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STARBUCKS PRIVACY STATEMENT

At Starbucks, we approach data and privacy as we approach everything we do: we put people first.

As part of our effort to protect your privacy and to comply with applicable privacy and data protection laws, we strive to consider all of our data governance practices through the lens of the recognized principles of data minimization, limited collection, and limited use, among other key areas addressed below. We do so to respect and maintain your trust. In other words, we believe that taking care of you includes taking care of your data and privacy. Grab a cup of coffee and learn more below.

Last Revised: July, 27 2021

Starbucks Privacy Statement

Overview

This Starbucks Privacy Statement describes the types of personal information that we collect, how we use it, how and when it may be shared, and the rights and choices you have with respect to your information. It also explains how we communicate with you and how you can make requests or submit inquiries to us about your information. Our goal is to help you understand how we use your information to improve our products, services, marketing, and interactions with you, as part of our commitment to maintaining your trust. Thank you for taking the time to read and understand our data and privacy related practices.

This Privacy Statement, as well as our <u>Terms of Use</u> and other important policies, are available on our <u>Online Policies</u> page. If you do not agree with our Terms of Use or this Privacy Statement, please discontinue use of our websites and mobile applications immediately.

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1. Applicability and Scope

This Privacy Statement ("Statement") applies to the websites located at starbucks.com, starbucksreserve.com, princi.com, starbucks.ca, the Starbucks mobile applications available at https://www.starbucks.com/coffeehouse/mobile-apps, and any other websites or applications owned and operated by Starbucks brands or products that direct the viewer or user to this Statement.

In this Statement, the terms "Starbucks," "we," and "us" refers to Starbucks Corporation and its respective subsidiaries and affiliated companies. Note that websites that are owned and operated by Starbucks may contain links to digital properties that are owned and operated by other companies. This Statement does not apply to websites and services that are owned and operated by unaffiliated third parties.

2. Updates to this Privacy Statement

This Statement went into effect on the "Last Revised" date noted near the top of this page. We may update this Statement from time to time. We will notify you of any modifications to this Statement that might materially affect your rights or the way that we use or disclose your personal

information prior to the change becoming effective by means of a message on this website. We encourage you to look for updates and changes to this Statement by checking the "Last Revised" date when you access our websites and mobile applications.

3. Information We Collect

As you use our websites and mobile applications or visit one of our stores, we collect information about you and the services you use. The information we collect falls into three main categories: (1) information you voluntarily provide us; (2) information we collect from you automatically; and (3) information we collect from other sources.

Some examples of when we collect this information include when you browse or make a purchase on one of our websites or mobile application; create a Starbucks account; use our website or mobile application to purchase, reload or redeem a Starbucks Card; use the order and pay functionality in our mobile applications; buy or send a gift card or e-gift; or participate in a survey or promotion.

(a) Information You Voluntarily Provide Us

Some information we collect is provided when you use our services, such as when you create an account, add a Stored Value Starbucks Card, or join Starbucks Rewards loyalty program; pay for products; book a Starbucks Roastery tour; or submit online forms through our websites or mobile applications.

This may include your first and last name, username, password, email address, postal address, phone number, financial account information such as a credit card number, the day and month of your birthday, demographic information (such as your gender), and any other information you give us, such as to participate in a promotion or to contact Starbucks customer service.

You may also choose to permit us to access information directly from your device, such as information in the device's "contacts list". The term "your device" as used in this Statement refers to any computer, tablet, smart phone or other device you are using to access our websites or to operate the Starbucks mobile applications. For more information about mobile application permissions, please see the <u>Starbucks Mobile Applications</u> section below.

You may also in some instances provide us information about other people, such as name, phone number and email address, including when you direct us to send someone a gift card or e-gift.

(b) Information We Collect Automatically

Purchasing Information – We may collect information about your transactions in our stores, on our websites or via our Starbucks mobile applications including what products you purchase, how frequently you purchase them, any Rewards or promotions associated with a purchase, and the products you have placed on your "Wishlist" or "My Bag" for future purchase.

Device and Usage Information – We may collect information about your browser or device. This information may include the type of device you are using, your operating system, your browser, your internet service provider, your domain name, your internet protocol ("IP") address, your device and mobile ad identifiers (e.g., Apple IDFA or Android AAID), the website that referred you to our website, the web pages of our website that you view (including the date and time you viewed them), the services or functionality you access or use (including the date and time of your access or use), and the subject of the ads you click or scroll over. To collect this information, we may use log files that record events in connection with your use of our services, as well as <u>cookies and similar technologies</u>, such as web beacons embedded in marketing emails to monitor the engagement of recipients.

CCTV Information – Closed circuit video surveillance cameras ("CCTV") may be installed at some of our retail locations to monitor building security and assist in crime prevention, detection, and investigation, and to ensure the health and safety of our staff and visitors to our facilities.

