

# METRO ONLINE PRIVACY POLICY

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## Scope and Definitions

**Metro** the “**Company**” or “**we**”) has developed this privacy policy out of respect for the privacy of our customers, visitors to our brands’ websites. This policy describes the personal information we collect, use, and disclose about individual consumers who visit or interact with this website, **METRO.COM** visit any of our, facilities or locations, purchase or inquire about any of our products or services, contract with us to provide services or otherwise interact or do business with us.

Whenever you visit this site <https://metro.com/> , we will collect some information from you automatically simply by you visiting and navigating through the site, and some voluntarily when you submit information using a form on the website, [utilize the Live Chat feature on our website], enroll in or subscribe to our newsletter or marketing communications, request information about our products or services, or use any of the other interactive portions of our website. Through this website, we will collect information that can identify you and/or your activity.

Additionally, whenever you communicate, interact or do business with us, whether online or at any of our physical locations or facilities, or whether you are contracted to perform services for us we will be collecting personal information from you or about you in the course of our interaction or dealings with you.

The meaning of “Personal Information” may be defined based on your state or province of residence: in this policy, it means any information that can reasonably be used to identify an individual.

-----**START**-----

This Privacy Policy applies to individuals located in the United States and Canada. In the United States, it applies to Consumers under applicable state privacy laws. In Canada, it applies to individuals whose personal information in the course of their commercial activities. For purposes of this Policy, all such individuals are collectively referred to as “Consumers”.

-----**END**-----

This policy does **not** apply to information collected from or about job applicants regarding their application for employment or candidacy. If you are a job applicant, click [HERE](#) for our Job Applicant Notice and Privacy Policy.

This policy does **not** apply to our current and former employees and their family members, dependents, and beneficiaries; if you are a California resident who is a current or former employee of the Company or a family member, dependent, or beneficiary of any of our current or former employees, you may request access to our Employee Privacy Policy by sending an email to [Tony.McGinley@metro.com](mailto:Tony.McGinley@metro.com).

-----**START**-----

## Accountability

**Metro** is responsible for the Personal Information it collects and uses, including information shared with service providers who help us operate our business. We take protecting Personal Information seriously and have measures in place to keep it secure, including safeguards, clear processes for handling privacy questions or concerns, and employee training on privacy responsibilities. **Metro** is the data controller responsible for your personal data. **Metro** has designated a privacy officer to oversee and ensure compliance of this Policy and applicable legislation. The privacy officer is responsible for implementing safeguards, responding to privacy related inquiries and complaints, maintaining access records, ensuring third party compliance, and supporting personnel on privacy-related matters. Day-to-day handling of personal information may be delegated to authorized personnel under the direction of the Privacy Officer. For any queries or concerns regarding your personal data, you can contact:

## Privacy Officer

The Company has appointed a Privacy Officer to oversee our privacy practices and help address privacy-related questions or requests. If you have any questions or concerns about how we handle Personal Information, you may contact our Privacy Officer using the information below.

### Privacy Officer

**Tony McGinley**

651 North Washington Street, Wilkes-Barre, PA 18705

[Tony.McGinley@metro.com](mailto:Tony.McGinley@metro.com)

## **Consent and Notice**

### **Visitors and Website Users**

**Metro** collects, uses, and discloses Personal Information of visitors and website users with their knowledge and consent, as required by applicable law. Personal Information may be collected when you visit our websites, communicate with us, attend events, or otherwise interact with us online or offline.

Consent may be express or implied, depending on the sensitivity of the information and the purpose for which it is collected. Implied consent may be relied upon where the purpose is obvious or reasonably expected, such as responding to inquiries or providing requested information. Express consent will be obtained where required by law, including for sensitive information or for purposes not reasonably expected

### **Customers and Business Clients**

In the context of commercial relationships, **Metro** collects, uses, and discloses Personal Information relating to representatives, contacts, or authorized users of its business customers and clients as reasonably necessary to establish, manage, and administer contractual and business relationships, in accordance with applicable privacy laws.

Where permitted by law, this collection, use, and disclosure is based on the existence of a business or contractual relationship, including for purposes such as account administration, communications, service delivery, invoicing, compliance, and contract management. Consent is obtained where required by law, including where the Personal Information is sensitive or where the intended use falls outside reasonable business expectations.

### **Independent Contractors**

In accordance with applicable law, **Metro** may collect, use, or disclose Personal Information relating to independent contractors without consent where the information is reasonably required to establish, manage, or terminate an employment or engagement relationship, or to evaluate suitability for such a relationship. Where notice is required, this section serves as that notice.

Where Personal Information is used for purposes outside core recruitment, engagement, or management activities, such as the use of photographs or likenesses for marketing or promotional purposes, **Metro** will obtain consent where required by law.

### **Québec-Specific Notice**

For individuals located in Québec, **Metro** collects, uses, and discloses Personal Information only for specific, explicit, and legitimate purposes. These purposes are communicated in clear and simple language at or before the time the Personal Information is collected, and the information is used only for identified purposes or as otherwise permitted by law.

Where consent is required under Québec law, it is obtained expressly and separately where appropriate and may be withdrawn in accordance with applicable legal requirements.

### **Withdrawal of Consent**

Where consent is required, individuals may withdraw their consent at any time, subject to legal or contractual restrictions and reasonable notice. Withdrawal of consent may affect **Metro**'s ability to provide services, continue a business relationship, process an application, or maintain an engagement, as applicable. Requests to withdraw consent may be made by contacting us at [Tony.McGinley@metro.com](mailto:Tony.McGinley@metro.com).

Email: [Tony.McGinley@metro.com](mailto:Tony.McGinley@metro.com)

Company **Metro**

Address 651 North Washington Street, Wilkes-Barre, PA 18705

Phone: +15707063166

## **Accountability**

**Metro** is responsible for personal information under its possession and control, including information that has been transferred to a third party for processing Metro has implemented policies and practices to uphold the accountability principles under applicable law, including:

Establishing procedures to safeguard personal information;

Maintaining internal processes for receiving and responding to inquiries and complaints related to this policy; and

Training **Metro** personnel on **Metro** privacy practices and responsibilities.

## **Consent**

**END**

## **Consent to Terms and Conditions**

By using this website, you consent to all terms and conditions expressed in this Privacy Policy. You also consent to the collection and processing of your Sensitive Personal Information.

## **Consent to Share Personal Information When Using Live Chat Function**

By using the Live Chat feature, you consent to our collection and analysis of all personal information provided. The Live Chat feature does not use any chatbot or artificial intelligence technology. Rather, each chat takes place with a live representative of the Company. We utilize a vendor called Microsoft Copilot ("Chat Vendor") to process, analyze, and store the contents of the chat on our behalf. "may disclose information you provide to marketing partners and/or their affiliated entities, distributors, agents, and contractors The Chat Vendor may also use the information analyzed or processed from the chat for targeted advertising purposes."] For more information on how the Chat Vendor may use or disclose your personal information, please review their privacy policy **HERE**. By using these forms and features, you direct the Company to disclose to and share with the Chat Vendor any personal information you provide. You cannot use the Live Chat feature without consenting to these terms and to the disclosure of your personal information to the Chat. If you do not consent to such disclosure, please do **NOT** use the Live Chat feature.

## **Collection of Personal Information and Sensitive Personal Information**

Based on your specific transactions and interactions with us or our website, we will or may collect, and we have in the last 12 months collected, the following categories of personal information about you. For each category of

information, the categories of third parties and service providers to whom we have disclosed the information in the last 12 months are referenced below. In [jurisdictions](#) required by law, we limit our collection of personal information to what is reasonably necessary and proportionate to provide or maintain the services you have requested or reasonably expect in the context of your relationship with us. The examples provided for each category are not intended to be an exhaustive list or an indication of all specific pieces of information we collect from or about you in each category, but rather the examples are to provide you a meaningful understanding of the types of information that may be collected within each category.

