



Walmart Commerce Technologies Shoptalk Europe Privacy Policy

Updated May 22, 2024

What Does Our Privacy Policy Include?

Our Policy includes how and why Walmart collects, uses, protects, and shares your personal information on our [Shoptalk Europe landing page](#) (“Website”), the personal information that you submit through the form on the Website, and the personal information that you share with us when you agree to have your badge scanned at our Shoptalk Europe booth. Our Policy focuses on personal information – information that identifies you or can be reasonably linked to information that identifies you. This Policy also outlines the rights that you have and the choices that you can make about the processing of your personal information.

For the purposes of this Policy, Walmart will be the controller of your personal information.

What is Our Pledge of Accountability?

We require our associates, business partners, and service providers who manage your personal information in accordance with our policies.

What Type of Information Do We Collect?

When you visit the Website, we collect device and online identifiers such as your IP address. If you choose to provide Walmart with personal information by submitting a form on the Website or by agreeing to have your badge scanned at our booth, that personal information may include:

- Name
- Job Title
- Business Email
- Organization Name
- Country/Region of Organization

Additional personal information that may be collected if you have your badge scanned at our booth includes the type of ticket that you have for Shoptalk Europe.

How Do We Use Your Personal Information?

We use the personal information that we collect from you to comply with legal obligations or for business interests. The business interests include reporting, identifying and reporting fraud, protecting the security of our network and information, and analytics efforts. Under European law, these purposes are described as “legitimate interests.” We may also transfer or share your personal information within our corporate family of companies for these purposes, as permitted by law.

With your consent, we use the personal information that we collect from you when you submit the form on the Website or agree to have your badge scanned at our booth to send you marketing emails from Walmart Commerce Technologies. You have the right to withdraw your consent at any time by contacting us as indicated below.

If you decide at any time that you no longer wish to receive marketing and promotional materials from us, please follow the unsubscribe instructions provided in any of the communications you receive from us. You may also contact us at privacy@wal-mart.com to make your request to unsubscribe from further marketing emails.

What If You Do Not Provide Personal Information?

We may need to collect personal information as provided by law or to send you marketing emails regarding our products. However, if you choose not to provide your personal information, we may not be able to provide you with information about our products through these emails.

How Do We Share Your Personal Information with Others?

We will not sell or rent your personal information. We may share your personal information in limited circumstances, such as to conduct our business, when legally required, or with your consent.

We will not share your personal information outside of our corporate family of companies, except in the following circumstances:

- *Legal Requirements and Protection of Our Company and Others* – We may share your personal information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of our customers, our associates, or other persons. Examples include:
 - Identifying and addressing fraud or financial risk;
 - Providing personal information to law enforcement at their written request;
 - Responding to a search warrant or other valid legal inquiry; and
 - Responding to an investigative body in the case of a breach of an agreement or violation of law.
- *Business Transfers* – In the event that all or a part of our business is merged, sold, or reorganized (including transfers made as a part of insolvency or bankruptcy proceedings), personal information about you could be shared with the successor business. We will use reasonable

measures to help ensure that any successor treats your information in accordance with this Policy.

- *With Your Consent* – In any circumstance other than those described above, we will ask for your affirmative consent before we share your personal information outside of our corporate family of companies. If we rely on your consent to process your personal information, we will inform you of the relevant purpose at the time of collecting your personal information to the extent required to do so by applicable laws. Where we rely on consent, you have the right to withdraw consent at any time by contacting us as indicated below.

How Do We Use Cookies and Other Technologies?

When you visit or interact with the Website, we may obtain certain information by automated means, such as cookies. A “cookie” is a small text file placed on your computer (or other device) to identify your computer and web browser.

For this Website, we will only use cookies that are necessary for the Website to function and that cannot be switched off. The cookies are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms.

How Do We Secure Your Personal Information?

We recognize the importance of maintaining the security of your personal information. We use reasonable security measures, including physical, administrative, and technical safeguards to protect your personal information. These measures may include security access controls or other physical security safeguards, information security technologies and policies, procedures to help ensure the appropriate disposal of information, and training programs.

How Long Do We Retain Your Personal Information?

We may keep the personal information we collect from you for as long as necessary to carry out the business purposes set forth in this Privacy Policy, such as supporting our business functions and operations, enabling us to communicate with you, marketing, and/or to satisfy our legal or contractual obligations. Where required, we will dispose of the information we collect when we no longer need it for the uses described in this Privacy Policy, in accordance with Walmart retention policies and procedures.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, statutory limitation periods, and any applicable legal requirements.

In some circumstances, we may anonymize your personal information so that it can no longer be used to identify you, in which case it is no longer personal data.

Transfers of Personal Information outside of Europe, Switzerland, and the UK

By using the Website or providing us with your information, you are directly transferring your information to us in the United States. In addition, we may transfer the information that we collect through the Website to other countries where we do business or where data recipients identified in the “When We Share and Disclose Personal Information” section above are located. These countries may not have the same data protection laws as the country in which you reside. When we transfer personal information we collect about you to other countries, we will protect that information as described in this Privacy Policy or as otherwise required by law, even though a given country may not have the same privacy and data protection laws as the country in which you reside.

If you are located in the European Economic Area, Switzerland, or the UK, we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of personal information to recipients in countries that are not deemed to provide an adequate level of data protection. These safeguards may include entering into the EU or UK-approved Standard Contractual Clauses with data recipients, as applicable. You may request a copy of these safeguards by contacting us as described below.

How Do We Protect the Privacy of Children Online?

This Website is intended for a general audience and is not directed to children.

We recognize the importance of protecting children's online privacy. To protect the privacy of children, our websites and mobile services do not knowingly collect personal information from children under the age of 13 unless we have prior parental consent or as permitted by law. Please contact us at privacy@wal-mart.com if you believe we may have collected information from your child through our websites or mobile services, and we will work to delete it.

Who Can I Contact About the Privacy Policy?

If you have any questions about this Policy or about how we handle your personal data rights, you can reach us at privacy@wal-mart.com or at the address below.

Data Privacy Officer
Corporate Privacy
Privacy Office, MS #0160
702 SW 8th Street
Bentonville, AR 72716-0160

What Are Your European Privacy Rights?

If you are located in the European Economic Area or the UK, you may have the right to:

- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no further need to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object 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, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to you, or another party, in a structured, commonly used and machine readable format.
- **Withdraw consent** for the processing of your personal data in instances where we rely upon it as a legal basis to do so.

If you wish to exercise any of your rights, please contact us at privacy@wal-mart.com or at the address below:

Data Privacy Officer
Corporate Privacy
Privacy Office, MS #0160
702 SW 8th Street
Bentonville, AR 72716-0160

If you believe we have processed your personal information in violation of applicable law and have failed to remedy such violation to your reasonable satisfaction, you may lodge a complaint with the data protection authority in your European jurisdiction.

How Will I Know if This Policy Changes?

Please check our Privacy Policy periodically for changes. We will provide additional notice of significant updates. We will post the date our Policy was last updated at the top of the Privacy Policy.