Location Information – We may collect information about the location of your device, such as information that identifies your device's precise location (for example, GPS latitude and longitude level) or its approximate location (e.g., less precise location estimated based on a browser or device's IP address). We may also use location–based technology in our retail locations, such as iBeacons, to collect information about the presence of your device, if your Bluetooth is turned on and your device settings allow for this.

We collect this location information or derive it from your GPS, WiFi, Bluetooth or other device settings for purposes of enhancing or facilitating our services, such as to enable the functionality of our websites or mobile applications that provide you with information about stores near you, to enable you to remotely order and pay for our products and services, or so that you may have certain Starbucks products delivered to you by a third-party vendor.

We may also use information about the location of the device you are using to help us understand how our websites, mobile applications, and other services and functionality are being used, or to deliver more relevant advertising or personalized experiences for you, including tailored marketing offers or messages based on your location or related context such as the time of day or weather. If you want to opt out of the collection of this location information, please see the section below titled Your Choices. To learn more about our mobile-based location services, please see the Starbucks Mobile Applications section below.

(c) Information We Collect from Other Sources

Some information we collect is from unaffiliated sources, including in some cases information that is publicly available, provided by or purchased from marketing business partners, or present on social media platforms.

For example, we may collect information you submit to a blog, a chat room, or a social network like Facebook or Twitter. We may also collect or license information about you from other companies and organizations, such as information aggregators or event or promotion co-sponsors, including to supplement information that we receive from you. We may also in some cases receive

information about you from Starbucks-affiliated entities, which we handle in accordance with this Privacy Statement. By gathering additional information about you, we can correct inaccurate information, enhance the security of your transactions and help prevent fraud, and give you product recommendations and special offers that are more likely to interest you.

4. How We Use Your Information

We use your information for business and commercial purposes, including to provide the products and services you request, to perform customer service functions, for security and fraud prevention, for marketing and promotional purposes, and to perform website and mobile application analytics.

We may use the information we collect about you in a variety of ways, including to:

- (a) To Provide Our Services. We process certain personal information when you access or use our services, including to:
 - process your purchases of, or requests for, products and services;
 - register and verify user accounts;
 - support and improve our loyalty programs, such as Starbucks® Rewards;
 - deliver gift cards or e-gifts, and any associated personalized messages, in accordance with your instructions;
 - facilitate the functionality of our websites and mobile applications, including paymentrelated functionality; and
 - customize experiences and personalization when you are in and around our stores, if you have given permission for location sharing.
- **(b) To Communicate With You.** We process certain information in order to communicate with you in relation to your accounts, our services, our marketing, and your requests, including to:
 - communicate with you about orders, purchases, returns, services, accounts, programs, contests, and sweepstakes;
 - respond to your customer service inquiries and requests for information;
 - post your comments or statements on our websites;
 - send you personalized promotions, content, and special offers;
 - communicate with you about our brands, products, events, or other promotional purposes;
 - implement your communications preferences, such as sharing information with Starbucks business partners so that they may email you about their promotions, products and initiatives; and
 - provide important product safety information and notice of product recalls.

- **(c) For Research, Development, and Improvement of Our Services.** We want to ensure that our website, mobile applications, and services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we may process certain personal information, including to:
 - maintain, improve, and analyze our websites, mobile applications, ads, and the products and services we offer; and
 - detect, prevent, or investigate suspicious activity or fraud.
- **(d) To Enforce our Terms, Agreements, or Policies.** To maintain a safe, secure, and trusted environment for you when you use our websites, mobile applications, and other services, we use your personal information to ensure our terms, policies, and agreements with you and any third parties are enforced.
- **(e) To Comply with Applicable Laws.** We may be required to process certain personal information under certain laws and regulations, such as tax laws, as well as to:
 - maintain appropriate records for internal administrative purposes; and
 - comply with applicable legal and regulatory obligations, and respond to lawful governmental requests, as needed.
- **(f) With Your Consent.** We may process certain personal information in order to fulfill any other business or commercial purposes at your direction or with your consent.

5. How We Share Your Information

We share your information as needed to fulfill the purposes described in this Privacy Statement and as permitted by applicable law. This includes sharing among Starbucks-affiliated entities for internal business purposes, sharing with service providers to help perform business functions at our direction, sharing with your consent, sharing for marketing purposes, sharing as part of corporate transactions, and sharing to protect lawful interests.

We may share your information in the following circumstances:

- **(a) When We Work Together** We may share information between and among Starbucks Corporation, its subsidiaries, and affiliated companies for purposes of management and analysis, decision making, and other business purposes. For example, we may share your information with our subsidiaries and affiliated companies to administer our loyalty programs, process orders and requests, and expand and promote our product and service offerings.
- **(b) When We Work with Service Providers** We may share your information with service providers that provide us with support services, such as credit card processing, website hosting, email and postal delivery, location mapping, product and service delivery, analytics services, or conducting academic research. We strive to contractually prohibit these service providers from

retaining, using, or disclosing your confidential personal information for any purpose other than performing agreed upon services for us.

