

Privacy Policy

Last updated and effective as of November 4, 2025.

Thank you for visiting our website and/or the Golden Pantry Loyalty Rewards Program (the "Program"). Golden Pantry Food Stores, Inc. ("Golden Pantry") and its affiliates, which we will refer to as "**Golden Pantry**," "**we**," "**us**," or "**our**," owns and/or operates the websites and related pages, sites and applications, including the Golden Pantry Loyalty Rewards App ("App") and Golden Pantry Loyalty Rewards Program (the "Program") and loyalty programs associated with Golden Pantry products and services, which we may change or update from time to time (collectively, the "**Websites**"). Protecting the privacy and security of your personal data is important to us. This Privacy Notice (this "**Notice**") describes the information we collect about you, how and why we use the information and the choices you have to restrict our usage of this information.

This Notice addresses the privacy and data protection rights of individuals under the laws of several jurisdictions, including the following: California: Title 1.81.5. – California Consumer Privacy Act of 2018; and Nevada: Nevada Statute Chapter 603A – Security And Privacy of Personal Information; and Georgia.

The term "**personal data**", when used in this Notice means any information relating to an identified or identifiable natural person, including a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

CHANGES TO THIS PRIVACY NOTICE

We may change this Notice at any time. Such changes, modifications, additions or deletions will be effective immediately upon posting the revised Notice on this page. The date of the last

revision of this Notice is set forth above at the top of this page and should be checked by you periodically. Your continued use of the Websites after such changes will constitute your acknowledgment of the updated Notice.

HOW TO CONTACT US

Please get in touch with us if you have any questions about this Notice, the practices of the Websites, or your dealings with the Websites, or would like to exercise certain rights associated with your personal data. You may contact us by mail at the following address:

Golden Pantry Food Stores, Inc.

Attn: Golden Pantry Privacy Compliance

1725 Electric Avenue, Unit 260

Watkinsville, GA 30677

You may also contact us by email at rewards@goldenpantry.com with "Privacy" in the subject line or at our toll-free number 1-800-533-3816.

THE TYPES OF PERSONAL DATA WE COLLECT

We receive, collect, and store information, including personal data, you submit on the Websites or provide to us in any other way, including information you provide us when conducting a transaction on the Websites or information you provide passively as a result of the settings on your computer, mobile device, software, mobile or on-line application, or web browsing software. Information collected may also include the following:

1. Your name, e-mail address, mailing address, telephone number, date of birth, driver's license information, social security number or a portion thereof, and any other

information that you input, upload or provide to the Websites including but not limited to metadata. Such information collected may include but is not limited to inquiries and submissions made by you, about you, inquiries about our products and services, financial information, payment information, personal preferences, and how we may assist or offer our products and services to you, your company, or your employer;

2. Identifiers, such as name, alias, online identifier, email address, IP address, and account name;
3. Information that identifies, relates to, describes, or is capable of being associated with a particular individual or business, such as the name of your company or employer and its address, e-mail address, and telephone number;
4. Internet or other electronic network activity, such as browsing history, search history, and information regarding a consumer's interaction with an online site or application;
5. Information gathered from your access and use of the Websites including but not limited to a website's Uniform Resource Locator (URL) that you visited prior to visiting the Websites or that you just came from, which URL you visit upon leaving the Websites, the type of browser you are using, your language, dates and times of access, and your Internet Protocol (IP) address; and
6. Information drawn from any of the above to create a consumer profile that includes characteristics, psychological trends, predispositions, behaviors, or similar information.

HOW WE USE YOUR INFORMATION

We process and use your information, including personal data, for the following reasons:

1. To provide and operate our services, including those offered at the Websites, including to enter into an agreement with you and for the performance of an agreement with you, such as for operational purposes, an order for purchase of our products and facilitating payment for products;

