



Hearing on Exploring the Online and Offline Collection and Use of Consumer  
Information

Testimony of Zoe Strickland, Vice President, Chief Privacy Officer  
Wal-Mart Stores, Inc.

Before the **Subcommittee on Communications, Technology and the Internet  
and the Subcommittee on Commerce, Trade and Consumer Protection** of  
the Energy and Commerce Committee of the United States House of  
Representatives

**November 19, 2009**

**I. Introduction**

**Chairman Rush, Ranking Member Radanovich, and Chairman Boucher and  
Ranking Member Stearns**, thank you for inviting Walmart to participate in today's hearing  
on online and offline privacy. My name is Zoë Strickland, and I serve as Walmart's Vice-  
President and Chief Privacy Officer. My role at Walmart provides me with a broad  
perspective on a range of privacy issues relevant to today's discussion. I appreciate the  
opportunity to contribute and am honored to offer input that may help inform your  
consideration of these important policy issues.

**II. Walmart's Role**

As the largest retailer and private employer in the U.S., with approximately 1.4  
million employees and 140 million customers coming through our U.S. stores every week,  
Walmart considers an array of privacy issues on a daily basis. Unlike companies that interact

with their customers – or other businesses – primarily online, Walmart approaches privacy from a very broad perspective. Walmart operations cover almost every conceivable privacy topic, channel, and geographical region. Walmart operations include:

- Operating as a “brick and mortar” retailer, with over 3500 outlets domestically.
- Operating as a leading online merchant through walmart.com.
- Operating over 600 Sam’s Clubs domestically, which offer a membership model with its customers.
- Conducting extensive global operations throughout the world.
- Communicating with our customers across multiple channels, including through email, postal mail, mobile devices, websites, and our stores.
- Collecting and merging data through numerous sources, including customers themselves, third party sources, and technology like websites.
- Providing a wide variety of products and services. Some of these are regulated more than others regarding privacy or personal data. Examples include health services, some covered by HIPAA and some not (like personal health records); financial products and services governed by the Gramm-Leach-Bliley Act; sales of hunting and fishing licenses; and sales of over-the-counter products containing pseudoephedrine.
- Serving in a leadership role in technology, be it online or offline. Some of these technologies have privacy implications, like online advertising, Radio Frequency Identification (RFID), or mobile devices.

Simply put, Walmart has a deep engagement with the American public in a variety of contexts. Consequently, we respectfully submit to you that the Company has one of the deepest understandings of not only the dynamics of compliance with myriad privacy requirements, but also what we see as the underlying goals of what privacy is trying to accomplish for consumers. We have made it our business to understand what customers want.

Given the depth and breadth of Walmart's understanding of consumer privacy issues, we appreciate the Committee including Walmart in today's discussion, and would encourage you to engage other similarly situated companies in the discussion of these important issues. Since the emergence of online behavioral advertising as a topic of legislative and regulatory interest, we have been concerned that policymakers evaluating privacy issues may narrow their focus to the practices and concerns of leading Internet companies, with less involvement of other industries that face the same or equally challenging privacy issues. Indeed, efforts to understand and mitigate the potential privacy risks posed by behavioral advertising and the online use of personal information are framing much of the debate on privacy issues across the board. Some companies have begun to advocate for comprehensive privacy legislation. It is imperative that, as privacy rules are developed, legislators take the time to fully understand the impact to consumers and companies that have both online and offline relationships.

That said, we certainly agree that behavioral advertising and the online tracking methods upon which it relies should be the subject of thoughtful scrutiny. To be sure, Walmart does have an interest in the issues that are of concern to online businesses – we are heavily engaged in that business ourselves. According to Hitwise, a service that measures online usage, Walmart.com is among the top five most visited ecommerce websites in 2009. As it relates to online advertising, we even use different models within the business. At samsclub.com, targeted online marketing is done within the four walls of the Sam’s Club website. At walmart.com, in addition to such first-party ads, the company also participates in an advertising network to serve relevant advertising across the network, the practice often called online behavioral advertising.

