

Privacy Policy

Last Updated: June 27, 2024

New Seasons Market LLC (“**New Seasons Market**,” “**we**,” “**us**,” “**our**”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy describes how we collect, use, store, and share your personal data when: (1) you access and use our website located at <https://www.newseasonsmarket.com/> or other websites, applications, and/or other programs owned and operated by us, including our Neighbor Rewards customer loyalty program (“**Sites**”); (2) you purchase our products or services (“**Products**”); (3) you visit one of our physical stores (“**Stores**”); (4) you communicate with us in any manner (“**Communicate**” or “**Communications**”); and (5) when we interact with certain third parties, such as our service providers (“**Third Parties**”).

For more information about the Neighbor Rewards Program and its terms and conditions, please see our [Rewards Terms and Conditions](#).

This Privacy Policy applies wherever it is posted.

What Type Of Data Do We Collect?

We collect your data when you interact with our Sites, purchase our Products, visit our Stores, Communicate with us, and when we engage with Third Parties.

Data Provided By You

We collect the following data directly from you when you interact with our Sites, Products, visit our Stores, or Communicate with us:

- **Contact Information**, such as your first and last name, mailing address, delivery address, email address, and telephone number.
- **Account Credentials**, such as your username, password, and information used for authentication and account access.
- **Demographic Information**, such as your age, gender, zip code, and country.
- **Billing Information**, such as your payment information (e.g., credit or debit card number), expiration date, security code, bank account information, or other financial information provided by you when purchasing our Products.
- **Profile Information**, such as your interests, Neighbor Rewards Program information, preferences, shopping lists, email preferences, purchasing history, or favorites.
- **Communications**, such as any messages you send to us such as feedback and questions to customer support, information you publicly post on our Sites or other websites (such

as comments), e-mail messages, and recordings of telephone calls with customer service or other New Seasons Market representatives.

- **Audio or Video Information**, such as audio and video footage from when you visit our Stores.

Data Collected Automatically

When you visit our Sites, data about your device hardware and software is automatically collected, including your IP address, browser type, domain name, access times, general geolocation, referring website address and other technical data. For more information about how we collect this data through the use of cookies and related technologies, see [Cookies & Related Technologies](#) below.

Data Collected From Third Parties

We use a variety of Third Parties to provide you with the Sites, Products, and Stores. From time to time, we may collect data about you from those Third Parties, including for fraud protection purposes, credit checks, address verification, account authentication and verification, and other related business and commercial purposes.

We limit the collection of personal data to only the personal data that is adequate, relevant, and reasonably necessary to serve the purposes identified in this Privacy Policy.

How Do We Use Your Data?

We may use the data we've collected from and about you for the following purposes:

- Improve our Sites and Products;
- Offer our Sites and Products to you;
- Deliver our Products to you;
- Responding to your requests;
- Processing and completing your transactions, including the delivery of products or services;
- Verifying your identity;
- Provide, maintain and facilitate the Neighbor Rewards Program;
- Contacting you regarding lost items in our Stores, such as your keys, purse, or wallet;
- Personalize our Sites and Products;
- Provide you with information about our Sites, Products, and Stores;
- Customer service;
- Security and to detect fraud and illegal activities;
- Research and analytical purposes;
- To fulfill your requests;
- To Communicate with you;
- To facilitate a business transaction, such as a merger, acquisition, asset sale, bankruptcy, or other related proceeding;

- Ad measurement purposes, delivery of ads, marketing, and other ways to personalize our Sites and Products for you; and
- To comply with the law, enforce our policies, or respond to a legal request such as a subpoena.

We do not process personal data for purposes that are not reasonably necessary for and compatible with the purposes specified in Privacy Policy without first obtaining your consent.

How Do We Share Your Data?

Depending on the circumstances, we may share your data in the following circumstances:

- **With Your Consent or at Your Direction.** We may disclose, share, or make available your data when we have your consent or your direction to do so, which may be obtained in writing, online, through “click-through” agreements, when you accept our terms for our Sites, orally (including over the telephone), or by other means. For example, if you purchase Products with a credit card and have them delivered to your home, you direct the disclosure of your name and mailing address to our third-party delivery service providers, and of your credit card number to the credit card processor to authorize the transaction and to the bank to collect payment.
- **With Service Providers & Business Partners.** We may disclose, share with, or make available your data to our third-party service providers, business partners, and other third parties, such as credit / debit card processing partners, partners that facilitate billing, delivery, and customer service, third-party auditors and law firms, marketing and advertising networks (including those that provide ad measurement services), internet service providers, data analytics providers, companies that help debug and identify and repair errors that may impair the functionality of our Sites, and third parties that help protect against malicious, deceptive, fraudulent, or illegal activity.
- **In A Business Transfer.** We may disclose, share, or make available your data as part of a business transaction (including at the negotiation stage), such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the unlikely event of insolvency, bankruptcy, or receivership, in which such data could be transferred to third parties as a business asset in the transaction.
- **For Legal Process & Protection.** We may disclose, share, or make available your data to satisfy any law, regulation, legal process, governmental request, or where we have a good faith belief that access, use, preservation or disclosure of such data is reasonably necessary to: (1) enforce or apply agreements, or initiate, render, or bill for use of the Sites; (2) protect our rights or interests, property or safety or that of others; (3) in connection with claims, disputes, or litigation – in court or elsewhere; (4) protect users of our Sites and other carriers, providers, or partners from fraudulent, abusive, unlawful, or otherwise improper use of our Sites; (5) facilitate or verify the appropriate

calculation of taxes, fees, or other obligations due to a local, state, or federal government.

- **Public Forums.** Some of our Sites provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information will be publicly available.
- **Partner Promotion.** We may offer contests, sweepstakes, or other promotions with third-party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third-party partner, the personal data that you provide will be disclosed to us and shared with them. Their use of your information is not governed by this Privacy Policy.

Cookies & Related Technologies

From time to time, our Sites may use cookies, beacons, pixel tags, scripts, and other similar technologies. We use these technologies to support the functionality of our Sites, perform analytics, advertise our Sites and Products, determine how users interact with our Sites, and for other related purposes. Below is an overview of these technologies. To learn more about your choices with regard to these technologies, see the [Your Rights & Choices](#) section below.

What Are Cookies? A cookie is a small file containing a string of characters that is sent to your computer or device when you visit a website or use an online service. The cookie then communicates with servers, ours (e.g., first-party cookies) or those of another third-party (e.g., third-party cookies) that we have authorized to place on our Sites. When you visit our Sites again, the cookie allows us to recognize your browser or device. Cookies may store unique identifiers, user preferences, and other data.

How Long Do Cookies Last? We may use “session cookies” or “persistent cookies.” Session cookies are temporary and expire once you close your browser or once your session ends. Persistent cookies remain on your device for much longer or until you or your browser erase them. Persistent cookies have varying durations that are dependent on their expiration date. For more information about what cookies are being set, and their duration, you may visit our Privacy Preference Center.

What Types Of Cookies Do We Use?

- **Necessary Cookies.** These cookies are necessary for you to browse the Sites and use their features, such as accessing secure areas of the Sites. Without these cookies, certain aspects of the Sites may not be available to you.
- **Preferences Cookies.** These cookies collect data about how you have used the Sites in the past and allow the Sites to remember the choices you have made. These cookies allow us to improve how the Sites work for you and tailor the Sites to your preferences.
- **Statistics Cookies.** These cookies collect data about how you use the Sites, such as which pages you most often visit on the Sites, the time you spend on the Sites, which links you click on, and any issues encountered. These cookies help us understand how

visitors interact with the Sites. All data collected is aggregated and does not identify you.

- **Marketing Cookies.** These cookies track your online activity to help deliver advertisements that are relevant to you and your interests and measure the effectiveness of the advertising campaigns. They also limit how many times you see a certain advertisement. We may share the data collected through these cookies with others, such as advertisers.

Beacons. Our Sites, and some of our e-mail communications, may from time to time contain small electronic files known as beacons (also known as web beacons, clear GIFs, pixel tags, single-pixel GIFS) that permit us, for example, to count users who have visited those pages or opened an email communication, and for other related statistical analysis. Beacons in email marketing campaigns allow us to track your responses and your interests in our content, offerings, and Sites. You may use the tools in your device to disable these technologies as well.

Links To Third Party Sites

Our Sites, from time to time, may contain links to third-party websites and services. Please note that these links are provided for your convenience and information, and may operate independently from us and have their own privacy policies and/or notices. You are strongly encouraged to review such policies or notices. We do not endorse or make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available on other websites, even if one or more pages of the other websites are framed within, or linked to, a page of our Sites.