- **(c) When We Work on Business Transactions** If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.
- **(d) When Sharing Helps Us Protect Safety and Lawful Interests** We may disclose your information if we believe that the disclosure is required by law, if we believe that the disclosure is necessary to enforce our agreements or policies, or if we believe that the disclosure will help us protect the rights, property, health or safety of Starbucks or our customers or partners.
- **(e) When We Work with Marketing Service Providers** We may share your information with marketing service providers to assess, develop and provide you with promotions and special offers that may interest you, administer contests, sweepstakes and events or for other promotional purposes.
- **(f) When You Give Consent** We may share information about you with other companies if you give us permission or direct us to share the information.
- **(g) When the Information Does Not Identify You** We may share your information in a way that does not directly identify you. For example, we may share information about your use of our websites and mobile applications in a manner that does not identify you, or we may combine information about the nature or frequency of your transactions with similar information about other people and share the aggregated information for statistical analysis and other business purposes.
- **(h) When You Post on Our Websites** If you post information on a blog or another part of our websites, the information that you post may be seen by other visitors to our websites, including your user name.

6. How We May Allow Others to Collect Your Information

When you use our websites or mobile applications, we may allow third parties to collect device and usage information and location information across your different devices through mobile software development kits, cookies, web beacons and other similar technologies.

These third parties collect this information for the following purposes and for other purposes consistent with their own privacy policies:

To Display Ads for Products or Services – We allow some advertising companies to collect this information in order to display ads that are more relevant to you across your different devices and on our own and others' websites and mobile apps. Please see the <u>Your Choices</u> section of this Statement for more information about opting out of targeted advertising and controlling the use of <u>cookies</u>, web beacons and other similar technologies.

To Understand the Use of Our Services – We allow certain service providers to collect this information to help us understand how our websites and mobile applications are used and to assist us in improving the content and operation of our online properties (e.g., compiling analytics and measuring user engagement with a particular website or feature through A/B testing). These service providers collect aggregate statistical usage data that is not matched or linked to any individual user.

To Make the Services of Other Companies Work on Our Websites – We allow companies to use cookies, web beacons, and other similar technologies to enhance the operations of particular services and functionality of our websites and mobile applications. For example, we allow Adobe to set and enable special cookies that are necessary to deliver video content for Adobe Flash Player. These cookies are called Flash cookies. To manage Flash cookies, see the "Your Choices" section below.

To Link Your Activity on Our Websites to Your Social Networks – We have added certain features to our websites and mobile applications that allow social networks (such as Facebook and Twitter) to track the activities of their members or collect certain information when they use our website or mobile applications. These features may include technologies called "plug-ins" and "widgets." Plug-ins create a direct link between two websites, and widgets are interactive mini-programs that provide other companies' services on our websites. If you are concerned about the way a social network is tracking your activity, please contact the social network or review its privacy policy. For example, you can review Facebook's data-use policy at https://www.facebook.com/about/privacy/.

7. Cookies, Web Beacons and Similar Technologies

We and others may use a variety of technologies to collect information about your device and use of our websites and mobile applications. These technologies include first- and third-party cookies, web beacons, JavaScript, entity tags, and HTML local storage. Most web browsers can be programmed to accept or reject the use of some or all of these technologies, although you must take additional steps to disable or control other technologies. For more information on exercising your preferences in relation to cookies and similar technologies, please see the section of this Statement titled <u>Your Choices</u>.

Cookies – Cookies are small data files that are sent from a website's server and are stored on your device's hard drive either for only the duration of your visit ("session cookies") or for a fixed period ("persistent cookies"). Cookies contain information that can later be read by a web server.

Web Beacons – Web beacons are small, transparent images that are embedded in web pages, applications, and emails that are sometimes called "clear gifs," "single pixel gifs", "page tags" or "web bugs." We use web beacons to track the web pages you visit, to test the effectiveness of our marketing, and to find out if an email has been opened and acted on.

JavaScript – JavaScript are code snippets embedded in various parts of websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain

functionality or monitoring usage of various online components.

Entity Tags — Entity Tags are HTTP code mechanisms that allow portions of websites to be stored or "cached" within your browser and validates these caches when the website is opened, accelerating website performance since the web server does not need to send a full response if the content has not changed.

HTML5 Local Storage – HTML5 local storage allows data from websites to be stored or "cached" within your browser to store and retrieve data in HTML5 pages when the website is revisited.

These and similar technologies are used for the following purposes:

Services and Functionality – Some of these technologies are required to allow you to access and use our websites or mobile applications and the various services and functionality we offer. Without these technologies, some of the services and functionality on our websites and mobile applications would not work properly.