At the same time, however, we submit that addressing the needs of one industry sector, or one channel such as online commerce, that excludes or is inconsistent with others, is short-sighted and may lead to skewed regulatory schemes. For the vast majority of U.S. businesses, this could be cumbersome at best and unworkable at worst, and may well not even address the underlying issues for consumers.

### **III. Principles-Based Approach**

In considering how to regulate privacy effectively, Walmart favors a principles-based approach. We think this is the best way for privacy to work for companies and consumers. It also provides a good foundation to discuss global issues with other countries where business is international. Having a set of framework principles in place that can be applied in many

different contexts would provide an effective, consistent approach to privacy. A privacy regime based on a well-conceived set of principles could be applied to every new technology, every new marketing channel, and every new use of consumer information. Such a framework would impose coherent and predictable standards that are easily understood by both consumers and businesses. We cannot stress enough that the more coherent the standard, the more compliance will be achieved.

A principles-based approach to privacy is not new. Several years ago, the Fair Information Practice Principles were put in place to provide a framework for addressing privacy. These principles set forth a broad scheme regarding issues that even today remain at the forefront of the policy debate. The principles address the need for organizations to provide:

- (1) Notice to consumers of an entity's information practices,
- (2) Choice for consumers regarding how their information may be used,
- (3) The ability of an individual to both access data about himself or herself and contest that data's accuracy and completeness,
- (4) Information security, and
- (5) Effective enforcement and redress.

While much has changed since the Fair Information Practice Principles were first articulated, they can provide a starting point from which to craft a modern framework. Focusing on core privacy principles in the U.S. would facilitate the creation of predictable

standards, and help avoid repeatedly dedicating time and energy to the creation of ad hoc laws to address emerging technologies.

While it may be possible to devise customized sets of laws to address privacy issues on an individualized, technology-specific basis, we question the efficiency – and, more importantly, the outcome – of such an approach. Not only does it create difficulties for companies attempting to develop an overarching approach to privacy, it also puts consumers in the position of having to navigate a confusing maze of unpredictable standards.

#### **IV. Walmart Privacy Policy Efforts**

As an example of a principle-based approach, this summer we updated our customer privacy policy for Walmart operations. The updated policy is based on the Fair Information Practice Principles, as well as developing industry standards and global guidelines. Our goal was to make the policy transparent, meet best practices, and to be integrated across all business units, online and offline, as well as all product offerings. We thought it would really help our customers to understand our privacy practices if we integrated them, rather than having separate policies for online and offline operations, and to have them all in one place. To further increase transparency, we included a short summary privacy notice that provides highlights of the privacy policy from which a customer can link through to the detailed privacy policy.

The new privacy policy provides customers more control over their data. Examples are:

- Creating a preference center that allows customers to tell us directly their preferences regarding direct marketing and data sharing for marketing purposes.
- Moving to a stricter standard for data uses customers typically consider more sensitive. Walmart now uses an opt-in standard for telemarketing and data sharing with third parties for marketing purposes.
- Providing additional or enhanced opt-out mechanisms. Examples include ratings and surveys via email; prescreened offers of credit; and online behavioral advertising.
- Providing customers greater access to their own information, through their online accounts or otherwise.
- Providing more options to submit questions and concerns. We receive about 15 - 20 customer inquires a week about privacy, and are very timely in our response.

This initiative gave us further insights into how to focus on underlying privacy principles and then to operationalize them. With regard to online behavioral advertising, Walmart provides clear notices and opt-outs, consistent with the FTC Self-Regulatory Principles for Online Behavioral Advertising as well as developing industry best practices. Equally importantly in our view, we integrated our approach regarding online advertising into our larger view of privacy – when and how is it appropriate to give notice? When and how should consumer choice be offered?