2. To provide and operate customer, loyalty, and rewards programs ("Golden Pantry Loyalty Rewards Program a/k/a the 'Program'");
3. Where permitted in our legitimate interest, provided these interests are not overridden by your interests or fundamental rights and freedoms, and provided you have not exercised your right to object, we may use your personal data for marketing analysis and to provide you with marketing and advertising content in printed or electronic form, or with promotional update communications about our products and/or services;
4. To ensure that age-restricted products such as beer, wine, alcoholic beverages, and tobacco are marketed and/or sold only to patrons who are of the legal age to consume such products.
5. To be able to contact visitors and users of our Websites and our customers such as, for example, with general or personalized service-related notices or promotional messages;
6. We process your personal data for our own business interests, including technical assistance and customer support, provided these are not overridden by your interests or fundamental rights and freedoms, and provided you have not exercised your right to object;
7. To create aggregated statistical data and other aggregated and/or inferred non-personal data, which we or our Business Associates, as described below, may use to provide and improve our respective services;
8. To disclose or share with our Business Associates to assist us with our advertising, marketing or providing our services to you, and which may include, for example, to enable them to provide marketing and advertising services, age verification, payment processing, to operate or provide our Rewards Program, or to assist us with providing our services to you;
9. To ensure that content from our Websites is presented in an effective manner for you and for your computer, tablet, smart phone, or device, and that we can provide you with information and services that you request from us in an efficient way;

10. To help provide and personalize the services you request and expect from us, to conduct direct marketing and sales promotions, and to better enhance your experience at our Websites or in using any of our services;
11. To administer our Websites and business for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, and to keep our Websites safe and secure; and
12. To comply with any applicable laws and regulations.

To use certain parts of our Websites, you may need to provide personal data, for example, in order to contact us or participate in our Rewards Program. Failure to provide your personal data may mean that you cannot fully use our Websites effectively.

HOW YOUR INFORMATION IS SHARED WITH THIRD PARTIES

In some instances, we may share certain of your information, including personal data, with others. We may work with and provide some of our services through contractual arrangements with affiliates, services providers, business partners and other third parties (collectively, "**Business Associates**"). Our Business Associates include our affiliates and companies that provide services in connection with ours, sub-contractors, payment processors, order fulfillment, marketing and advertising, shipment and delivery of our products, hosting companies and providers, advertising networks, analytics providers, and search information providers. We and our Business Associates use your information to operate the Websites and to deliver and provide services, including our Rewards Program, age verification, and payment processing. We will encourage our Business Associates to adopt and post privacy notices. However, the use of your information by Business Associates is governed by the privacy notices of those Business Associates and applicable laws and is not subject to our control.

From time to time, Business Associates and other third parties may sell our products. While we do not make any promises or warranties regarding the privacy notices of any third parties or Business Associates, which are out of our control, we safeguard any personal data we receive from them in accordance with this Notice.

The information we share with these Business Associates may include names, addresses, phone numbers, e-mail addresses, driver's license information, social security numbers or portions thereof, contact information, payment information, and information about orders and products purchased from us. For example, we may provide Business Associates performing payment processing with payment information; Business Associates performing or assisting in identity confirmation for purchases of age-restricted products with your name and address and other information needed for verification; Business Associates performing or assisting with our Rewards Program with your name and address and other information; Business Associates performing order fulfillment with your name, address, order and delivery information; and we may provide Business Associates performing marketing and advertising services with such information so they may provide and deliver marketing and advertising materials and content, whether in electronic or printed form. We may also share with Business Associates information about sales, traffic patterns, and related information collected from the Websites for use in marketing, advertising, analytics and to enhance the Websites and our services.

We will disclose your personal data to third parties:

1. In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer, but subject to the terms of this Notice.
2. In the event of a sale of our company or a sale of all or substantially all of our assets, the personal data we hold may be sold and transferred in connection with that sale.
3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, subpoena or court order, or in order to enforce or apply our terms or other agreements with you, or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime and any other unlawful activities.

USE OF TECHNICAL INFORMATION

Your IP address is a unique number used to identify your specific computer on a public network. We collect IP addresses for the purpose of system administration, to analyze consumer behavior and trends, and to audit the use and functionality of our Websites. We may utilize IP addresses to identify visitors to the Websites when we feel it is necessary to enforce compliance with our Websites' terms of use, or to protect our service, site, consumers, or others.

Technical information may include the IP address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, platform, or other similar information.

Information about your visit may include the full URL, clickstream to, through, and from our Websites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.

This technical information may constitute personal data as defined in this Notice. In these circumstances, this technical information is subject to the provisions of this Notice.