Category	Personal Identifiers
<p><b>Examples</b></p>	<p>Name, alias, social security number or social Insurance Number, date of birth, driver’s license, state identification card number, or identification card number, passport number, Company ID number., account login/usernames or debit or credit card numbers in combination with login credentials that would enable access (such as security code, security questions and answers, and passwords) , exact geolocation</p> <p><b>[START - Canada-Specific]</b> Name, alias, date of birth, driver’s license number or provincial/territorial identification card number, Company ID number, or Social Insurance Number, account login/usernames or debit or credit card numbers <u>in combination with</u> login credentials that would enable access (such as security code, security questions and answers, and passwords)exact geolocation</p> <p><b>[END - Canada-Specific]</b></p>
<p><b>Disclosed To in Last 12 Months</b></p>	<ul style="list-style-type: none"> <li>• Financial institutions</li> <li>• Government agencies</li> <li>• Promotional or other fulfilment vendors</li> <li>• Marketing support vendors and vendors that support managing or hosting the website and the Chat function on the website</li> <li>• Communication providers/vendors [if distinct from marketing support vendors] that facilitate, manage, and send/receive communications on our behalf via email, text/SMS, phone, Lead providers (referral sources)</li> <li>• Transaction support vendors (e.g., check guaranty, payment processors)</li> <li>• Data analytics vendors</li> <li>• Social media platforms</li> <li>• Consumer reporting agencies or credit reporting agencies</li> <li>• Video content hosts and providers</li> <li>• Consulting and investigation firms, including HR consultants, safety consultants, and workplace investigators</li> <li>• Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</li> <li>• Insurance carriers, administrators, and brokers</li> <li>• Corporate customers (meaning an entity, as opposed to a natural person, that purchases, leases, or finances any of our products or services)</li> <li>• Our affiliated entities, including parent entities, subsidiaries, and affiliated entities</li> <li>• Original equipment manufacturers (OEM) (suppliers and makers of the products we sell or lease to our customers)</li> </ul>
<p><b>We May Collect, Process, and Disclose for the</b></p>	<ul style="list-style-type: none"> <li>• To fulfill or meet the purpose for which you provided the information.</li> <li>• Marketing and sales activities.</li> <li>• To process, complete, and maintain records on transactions.</li> </ul>

<p><b>Following Business Purposes</b></p>	<ul style="list-style-type: none"> <li>• To schedule, manage and keep track of customer appointments.</li> <li>• To respond to consumer inquiries, including requests for information, customer support online, and phone calls.</li> <li>• To provide interest-based advertising.</li> <li>• To contact you by email, telephone calls, mail, SMS, or other equivalent forms of communication regarding updates or informative communications.</li> <li>• To improve user experience on our website.</li> <li>• To understand the demographics of our website visitors.</li> <li>• To detect security incidents.</li> <li>• To protect against malicious or illegal activity and prosecute those responsible.</li> <li>• To verify and respond to consumer requests.</li> <li>• To prevent identity theft.</li> <li>• To monitor security controls for electronic networks.</li> <li>• To process customer payments.</li> <li>• To perform background checks.</li> <li>• To allow access to the internet at our properties, stores, or facilities.</li> </ul>
<p><b>Sold To / Shared With</b></p>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>

<p><b>Category</b></p>	<p><b>Contact Information</b></p>
<p><b>Examples</b></p>	<p>Home, postal or mailing address, email address, home phone number, cell phone number.  <span style="color: red;">[START - Canada-Specific]</span>                      Home, postal or mailing address, email address, home phone number, mobile telephone number.  <span style="color: red;">[END - Canada-Specific]</span></p>
<p><b>Disclosed To in Last 12 Months</b></p>	<ul style="list-style-type: none"> <li>• Financial institutions</li> <li>• Government agencies</li> <li>• Promotional or other fulfilment vendors</li> <li>• Marketing support vendors and vendors that support managing or hosting the website and the Chat function on the website</li> <li>• Communication providers/vendors that facilitate, manage, and send/receive communications on our behalf via email, text/SMS, or phone</li> <li>• Lead providers (referral sources)</li> <li>• Transaction support vendors (e.g., check guaranty, payment processors)</li> <li>• Data analytics vendors</li> <li>• Social media platforms</li> <li>• Consumer reporting agencies or credit reporting agencies</li> <li>• Video content hosts or providers</li> <li>• Consulting and investigation firms, including HR consultants, safety consultants, and workplace investigators</li> <li>• Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</li> <li>• Insurance carriers, administrators, and brokers</li> </ul>

	<ul style="list-style-type: none"> <li>• Corporate customers (meaning an entity, as opposed to a natural person, that purchases, leases, or finances any of our products or services)</li> <li>• Our affiliated entities, including parent entities, subsidiaries, and affiliated entities</li> <li>• Original equipment manufacturers (OEM) (suppliers and makers of the products we sell or lease to our customers)</li> </ul>
<p><b>We May Collect, Process, and Disclose for the Following Business Purposes</b></p>	<ul style="list-style-type: none"> <li>• To fulfill or meet the purpose for which you provided the information.</li> <li>• Marketing and sales activities.</li> <li>• To process, complete, and maintain records on transactions.</li> <li>• To schedule, manage and keep track of customer appointments.</li> <li>• To respond to consumer inquiries, including requests for information, customer support online, and phone calls.</li> <li>• To provide interest-based advertising.</li> <li>• To contact you by email, telephone calls, mail, SMS, or other equivalent forms of communication regarding updates or informative communications.</li> <li>• To understand the demographics of our website visitors.</li> <li>• To detect security incidents.</li> <li>• To protect against malicious or illegal activity and prosecute those responsible.</li> <li>• To verify and respond to consumer requests.</li> <li>• To prevent identity theft.</li> <li>• To monitor security controls for electronic networks.</li> <li>• To process customer payments.</li> <li>• To perform background checks.</li> <li>• To allow access to the internet at our properties, stores, or facilities.</li> </ul>
<p><b>Sold To / Shared With</b></p>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>

<p><b>Category</b></p>	<p><b>Account Information</b></p>
<p><b>Examples</b></p>	<p>Username and password for Company accounts and systems and any required security or access code, password, security questions, or credentials allowing access to your Company accounts.</p>
<p><b>Disclosed To in Last 12 Months</b></p>	<p>Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</p>
<p><b>We May Collect, Process, and Disclose for the</b></p>	<ul style="list-style-type: none"> <li>• To grant access to Company accounts and systems</li> <li>• To ensure security of Company data accessed through Company account and systems</li> </ul>

<b>Following Business Purposes</b>	
<b>Sold To / Shared With</b>	Not sold for monetary or other valuable consideration. Not shared for cross-context behavioral advertising.

