



Privacy Statement ALDI Shop & Go

Your privacy is very important to us. We adhere to the privacy legislation called the General Data Protection Regulation (GDPR). This means that your personal data is safe with us and that we always process it in accordance with the GDPR and our guidelines and processes.

This privacy statement informs you (the data subject) about the processing of your personal data when you use the ALDI Shop & Go app (hereinafter: the “**App**”) and when you enter the ALDI Shop & Go store in Utrecht, the Netherlands (hereinafter: the “**Store**”).

The App is available on third-party app stores (Apple App Store and Google Play). Prior registration with the respective provider is required to download the App. We have no influence on the data processing in connection with this registration. The responsible data controller regarding that registration is exclusively the provider of the respective app store. If you have any questions, please contact the respective provider directly.

1. Controller

The organisation responsible for this data processing (the controller) is:

Aldi Culemborg B.V. (hereinafter: “**ALDI**”)

Ohmweg 3

4104 BM Culemborg

The data protection coordinator of ALDI can be reached via the contact form on the website (<https://www.aldi.nl/service/contact.html>).

2. Personal data, purposes of the processing, legal bases of the processing and retention periods

2.1 General use of the App

When you use the App without entering the Store we process certain personal data of you. Below we inform you about the specific personal data this concerns, the purposes of the processing, the legal bases of the processing and the retention periods.

Categories of personal data	Specification	Retention periods
User information	Title (gender) Name Date of birth (voluntary) Telephone number (voluntary) Email Password User ID IP address Social login (if used)	2 months after deletion of your account in the App
Financial information	Type of bank card Payment token* <i>*The Payment Provider processes all payment data, ALDI does not.</i>	2 months after deletion of your account in the App
Request support	Email Telephone number (voluntary) Content within the message (e.g. receipt number, bank account)	90 days within our support solution.
Feedback form	Personal data the user can fill in on the form.	6 months, based on send date of the feedback form
Adobe Analytics	Tracking data (see below)	37 months, from the time they are collected

Purposes and legal bases of the processing

User information

To use the App you must first register. You must then provide information about yourself. We process your user information to create your account and give you access to the App.

The legal basis of the processing of your user information is the performance of a contract to which you are a party (article 6(1)(b) GDPR).

Please note, you have the option to update your user information within the App. When you update your user information, your newsletter account will be updated automatically if you have subscribed to the newsletter with the same email address.

Financial information

The App uses a payment token, which creates a link to your payment provider (bank). This makes it possible for ALDI to process your payment for the purchased products. However,

ALDI does not store any financial data related to your bank information, this remains with the Payment Provider.

You can set up the abovementioned link through the menu in the App, where you will be redirected through the App to your bank.

The legal basis of the processing of your financial information is the performance of a contract to which you are a party (article 6(1)(b) GDPR).

Request support

Within the App you have the option to request support, for example in case the receipt does not match with the items you have purchased. In order to provide support ALDI needs some information, e.g. contact information and a description of your issue.

The legal basis of the processing of your personal data regarding your support request is your consent (article 6(1)(a) GDPR).

Feedback form

It is possible to give feedback about the App. Giving feedback to ALDI is completely voluntary.

The feedback form uses free input fields where you can give feedback. You may not enter any personal data, especially sensitive personal data such as personal data about illness, religion, political affiliations, etc. ALDI cannot guarantee that it will not use (sensitive) personal data without a purpose. It is therefore possible that your feedback will not be processed if this is the case.

The legal basis of the processing of your personal data regarding your feedback is your consent (article 6(1)(a) GDPR).

Adobe Analytics

The App uses the analysis tool Adobe Analytics. Adobe Analytics is directly integrated into the App and allows an analysis of user behaviour within the App. Anonymized usage profiles can be created based on this data. These cannot be traced back to individuals as the IP address is anonymized.

The following personal data are processed:

- IP address of end device (anonymised)
- Country, State/Province, City
- Type of device
- Operating system
- Screen resolution
- Color depth
- App version
- Date and time
- Recalled content and functions

- Length of stay

The information created in the App is usually transferred to an Adobe server in the USA and stored there. Since we have activated IP anonymization in the App, the settings we have made ensure that your IP address is anonymized before geolocation takes place. In doing so, the last eight characters of the IP address are replaced by zeros. Before the created information is saved, the IP address will be replaced by separate generic IP addresses. Adobe will use this information to analyze your use of the App for us, to compile reports on app activity, and to provide other app usage-related services to us.

You may stop Adobe's processing of your user behavior at any time by withdrawing your consent in the App settings. The withdrawal of consent does not affect the lawfulness of the processing before such withdrawal.

The legal basis of the processing of the abovementioned personal data is your consent (article 6(1)(a) GDPR).

