



# Privacy statement ALDI Shop & Go

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

This privacy notice 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 shop in Utrecht, the Netherlands (hereinafter the "**Store**").

The App is available in 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 data controller in respect of this 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 Holding B.V. ("**ALDI**")

Pascalweg 15

4104 BE Culemborg

ALDI's data protection coordinator can be reached via our [contact form](https://www.aldi.nl/service/contact.html) or via our website (<https://www.aldi.nl/service/contact.html>).

## 2. Personal data, purposes of processing, legal grounds for processing and retention periods

### 2.1 General use of the App

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

Categories of personal data	Specification	Retention periods
Information for the user	Title (gender) Name Date of birth (voluntary) Phone number (voluntary) Email Password User ID IP address Social notification (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
Requesting support	Email Phone number (voluntary) Message content (e.g. receipt number, bank account)	90 days
Feedback form	Personal data that the user can enter on the form.	6 months, from the submission date of the feedback form
Adobe Analytics	Tracking data (see below)	37 months, from the time they were collected

## Purposes and legal bases of processing

### Information for the user

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

The legal basis for processing your user data is the performance of a contract to which you are a party (Article 6(1)(b) of the AVG).

Please note, you have the option to update your user information in the App. When you update user information, your newsletter account will also be updated automatically if you have signed yourself up for the newsletter with the same email address.

### Financial information

The App uses a payment token, which links to your payment provider (bank). This enables ALDI to process your payment for the purchased products. However, ALDI does not store any financial data relating to your bank details, these remain with the payment provider.

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

The legal basis for processing your financial data is the performance of a contract to which you are a party (Article 6(1)(b) of the AVG).

### **Requesting support**

Within the app, you have the option to request support, for example if the receipt does not match the items you bought. To provide support, ALDI requires some information, such as contact details and a description of your problem.

The legal basis for processing your personal data relating to your support request is your consent (Article 6(1)(a) of the AVG)

Customer service may also contact you in case of problems with payment methods, app crashes or fraud detection and feedback requests.

The legal basis for processing your personal data relating to customer service is our legitimate interest to ensure that your experience in the shop and with the app are as optimal as possible (Article 6(1)(f) of the AVG).

### **Feedback form**

It is possible to provide feedback on the App. Giving feedback to ALDI is entirely voluntary.

The feedback form uses free input fields in which you can provide feedback. ALDI requests you not to enter any personal data in the form, in particular sensitive personal data about illness, religion, political affiliation, etcetera. ALDI cannot guarantee that it will not process any (sensitive) personal data if such data is provided in the form. Therefore, your feedback may not be processed if this is the case.

The legal basis for processing your personal data relating to your feedback is your consent (Article 6(1)(a) of the AVG).

### **Adobe Analytics**

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

The following personal data are processed:

- IP address of end device (anonymised)
- Country, state/province, city
- Type of device

- Operating system
- Screen resolution
- Colour 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 US and stored there. We have activated IP anonymisation in the App so that your IP address is anonymised by our settings before geolocation takes place. This involves replacing the last eight characters of the IP address with zeros. Before the created information is stored, the IP address is replaced with individual generic IP addresses. Adobe will use this information to analyse your use of the app for us, to compile reports on app activity and to provide other services related to app usage to us.

You can stop Adobe's processing of your user behaviour at any time by withdrawing your consent in the App settings. Withdrawing consent does not affect the lawfulness of the processing prior to the withdrawal.

The legal basis for processing the above personal data is your consent (Article 6(1)(a) of the AVG).

## Social login

### Facebook login

We offer the "Facebook Connect" feature 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 feature, you will first be redirected to Facebook. There you will be asked to log in with your username and password. We do not get to know your login details during this process.

Facebook then tells you what data will be sent to us (last name, first name, e-mail address, profile picture URL, unique Facebook identifier). You confirm this by clicking on the "OK" button. We use the forwarded data to create your customer account, which does not integrate the profile picture. We do not pass on any data to Facebook in this process.

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

If you want to disconnect the Facebook account from the ALDI Shop & Go App, you need to perform the following steps:

1. Go to the Settings & Privacy of your Facebook account. Click on "Settings".
2. Search for "Apps and websites" and you will see all the apps and websites you have linked to your Facebook.

3. Find and click on "ALDI Shop & Go" in the search bar.
4. Scroll and click "Delete".
5. Congratulations, you have successfully deleted 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 sign in to Google Sign In and click on the "Sign in to Google" / "Connect to Google" button, you will be automatically redirected to Google's registration website. There you can log in with your user data, which we also do not know about here. This links your Google profile to the Shop & Go customer account.