<b>Category</b>	<b>Protected Classifications</b>
<b>Examples</b>	Race, ethnicity, national origin, sex, gender, sexual orientation, gender identity, religious or philosophical beliefs, age, disability, medical or mental condition, military status, familial status, union membership.
<b>Disclosed To in Last 12 Months</b>	<ul style="list-style-type: none"> <li>• Financial institutions</li> <li>• Government agencies</li> <li>• Corporate customers (meaning an entity, as opposed to a natural person, that purchases, leases, or finances any of our products or services)</li> </ul>
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• To report applicant demographics to government agencies</li> <li>• Marketing activities</li> <li>• For marketing and sales activity, relating to product specials or other promotional events</li> <li>• For customer service related activities</li> </ul>
<b>Sold To / Shared With</b>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising. Not sold for monetary or other valuable consideration. Not shared for cross-context behavioral advertising.</p>

<b>Category</b>	<b>Biometric Data</b>
<b>Examples</b>	Fingerprints, retina scans, facial recognition, handprint.
<b>Disclosed To in Last 12 Months</b>	Not disclosed other than to the vendor we engaged to process this data.
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	Identity verification
<b>Sold To / Shared With</b>	

	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>
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<b>Category</b>	<b>Commercial or Transactional Data</b>
<b>Examples</b>	Information regarding products or services provided, purchasing history.
<b>Disclosed To in Last 12 Months</b>	<ul style="list-style-type: none"> <li>• Financial Institutions</li> <li>• Promotional or other fulfillment vendors</li> <li>• Marketing support vendors and vendors that support managing or hosting the website and the Chat function on the website</li> <li>• Communication providers/vendors that facilitate, manage, and send/receive communications on our behalf via email, text/SMS, or phone.</li> <li>• Lead providers (referral sources)</li> <li>• Transaction support vendors (e.g., check guaranty, payment processors)</li> <li>• Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</li> <li>• Insurance carriers, administrators, and brokers</li> <li>• Corporate customers (meaning an entity, as opposed to a natural person, that purchases, leases, or finances any of our products or services)</li> <li>• Our affiliated entities, including parent entities, subsidiaries, and affiliated entities</li> <li>• Original equipment manufacturers (OEM) (suppliers and makers of the products we sell or lease to our customers)</li> </ul>
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• To fulfill or meet the purpose for which you provided the information.</li> <li>• Marketing and sales activities</li> <li>• To process, complete, and maintain records on transactions.</li> <li>• To respond to consumer inquiries, including requests for information, customer support online, and phone calls</li> <li>• To provide interest-based advertising.</li> <li>• To verify and respond to consumer requests.</li> <li>• To process customer payments.</li> </ul>
<b>Sold To / Shared With</b>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this</p>

	<p>website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>
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<b>Category</b>	<b>Credit/Financing Application Data</b>
<b>Examples</b>	Information collected through credit or financing applications, including employment history, company name, role, salary, dates of employment, bank accounts, income sources.
<b>Disclosed To in Last 12 Months</b>	<ul style="list-style-type: none"> <li>• Financial Institutions</li> <li>• Government agencies</li> <li>• Consumer reporting agencies or credit reporting agencies</li> <li>• Corporate customers (meaning an entity, as opposed to a natural person, that purchases, leases, or finances any of our products or services)</li> </ul>
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• Facilitating the purchase of a product or obtaining financing for a product we sell.</li> </ul>
<b>Sold To / Shared With</b>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>

<b>Category</b>	<b>Internet Network and Computer Activity, Mobile Device Data</b>
<b>Examples</b>	Date and time of your visit to this website; webpages visited; links clicked on the website; session identifiers; browser ID; browser type and characteristics; device ID and characteristics or attributes; referring URLs; mobile phone make, model and serial number; mobile service provider; operating system; form information downloaded; domain name from which our site was accessed; search history; interaction-level

	telemetry; cookies; and internet or other electronic network activity information related to usage of Company networks, servers, intranet, or shared drives, as well as Company-owned computers and electronic devices, including system and file access logs, security clearance level, browsing history, search history, and usage history.
<b>Disclosed To in Last 12 Months</b>	<ul style="list-style-type: none"> <li>• Marketing tracking and retargeting vendors and vendors that support managing or hosting the website and the Chat function on the website</li> <li>• Transaction support vendors (e.g., check guaranty, payment processors)</li> <li>• Data analytics vendors</li> <li>• Behavior analytics vendors</li> <li>• Video content hosts and platforms (e.g., Vimeo, YouTube)</li> <li>• Social media platforms (e.g., Facebook, LinkedIn)</li> <li>• Ad Trackers (e.g., Google Ads)</li> <li>• Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</li> </ul>
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• To fulfill or meet the purpose for which you provided the information.</li> <li>• To engage in marketing and sales activities</li> <li>• To process, complete, and maintain records on transactions.</li> <li>• To schedule, manage and keep track of customer appointments.</li> <li>• To respond to consumer inquiries, including requests for information, customer support online, and phone calls</li> <li>• To provide interest-based advertising.</li> <li>• To process for targeted advertising.</li> <li>• To improve user experience on our website.</li> <li>• To understand the demographics of our website visitors.</li> <li>• To detect security incidents.</li> <li>• To protect against malicious or illegal activity and prosecute those responsible.</li> <li>• To monitor security controls for electronic networks.</li> <li>• To allow access to the internet at our properties, stores, or facilities.</li> </ul>
<b>Sold To / Shared With</b>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>

<b>Category</b>	<b>Form and other Electronic Submission Data</b>
<b>Examples</b>	Data submitted through the website, including Contact Us forms, and search bar queries.
<b>Disclosed To in Last 12 Months</b>	<ul style="list-style-type: none"> <li>• Government agencies</li> <li>• Promotional or other fulfillment vendors</li> <li>• Marketing, tracking, and retargeting vendors and vendors that support managing or hosting the website and the Chat function on the website</li> </ul>

	<ul style="list-style-type: none"> <li>• Communication providers/vendors that facilitate, manage, and send/receive communications on our behalf via email, or text/SMS, phone</li> <li>• Lead providers (referral sources)</li> <li>• Transaction support vendors (e.g., check guaranty, payment processors)</li> <li>• Behavior analytics vendors</li> <li>• Video content hosts and platforms (e.g., Vimeo, YouTube)</li> <li>• Social media platforms (e.g., Facebook, LinkedIn)</li> <li>• Ad Trackers (e.g., Google Ads)</li> <li>• Consulting and investigation firms, including HR consultants, safety consultants, and workplace investigators</li> <li>• Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</li> </ul>
<p><b>We May Collect, Process, and Disclose for the Following Business Purposes</b></p>	<ul style="list-style-type: none"> <li>• To fulfill or meet the purpose for which you provided the information.</li> <li>• To engage in marketing and sales activities.</li> <li>• To process, complete, and maintain records on transactions.</li> <li>• To schedule, manage and keep track of customer appointments.</li> <li>• To respond to consumer inquiries, including requests for information, customer support online, and phone calls.</li> <li>• To provide interest-based advertising.</li> <li>• To process for targeted advertising.</li> <li>• To improve user experience on our website.</li> <li>• To understand the demographics of our website visitors.</li> <li>• To detect security incidents.</li> <li>• To protect against malicious or illegal activity and prosecute those responsible.</li> <li>• To monitor security controls for electronic networks.</li> <li>• To allow access to the internet at our properties or facilities.</li> </ul>
<p><b>Sold To or Shared With</b></p>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>

<b>Category</b>	<b>Geolocation Data</b>
<b>Examples</b>	IP address and/or GPS location (latitude & longitude) .
<b>Disclosed To in Last 12 Months</b>	<ul style="list-style-type: none"> <li>• Behavior analytics vendors</li> <li>• Video content hosts and platforms (e.g., Vimeo, YouTube)</li> <li>• Social media platforms (e.g., Facebook, LinkedIn)</li> <li>• Ad Trackers (e.g., Google Ads)</li> </ul>

	<ul style="list-style-type: none"> <li>• Marketing, tracking, and retargeting vendors and vendors that support managing or hosting the website and the Chat function on the website</li> <li>• Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</li> </ul>
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• To fulfill or meet the purpose for which you provided the information.</li> <li>• To engage in marketing and sales activities</li> <li>• To provide interest-based advertising.</li> <li>• To process for targeted advertising.</li> <li>• To understand the demographics of our website visitors.</li> <li>• To detect security incidents.</li> <li>• To protect against malicious or illegal activity and prosecute those responsible.</li> <li>• To monitor security controls for electronic networks.</li> </ul>
<b>Sold To / Shared With</b>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>