Performance Monitoring – Some of these technologies help us analyze and estimate traffic and assess the volume of use of services and functionality on websites and mobile applications. They show us how visitors and customers interact with our digital properties, whether there are any errors, the degree to which certain web pages, applications, services or functionality are accessed and used and how they are performing or operating. When these technologies are used for performance monitoring, no directly identifiable information (e.g., your name, email address or phone number) is collected.

User Convenience – Some of these technologies enhance the ease of use of our websites and mobile applications and the services and functionality they make available by accelerating load and refresh times and remembering information that you have provided on prior visits to our websites or when you last used a website or mobile application service or functionality.

Marketing – Some of these technologies are used to tailor your experience on our website, within our mobile applications, or across your applications or devices by controlling the promotions, advertisements and other marketing messages that may appear when you access or use these or other digital properties.

Taken together, these technologies help us learn which services and functionality you are using and how you are accessing information about us. We may use this information to personalize your visit to a website or use of a mobile application or to send you relevant promotions and advertisements.

8. Starbucks Mobile Applications

In certain locations, Starbucks may offer the Starbucks mobile application ("Application") for our customers' use and enjoyment. For more information on the Starbucks[®] Application for iPhone[®] or

Android[™], please visit: https://www.starbucks.com/coffeehouse/mobile-apps or your device's mobile app store.

By downloading, installing, accessing or using the Application, you (the "User") consent to all actions that we take with respect to your data consistent with this Starbucks Privacy Statement. Use of the Application entails information collection in accordance with the <u>Information We Collect</u> section above, and includes user controls for Application functionality, such as location services, purchasing e-gifts, and setting push notification and in-app message preferences.

User Information –Through the use of an iOS, Android or other supported hardware device, some functionality of the Application may require the transmission of certain information provided by you, including:

- username and password;
- e-mail address:
- billing address;
- phone number;
- financial information, such as payment card numbers or account numbers;
- information related to a Starbucks stored value card ("Starbucks Card");
- · voice; and
- GPS location (together, "User Information").

This User Information may be needed in order to purchase Starbucks products through the Application. You have multiple options to securely and conveniently make your purchase, including:

- by using the Application to pay in the same manner as you would pay with a Starbucks Card ("Mobile Payment");
- by making payment via your mobile device using a Starbucks Card prior to arriving at the store ("Method of Payment," or "MOP"); and
- by placing an order using voice commands ("Voice Ordering").

As described further below, certain optional information may also be shared with Starbucks through the Application, including:

- Personalized messages for individuals to whom you would like to purchase and send a Starbucks gift card ("eGift"), and names and email addresses from a device's "contacts" list if you choose to import a recipient's contact information from there;
- advanced analytics information such as location data, diagnostic and usage data, and user interactions;
- location-based information, such as through GPS, Bluetooth-enabled iBeacons, or other location-based technology to enhance the user experience so that you may order ahead,

receive directions, and see what is available at nearby stores; and

• the day and month of your birthday, so that we may recognize you on your special day (we don't ask for your birth year for this).

Controlling Application Functionality

Location Services – In order to use certain Application functionality, such as MOP and location-based services and technology, you must either (a) enable "location services" in the Application; and/or (b) set the permissions in your mobile device to allow communication of this information. More information about adjusting location services on iOS devices may be found here, and additional information on managing an Android device's location settings may be found here.

If you allow for location sharing, your device may communicate with us in ways that allow for us to customize your experience in and around Starbucks stores, to monitor the effectiveness of our marketing efforts, to tailor messages based on your time and location patterns, and to limit the number of times you see a promotional message or offer.

Voice Ordering – In order to use certain Application functionality such as Voice Ordering, when available, you must (a) enable "microphone" and "speech recognition" in the Application; and/or (b) set the permissions in your mobile device to allow communication of this information.

If you use such Application functionality, including location services and voice ordering, you consent to the transmission of User Information to Starbucks and/or its agents, and authorize Starbucks and/or its agents, to record, process, and store such User Information as necessary for the Application functionality and for purposes described in the Starbucks Privacy Statement. Please see the rest of this Privacy Statement for more information about how we may use and store personal information, and how to opt out of sharing personal information.

eGifts – If you choose to use Application functionality that allows you to send messages or eGifts to third parties, you must first obtain their permission to provide their personal information, such as their name, phone number or email address, to Starbucks. The referred information will be used by Starbucks for the purpose of contacting the third party, on your behalf, to carry out the requested functionality, for example, by emailing an eGift. Although you may enter the recipient's contact information into the Application, you also have the option to provide the recipient's contact information by granting Starbucks permission to access your device's contacts.