Social Login

Facebook Login

We offer the "Facebook Connect" function as an option for registration and login in the ALDI Shop & Go app. This is a service of Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland.

If you want to use this function, you will first be redirected to Facebook. There you will be asked to log in with your username and password. We do not gain any knowledge of your login data during this process.

Facebook will then tell you which data will be transmitted to us (last name, first name, e-mail address, profile picture URL, facebook unique identifier). You confirm this by clicking the "OK" button. With the transmitted data, we create your customer account, whereby the profile picture is not integrated. We do not transmit any data to Facebook in the process.

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as your rights in this regard and setting options for protecting your privacy, can be found in (<https://www.facebook.com/about/privacy/>).

In case you would like to disconnect your Facebook account from the ALDI Shop & Go App, the following steps need to be conducted:

1. Go to your Facebook Account's Setting & Privacy. Click "Settings"
2. Look for "Apps and Websites" and you will see all of the apps and websites you linked with your Facebook.
3. Search and Click "ALDI Shop & Go" in the search bar.
4. Scroll and click "Remove".
5. Congratulations, you have successfully removed your connection.

Google Sign In

Another option for registering and logging in to the ALDI Shop & Go app is Google Sign In. The provider of this service is Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

If you decide to register with Google Sign In and click on the "Login with Google" / "Connect with Google" button, you will automatically be redirected to Google's registration website. There, you can log in with your user data, of which we also gain no knowledge here. This links your Google profile with the Shop & Go customer account.

As a result, we receive the following data from Google: Name, first name, email address, profile picture URL, Google unique identifier. With the transmitted data we create your customer account, whereby the profile picture is not integrated. We do not transmit any data to Google in the process.

For more information, see the Google Terms of Use and the [Google Privacy Policy \(https://policies.google.com/\)](https://policies.google.com/).

Apple Sign In

As a third option, you can use to register and log in your Apple ID. This function is provided by the provider Apple, One Apple Park Way, Cupertino, CA 95014.

If you select this option, you will be asked to login via your Apple ID user data in the app. We receive the following data from Apple: Name, first name, email address to create the Shop & Go customer account. We do not transmit any data to Apple.

If you want to disconnect your Apple account, you'll need to follow these steps in your phone settings:

1. Go to Apple ID
2. Open Password & Security
3. Choose Apps using your Apple ID
4. Disable the Pinterest App

For more information, please see the Apple Terms of Use and the Apple Privacy Policy (<https://www.apple.com/legal/privacy/en-ww/>).

If you disconnect your ALDI Shop & Go account from your social login, please note that your ALDI Shop & Go account will remain. In **Paragraph 5** you will find information about your data subject rights.

2.2 Shopping at the Store

When you use the App to enter the Store (and to shop at the Store) we process certain personal data of you. Below we inform you about the specific personal data this concerns, the purposes of the processing, the legal bases of the processing and the retention periods.

Categories of personal data	Specification	Retention periods
Customer Information	Random number, not connected to your personal data	6 hours after leaving the Store
	Images of you	14 days for images that are anonymized
	Location of you in the Store based on coordinates (heatmaps)	6 hours, after leaving the Store
Sensor Data	Movements you make	6 hours, after leaving the Store
Shopping data	Images of products that you take from the shelves	6 hours, after leaving the Store
Purchase history	Receipt of products purchased by you	7 years after the purchase
Camera surveillance	Camera images of you	120 hours or longer if an incident is filmed

Purposes and legal bases of the processing

Customer information

Inside the Store we use images and coordinates to identify the products you take. This personal data is anonymized by cropping and blurring the images when a product is taken of the shelves. This means that the images should only contain the products. However, it is possible that an arm or hand is slightly visible on the images. For this reason, blurring is used to mask the surroundings and other body parts.

The legal basis of the processing of your customer information is the performance of a contract to which you are a party (article 6(1)(b) GDPR).

Sensor data

By processing sensor data, we can see whether a product has been taken from or returned to the shelves.

The legal basis of the processing of your sensor data is the performance of a contract to which you are a party (article 6(1)(b) GDPR).

Shopping data

In order to record which products are taken from and returned to the shelves, images are taken of the products.

The legal basis of the processing of your shopping data is the performance of a contract to which you are a party (article 6(1)(b) GDPR).

Group shopping mode

It is possible to shop at the Store with friends and/or family together, therefore you can choose to share one basket. To share a basket, simply scan a QR code of the App user and let each additional person of your group enter first. All group members will have the same random ID as the App user.

The abovementioned processing of customer information, sensor data and shopping data takes place regarding each group member.

The legal basis of this data processing is the consent (article 6(1)(a) GDPR). The group members that aren't the App user give their consent for this processing by entering the Store.