<b>Category</b>	<b>Video Content Analytics Information</b>
<b>Examples</b>	Video content hosts and platforms (e.g., YouTube, Vimeo) that may collect or receive user interaction data when videos are played, paused, or viewed on our Site.
<b>Disclosed To in Last 12 Months</b>	Third-party platforms that host or stream videos.
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• To embed and display video content hosted on third-party platforms.</li> <li>• To enable user interaction with hosted video content.</li> <li>• To provide interest-based advertising.</li> <li>• To process for targeted advertising.</li> <li>• To improve user experience on our Site.</li> <li>• To understand the demographics of our Site visitors.</li> </ul>
<b>Sold To / Shared With</b>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for</p>

	other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.
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<b>Category</b>	<b>Online Portal and/or Mobile App Access and Usage Information</b>
<b>Examples</b>	Username and password, account history, usage history, file access logs, security clearance level, and any information submitted through the account.
<b>Disclosed To in Last 12 Months</b>	Not Disclosed.
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• To grant access to Company accounts and systems.</li> <li>• To ensure security of Company data accessed through Company account and systems.</li> <li>• To improve user experience on our website.</li> </ul>
<b>Sold To / Shared With</b>	Not sold for monetary or other valuable consideration. Not shared for cross-context behavioral advertising.

<b>Category</b>	<b>Visual, Audio, or Video Recordings</b>
<b>Examples</b>	Your image when recorded or captured in surveillance camera footage or pictures of you taken on our premises or at our events or that you share with us; audio recordings of calls and virtual meetings as disclosed to you at the time of the call.
<b>Disclosed To in Last 12 Months</b>	<ul style="list-style-type: none"> <li>• Consulting and investigation firms, including human resources consultants, safety consultants, and workplace investigators</li> <li>• Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants</li> <li>• AI call recording vendors whom we engage to record, transcribe, summarize, and process calls or meetings</li> </ul>
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	<ul style="list-style-type: none"> <li>• To fulfill or meet the purpose for which you provided the information.</li> <li>• To detect security incidents.</li> <li>• To protect against malicious or illegal activity and prosecute those responsible.</li> <li>• We engage an AI vendor to record, transcribe, summarize, and process calls or meetings and integrate the data into our database, and the vendor may use the recording and transcripts for purposes consistent with the services they provide and, if they anonymize the data, they can then use it to train their AI model.</li> </ul>
<b>Sold To / Shared With</b>	Not sold for monetary or other valuable consideration. Not shared for cross-context behavioral advertising.

<b>Category</b>	<b>Facility &amp; Systems Access Information</b>
<b>Examples</b>	Information identifying you, if you accessed our secure Company facilities, systems, networks, computers, and equipment, and at what times, using keys, badges, fobs, login credentials, or other security access method.
<b>Disclosed To in Last 12 Months</b>	Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants
<b>We May Collect, Process, and Disclose for the</b>	<ul style="list-style-type: none"> <li>• To grant access to facilities and systems.</li> <li>• To detect security incidents.</li> <li>• To protect against malicious or illegal activity and prosecute those responsible.</li> </ul>

<b>Following Business Purposes</b>	
<b>Sold To / Shared With</b>	Not sold for monetary or other valuable consideration. Not shared for cross-context behavioral advertising.

<b>Category</b>	<b>Inferences</b>
<b>Examples</b>	Based on analysis of your activity on the website, we may develop inferences regarding your interests and preferences for our products and services including your potential to purchase a specific product or service.
<b>Disclosed To in Last 12 Months</b>	Not Disclosed.
<b>We May Collect, Process, and Disclose for the Following Business Purposes</b>	Advertising Improving User Experience Analytics
<b>Sold To / Shared With</b>	<p>For data collected through our website, we sell some of this data to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), and we also share the data with Data Analytics Vendors for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p> <p>For data collected through our website in the last 12 months, this has been sold or shared in the last 12 months to Data Analytics Vendors (not for monetary consideration but for other valuable consideration), but we no longer sell or share any of this data moving forward. We do not and will not share this data with third parties for cross-context behavioral advertising. For all other data in this category collected through other sources (not through this website [or app]), this data is neither sold for monetary or other valuable consideration, nor shared for cross-context behavioral advertising.</p>

## Categories of Sensitive Personal Information Collected or Processed

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information, the Company may collect from or about consumers:

1. Personal Identifiers (social security number, driver’s license or state identification card number, passport number)
2. Account Information (your Company account log-in, in combination with any required security or access code, password, or credentials allowing access to the account)
3. Protected Classifications (racial or ethnic origin, religious or philosophical beliefs, union membership, or sexual orientation)
4. Biometric or Genetic Information (used for the purpose of uniquely identifying you)
5. Geolocation Data (IP address and/or GPS location, latitude & longitude)
6. Medical and Health Information
7. Contents of Personal Communications (contents of mail, email, and text messages where the Company is not the intended recipient)

8. Personal data revealing race, racial or ethnic origin, religious beliefs, sex, sexual orientation, gender, age, military status, familial status, disability, or medical, mental, or physical health condition or diagnosis.
9. Personal data collected from a known child

Personal information does not include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer, independent contractor, or applicant, or from widely distributed media.
- Information made available by a person to whom the consumer, independent contractor, or applicant has disclosed the information if the consumer, independent contractor, or applicant has not restricted the information to a specific audience.
- Deidentified or aggregated information.

## Sources of Personal Information

**Metro** collects Personal Information in accordance with applicable law. The Company will collect Personal Information directly from you; however, we may also collect Personal Information from outside sources with your consent. We may collect Personal Information without consent if the law authorizes such collection, including when the collection from third person is necessary to ensure the accuracy of the information if the person is authorized to communicate such information.

We may collect your personal information from the following sources:

- You the consumer, when you visit the website and voluntarily submit information through forms on the website or social media, when you visit any of our physical locations, when you purchase or inquire about any of our products or services, when you utilize the Chat feature on the website.
- Our employees, contractors, vendors, suppliers, guests, visitors, and other consumers, and customers based on your interactions with them (if any)
- Our affiliates, affiliated brands, including parent entities, subsidiaries, and affiliated entities
- We utilize cookies to automatically collect information about our website visitors
- Surveillance cameras at our physical locations
- Lead generators and referral sources
- Credit and consumer reporting agencies
- Social media platforms
- Company systems, networks, software applications, and databases you log into or use
- Third-party customer databases
- Our affiliated entities, including parent entities, subsidiaries, and affiliated entities
- To Whom We Disclose Personal Information

**Metro** discloses your Personal Information only as described in this Privacy Policy, with your consent, or as otherwise permitted or required by law. The Company may disclose your Personal Information to the following categories of service providers, contractors, or third parties (collectively, “third parties”):

We may disclose, sell, or share your personal information to/with the following categories of service providers, contractors, or third parties:

- Financial institutions
- Government agencies
- Promotional or other fulfillment vendors

- Marketing, tracking, and retargeting vendors and vendors that support managing or hosting the website and the Chat function on the website
- Communication providers/vendors that facilitate, manage, and send/receive communications on our behalf via email, text/SMS, phone, or that record, transcribe, summarize, or process phone calls and meetings
- Lead providers (referral sources)
- Transaction support vendors (e.g., check guaranty, payment processors)
- Behavior analytics vendors
- Video content hosts and platforms (e.g., Vimeo, YouTube)
- Social media platforms (e.g., Facebook, LinkedIn)
- Ad trackers (e.g., Google Ads)
- Consumer reporting agencies or credit reporting agencies
- Consulting and investigation firms, including HR consultants, safety consultants, and workplace investigators
- Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants
- Insurance carriers, administrators, and brokers
- Corporate customers (meaning an entity, as opposed to a natural person, that purchases, leases, or finances any of our products or services)
- Original equipment manufacturers (OEM) (suppliers and makers of the products we sell or lease to our customers)
- Our affiliates, including parent entities, subsidiaries, and affiliated entities

-----**START**-----

## **Legal Basis for Processing**

We process your personal data based on the following legal grounds:

1. Performance of contract. Processing is necessary for the performance of your contract with **Metro**
2. Legal obligation. Processing is necessary for compliance with a legal obligation to which **Metro.** is subject.
3. Legitimate interests. Processing is necessary for the legitimate interests of **Metro.** such as ensuring workplace safety and operational efficiency.