User Responsibility

You are solely responsible for maintenance of the confidentiality and security of any User Information which you transmit from or store on a Device for purposes of the Application, including Mobile Payment, MOP and Voice Ordering, and for all transactions and other activities undertaken with any Starbucks Card registered in the your name, whether authorized or unauthorized. You agree to immediately notify Starbucks of any unauthorized transactions associated with the Application including Mobile Payment, MOP, Voice Ordering, or any other breach of security. Starbucks shall not be responsible for any losses arising out of the loss or theft

of User Information which you transmit from or store on a Device or from unauthorized or fraudulent transactions associated with the Application.

Email Communications, Push Notifications, and In-App Messages

The Application allows all users to set preferences for receiving promotional email communications from Starbucks, receiving push notifications on your device, and receiving inbox messages. Please note as well that you may opt-out of receiving email communications at any time by adjusting your Starbucks online account settings as described in the **How to Manage Your Account Settings** section below, or by clicking the "unsubscribe" link included within any commercial email we send you.

9. Your Choices

You have control over your promotional communications preferences, mobile application functionality, cookie settings, interest-based advertising preferences, Flash cookies, and more.

Promotional Communication Choices

You can opt out of receiving promotional emails and mailings by informing us of your preference at the time you sign up for a Starbucks account, by modifying your promotional preferences online in your account's profile management section, or by following the "unsubscribe" instructions in the promotional emails we send you. Similarly, you may opt in to receive text messages, telephone calls and mailings. Please note that if you opt out of receiving promotional communications from us, we may still send you transactional communications, including emails about your Starbucks accounts or purchases.

Mobile Functionality – As described in the <u>Starbucks Mobile Applications</u> section above, location services, push notifications, and voice transmissions may be adjusted or disabled within your device settings.

Cookies, Web Beacons and Similar Technologies – You may be able to reject cookies, web beacons, entity tags and HTML5 local storage by adjusting the appropriate settings in your browser. Each browser is different, but many browsers have preferences or options that may be adjusted to allow you to either accept or reject cookies and certain other technologies before they are set or installed, or allow you to remove or reject the use or installation of certain technologies altogether. If you want to learn the correct way to modify your browser settings, please use the Help menu in your browser or review the instructions provided by the following browsers: Internet Explorer, Google Chrome, Mozilla Firefox, Safari Desktop, Safari Mobile; and Android browser.

For more information on how to opt-out of tracking technology from Google Analytics, click here.

Interest-Based Ads – Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain websites where people can opt out of interest-based

advertising from their members. To opt-out of website interest-based advertising provided by each organization's respective participating companies, visit the DAA's opt-out portal available at http://optout.aboutads.info/, the DAA of Canada's opt-out portal available at https://youradchoices.ca/en/tools, or visit the NAI's opt-out portal available at http://optout.networkadvertising.org/?c=1...

Residents of the European Union may opt-out of online behavioral advertising served by the European Interactive Digital Advertising Alliance's participating member organizations by visiting https://www.youronlinechoices.eu/.

To opt-out of data collection for interest-based advertising across mobile applications by participating companies, download the DAA's AppChoices mobile application opt-out offering here: https://youradchoices.com/appchoices.

Adobe Flash Player Technology – We allow Adobe to set and enable special cookies that are necessary to deliver video content for Adobe Flash Player. You cannot remove Flash cookies simply by changing your browser settings. If you would like to limit the websites that can store information in Flash cookies on your device, you must visit the Adobe website: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

"Do Not Track" Technology – Some newer web browsers have a "Do Not Track" preference that transmits a "Do Not Track" header to the websites you visit with information indicating that you do not want your activity to be tracked. We currently do not respond to browser "Do Not Track" signals, as there is no standard for how online services should respond to such signals. As standards develop, we may develop policies for responding to do-not-track signals that we will describe in this Privacy Statement.

10. How to Manage Your Account Information and Your Privacy Rights

Starbucks believes in putting you in control of your personal information. Upon request we will provide you with information about whether we hold any of your personal information and how it is used. You may access, correct, or remove your personal information by visiting your user account, such as at Starbucks.com/Account, or by contacting us as described in the Contact Us section below. As required by law for taxes and other record keeping purposes, we are unable to completely delete an account from our internal records.

In addition, to submit an information request as a U.S. resident, please click <u>here</u>; or to submit an information request as a Canadian resident, please click <u>here</u>.

11. How We Protect Your Information

Starbucks protects your information using technical, physical, and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure or modification of your information. When you transmit highly sensitive information (such as a credit card number) through our website or in one of our mobile applications, we encrypt the transmission of that information using the Secure Sockets Layer (SSL) protocol.

However, no security system is perfect, and due to the inherent nature of the Internet, we cannot guarantee that data, including personal information, is absolutely safe from intrusion or other unauthorized access by others. You are responsible for protecting your password(s) and maintaining the security of your devices.