As a result, we receive the following data from Google: name, first name, e-mail address, profile picture URL, Google's unique identifier. With the transmitted data, we create your customer account, which does not integrate the profile picture. In doing so, we do not pass on any data to Google.

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

### Apple sign up

As a third option, you can register and login yourself Apple ID. This feature is provided by the provider Apple, One Apple Park Way, Cupertino, CA 95014.

If you select this option, you will be asked to log in using your Apple ID user details 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 pass on any data to Apple.

To disconnect from your Apple account, follow these steps on your phone settings:

1. Go to Apple ID
2. Open password and security
3. Choosing apps with your Apple ID
4. Disable the Pinterest app

For more information, please refer to [Apple's Terms of Use](#) and [Privacy Policy \(https://www.apple.com/legal/privacy/en-ww/\)](https://www.apple.com/legal/privacy/en-ww/).

If you disconnect the ALDI Shop & Go account from your social login, please note that your ALDI Shop & Go account will continue to exist. **Section 5** provides information on your rights as a data subject.

## 2.1 Shopping in shop

When you use the App to access the Store (and to shop in the Store), we process certain personal data from you. Below, we inform you about the specific personal data involved, the purposes of the processing, the legal grounds for the processing and the retention periods.

Categories of personal data	Specification	Retention periods
Customer information	Random number, not linked to your personal data	6 hours after leaving the shop
	Images of you, further features such as clothing in exceptional cases	10 days for images that are anonymised
	Location of you in the shop based on coordinates	6 hours, after leaving the shop
Sensor data	Movements you make	6 hours, after leaving the shop
Shop details	Images of products you take off the shelves	6 hours, after leaving the shop
Acquisition history	Receipt of products purchased by you	7 years after purchase
Camera surveillance	Camera footage of you	120 hours or more if an incident is filmed

## Purposes and legal bases of processing

### Information for customers

In-store, we use images and coordinates to identify the products you take away. After six hours, this personal data is anonymised by cropping and blurring the images of the moments when a product is taken from the shelves. This means the images may only include the products. However, it is possible that an arm or hand is slightly visible in the images. For this reason, blurring is used to blur the surroundings and other body parts. The system assigns a random ID to each customer.

The legal basis for processing your customer data is your consent (Article 6 (1)(a) AVG) and the performance of a contract to which you are a party (Article 6(1)(b) AVG).

### Sensor data

By processing sensor data, we can see if a product has been taken off the shelves or returned.

The legal basis for processing your sensor data is your consent (Article 6(1)(a) of the AVG) and the performance of a contract to which you are a party (Article 6(1)(b) of the AVG).

### **Shop details**

To record which products are removed from shelves , pallets, wire baskets, etc. and or put back, photographs of the products are taken.

If the system loses track of a person shopping, the system performs another identification process. First, the system compares images of a person near the original person, based on a representation of key points (an image consisting of dots and lines, not faces). If the representation of key points is the same, the connection to that person is automatically restored. If the system cannot re-identify someone based on proximity, a connection is automatically established based on comparing the colour composition patterns of the two individuals. In this case, the colours of completely blurred images are compared to determine whether they are the same person. If the system still cannot re-identify someone, an employee manually reconnects based on the information from the previous two processes.

The legal basis for processing your shopping data is your consent (Article 6(1)(a) of the AVG) and the performance of a contract to which you are a party (Article 6(1)(b) of the AVG).

### **Financial data**

ALDI collects financial data from customers during the payment process. This data includes the card number, expiry date and possibly the name of the cardholder (credit card payments only), depending on the requirements of the card issuer.

ALDI sends the financial data collected to Adyen, which acts as payment processor. This includes forwarding the card number, expiry date and possibly the cardholder's name if paying by credit card. No personal data is recorded for all other payment methods.

During the transfer of financial data between ALDI and Adyen, end-to-end encryption is applied. This means the data is secured against interception and can only be decrypted by authorised parties.

After receiving the financial data, Adyen performs the necessary payment processing. This includes validating the data, verifying the payment details with the card issuer and facilitating the transaction between ALDI and the card issuer.

Adyen stores certain data required by law and provided by card issuers. This may include information such as transaction details, card number (masked using tokenisation), and possibly other relevant details for payment processing.

The legal basis for processing your financial data is the performance of a contract to which you are a party (Article 6(1)(b) of the AVG).

### **Group shopping mode**

It is possible to shop together with friends and/or family in the Store, which is why you can choose to share one basket. First, all trips from all group members are collected individually and then grouped together when you shop as a group. This means that each group member gets their own random ID.