-----**END**-----

## **Reasons Why We Collect, Use, Retain, and Disclose Personal Information**

-----**START**-----

**Metro** is committed to collecting only the Personal Information that is necessary to establish, manage, and maintain the employment relationship, and meet our legal, regulatory, and operational obligations. We may collect, use, and disclose your Personal Information for the purposes outlined below, and may share this information with third party service providers who help us with carrying out these activities:

END

We may collect, use, and disclose your personal information for any of the following purposes:

1. To fulfill or meet the purpose for which you provided the information, or a purpose reasonably associated with the context in which you provided the information and consistent with reasonable consumer expectations.
2. To provide you or our customers with the requested products or services.
3. To process, complete, and maintain records on transactions.
4. To provide warranty coverage on products and services.
5. To retain your selection for Text opt in/opt out to ensure customers who opted out are not sent any text messages.
6. To provide and communicate recall notifications to customers.
7. To schedule, manage and keep track of customer appointments.
8. To complete appraisals.
9. To maintain records of when customers decline a service or sale.
10. To respond to consumer inquiries, including requests for information, customer support online, Chat on the website, phone calls, and in-store inquiries.
11. To provide interest-based and targeted advertising.
12. To comply with our contractual obligations to our marketing partners and vendors.
13. To engage in corporate transactions, including mergers, acquisitions, and joint ventures, as well as due diligence in proposed or pending corporate transactions.
14. To contact you by email, telephone calls, mail, SMS, or other equivalent forms of communication regarding updates or informative communications related to the functionalities, services, or other information you requested or asked the Company to provide to you.
15. To embed and display video content hosted on third-party platforms.
16. To enable user interaction with hosted video content.
17. To improve user experience on our website and client portals.
18. To understand the demographics of our website visitors.
19. To detect security incidents.
20. To debug, identify, and repair errors that impair existing intended functionality of our website.
21. To protect against malicious or illegal activity and prosecute those responsible.
22. To verify and respond to consumer requests.
23. To prevent identity theft.
24. To understand the demographics of our website visitors.
25. **Business-to-Business Purposes:**
  - a. To fulfill or meet the purpose for which you provided the information.
  - b. To comply with state and federal law and regulations requiring businesses to maintain certain records (accident or safety records, and tax records/1099 forms).
  - c. To engage the services of vendors, service providers and consultants and compensate them for services.
  - d. To grant you access to secure Company facilities, systems, networks, computers, and equipment, and maintain information on who accessed such facilities, systems, networks, computers, and equipment, and what they did therein or thereon.

- e. To engage in lawful monitoring of your activities and communications when you are on Company premises, or utilizing Company internet and WiFi connections, computers, networks, devices, software applications or systems.
- f. To implement, monitor, and manage electronic security measures on devices that are used to access Company networks and systems.
- g. To engage in corporate transactions requiring review of the relationships and contracts between the Company and the entity you represent or work for, such as for evaluating potential mergers and acquisitions of the Company.
- h. To maintain commercial insurance policies and coverages.
- i. To provide services to corporate customers/entity customers who may request certain pieces of information about a Company vendor or consultant (such as name and phone number) to permit the individual access or security clearance to their facility in advance of the Company independent contractor being dispatched to provide services at the facility of the corporate/entity customer or client.
- j. To refer business representatives to the proper Securitas affiliated entity based on the products and/or services sought.
- k. To evaluate, assess, and manage the Company's business relationship with vendors and service providers that provide services to the Company.
- l. To improve user experience on Company computers, networks, devices, software applications or systems, and to debug, identify, and repair errors that impair existing intended functionality of our systems.
- m. To detect security incidents involving potentially unauthorized access to and/or disclosure of Personal Information or other confidential information, including proprietary or trade secret information and third-party information that the Company receives under conditions of confidentiality or subject to privacy rights.

## **Do We Sell Your Information?**

**We do NOT and will not sell or share your personal information in exchange for monetary consideration.** However, we may sell or share some of your information to third parties for other valuable consideration, as noted in the table above.

**We may sell or share your personal information for the following business or commercial purposes:**

1. For marketing activities, including targeting and retargeting our ads and our affiliates' ads based on your activity on our websites.
2. To improve user experience.
3. To understand the demographics of our website users and receive reports on website traffic.

Other than these exceptions, we do not and will not disclose your personal information to any third party in exchange for monetary or other valuable consideration or share your personal information for cross-context behavioral advertising.

## **Notice of Right to Opt-Out of the Selling and Sharing of Your Information**

Depending on the state where you reside, you may have the right to tell us NOT to sell or share your personal information. You have the full and free right to opt-out of our disclosure of your personal information to any third parties where the disclosure constitutes “selling” or “sharing” as defines by specific state laws. You may exercise your right to opt-out without fear of discrimination for doing so. To opt-out of our selling and sharing of your information, meaning we will not disclose your information to third parties for any monetary or other valuable consideration, you can do any of the following: Click **HERE** to be taken to an online opt-out submission form. Visit our website at [Opt-Out Preference Form](https://metro.com/opt-out-preference-form/) <https://metro.com/opt-out-preference-form/>. Click on “**Do Not Sell or Share My Personal Information**” to be taken to an online submission form.

- You can use a Global Privacy Controls (GPC) signal. Metro will process opt-out preferences from GPC signals, which are in formats commonly used and recognized by businesses, such as an HTTP field header, as requests to opt-out of sale or sharing. The GPC signal opt-out will only apply to the browser you are using on your device; it will not apply to other browsers and/or devices to which GPCs are not activated or to offline sales.
- If you are unable to submit an opt-out through any of the above methods, please call our toll-free privacy line at for assistance and a representative will assist in meeting your needs.

You can have an authorized agent submit a request on your behalf. To submit an opt-out through use of an authorized agent, you must provide that agent with written permission signed by you to submit an opt-out on your behalf, except when using an opt-out preference signal. The authorized agent may call our toll-free privacy line at +15707063166 to make the opt-out request and for directions for submitting the proof of authorization and the authorized agent’s proof of identification to the Company. We maintain the right to deny any request from an authorized agent that does not submit sufficient proof that they have been authorized by you to act on your behalf.

A request to opt-out need not be a verifiable consumer request. However, we may deny a request to opt-out if we have a good faith, reasonable, and documented belief that a request to opt-out is fraudulent. If we deny your request to opt-out, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

### **Opt-Out Preference Signals**

Opt-out preference signals provide consumers with a simple and easy-to-use method by which to exercise the right to opt-out of the selling and sharing of their information. Global Privacy Controls (GPC) or Universal Opt-Out Mechanism (UOOM) are user-enabled opt-out preference signals which can communicate a user’s “Do Not Sell or Share” request on behalf of the person or device. We will process opt-out preferences from GPC and UOOM signals which are in formats commonly used and recognized by businesses, such as an HTTP field header. We will treat a consumer’s use of GPCs or UOOMs as a valid request to opt-out of the selling and sharing of information for that browser. We currently do not connect browser use to particular consumers and, as such, you will need to use GPCs or UOOMs on all browsers in which you access our website and use our opt-out form to opt-out of offline sales.