12. Retention and Disposal of Your Information

Starbucks stores personal information as needed to accomplish the purposes identified in this Privacy Statement and to meet legal requirements, including record retention, resolving disputes, and enforcing our agreements. Our retention of your personal information is governed by applicable law. This storage period may extend beyond the term of your relationship with Starbucks.

The personal information that you provide us is stored and processed on servers owned by Starbucks and other companies in the United States, Canada or elsewhere around the world, including locations outside of the country or jurisdiction where you are located. Regardless of the company or person who processes your information and where it is processed, we will take steps to transfer and protect your information through appropriate safeguards in accordance with applicable data protection laws and this Privacy Statement. See also the <u>Participation in Privacy Shield Frameworks</u> section below.

When personal information is no longer needed, or in any event, after legal authority to retain it has expired, personal information will be destroyed, in accordance with local law and pursuant to procedures established in relation to the relevant Starbucks system or process.

13. Children's Privacy

We do not intend for our websites or online services to be used by anyone under the age of 13. If you are a parent or guardian and believe we may have collected information about your child, please contact us immediately as described in the "Contact Us" section of this Statement. For more information, please see our Terms of Use.

14. Starbucks® Rewards

If you would like to become a <u>Starbucks</u> Rewards member, please see the Starbucks Rewards Terms of Use available at https://www.starbucks.com/rewards/terms.

15. Starbucks Wifi

Many Starbucks stores support providing you access to wireless internet (WiFi) at no charge. For any such WiFi access, please carefully review the terms of use listed on the activation page prior to accepting and connecting.

16. Additional Disclosures for California Residents

In the preceding twelve months we may have disclosed these categories of personal information for a business purpose:

Identifiers

- Sources of Information We collect identifiers from the information you voluntarily provide to us; from the information we automatically collect; and from other sources, as outlined in Section 3(a)–(c) above.
- Purpose of Information Collected We collect identifiers to provide our services; to communicate with you; for research and development and services improvement; and to comply with applicable laws, and as otherwise outlined in Section 4 above.
- How we share it We share identifiers with our service providers; to protect lawful
 interests; and for any other purpose with your consent, as otherwise outlined in Section
 5 above.

• Personal information under California Civil Code section 1798.80

- Sources of Information We collect Section 1798.80 information from the information you voluntarily provide to us; from the information we automatically collect; and from other sources, as outlined in Section 3(a)–(c) above.
- Purpose of Information Collected We collect Section 1798.80 information for the purposes outlined in Section 4(a)–(f) above.
- How we share it We share identifiers with our service providers; to protect lawful
 interests; and for any other purpose with your consent, as otherwise outlined in Section
 5 above.

Commercial information

- Sources of Information We collect commercial information from the information you voluntarily provide to us; from the information we automatically collect; and from other sources, as outlined in Section 3(a)–(c) above.
- Purpose of Information Collected We collect commercial information to provide our services; to communicate with you; for research and development and services improvement; and to comply with applicable laws, and as otherwise outlined in Section 4 above.
- How we share it We share commercial information with our service providers and Starbucks affiliates, as outlined in Section 5(a), (b) and (e) above.
- Electronic network activity information

- Sources of Information We collect network information through the information you voluntarily provide to us; from the information we automatically collect; and from other sources, as outlined in Section 3(a)–(c) above.
- Purpose of Information Collected We collect network information to provide our services; to communicate with you; for research and development and services improvement; and to comply with applicable laws, and as otherwise outlined in Section 4 above.
- How we share it We share network information with our service providers; to protect lawful interests; and for any other purpose with your consent, as outlined in Section 5 above.

Geolocation data

- Sources of Information We collect geolocation data through the information you voluntarily provide to us; from the information we automatically collect; and from other sources, as outlined in Section 3(a)–(c) above.
- Purpose of Information Collected We collect geolocation data to provide our services; to communicate with you; for research and development and services improvement; and to comply with applicable laws, and as otherwise outlined in Section 4 above.
- How we share it We share geolocation data with our service providers; to protect lawful interests; and for any other purpose with your consent, as outlined in Section 5 above.

Inferences

- Sources of Information We develop inference data through the information you voluntarily provide to us; from the information we automatically collect; and from other sources, as outlined in Section 3(a)–(c) above.
- Purpose of Information Collected We develop inference data to provide our services; to communicate with you, and for research, development, and services improvement, as outlined in Section 4(a)–(c) above.
- How we share it We share inference data with our service providers and to protect lawful interests, as outlined in Section 5 above.

How We Sell Your Information – In the preceding twelve months we have not sold personal information. We do not sell personal information, but we recognize that the CCPA defines "personal information" in such a way that making available identifiers linked to you for a benefit may be considered a "sale."