## V. Consumer Notice and Choice

We would like to turn to these key aspects of privacy principles. We understand that a growing topic in the public policy debate is whether the traditional U.S. approach, including notice and choice, is still valid as technology, business practices, and consumer expectations evolve. We do believe that notice and choice still have a central place. This is not to say that there are no other protections to consider as a framework is developed. But we should not lose sight of some of the key ways that consumers interact with businesses. We offer the following examples to show the value of notice and choice, as well as how a broader principles-based approach is appropriate and needed, which can extend beyond the current debate about online activities and behavioral advertising. Walmart extensively develops and implements new technology. As one example, Walmart has begun programs or pilots with mobile messaging. These messages can alert customers that pharmacy prescriptions are ready for pick-up, or about special offers in store. Notice and choice are needed to make mobile interactions work.

Another illustrative example concerns our experiences with the use of Electronic Product Code (EPC) technology. At the simplest level, EPC is the next generation bar code. EPC is a unique identifier, which can signify any unique item, such as a case or pallet of products, or an individual product. EPC is typically placed on a tag, which can then be “read” by RFID. Currently, EPC benefits our company by tracking certain case and pallets in the supply chain, and benefits consumers through greater availability of merchandise.

When EPC may be offered on individual products on the sales floor, there will be more benefits to the company and consumers. Consumer benefits of online behavioral advertising are often discussed in terms of more focused and relevant advertising. These are certainly of value. But potential benefits of EPC to the customer are even more direct. To name just a few, EPC could facilitate the following: merchandise returns without receipts; automatic warranty activation; easier sortation of items for recycling; and product and food safety. Some day EPC could revolutionize check-out-lines.

While we know EPC will offer benefits, we understand that some customers may feel uncomfortable with the technology. Walmart has thus been building in privacy protections. As we develop EPC, Walmart follows the Guidelines on EPC for Consumer Products. The Guidelines were issued by GS1 EPCglobal, the standard-setting body for EPC, in 2003 with final adoption in 2005. We believe the Guidelines represent one of the first instances of applying privacy standards to technology and tackling some of these issues. As an example, the Guidelines are some of the earliest privacy guidelines to tackle how to extend privacy protections to non-personal information, as EPC tags used by retail contain no personal data.

As a cornerstone of EPC development, Walmart is designing its use to enable consumer choice. EPC tags will be easily removable from the product or its packaging, such as by placing the EPC tag on the price tag. If EPC tags used by the retail industry are ever embedded, we will offer a mechanism to disable the tag.

We believe that choice is absolutely the right model for this technology. Some, perhaps most, consumers will appreciate the benefits provided by the technology. Some will not. But ultimately consumers should be able to choose which they prefer.

A challenge, of course, is how to provide appropriate notice. This covers both how consumers will know this technology is in operation – and also know what this technology actually means. A variety of methods and channels are possible, including notices on products themselves; notices on or in facilities; and website information. You can see how a debate that focuses solely on notice that can be provided on a website, like pop-up notices, would miss the boat for this technology.

#### **IV. Conclusion**

Walmart interacts with consumers frequently and in every conceivable way. A uniform, or at least consistent, privacy framework that includes standards such as consumer choice is effective both for consumers and businesses. Companies would be able to structure cohesive policies for protecting consumer privacy. A privacy regime based on a set of core principles would be sufficiently flexible to be applied in multiple contexts. Consumers deserve to know what to expect with regard to how their information is being collected and used, where they may obtain further details if they desire, and how they can make appropriate choices regarding the use of their data or technology. As additional protections are developed, a principle-based approach should help answer questions like how to make the

protections meaningful, and how far to extend them before they become attenuated and unworkable.

Thank you again for the opportunity to address **the Subcommittees**. Walmart looks forward to working with **the Subcommittees and the full Committee as you** move forward in shaping the privacy framework in the U.S.

APPENDIX

WALMART PRIVACY POLICY



# Privacy Policy Highlights

## Scope:

This policy applies to Wal-Mart operations, both in stores and online, in the United States and Puerto Rico. Examples include Walmart Supercenters, Neighborhood Markets and Walmart.com.

## Information We Collect:

[Read more about Information We Collect.](#)

We collect your information from the following sources:

- Information you give us, such as during transactions, customer service, surveys, and online registrations.
- Information from other sources, such as consumer reporting agencies, and
- Information automatically collected when you visit our websites, such as via cookies, and in stores, e.g. via video cameras.