Do Not Track (DNT) is a privacy preference that users can set if they do not want web services to collect information about their online activity. We do not respond to DNT signals or other mechanisms (with the exception of GPCs and UOOMs) that provide a choice regarding the collection of personal information about activities over time and across different websites or online services. We encourage users who have DNTs to use GPCs or UOOMs.

We have adjusted our practices **and do NOT currently and will not** sell your personal information in exchange for monetary or other valuable consideration. Likewise, we currently do NOT and will not share your personal information for cross-context behavioral advertising.

In the past, we may have sold or shared your personal information for the following business purposes:

1. To provide interest-based and retargeted advertising.
2. To receive data analytics.

Other than these exceptions, we do not and will not disclose your personal information to any third party in exchange for monetary or other valuable consideration or share your personal information for cross-context behavioral advertising.

## **Notice of Rights of California Residents to Limit the Use of Your Sensitive Personal Information**

We use or disclose your sensitive personal information for purposes that give rise to a right (which is only available to California residents) to limit the use and disclosure of your sensitive personal information under the California Consumer Privacy Act (CCPA).

As provided by the CCPA, **you have the right to limit our use or disclosure of your sensitive personal information** to uses that are necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those services or goods. You have the full and free right to limit our use or disclosure of your sensitive personal information as defined by the CCPA. You may exercise your right to limit without fear of discrimination for doing so. A request to limit need not be a verifiable request. However, we may deny a request to limit if we have a good faith, reasonable, and documented belief that a request to limit is fraudulent. If we deny your request to limit, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

To limit the use or disclosure of your sensitive personal information, please see the instructions below for Submitting a Consumer Request.

## **Notice of Right to Opt-Out of Profiling, Automated Decision Making, and Targeted Advertising**

Depending on your state of residence, you may have the right to opt out of targeted advertising and selling of your data. You may submit a request to exercise this right by submitting a request through one of the two options provided in the “Submitting a Consumer Request” section below.

We may create a profile regarding your interests and preferences for our products and services including your potential to purchase a product or service. For independent contractors, we may create a profile regarding predispositions, behavior, attitudes, intelligence, abilities, and aptitudes for recruiting and hiring assessments and decisions. Depending on your state of residence, you may have the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects.

## U.S. Consumer Privacy Rights

Under the applicable U.S. Privacy Laws, depending on state of residence, Consumers may have the following rights, which can be exercised directly or, in certain cases, through an authorized agent:

<b>Right to Know</b>	You may, depending on your state of residence, have the right to request, (1) the categories of personal information we have collected about you, (2) the categories of sources from which the personal information was collected, (3) the business or commercial purpose for collecting, selling, or sharing this information, (4) the categories of third parties with whom we share or have shared your personal information, (5) as applicable, the categories of personal information that we have sold or shared about you and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each category of third parties to whom the personal information was sold or shared, (6) the categories of personal information that we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose, (7) a list of the specific third parties to whom we sell personal data, and (8) the reasons behind any profiling decisions made about you, the data used in making those decisions, and the actions you can take to secure a different decision in the future.
<b>Right to Access</b>	You may, depending on your state of residence, have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
<b>Right to Portability</b>	You may, depending on your state of residence, have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
<b>Right to Confirm</b>	You may, depending on your state of residence, have the right to confirm if we are processing your Personal Information and to access your Personal Information, as just stated above.
<b>Right to Delete</b>	You may, depending on your state of residence, have the right to request that we delete personal information that we collected from you, subject to certain exceptions.
<b>Right to Correct</b>	You may, depending on your state of residence, have the right to request we correct inaccurate personal information (to the extent such an inaccuracy exists) that we maintain about you.
<b>Right to Opt-Out</b>	You may, depending on your state of residence, have the right to opt-out of certain uses or disclosures of your personal information, including opting out of the selling of your personal information or the sharing of such information for cross-context behavioral advertising purposes. To learn more about this right and how to exercise it, please refer to the detailed discussion in the section above.
<b>Right to Limit Sensitive Personal Information Processing</b>	You may, depending on your state of residence, have the right to direct businesses to limit their use and disclosure of Sensitive Personal Information if we use or disclose it beyond certain internal business purposes. Where applicable, we will treat such a request as a revocation of any consent that you may have provided to your processing of Sensitive Personal Information.
<b>Right to Non-Discrimination</b>	You have the right to not be discriminated or retaliated against for exercising any of the above rights.

<b>Right to Appeal</b>	You may, depending on your state of residence, have the right to appeal our refusal to take action on a request.
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## Submitting a Consumer Request

You can submit any of the above types of consumer requests through either of the options below:

1. Submit an online request on our website by clicking [HERE](#)
2. Call our privacy toll-free line at +15707063166

### How We Will Verify That It Is Really You Submitting The Request:

When you submit a Right to Know, Right to Access, Right to Delete, or Right to Correct request through one of the methods provided above, we will need to confirm your state of residence to determine which rights apply and then we will need to verify your identity.

We will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular records in our possession, which depends on the nature of your relationship and interaction with us. This process may require us to request additional personal information from you, including, but not limited to, your first name, last name, email address, phone number, state/province of residence, and/or country. During verification, we will only request the minimum personal information necessary to correctly identify you for the purpose of fulfilling your request.

In certain circumstances, we may decline a request to exercise the rights described above, particularly where these rights are not available in your state, or when we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with your request.

### Designated Authorized Agent:

You may, depending on your state of residence, have the right to designate an authorized agent to submit one of the above requests on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized power of attorney or (b) provide other written, signed authorization that we can then verify. We maintain the right to deny any request from an authorized agent that does not submit sufficient proof that they have been authorized by you to act on your behalf.

### California Shine The Light:

The California Civil Code permits California Residents with whom we have an established business relationship to request that we provide you with a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the preceding calendar year. To make such a request, please send an email [tony.mcginley@metro.com](mailto:tony.mcginley@metro.com) Please mention that you are making a “California Shine the Light” inquiry.

### Nevada Residents:

If you are a resident of the State of Nevada, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. To make such a request, please send an email to [tony.mcginley@metro.com](mailto:tony.mcginley@metro.com) Please mention that you are making a request pursuant to Nevada law.

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## Canadian Privacy Rights and Choices

This subsection sets out jurisdiction-specific information that applies to independent contractors located in Canada, reflecting both federal and provincial privacy frameworks such as the Personal Information Protection and Electronic Documents Act (PIPEDA), Alberta Personal Information Privacy Act (AB PIPA), British Columbia Personal Information Privacy Act (BC PIPA), and Quebec’s Law 25 (Bill 64 Act).

Depending on your province of residence, you have the following rights regarding their personal information:

<b>Right to Access</b>	You may have the right to access the personal information the Company holds about you. To the extent possible, the information will be provided in a portable and commonly used format so that it can be transferred to another entity.
<b>Right to be Informed.</b>	You may have the right to request information about the Company’s collection information, including how it will be used and with whom it may be shared
<b>Right to Correct (Rectification)</b>	You may have the right to request that incomplete or inaccurate Personal Information be corrected. The Company will make reasonable efforts to ensure that Personal Information is accurate, complete and up to date as necessary for the purposes for which it is used. Personal information used on an ongoing basis is assumed to be accurate unless a request for correction is received. You are responsible for notifying the company of any significant changes to their Personal Information.
<b>Right to Rectification</b>	You may have the right to correct your personal information.
<b>Right to Portability</b>	You may have the right to request your Personal Information in a structured, commonly used technology format and may request its transfer to another organization.
<b>Right to Erasure (Right to be Forgotten)</b>	You may have the right to request- deletion of their Personal Information when it is no longer needed or when the organization has handled it unlawfully.
<b>Right to Object to Automated-Decision-Making</b>	<p>You may have the right to request information about the technology used and the factors that led to the decision.</p> <p>The Company does not rely solely on automated decision to make engagement decisions; if that changes, individuals will be notified.</p>