USE OF COOKIES AND PIXEL TAGS

When you use our Websites we collect information using a variety of methods, such as cookies and pixel tags. We will store cookies on your computer in order to facilitate and customize your use of our Websites. A "cookie" is a small data text file, which a website stores on your computer's hard drive (if your Web browser permits) that can be retrieved later. Our cookies and pixel tags may store information that includes, without limitation, randomly assigned user identification numbers, the country where you are located, and your first name. The cookies make your use of the Websites easier,

make the Websites run more smoothly, and help us improve the security of the Websites. You are always free to decline our cookies if your browser permits, but some parts of our Websites may not work properly as a result.

We use the following types of cookies:

- **STRICTLY NECESSARY COOKIES.** These are cookies that are required for the operation of our Websites and to provide our services to you and our customers. They include, for example, cookies that enable you to log into secure areas of our Websites.
- **ANALYTICAL/PERFORMANCE COOKIES.** These cookies allow us to recognize and count the number of visitors to the Websites and to see how visitors navigate and use our Websites. This helps us for our legitimate interests of improving the way our Websites work, for example, by ensuring that users are finding what they are looking for easily.
- **FUNCTIONALITY COOKIES.** These cookies are used to recognize you when you return to our Websites. For example, this enables us to personalize our content, greet you by name and remember your preferences (for example, your choice of language or region), and items you may have previously browsed, searched or reviewed, or placed in a shopping cart (if applicable).
- **TARGETING/ADVERTISING COOKIES.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We may use this information subject to your choices and preferences to make our Websites and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

This information collected by these cookies may constitute personal data as defined in this Notice. In these circumstances, this information is subject to the provisions of this Notice.

RETENTION

We retain personal data for no longer than is necessary for the purposes described above and for statutory limitation periods that require retention for a certain amount of time or to allow us to identify any issues and resolve any disputes. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

LINKS TO WEBSITES AND SERVICES

Except as otherwise discussed in this Notice, this document only addresses the use and disclosure of information we collect from you. Other sites accessible through our Websites have their own privacy notice and data collection, use and disclosure practices. Please consult each site's privacy notice. We are not responsible for the policies or practices of third parties. You should contact these third parties directly if you have any questions about their use of the information that they collect.

INHERENT ONLINE RISKS

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we use reasonable efforts to protect your information, you understand and acknowledge that: (a) there are security and privacy risks and limitations of the Internet which are beyond our control; (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through our Websites cannot be guaranteed.

EMAIL LIST AND UNSUBSCRIBING

We offer those who sign up for our email list the opportunity to receive emails about our business, products and other information and solicitations we believe might be of interest to you, which may include advance notice of sales, new merchandise, and special promotions. Email addresses collected on the Websites are used internally. If you would like to unsubscribe from our email list, please contact us, and we will remove your name from our email

list. Members can opt-out of receiving Program marketing and Golden Pantry brand marketing e-mails by going to the user's profile page on the App or website. Please understand that you may receive emails between the time you request to be removed from our list and the time we are able to process your request. Email communications are not encrypted and are not considered a secure means of transmitting credit card numbers. We will never ask for sensitive information via email.

YOUR PRIVACY RIGHTS

We provide multiple choices to you with respect to the information we process about you, if you reside in California or any other jurisdiction that provides you these choices as a matter of law:

1. **Opt-out of our use or sharing of your personal data.** You may withdraw consent you have previously provided for the processing of your personal data, including for email marketing by us. You may also ask us not to share information with third parties. You can object to further marketing at any time by checking and updating your contact details within your account (if the website provides that functionality), by selecting the "unsubscribe" link at the end of our marketing and promotional update communications to you, or by contacting us.
2. **Delete personal data.** You can ask us to erase or delete all or some of the information about you. Removal may not encompass all possible locations; for example, back-ups, information in our systems for business purposes such as transaction records and warranty information, or information that we shared with Business Associates prior to removal.
3. **Change or correct personal data.** You can also ask us to change, update, or fix your personal data in certain cases, including if it is inaccurate. If offered as a feature of the Websites, you may also be able to edit some of the information about you.
4. **Object to, or limit or restrict use of personal data.** You can ask us to stop using all or some of the personal data about you (for example, if we have no legal right to keep using it) or to limit our use of it (for example, if the personal data about you is inaccurate).