## How We Use and/or Share Your Information:

[Read more about How We Use and/or Share Your Information.](#)

- Walmart does not sell or rent your personal information to third parties.
- Walmart uses your information to provide products and services and to support core business functions. These uses include fulfillment, internal business processes, marketing, authentication and fraud prevention, and public safety and legal functions.
- We may combine all the information we collect. We may share your information with our corporate affiliates like Sam's Club (except for information you provide to purchase financial products).
- We may share your personal information with third parties under the following limited circumstances:
  - with service providers or suppliers that help with our business operations
  - with the financial institution who jointly offers a Walmart credit card
  - when necessary to protect the safety, property, or other rights of Walmart, its affiliates, customers, or associates, or when we believe in good faith that the law requires it.

## Your Choices:

[Read more about Your Choices.](#)

We want to communicate with you in ways you want to hear from us. Examples include email newsletters, special offers, and new product announcements. We use the following standards for marketing communications:

- We will not contact you via phone or text message without your express consent (opt in),
- We will not share your information with third parties for marketing purposes, without your express consent (opt in),
- We use an opt-out standard for all other communications. This means we will conduct the activity unless you tell us not to.
- We participate in an ad network for some advertising on the site. This means that you may see advertising tailored to how you browse websites in the network. Learn more about the ad network, including how to opt-out.

You can provide us your marketing preferences by visiting the [Privacy Preference Center](#) or by contacting us below. The Preference Center allows you to update or change your preferences for marketing materials at any time.

## How to Contact Us:

You may contact us as described in the Contact Us section below.

## Important Information:

- We are committed to providing you a fair and timely response to any privacy concern or question you bring to us.
- We recognize the importance of privacy. It is more than an issue of compliance – it is one of trust. Read our entire privacy policy.
- Read more about the additional protections for sensitive information, such as health-related information or financial services.
- Visit Walmart's Privacy & Security Information Center for general tips and resources.

## WALMART PRIVACY POLICY

Walmart recognizes the importance of information privacy. We believe that privacy is more than an issue of compliance – it is one of trust. We strive to manage your personal information in accordance with our basic belief of respect for the individual. This policy describes:

- How and why we collect your personal information.
- How your information is used and protected.
- When and with whom we share your information.
- The choices you can make about how we collect, use, and share your information.

We do not sell or rent your personal information to third parties. If you have any questions about our privacy policy, please contact us as described in the section entitled “Contact Us” below.

### **Notice and Scope of Our Privacy Practices**

Walmart provides customers with clear, prominent, and easily accessible information about its privacy practices. This policy applies to Walmart operations, both in stores and online, in the United States and Puerto Rico. Examples include Walmart, Supercenters, Neighborhood Markets, and Walmart.com. Sam’s Club has its own privacy policy for its members. Read more about the Sam’s Club Privacy Policy.

### **Our Pledge of Accountability**

Walmart expects our associates and business partners to manage your personal information properly and maintain your trust. We are accountable for complying with this policy and take reasonable and timely steps to ensure compliance.

### **Information We Collect**

We collect personal information about you to deliver the products and services you request and to help improve your shopping experience. We do this using lawful and fair methods. We strive to limit the amount of personal information collected to support the intended purpose of the collection.

#### *Information You Give Us*

We collect personal information from you in a variety of ways when you interact with Walmart, both in stores and online. Some examples are when you:

- Create an account on one of our websites;
- Make an online or in-store purchase from us;
- Use a gift registry;
- Request check cashing, apply for credit, or purchase certain financial products;
- Conduct a transaction where we collect information required by law (such as the sale of pseudoephedrine);
- Request customer service or contact us;
- Submit a Walmart related story or testimonial;
- Participate in a contest, sweepstake, promotion, or survey; or
- Otherwise submit personal information to us.

Personal information is information that identifies you specifically. The personal information we collect may include contact and payment information like your name, email and physical addresses, phone numbers, and credit and debit card numbers. When you ask us to ship an order, we may collect information you provide us such as the name, address, and phone number of recipients. We may collect your Social Security Number where required for certain transactions, such as to purchase firearms, or to help provide credit or other financial products and services.