### Submitting a Request

You may make exercise your rights by writing to our Privacy Officer. You must provide sufficient information in your request to allow us to identify the information you are seeking. You can contact our privacy officer through any of the options below:

1. Submit an online request on our website at [metro.com/canadian-privacy-rights-and-choices/](https://metro.com/canadian-privacy-rights-and-choices/)

2. Call us at: +15707063166
3. Send us an e-mail: [tony.mcginley@metro.com](mailto:tony.mcginley@metro.com)

We will respond to your request within 45 calendar days unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

## **Submitting a Request**

You may exercise your rights by contacting our Privacy Officer:

### **Privacy Officer**

#### **Metro**

651 N Washington St, Wilkes-Barre, PA 18705

[Tony.McGinley@metro.com](mailto:Tony.McGinley@metro.com)

+15707063166

You must provide sufficient information in your request to allow us to identify the information you are seeking. We will respond to your request within 30 calendar days unless an extension is granted. We may charge a reasonable fee to provide information, but not to request correction to your Personal Information. We will advise you of any fees that may apply before beginning to process your request.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions apply to access, we may withhold that information and provide you with the remainder of the record.

## **Submitting a Complaint**

If you are not satisfied with the response you receive from Metro, or wish to make a complaint about how your Personal Information has been handled, you may also contact the relevant privacy commissioner:

### **1. Residents of Alberta**

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 - 6 Avenue, SW

Calgary, Alberta T2P 3W2

Direct Phone: 403-297-2728

Toll Free Number: 1-888-878-4044

Email: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca)

Visit [www.oipc.ab.ca](http://www.oipc.ab.ca) to find the correct forms and learn more about the review process.

### **2. Residents of British Columbia**

Office of the Information and Privacy Commissioner of British Columbia

PO Box 9038, Stn. Prov. Govt.

Victoria, BC V8W 9A4  
Telephone: 250-387-5629  
Toll-free Number: 1-800-663-7867  
Email: [info@oipc.bc.ca](mailto:info@oipc.bc.ca)

Visit <http://www.oipc.bc.ca> to find the correct forms and learn more about the review process.

### **3. Residents of Quebec**

Québec Access to Information Commission / Commission d'accès à l'information du Québec

#### **Quebec City**

525 René-Lévesque Boulevard East,  
Suite 2.36  
Quebec City, Quebec G1R 5S9  
Telephone: 418-528-7741  
Fax: 418-529-3102  
Toll-free Number: 1-888-528-7741

#### **Montreal**

2045 Stanley Street,  
Suite 900  
Montreal, Quebec H3A 2V4  
Telephone: 514-873-4196  
Fax: 514-844-6170  
Toll-free number: 1-888-528-7741

Visit <https://www.cai.gouv.qc.ca/> to find the correct forms and learn more about the review process.

### **4. Residents in Other Provinces**

Office of the Privacy Commissioner of Canada  
30 Victoria Street  
Gatineau, Québec  
K1A 1H3  
Telephone: 819-994-5444  
Toll-free Number: 1-800-282-1376

Visit <https://www.priv.gc.ca/en/> to find the correct forms and learn more about the review process. **Challenging Compliance**

Depending on your province of residence, you may challenge **Metro's** compliance with this policy. Challenges must be submitted in writing to the Privacy Officer with sufficient detail to allow for appropriate investigation and response. The Company will respond to such requests within 30 days of receipt or as otherwise required by law.

#### **Residents of Alberta**

If you are not satisfied with the response you receive, you may contact the Information and Privacy Commissioner of Alberta to request a review or a file a complaint.

Office of the Information and Privacy Commissioner of Alberta  
Suite 2460, 801 - 6 Avenue, SW  
Calgary, Alberta T2P 3W2  
Direct Phone: 403-297-2728 ; Toll Free: 1-888-878-4044  
Email: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca)

Visit [www.oipc.ab.ca](http://www.oipc.ab.ca) to find the correct forms and learn more about the review process.

#### **Residents of British Columbia**

If you are not satisfied with the response you receive, you may contact the Information and Privacy Commissioner of British Columbia to request a review or a file a complaint

Office of the Information and Privacy Commissioner of British Columbia  
PO Box 9038, Stn. Prov. Govt.  
Victoria, BC V8W 9A4  
Telephone: 250-387-5629 or 1-800-663-7867  
Email: [info@oipc.bc.ca](mailto:info@oipc.bc.ca)

Visit <http://www.oipc.bc.ca> to find the correct forms and learn more about the review process.

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## **Retention of Personal Information**

We will retain each category of personal information in accordance with our established data retention policy and practice. In deciding how long to retain each category of personal information that we collect, we consider many criteria, including but not limited to the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; applicable statute of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

## **Co-Branded Services**

From time to time, we may enter an arrangement with another company that is not owned by or affiliated with us to provide additional features on the Website. These arrangements may include business partners, sponsors, and co-branded online services (referred to here as “co-branded services”). Any information, including personal information, that you provide on one of these co-branded services may be shared with these partners. By participating in activities or providing your information on these co-branded services, you consent to our providing your information to those partners. Separate privacy policies may apply to these partners’ uses of your personal information.

## **Third Party Vendors**

We may use other companies and individuals to perform certain functions on our behalf. Examples include administering e-mail services and running special promotions. Such parties only have access to the personal information needed to perform these functions and may not use or store the information for any other purpose.

## **Business Transfers**

In the event we sell or transfer a particular portion of its business assets, information of consumers, contractors and applicants may be one of the business assets transferred as part of the transaction. If substantially all of our assets are acquired, information of consumers, contractors and applicants may be transferred as part of the acquisition.

## **SMS Terms of Service**

By subscribing to our SMS program, you agree to receive recurring texts from the Company for purposes that include two-factor authentication, customer service, account notifications, and security alerts. You provide your phone number to us voluntarily and solely so we can send you these communications. Your phone number is shared only with our SMS service provider Slicktext and not with third parties or affiliates for marketing purposes.

You can opt-out any time by replying **STOP** or get assistance by replying **HELP** or contacting us directly by phone +15707060000 or email [allyson.sebolka@metro.com](mailto:allyson.sebolka@metro.com)

Message frequency may vary. Message and data rates may apply. Consent is not a condition of service.

## **Consent to Use of AI Technology**

Certain Company services and website features may be supported by third party vendors that utilize AI technology. When utilizing the chatbot, our AI vendor(s) Microsoft may record and transcribe information and may access the information in real-time and use the information for their own purposes, including to train their AI model. By using the chatbot, you consent to the collection and analysis of any personal information provided. If you do not consent to such use and disclosure, please do NOT use the chatbot. For more information on how Microsoft may use or disclose personal information, please review their privacy policy [HERE](#).

## **Compliance with Law and Safety**

We may disclose specific personal and/or Sensitive Personal Information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect our employees or the public.


## **Use of Cookies, Pixels, and Other Tracking Technologies**

Our website may store or retrieve information on your browser, mostly in the form of cookies. A cookie is a small piece of data (text file) that a website – when visited by a user – places on the user’s device to remember information about the user, such as the user’s language preference or login information.

This type of cookie is set by us and is referred to as a “first-party cookies.” Our website uses first-party cookies primarily to make the website work as you expect it to. For example, we use the information we collect through first-party cookies to allow you to navigate between pages efficiently, analyze how well our website is performing, and understand the content that you spent the most time reviewing. In some cases, we use first-party cookies to store information that we use for targeted advertising.

We also incorporate cookies and similar technologies, such as pixels, tags, and web beacons, from outside our website’s domain (“third-party cookies”). Third-party cookies gather information to enable our vendors to provide a range of services to us, including targeted advertising and measuring the success of our advertising campaigns.