If you use the Shop & Go App, simply scan an App user QR code and let each additional person in your group get off first. If you use the self-checkout terminal, all group members will be identified as a group while in a particular area.

The above processing of customer information, sensor data and shop data takes place in relation to each group member.

The legal basis for this data processing is consent (Article 6(1)(a) of the AVG). Group members who are not App users give their consent for this processing by entering the Store.

### **Purchase history within the Shop & Go App**

During your shopping visit in the Store, your shopping basket is tracked with the products you have taken from the shelves of Store, pallets, wire baskets etc. After you open the exit via the App and leave the Store, the receipt with the products you bought is saved in your account in the App and sent to your personal email. This allows you to look back to see which products you bought and at what price.

If you have a service request, our customer service team can view your account and purchase history to address your requests.

The legal basis for the processing of your purchase history is the performance of a contract to which you are a party (Article 6(1)(b) of the AVG) and a legal obligation to which we are subject (Article 6(1)(c) of the AVG) regarding the storage of payment data.

### **Camera surveillance**

As in our other shops, camera surveillance is used in the shop to protect our goods, staff and customers. This allows us to record incidents so that we can make a report of them, for example.

The legal basis for processing camera images of you is our legitimate interest to protect our goods, employees and customers (Article 6(1)(f) of the AVG).

## **3. Disclosure of your personal data to third parties**

All personal data mentioned in paragraph 2 is only processed in the EU/EEA. We only provide anonymised data to third parties outside the EU/EEA (e.g. the UK and Israel).

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

We also provide your personal data to third parties for advertising purposes, but only with your consent.



Furthermore, we may provide your personal data to authorities - such as the police - if an incident occurs and it is necessary to deal with such an incident.

Finally, we provide your personal data to third parties if we are legally obliged to do so.

## 4. Safety measures

The security of your personal data is very important to us.

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

### Technical measures

- Logical and physical (access) security and equipment protection (e.g. safes and porters, but also firewalls and network segregation).
- Technical management of (as limited as possible) authorisations and logging.
- Managing technical vulnerabilities (patch management).
- Keeping software such as browsers, virus scanners and operating systems up-to-date.
- Creating backups that allow us to restore the availability of and access to personal data in a timely manner.
- Automatic deletion of obsolete data:
  - Data encryption;
  - Hashing: ALDI uses hashing as a method to pseudonymise personal data.

### Organisational measures

- Promote security awareness among existing and new employees.
- Establish procedures to regularly test, assess and evaluate security measures.
- Regular checking of log files.
- Establish a protocol for dealing with data breaches and security incidents.
- Sign confidentiality and processing agreements with our suppliers.
- Use AVG principles: legality, fairness and transparency, purpose limitation, minimum data processing, accuracy, storage limits, integrity and confidentiality, accountability.
- Only authorised personnel can access the data.
- Record the decision-making process and 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 AVG, as a data subject, you have the right to request us to access and rectify or erase personal data or restrict processing relating to 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 AVG)

You have the right to demand an explanation from ALDI as to whether or not personal data relating to you are processed, for what purpose and for how long, which categories of data are involved and to which recipients or categories of recipients the data are provided.

### **Right to rectification (Article 16 AVG)**

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

### **Right to erasure (Article 17 AVG)**

You have the right to have your personal data erased without undue delay and we will carry this out when one of the grounds in Article 17 AVG applies, for example when:

- the personal data are no longer necessary for the purposes for which they were collected;
- consent to the processing of personal data is withdrawn.

### **Right to restriction of processing (Article 18 AVG)**

You have the right to obtain restriction of the processing of your personal data if any of the following situations apply:

- the accuracy of the personal data is disputed by you, for a period that allows us to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request instead that its use be restricted;
- we no longer need the personal data for the purposes of processing, but you need them for the establishment, exercise or defence of legal claims;
- you have objected to processing under Article 21(1) AVG pending verification of whether our legitimate grounds outweigh yours.

### **Right to data portability (Article 20 AVG)**

You have the right to request that your personal data be provided 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;
- processing is done through automated processes;
- you have provided the personal data to us.

### **Right to object (Article 21 AVG)**

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

## **6. Right to file a complaint**

You may disagree with the way ALDI handles your personal data. You have the right to file a complaint with the Dutch Data Protection Authority (College Bescherming Persoonsgegevens) (<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 notice. Always note the date above this privacy notice and check regularly for new versions. We will do our best to announce changes separately as well.