#### *Information from Other Sources*

We may receive personal information about you from other sources as well. Examples of these sources are entities that can help us correct our records, improve the quality or personalization of our service to you, and help prevent or detect fraud. In addition, we may collect information from consumer reporting agencies, affiliates, or other service providers if you apply for credit or purchase certain financial products.

#### *Automated Information Collection*

We receive and store certain types of information when you interact with our websites, emails, and online advertising. Our purpose is to allow the websites to work correctly, to evaluate use of the website, and to support website analytics and marketing campaigns. Some examples include:

- We may collect technical information such as your internet protocol address, your computer's operating system and browser type, the address of a referring website, if any, and the path you take through our web pages.
- We use "cookies" to recognize you as you use or return to our sites. This is done so that we can provide a continuous and more personalized shopping experience for you. A cookie is a small text file that a website or email may save to your browser and store on your hard drive.
- We may also use web beacons. Beacons allow us to know if a certain page was visited, an email was opened, or if ad banners on our website and other sites were effective.

We operate cameras in stores for security and operational purposes, such as to measure traffic patterns. When used for operational purposes, we do not use these cameras to identify you personally.

### **How We Use Your Information**

Walmart uses your information to provide requested products and services and to support core business functions. These include fulfillment, internal business processes, marketing, authentication and fraud prevention, and public safety and legal functions. Some examples include:

- To fulfill your requests for products and services and communicate with you about those requests;
- To register and service your account;
- To administer surveys, sweepstakes, contests, and promotions;
- To provide customer service and alert you to product information, including recalls;
- To help us improve and customize our service offerings, websites, and advertising;
- To send you information about our products, services and promotions;
- To protect the security or integrity of our websites and our business; and
- With regard to credit qualification and applications.

To accomplish these purposes, we may combine personal and non-personal information we collect online with offline information, including information from third parties. We may also share your information within our family of corporate affiliates, including Sam's Club, to accomplish these and our affiliates' purposes. However, we do not share with affiliates information that you provide to purchase a financial product or service like check cashing, money orders, money transfers, or bill pay.

### **How We Share Your Information Outside Walmart**

Walmart does not sell or rent your personal information to third parties. We may share your personal information, whether you are a current or former customer, only under the following limited circumstances.

#### *Service Providers*

We may share information about you with service providers or suppliers that help with our business operations. Examples are shipping vendors, billing and refund vendors, credit card processors, and companies that help us improve our product and service offerings and our websites. We require these service providers and suppliers to keep the information secure. We also prohibit them from using your information for any purposes other than those requested by us.

### *Credit Applications*

If you apply for a Walmart credit card, such as a co-branded or private label card, we may share your information with the financial institution(s) that we partner with to offer the credit card. Our partner may only use the information you give to us to provide the credit card. Similarly, if you qualify for a credit account and are not offered credit by Walmart, we may share your information with our partner so that they may extend the offer of credit as required by law.

### *Legal Requirements and Protection of Our Company and Others*

We may share your information in other special circumstances. These include situations when we believe in good faith that the law requires it or that the sharing is necessary to protect the safety, property, or other rights of Walmart, our customers, our associates, or any other person. Examples include protecting the health or safety of customers, or addressing crimes committed on Walmart property. Data from in-store security cameras may also be provided to law enforcement upon written request.

### *Marketing Purposes*

Based only on your express consent, we may share information with carefully selected vendors who may offer you products and services of interest. You may opt-in to this sharing under the “Your Choices” section below.

### *Aggregate Information*

We may share aggregate and statistical data that does not identify you personally. We may do this for research and marketing purposes, for instance to describe our services to prospective partners or advertisers, and for other lawful purposes.

### *Business Transfers*

In the unlikely event that Walmart or substantially all of its assets are acquired by an unrelated third party, your personal information may be one of the transferred assets.