5. **Right to access and/or have your personal data provided to you.** You can also ask us for a copy of personal data we hold about you and can ask for a copy of such personal data.
6. **Data portability.** Under certain circumstances, you can ask us to furnish you with the personal data which you provided us with in a structured, commonly used, and machine-readable format.

You can exercise these choices in accordance with applicable laws or by contacting us using the contact information provided above.

TRANSFERS OUTSIDE OF EUROPEAN ECONOMIC AREA

The Websites are published in the United States and are governed by United States law. If you are located within the European Union, you should be aware that your personal data will be collected in the United States or otherwise outside the European Economic Area ("**EEA**"), being areas that may not be subject to protections equivalent to those afforded by the General Data Protection Regulation (GDPR) provided in the EEA. With respect to information you provide to us in the course of making a purchase, the collection is necessary because our servers and data centers are located in the United States and without collecting your personal data we are not able to process your payment and perform our obligation to provide you the services or goods you have purchased from us. With respect to other types of data we collect which are not related to a purchase, we rely on your explicit or implicit consent to collect the data.

Where your information is transferred outside of the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognized legal adequacy mechanism, and that it is treated securely and in accordance with this Notice. Golden Pantry continues to monitor all developments regarding the legal bases for the international transfer of personal data outside of the EEA and shall update its processes as necessary.

ADDITIONAL JURISDICTION-SPECIFIC PRIVACY RIGHTS

The States of California and Nevada have laws which provide you with additional rights. The rights described herein are subject to exemptions under the California Consumer Privacy Act (“**CCPA**”) and other limitations under applicable law. Other states, countries, and jurisdictions may also have laws that provide you with additional rights. In addition to the purposes for collection stated above, we collect information for disclosure or sharing with Business Associates that, in some cases, may constitute a “sale” under the laws of certain jurisdictions. All references in this section refer exclusively to our obligations under these other applicable laws. Some of the obligations do not apply to all jurisdictions but others are shared. The other provisions of this Notice may also apply to you so please exercise them in accordance with this Notice.

PRIVACY RIGHTS OF NEVADA RESIDENTS

We collect personal data from you in the course of providing requested services and use of the Websites. Unless otherwise stated, we do not sell any Covered Information, as defined under Nevada law (N.R.S. 603A.320). If you would like to make a further inquiry regarding the selling of your Covered Information as defined under Nevada law, please contact us using the contact information we provided to you above.

PRIVACY RIGHTS OF CALIFORNIA RESIDENTS

As a resident of California, you have rights under the CCPA, California Civil Code § 179.100 *et seq.* and under any implementing regulations and as may be amended from time to time, relevant to your Personal Information (as defined under the CCPA), as well as other laws. The rights described herein are subject to exemptions under the CCPA and other limitations under applicable law.

California Consumer Rights Under the CCPA: If your Personal Information is subject to the CCPA, you may have certain privacy rights with regard to that information. You may have the right to:

- Request that we disclose certain information to you about our collection and use of your Personal Information during the preceding 12 months:

- the categories and specific pieces of Personal Information that we have collected about you;
- the categories of sources from which the Personal Information is collected;
- the business or commercial purpose for collecting or selling your Personal Information;
- the categories of third parties with whom we shared your Personal Information;
- the categories of Personal Information about you that we disclosed for a business purpose; and
- the categories of Personal Information about you that we sold and the categories of third parties to whom the Personal Information was sold.
- Request that we delete your Personal Information, subject to exceptions under the CCPA or other applicable law; and
- Direct us not to sell your Personal Information to third parties, which is known as your right to opt-out, which may be exercised, for example, using the **Do Not Sell My Personal Information** link discussed below.

You also have the right not to receive discriminatory treatment for the exercise of any of the privacy rights conferred by the CCPA. We will not discriminate against you because you have exercised any of your rights under the CCPA, and we will not do the following as a result of your choice to exercise any rights as outlined in this Notice: charge different rates for goods or services; provide a different level quality of goods or services; or suggest any of the preceding will occur.