In addition to the <u>Your Choices</u> section above's description for opting out of interest-based advertising and controlling browser settings, California consumers may also use the Digital Advertising Alliance's tool to send requests under the CCPA for a web browser to opt out of the sale of personal information by some or all of that framework's participating companies by accessing the DAA's tool here: https://www.privacyrights.info/, or by downloading the DAA's AppChoices mobile application opt-out here: https://www.privacyrights.info/appchoices.

Your Rights

Access to Specific Information and Data Portability Rights – Subject to certain exceptions, if you are a California resident you have the right to request a copy of the personal information that we collected about you during the 12 months before your request. Once we receive your request and verify your identity, we will disclose to you:

- The categories of personal information we have collected about you;
- The categories of sources for the personal information we have collected about you;
- Our business or commercial purpose for the information collection;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you;

Deletion Request Rights – You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

Opting Out – As described in "How We Sell Your Information" above, California residents have the right to opt-out of having their personal information sold.

Non-Discrimination – California residents may not receive discriminatory treatment by the business for exercising your CCPA rights.

Exercising Access, Data Portability, and Deletion Rights – To exercise the access, data portability, and deletion rights described above as a California resident, please submit a verifiable consumer request to us by either:

Phone: 1–800–STARBUC (782–7282); or by submitting this <u>form</u>. Please note that in order to verify your request, we may require you to verify personal information that we already have on file for you or to provide additional information.

Use of an Authorized Agent to Submit a Request – Only you or a person you formally authorize to act on your behalf, may make a verifiable consumer request related to your personal information as a California consumer. If you use an authorized agent to submit such a request, we will require written proof that the authorized agent has been authorized to act on your behalf or a copy of the power–of–attorney document granting that right.

Direct Marketing – If you are a California resident, you can request a notice disclosing the categories of personal information we have shared with third parties for the third parties' direct marketing purposes. To request a notice, please submit your request by postal mail to:

Starbucks Customer Service Starbucks, P.O. Box 20430, Augusta, GA 30916

Privacy Rights Metrics (January 2020 – December 2020) – Includes requests from the United States and Canada:

Right to Know

- Requests Received 498
- Requests Complete 336
- Requests unable to be completed* 162
- Average completion time 9 days

Right to Delete

- Requests Received 2,659
- Requests Complete 1,266
- Requests unable to be completed* 1,393
- Average completion time 13 days

17. Additional Disclosures for Data Subjects in the EEA, the U.K., and Switzerland

This section provides general information about how Starbucks collects, stores, uses, transfers and otherwise processes personal data in or from certain countries in the European Economic Area, the United Kingdom, and Switzerland (together, for purposes of this section of the Privacy Statement, "EEA"), in accordance with the General Data Protection Regulation (GDPR) and its local implementations. This section does not supersede the applicability of any privacy policy found on the website of an EEA-based Starbucks affiliate with whom you have engaged, as that entity would be the data controller with respect to your personal data and the entity to which your data subject rights requests should be directed.

Lawful Bases of Processing – Where a Starbucks entity is acting as a data controller that determines the purposes and means of processing your personal data, such as when we collect, use, and share personal data as described in the <u>Information We Collect</u>, <u>How We Use Your Information</u>, and <u>How We Share Your Information</u> sections above, we must have a lawful basis for processing for doing so. Our lawful bases for processing personal data include:

- to conclude or perform a contract with you, for example to:
 - process your purchases of or requests for products and services, including delivering gift cards in accordance with your instructions;
 - communicate with you about orders, purchases, returns, services, accounts, programs, contests, and sweepstakes;
- for our legitimate business purposes, including to:
 - respond to your customer service inquiries and requests for information;

^{*}Requests may be unable to be completed due to factors such as inability to verify the customer, duplicate requests, or no information is found

- maintain, improve, and analyze our websites, mobile applications, ads, and the products and services we offer:
- · detect, prevent, or investigate security breaches or fraud; and
- facilitate the functionality of our websites and mobile applications;
- to comply with our legal obligations, for example to maintain appropriate records for internal administrative purposes and as required by applicable law, and provide important product safety information and notice of product recalls; and
- on the basis of your consent, for example to send you via email and other electronic means personalized promotions and special offers or informing you about our brands, products, events, or other promotional purposes.

You can withdraw your consent at any time by modifying your promotional preferences in your Starbucks user account online, or by contacting us as described in the <u>Contact Us</u> section below.

Your EEA Data Subject Rights - Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party), or where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you.
- Request the transfer of your personal information to another party, when possible.
- **Not be subject to automated decision-making** producing legal or significant effects on an individual, which we do not engage in.

To exercise any of these rights, please see the <u>How to Manage Your Account Information and Your Privacy Rights</u> section above, or contact us as set forth in the <u>Contact Us</u> section below and specify which GDPR privacy right(s) you wish to exercise. We must verify your identity in order to honor your request, which we will respond to within 30 days of receipt.

