact information | From you and through updates from third parties (like the Canada Post change of address database) | To communicate with you, to send you information, newsletters, promotional materials and other offerings from Hudson’s Bay or on behalf of our partners and affiliates, to offer a contest or other promotion, when you contact us, when you request customer service or support, when you join a clientele list or sign up for personal shopping, to complete your registration on our Services, to administer your account with us, and to provide you with offers that may be of interest to you | Hudson’s Bay Family of Companies, our service providers, and our co-marketing partners, and other third parties, including select partners and affiliates that we believe may have or facilitate offers that may be of interest to you |
| **HBC Rewards Loyalty information:** your loyalty account number, birthday, gender, age, purchase history and information on rewards or other benefits | From you and from our loyalty service provider | To administer your loyalty account and provide you with offers that may be of interest to you, including offers on your birthday | Hudson’s Bay Family of Companies, our service providers who administer our loyalty program, and our co-marketing partners |
| **Purchase and order information:** contact information, together with purchase details online and in store through e-receipts, delivery details, payment details, any communications we have received about your order or purchase | From you or from a Hudson’s Bay customer who places an order to be delivered to you | To validate, confirm, verify, deliver, install, and track your order, including to arrange for shipping, handle returns and refunds, maintain a record of the purchases you make, to service products you purchased from us, and to provide you offers that may be of interest to you | Hudson’s Bay Family of Companies and our service providers who process, fulfill and ship orders |
| **Gift Registry:** Registrant’s name, email address, phone number, co-registrant name and event date | From you or from a Gift Registry co-registrant | To administer your Hudson’s Bay Gift Registry account and allow you to add gifts and view purchases | Hudson’s Bay Family of Companies and our service providers who process, fulfill and ship orders |
| **Other delivery information:** name and address of recipient for delivery, if different from customer’s | From you or from a Hudson’s Bay customer who places an order to be delivered to you | To deliver to the person at the address which you have requested | Hudson’s Bay Family of Companies and our service providers who process, fulfill and ship orders |
| **Payment information:** name, card issuer and card type, credit or debit card number, expiration date, CVV code and billing address | From you and your payment card issuer | To check that the right person is using the right card or account, meet the requirements of the card brands or account issuers, and to make sure we are paid for what you buy | Our service providers who process payments for us and who are contractually required to comply applicable laws and requirements applicable to payment processing, which may include Payment Card Industry Data Security Standards |
| **Information provided at a Boutique Service:** name, billing address, shipping address, telephone number, email address and payment or gift card information | From you or from a Hudson’s Bay customer who places an order to be delivered to you | To validate, confirm, verify, deliver, and track your order, including to arrange for shipping, handle returns and refunds, maintain a record of the purchases you make, or to service products you purchased from us | Hudson’s Bay Family of Companies, our service providers, and the Boutique Service |
| **Information provided on your credit card application:** if you apply for a Hudson’s Bay MasterCard® or the Hudson’s Bay private label credit card, we and the credit provider may be required to collect your name, address, email address, phone number, and other information needed to assess your credit worthiness and verify your identity, such as social security number, income, and employer information | From you, from our credit card partner, and from sources of information available to our credit card partner | To process your application, operate your account, and provide you with credit services | Hudson’s Bay Family of Companies, our service providers, and the financial institution that issues the relevant credit card account |
| **Information you provide about a third party:** if you send someone else a communication from the Services (such as sending a gift or virtual gift card), we may collect information such as that person's name, telephone number, email, and/or shipping address | From you | To deliver to or communicate with the person at the address which you have requested | Hudson’s Bay Family of Companies, our service providers, and our co-marketing partners |
| **Legal information:** fraud checks or flags raised about your transactions, the payment card you want to use, payment card refusals, suspected crimes, complaints, claims and accidents | From you, the police, crime and fraud prevention agencies, payment card providers, the public, regulators, your and our professional advisors and representatives | To protect you, other customers and our business against criminal activities and risks, make sure we understand and can meet our legal obligations to you and others and can defend ourselves | Hudson’s Bay Family of Companies, our service providers who help us with fraud protection and credit risk reduction, law enforcement and other governmental authorities in accordance with applicable law. |
| **Preference information:** your marketing preferences, your account settings including any default preferences, any preferences you have indicated, the types of services/offers that interest you, the areas of our Services that you have visited or ways that you interact with our Services | From you, from our website technology interaction with your browser/devices and cookies and other similar technologies tracking the pages you visit, the marketing messages you open and the links you follow, and from other third-party sources of information | To enhance your online shopping experience, including as a way to recognize you and welcome you to the Site or App, to provide you with customized Site or App content, targeted offers from Hudson’s Bay or others, promotions and advertising on the Site or App, through other third party sites or app, via email, text messages, or App push notifications that are offered by Hudson’s Bay or others that might be of interest to you | Hudson’s Bay Family of Companies and third party vendors and service providers that perform website analytic services for us or enable the customization of offers to you to improve your shopping experiences through our Services or elsewhere |