Categories of Personal Information We Collected: During the preceding 12 months we have collected the following categories of Personal Information about consumers:

1. Identifiers (e.g., name, alias, postal address, online identifier, Internet Protocol address, email address, account name, or similar identifiers);
2. Information that identifies, relates to, describes, or is capable of being associated with a particular individual (e.g., telephone number, address, or similar information);

3. Commercial information (e.g., records regarding services purchased, or other purchasing histories or tendencies);
4. Categories of Personal Information described in subdivision Cal. Civ. Code Section 1798.130(e) (e.g., bank account number, credit card number, and debit card number);
5. Internet or other electronic network activity (e.g., browsing history, search history, and information regarding a consumer's interaction with an online site or application, or similar information);
6. Geolocation data (e.g., 'location sharing' data from a mobile device); and
7. Information drawn from any of the above to create a consumer profile that includes characteristics, psychological trends, predispositions, behaviors, or similar information.

Categories of Personal Information We Disclosed: During the preceding 12 months we have disclosed the following categories of Personal Information about consumers:

1. Identifiers (e.g., name, alias, postal address, online identifier, Internet Protocol address, email address, account name, or similar identifiers);
2. Information that identifies, relates to, describes, or is capable of being associated with a particular individual (e.g., telephone number, address, or similar information);
3. Commercial information (e.g., records regarding services purchased, or other purchasing histories or tendencies);
4. Categories of Personal Information described in subdivision Cal. Civ. Code Section 1798.130(e) (e.g., bank account number, credit card number, and debit card number);
5. Internet or other electronic network activity (e.g., browsing history, search history, and information regarding a consumer's interaction with an online site or application, or similar information);
6. Geolocation data (e.g., 'location sharing' data from a mobile device); and
7. Information drawn from any of the above to create a consumer profile that includes characteristics, psychological trends, predispositions, behaviors, or similar information.

Categories of Personal Information We May Have Sold: During the preceding 12 months we may have shared the following categories of Personal Information about consumers in a manner that constitutes a “sale” as defined by the CCPA:

1. Identifiers (e.g., name, alias, postal address, online identifier, Internet Protocol address, email address, account name, or similar identifiers);
2. Information that identifies, relates to, describes, or is capable of being associated with a particular individual (e.g., telephone number, address, or similar information);
3. Commercial information (e.g., records regarding goods purchased, or other purchasing histories or tendencies);
4. Internet or other electronic network activity (e.g., browsing history, search history, and information regarding a consumer’s interaction with an online site or application, or similar information);
5. Geolocation data (e.g., ‘location sharing’ data from a mobile device); and
6. Information drawn from any of the above to create a consumer profile that includes characteristics, psychological trends, predispositions, behaviors, or similar information.

Categories of Third Parties With Whom We Shared Personal Information: During the preceding 12 months we have shared Personal Information with the following categories of third parties:

1. Business Associates;
2. Our banks, insurers, and brokers;
3. Credit card and card payment processors and other companies that help facilitate your transactions and payment processing;
4. Companies that provide statistical analysis of your interactions with us;
5. Companies that provide customer support, order fulfillment, product shipment and delivery;
6. Companies that provide marketing and advertising services; and
7. Other third parties that may be approved by you.

If you would like to exercise any of these rights, you or your authorized agent may contact us by telephone, mail or e-mail at the addresses, telephone number or other manner we provided to you above or as set forth in the **Do Not Sell My Personal Information** link. You may authorize an agent to exercise any of these rights on your behalf. If you use an agent, we will take measures to verify your agent's authorization for fulfilling any access or deletion requests. We may require more information to ensure proper verification of you and your agent's identity and authorization, such as by logging into your account, if you already have one, or by confirming at least two additional pieces of your information, such as order history.

COMPLAINTS

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, which can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

AGE OF USER

We do not knowingly collect personal data directly from children under the age of thirteen (13) (or such other digital age of consent in your jurisdiction, for example, sixteen (16) years of age in certain European countries) without parental consent. We do not sell the personal data of consumers under the age of sixteen (16) if we have actual knowledge of the individual's age. The Websites are general audience sites and are not specifically targeted to or intended for use by children. If we learn we have collected or received personal data from a child under thirteen (13) years of age (or such other digital age of consent in your jurisdiction, for example, sixteen (16) years of age in certain European countries) without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under thirteen (13) years of age, please contact us using the contact information we provided to you above.