Retention – As described in the <u>Retention and Disposal of Your Information</u> Section above, as a general rule, we keep your data for only as long as it is needed to complete the purpose for which it was collected or as required by law. We may need to keep your data for longer than our specified retention periods to honor your requests, including to continue keeping you opted out of marketing emails, or to comply with legal, regulatory, accounting or other obligations.

Transfers Outside the EEA – Your personal information may be transferred to, stored, and processed in a country other than the one in which it was collected, including the United States. It may also be processed by staff operating outside the EEA who work for Starbucks or for our third-party service providers. In such cases, we will take appropriate steps to ensure an adequate level of data protection of the recipient as required under the GDPR and as described in this Privacy Statement.

Complaints – If you have any issues with our compliance, you have the right to lodge a complaint with an EEA supervisory authority (<u>link</u>). We would, however, appreciate the opportunity to first address your concerns and would welcome you directing an inquiry first to us per the <u>Contact Us</u> section below, or to our U.S.-based third-party dispute resolution provider (free of charge) at https://feedback-form.truste.com/watchdog/request. You may also contact our Data Protection Officer ("DPO") at any time at privacy@starbucks.com.

18. Participation in the Privacy Shield Frameworks

On July 16, 2020, the European Court of Justice invalidated the EU–U.S. Privacy Shield Framework as a transfer mechanism for data between EU and U.S. companies. On September 8, 2020, the Swiss supervisory authority similarly announced that it no longer considered the Swiss–U.S. Privacy Shield Framework as adequate for personal data transfers from Switzerland to the U.S. Starbucks Corporation will utilize alternate appropriate safeguards going forward for such data transfers. Even though the Privacy Shield Frameworks have been invalidated, Starbucks will continue to honor its commitments with respect to EU and Swiss personal data transfer pursuant to Privacy Shield prior to the respective Frameworks' invalidation.

Starbucks Corporation participates in and has certified its compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks. Starbucks is committed to subjecting all personal data received from European Union (EU) member countries, Switzerland, and the United Kingdom in reliance on the Privacy Shield Frameworks, to the applicable Principles. To learn more about Privacy Shield, visit the U.S. Department of Commerce's Privacy Shield List here:

https://www.privacyshield.gov/list.

Starbucks is responsible for the processing of personal data it receives, and subsequently transfers to a third party acting as an agent on its behalf, under the Privacy Shield Framework. Starbucks complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, the U.K., and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Starbucks is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Starbucks may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at

https://feedback-form.truste.com/watchdog/request.

Under certain conditions, more fully described on the Privacy Shield website here: https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

19. Contact Us

We welcome your questions, comments and concerns about privacy. You can contact Starbucks Customer Service online at http://customerservice.starbucks.com (by phone at 800–Starbuc (782–7282), or by postal mail at: Starbucks Customer Service, Starbucks, P.O. Box 20430, Augusta, GA 30916.

You may also contact our U.S. privacy team by submitting this <u>form</u>, or our Canadian privacy team by submitting this <u>form</u>.

You may reach our Global Privacy Department and our Data Protection Officer at privacy@starbucks.com.

Additional contact information may be found below for various Starbucks entities.

- Country Canada
 - Entity Name Starbucks Corporation (Canada)
 - Entity Address P.O. Box 20430, Augusta, GA 30916 USA
 - Additional Contact (If Any)
 - Customer Service
 - 800-Starbuc (782-7282)
 - tel.: 800-Starbuc (782-7282)
- Country France
 - Entity Name Starbucks Coffee France SAS
 - Entity Address 38 rue des Jeûneurs, 75002 Paris
 - Additional Contact (If Any)
 - Customer Support
 - <u>service.clientele@starbucks.fr</u>
 - tel.: +33 01 44 76 72 00
- Country Germany
 - Entity Name AmRest Coffee Deutschland Sp. Z oo & Co. KG
 - Entity Address Dachauser Strasse 6, 80335, Munich
 - Additional Contact (If Any) -
 - Customer Relations
 - Starbucks.Gaesteservice@amrest.eu

- tel.: +49 (0) 89.551.555.990
- Country U.K.
 - Entity Name Starbucks Coffee Company (UK) Limited
 - Entity Address Building 4 Chiswick Park, 566 Chiswick High Road, London, W4 5YE
 - Additional Contact (If Any) -
 - Customer Support
 - <u>UKInfo@support.starbucks.com</u>
 - tel.: +443330050449 or +442088345050 (app)
- Country U.S.
 - Entity Name Starbucks Reserve; Princi
 - Entity Address Starbucks, P.O. Box 20430, Augusta, GA 30916
 - Additional Contact (If Any) -
 - Customer Service
 - http://customerservice.starbucks.com
 - tel.: 800-Starbuc (782-7282)

About Us	~
Careers	~
Social Impact	~
For Business Partners	~
Order and Pickup	~













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Terms of Use

CA Supply Chain Act

Submit Your Idea

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