| **Communications:** communications we have with you. Please note that we may record calls to our customer service team. | From you | To handle your requests, to contact you when necessary or requested, including responding to your questions and comments and providing customer support, and to obtain customer feedback and improve our customer service and customer shopping experience | Hudson’s Bay Family of Companies and our service providers who assist us with customer service |
| **Voluntary information:** any voluntary information you provide us with, such as responses to surveys or competitions and social media account details | From you and your social media account provider | To know you better, make our communications with you more personal, learn and improve from your survey feedback, organize events and pick competition winners | Hudson’s Bay Family of Companies, our service providers who administer surveys and promotions, and our co-marketing partners |
| **In-store privacy:** CCTV images of you in and around entrances and exits to our stores and offices, and your customer journey around our store from Wi-Fi connectivity or comparable technology use | From you, our CCTV and from our W-Fi and similar technology interaction with your devices | To keep you, other customers, our staff, buildings, systems and data safe and secure, to investigate potential theft, fraud or misconduct, provide you with Wi-Fi in our stores and to better understand how customers want to shop in our stores, popular routes and areas and where we should place different products and what products and services may be of interest | Hudson’s Bay Family of Companies, our service providers who help us with fraud protection, law enforcement and other governmental authorities in accordance with applicable law |
| **Personalization:** your journey through our Sites or stores and how you use our Site and App, whether and when you interact with our marketing | From you, from our Site or app technology’s interaction with your browser or devices and cookies tracking the pages you visit | To improve our Site, products and services, customer service, and customer shopping experience | Hudson’s Bay Family of Companies and third party vendors and service providers that perform website analytic services for us or enable the customization of offers to you to improve your shopping or website experience for our Services or elsewhere |
| **Device information:** IP address, internet provider, operating system and browser used, phone number according to your mobile service provider, type of device, such as laptop or smart phone, device cookie settings and other device details, such as MAC address and location information | From you and from our website or app technology’s interaction with your browser or devices and from service providers who support our fraud detection efforts | To make sure our Site and app technology works properly with your device and make sure you can see and use our intended website and apps on the device you are using, and for analytical and demographic purposes and to provide offers that may be of interest to you  We also will use this information to protect the security or integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, and managing risk exposure, including by identifying potential hackers and other unauthorized users | Hudson’s Bay Family of Companies, our service providers who help us with fraud protection, and third party vendors and service providers that perform website analytic services for us or enable more relevant offers to you on our Services or elsewhere |
| **Information automatically collected from your browser:** when you use the Services, some data is automatically transferred from your browser to our server, including your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address, mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App | From you and from our website or app technology’s interaction with your browser or devices | We will use this information in an aggregated non-specific format for analytical and demographic purposes  We also will use this information to protect the security or integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, and managing risk exposure, including by identifying potential hackers and other unauthorized users | Hudson’s Bay Company Family and third party vendors and service providers that perform website analytic services for us or enable the customization of offers to you to improve your shopping or website experience and the relevance of offers to you on our Services or elsewhere |
| **Accident information:** details about any accident or injury on our premises, or health incident | From you, witnesses or observed about you | To get you the help you need, deal with the emergency services, insurance and claims, to prevent loss and to defend ourselves | Hudson’s Bay Family of Companies, law enforcement and other governmental authorities in accordance with applicable law, and our professional advisors |
| **Suspected crime information:** details of your identity, image, name and address, suspected or alleged thefts, fraud, assault or other criminal behavior | From crime and fraud prevention agencies, from you, witnesses, and from the police | To protect customers, the public and our business against risks and crime, to prevent loss, to prosecute crime, and to defend ourselves | Hudson’s Bay Family of Companies, law enforcement and other governmental authorities in accordance with applicable law, and our professional advisors |
| **Hudson’s Bay Financial Services:** if you apply for insurance through Hudson’s Bay, we and/or third party insurance companies and service providers may collect personal information such as your name, address, email address, phone number, your loyalty account number and other information needed to determine your eligibility | From you, from our third party insurance companies and service providers, and from sources of information available to our third party insurance partners | To process your application and provide you with insurance products and services | Hudson’s Bay Family of Companies, our third party insurance companies and service providers |