Below is a detailed list of the categories of first- and third-party cookies we use on our website. You can prevent

the collection of data by non-essential performance, functional, and marketing cookies by clicking on  in our website footer and toggling off the related functionality.

### **How we use cookies**

We make use of cookies under the following circumstances and for the following reasons:

- Provide you with services available through the website and to enable you to use some of its features
- Authenticate users and prevent fraudulent use of user accounts
- Identify if users have accepted the use of cookies on the website
- Compile data about website traffic and how users use the website to offer a better website experience
- Understand and save visitor preferences for future visits, such as remembering your login details or language preference, to provide you with a more personal experience, or to avoid you having to re-enter your preferences every time you use the website
- Track your browsing habits to enable us to show advertising which is more likely to be of interest to you, including advertising by third parties on our website

### **Essential Cookies**

Essential cookies are necessary for the website to function and cannot be switched off in our systems. They 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. You can set your browser to block or alert you about these cookies, but blocking these cookies will prevent the website from working correctly or might prevent the Website from working at all.

### **Non-Essential Cookies**

Non-Essential cookies are not essential to the website functionality but serve some other unique purpose in three subcategories:

1. **“Performance” cookies** (sometimes referred to as static cookies) collect information about the user’s behavior on the website without collecting personal information, for example:
  - Pages the user visits.
  - Ads the user views.
  - Ads or site features that the user clicks.
2. **“Functional” cookies** (sometimes called preference cookies) track and remember the user’s preferences and past choices on the website to provide a personalized user experience. For example, functional cookies can collect:
  - Usernames
  - Passwords
  - Regions
3. **“Targeting” cookies** (sometimes called preference cookies) can track:
  - Content the user views
  - Links the user follows
  - The user’s browser and device information and IP address

Please note: Organizations can use targeting cookies to track and influence users by building user profiles or displaying advertisements.

## **Information on Some of the Cookies in Use on our Site**

For information on some of the cookies we use on our site and apps, please review the policies from our some of our vendors:

- [Google Analytics](#)
- [Meta/Facebook](#)

## **Cookie Management**

You can control and manage cookies associated with your browser. If you are interested in controlling and managing cookies from your browser including any set by our Website, please refer to <http://www.allaboutcookies.org/manage-cookies/index.html> for information on different ways to configure your browser's cookie settings.

If you want to clear all cookies left behind by the websites you have visited, here are links where you can download three third party programs that clean out tracking cookies.

- [http://www.lavasoftusa.com/products/ad-aware\\_se\\_personal.php](http://www.lavasoftusa.com/products/ad-aware_se_personal.php)
- <http://www.spybot.info/en/download/index.html>
- <http://www.webroot.com/consumer/products/spysweeper/>

You may delete cookies from your web browser at any time or block cookies on your equipment, but this may affect the functioning of or even block the website. You can prevent saving of cookies (disable and delete them) by changing your browser settings accordingly at any time. It is possible that some functions will not be available on our website when use of cookies is deactivated. Check the settings of your browser. Below you can find some guidance:

- [Safari](#)
- [Opera](#)
- [Internet Explorer](#)
- [Google Chrome](#)
- [Mozilla](#)

Do Not Track (DNT) is a privacy preference that users can set if they do not want web services to collect information about their online activity. We do not respond to DNT signals. [ADD IF APPLICABLE → (with the exception of Global Privacy Controls as explained above in the section of this policy on “Opt-Out Preference Signals”).

You can adjust your advertising preferences on mobile devices through your device settings. Below you can find some guidance based on your type of mobile device:

- [Apple](#)
- [Android](#)

## **DAA**

Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) which maintains a self-regulatory program along with a website where people can opt out of interest-based advertising from its members. To opt-out of website interest-based advertising provided by the DAA's participating companies, visit the DAA's opt-out portal available at <http://optout.aboutads.info/>.

- 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 found here: <https://youradchoices.com/appchoices>.

### **Non-Participant Opt-Out Options**

- Some of our vendors do not participate in the DAA self-regulatory program for online behavioral advertising or have developed their own processes for allowing consumers to opt-out: <https://branch.app.link/optout>
- Some devices and apps do not have access to web-based browser cookie opt-outs. To learn more about the advertising opt-outs provided by your mobile device's operating system (like iOS and Android) or the device manufacture, click [here](#).

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## **Challenging Compliance**

Depending on your province of residence, you may challenge **Metro**'s compliance with this Policy. Challenges must be submitted in writing to the Privacy Officer with sufficient detail to allow for appropriate investigation and response. **Metro** will respond to such requests within 30 days of receipt or as otherwise required by law.

## **Breach Notification**

In the event of unauthorized access to Personal Information, **Metro** will notify the appropriate regulatory authorities and affected individuals if the breach poses a risk of significant harm, as determined by the Privacy Officer. Notification may be delayed if required to avoid interfering with an investigation conducted by law enforcement or another authorized agency.

**Metro** will maintain a record of all security incidents involving Personal Information and will implement reasonable measures to mitigate risk and prevent similar incidents from occurring in the future. A copy of the breach record may be provided to regulatory authorities upon request.

## **Safeguards**

**Metro** protects Personal Information in our possession and control by using security safeguards appropriate to the sensitivity of the information. These safeguards are designed to protect against loss, theft, and unauthorized access, disclosure, copying, use, or modification. The Company applies these protections regardless of the format in which the information is stored. The nature and extent of the safeguards vary depending on the sensitivity, volume, and storage method of the information. A higher level of protection is applied to more sensitive categories of information.

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## **External Links**

Our website contains links to other sites. We are not responsible for the privacy practices or the content of such websites. To help ensure the protection of your privacy, we recommend that you review the Privacy Policy of any site you visit via a link from our website.

## **Passwords**

The personal data record created through your registration with our website can only be accessed with the unique password associated with that record. To protect the integrity of the information contained in this record, you should not disclose or otherwise reveal your password to third parties.

## **Children Under the Age of 16**

We do not knowingly sell or share the personal information of consumers under 16 years of age.

## **How We Protect the Information that We Collect**

The protection of the information that we collect about visitors to this website is of the utmost importance to us and we take every reasonable measure to ensure that protection, including:

- We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- We restrict access to private information to those who need such access in the course of their duties for us.
- We keep automatically collected data and voluntarily collected data separate at all times.
- We use internal encryption on all data stores that house voluntarily captured data.

## **International Visitors**

If you reside in the European Economic Area, European Union, Great Britain, or Switzerland, submitted personally identifiable information to the Company, and want to request a copy of, correct, delete, or limit the ways the Company uses the information, send an email to [Tony.McGinley@metro.com](mailto:Tony.McGinley@metro.com) indicating your request. The Company will use reasonable and appropriate measures to honor your request.]

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## **International Transfers**

Some or all of the Personal Information collected by **Metro** may be stored or processed in jurisdictions outside of Canada, including the United States. As a result, this information may be subject to access requests from foreign governments, courts, or law enforcement agencies in accordance with the laws of those jurisdictions.

-----**END**-----

## **Consent to Terms and Conditions**

By using this website, you consent to all terms and conditions expressed in this Privacy Policy.

## **Changes to Our Privacy Policy**

As our services evolve and we perceive the need or desirability of using information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check our website frequently to see the current Privacy Policy in effect and any changes that may have been made to them. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on this website. Please check back here periodically or contact us at the address listed at the end of this Privacy Policy.

## **Consumers With Disabilities**

This policy is in a form that is accessible to consumers with disabilities.

## **Questions About the Policy**

This website is owned and operated by Welbilt. If you have any questions about this Privacy Policy, please contact us at [tony.mcginley@metro.com](mailto:tony.mcginley@metro.com) or call +15707063166.

***\*\*This policy was last updated March 27 2026***