Do Not Track

Our Sites may, from time to time, collect data about your online activities, overtime time and across our Sites. Third parties may also collect data about your online activities, over time and across different internet websites, online or cloud computing services, online applications, or mobile applications. Some browsers incorporate a “Do Not Track” feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Not all browsers offer a Do Not Track option and there is currently no industry consensus for how to recognize or respond to a Do Not Track signal. If you enable a browser-based opt-out preference signal that complies with Oregon law, such as the Global Privacy Control (GPC), upon receipt or detection, we will by January 1, 2026 or before, treat the signal as a valid request to opt out of the sharing of personal data linked to that browser and any consumer profile we have associated with that browser. Please note that if you use different browsers or browser profiles, you will have to enable the signal on each one that you use.

How We Store & Protect Your Data

Although no system or website can guarantee the complete security of your data, we take all commercially reasonable steps to ensure your data is protected in accordance with all applicable laws and regulations, as appropriate to the sensitivity of your data. In the event that we are required by law to inform you of a breach to your personal data we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our Sites may permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account by contacting us at talktous@newseasonsmarket.com.

How Long Do We Keep Your Data?

We keep your data for as long as necessary in accordance with the purposes for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your data, we will do so in a way that is commercially reasonable taking into account the sensitivity of the data.

Children

Our Sites are not intended for children under the age of 18. This includes any links to other websites that we provide for our convenience. We do not intend to or knowingly collect personal data online from children under the age of 16 for any reason, and we encourage parents or guardians to participate in and monitor their children's online activity. If a child under 16 has provided personal data, a parent or guardian may inform us of that fact by contacting us using one of the methods listed under the caption "Contact Us" that appears below, and we will then delete the data from our database. If you are under the age of 16, do not provide us with any personal data.

Your Rights & Choices

Where available to you in accordance with applicable data protection laws, we provide you with the ability to exercise certain controls and choices about how we collect, use, share, and store your personal data.

Oregon Privacy Rights

Oregon consumer privacy law provides Oregon residents with certain rights, including those listed below. To exercise the rights listed below see the "[Exercising Your Oregon Privacy Rights](#)" section below:

- **Right to Access and Data Portability.** You have the right to request details regarding our processing and access to your personal data and to obtain your personal data in a portable and, to the extent technically feasible, readily usable format.
- **Right to Delete.** You have the right to request that we delete the personal data that we have collected about you.
- **Right to Correct.** You have the right to request that we correct inaccuracies in your personal data, taking into account the data's nature processing purpose.
- **Right to Opt-out.** You have the right to opt-out of personal data processing for:
 - targeted advertising (to opt-out of targeted advertising please see our Privacy Preference Center);
 - sales; or

- profiling in furtherance of decisions that produce legal or similarly significant effects.

Exercising Your Oregon Privacy Rights

To exercise any of the aforementioned rights, please submit your request via our [Privacy Request Portal](#), or call 1-888-914-9661 x 279 173. As applicable, authorized agents can make certain requests on your behalf if you have given them legal power of attorney or we are provided proof of signed permission, verification of your identity, and, in some cases, confirmation that you provided the agent permission to submit the request.

To appeal a decision regarding a consumer rights request, please contact legal@goodfoodholdings.com.

We will not discriminate against you in any way if you choose to exercise your rights under this section and applicable law.

Communication Preferences

- **Email.** You can stop receiving promotional emails at any time by clicking on the “unsubscribe” link at the bottom of any promotional email you receive from us. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.
- **Direct Mailing.** You can stop receiving promotional postal mail by sending an email to talktous@newseasonsmarket.com with "DO NOT MAIL" in the subject line along with your name, address and zip code. Alternatively, you can submit a request to stop receiving promotional postal mail via our [Privacy Request Portal](#). Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
- **Mobile Push Notifications/Alert.** With your consent, we may send push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device or by following the instructions in those communications. For more information, please see our [Mobile Text Terms of Use](#).

Accessibility

Consumers with disabilities may access this Privacy Policy and other notices in an alternative format by contacting us at talktous@newseasonsmarket.com.

Changes

We may change this Privacy Policy from time to time. Any and all changes to this Privacy Policy will be reflected on this page, and where appropriate provided in person or by another electronic method. Material changes to this Privacy Policy will be posted here, and may be provided via e-mail or another method, as appropriate under applicable law. The last updated date will be stated at the top of this Privacy Policy. You should regularly check this page for any changes to this Privacy Policy.

Contact Us

If you have any questions about this Privacy Policy, please contact us at **talktous@newseasonsmarket.com**.