Purchase history

During your shopping visit at the Store, your shopping basket is kept up to date with the products you took from the Store shelves. After opening the exit door through the App and leaving the Store, the receipt with the products you purchased is stored in your account in the App and sent to your personal email. This makes it possible to look back at what products you bought and at what price.

In case of a service request from you, our customer service team can have a look at your account and purchase history in order to take care of your requests.

The legal basis of the processing of your purchase history is the performance of a contract to which you are a party (article 6(1)(b) GDPR) and a legal obligation to which we are subject (article 6(1)(c) GDPR).

Camera surveillance

Just like in our other stores, camera surveillance is used in the Store to protect our goods, staff and customers. This allows us to capture incidents so that we can, for example, make a report of them.

The legal basis of the processing of camera images of you is our legitimate interest to protect our goods, staff and customers (article 6(1)(f) GDPR).

3. Provision of your personal data to third parties

All the personal data mentioned in paragraph 2 will only be processed in the EU/EEA. We will only provide anonymized data to third party located outside of the EU/EEA (e.g. UK and Israel).

We will provide your personal data to our (IT) suppliers who act as processors. To protect your personal data we concluded data processing agreements with those parties.

Next to this we will provide your personal data to third parties for advertising purposes, but only if you have given your consent.

Furthermore we may provide your personal data to authorities – such as the police - if an incident takes place and it is necessary to handle such an incident.

Lastly we will provide your personal data to third party if we are legally obliged to do so.

4. Security measures

Security of your personal data is very important to us.

ALDI uses the latest and strongest security against misuse or theft of your personal data. ALDI uses at least the following technical and organizational measures:

Technical measures

- Logical and physical (access) security and protection of equipment (for example safes and porters, but also firewalls and network segregation).
- Technical management of (as limited as possible) authorizations and logging.
- Management of technical vulnerabilities (patch management).
- Keeping software such as browsers, virus scanners and operating systems up to date.
- Making back-ups that allow us to restore the availability of and access to the personal data in a timely manner.
- Automatic deletion of outdated data:
 - Data encryption;
 - Hashing: ALDI uses hashing as a method to pseudonymize personal data.

Organizational measures

- Promoting security awareness among existing and new employees.
- Establishing procedures to test, assess and evaluate security measures at regular intervals.
- Regular checking of log files.
- Drawing up a protocol for dealing with data breaches and security incidents.

- Signing confidentiality and processing agreements with our suppliers.
- Using GDPR principles; Lawfulness, fairness and transparency, purpose limitation, minimum data processing, accuracy, storage restrictions, integrity and confidentiality, accountability.
- Only authorized personnel have access to the data.
- Recording the decision-making process and the underlying considerations for each processing operation.

[Click here to report a security incident or data breach.](#)

5. Your rights as a data subject

Under the GDPR, you as a data subject have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning you and to object to processing as well as the right to data portability

If you want to exercise your rights, please use [the data request form](#).

Right of access (article 15 GDPR)

You have the right to demand a statement from ALDI about whether or not personal data relating to you are being processed, for what purpose and for how long, what categories of data are involved, and to what recipients or categories of recipients these data are being provided.

Right to rectification (article 16 GDPR)

You have the right to request the rectification or completion of your personal data that are inaccurate or incomplete. This means that you have the right to make changes concerning incorrect personal data. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed.

Right to erasure (article 17 GDPR)

You have the right to obtain the erasure of your personal data without undue delay and we will execute this where one of the grounds in article 17 GDPR apply, for example when:

- the personal data is no longer needed for the purposes for which it was collected;
- the consent is withdrawn for the processing of personal data.

Right to restriction of processing (article 18 GDPR)

You have the right to obtain restriction of the processing of your personal data if one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;

- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- you have objected to processing pursuant to article 21(1) GDPR pending the verification whether the legitimate grounds of us override those of you.

Right to data portability (article 20 GDPR)

You have the right to request the provision of your personal data in a machine-readable format. This means that your personal data will be transferred to you in a structured, common and machine-readable form. This right only applies if the processing:

- is based on your consent or on a contract with you;
- the processing is done through automated processes;
- you have provided the personal data to us.

Right to object (article 21 GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on article 6(1)(f) GDPR. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of you or for the establishment, exercise or defence of legal claims.

6. Right to lodge a complaint

You may disagree with the way in which ALDI handles your personal data. You are entitled to lodge a complaint with the Dutch Data Protection Authority (<https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/gebruik-uw-privacyrechten/klacht-melden-bij-de-ap>).

7. Changes to this privacy statement

If there are any changes regarding our processing of your personal data, we will update this privacy statement. Please always pay attention to the date above this privacy statement and check regularly for new versions. We will do our best to announce changes separately as well.