## **Your Choices**

### *Marketing Preferences*

We want to communicate with you in ways you want to hear from us. Examples are newsletters, special offers, and new product announcements. We use the following standards for marketing communications:

- We use an opt-in standard for phone and text messages. We also use an opt-in standard for sharing information with third parties for marketing purposes. Opt-in means we will only conduct the activity with your express consent.
- We use an opt-out standard for all other communications. Opt-out means we will conduct the activity unless you tell us not to.

You can provide us your marketing preferences by visiting the Privacy Preference Center. The Preference Center allows you to update or change your preferences about receiving marketing materials at any time.

Or you may contact us as described in the Contact Us section below.

If you contact us by email or mail, please be sure to include your full name, the types of communications you would like to receive or not receive, and your related contact information. For instance, if you would like to opt-out of mail, include your mailing address.

Please allow sufficient time for your preferences to be processed. It may take up to 10 days to process your requests related to email and 4-6 weeks for other requests. You can also change your mind about your marketing preferences. To do so, you can visit the Privacy Preference Center or contact us at one of the above addresses.

Please be aware that, even if you have opted out of receiving marketing communications from us, we may still contact you for transactional purposes. Some examples are contacts for customer service, product information, service or reminder notices, or recalls. We may also need to contact you with questions or information regarding your order, such as regarding order status, shipment, or refunds.

#### *Credit offerings*

The above marketing preferences do not apply to our credit card offerings since these are provided through our financial institution partner(s). However, you can choose to stop receiving prescreened offers of credit from all companies, including our prescreened offers, by calling 1-888-567-8688 or by going to [www.optoutprescreen.com](http://www.optoutprescreen.com).

#### *Online Operations and Advertising*

You may exercise choices related to our online operations and advertising. For instance, you can choose to browse our websites without accepting cookies. Please know that cookies allow us to recognize you from page to page, and they support your transactions with us. Without cookies enabled, you will still be able to browse our websites, but will not be able to complete a purchase or take advantage of certain website features.

To learn more about cookies, including how to refuse cookies on your computer, follow these links:

- Microsoft Internet Explorer
- Netscape Navigator
- Mozilla Firefox
- Apple Safari
- All About Cookies

You may also opt-out of certain online advertising. Walmart.com participates in an ad network for some of the advertising found on the site. The ad network allows us to display advertisements that are tailored to your browsing interests on our websites and other sites. It also allows us to avoid sending you duplicate ads and to control the frequency of the ads you see. Walmart uses one or more partners to participate in the ad network. The partners use cookies, web beacons, or similar technologies to display these advertisements. We do not permit our ad serving partners to collect personal information about you on our websites. Rather, we provide them non-personal information about you such as browsing information like types of pages viewed and categories of interests. Our partners may use this information, as well as information they have collected when you are on other sites within their network, to help select which ads to display. We or our partners only retain ad network data for legitimate business purposes. Learn more about ad network business practices and the privacy policies of our partners. The information includes how to opt-out of participating in ad networks in this manner.

## **How to Access and Update Your Information**

Walmart takes reasonable steps to keep your personal information accurate and complete, so we can treat your information properly and effectively under this policy. You can access or update your information, including contact or account information, in the following ways:

- If you have created an account on one of our websites, log into your account. Once you do, you will be able to enter and update your own contact information and payment information, as well as contact information for recipients you have designated.
- Contact us at the email or postal address listed in the “Contact Us” section of this policy. Please include your current contact information, the information you are interested in accessing, and your requested changes. We will provide you the information requested if reasonably available, or will describe the types of information we typically collect. We will make changes you request or will provide an explanation of what actions we will be able to take with regard to the request.
- If you need help accessing your information related to a financial product offered by a Walmart partner, we will assist you with that request if you contact us via the “Contact Us” section below.
- If you need assistance with your Optical or Pharmacy information, please visit the Pharmacy or Optical section below for instructions on accessing these records.

## **How We Secure Your Information**

Securing your information is a company priority. Whether you are shopping online or in our stores, we use reasonable security measures to protect the confidentiality of personal information. When we do have to collect your most private personal information, such as Social Security Numbers, we will protect its confidentiality, prohibit its unlawful disclosure, and limit access to authorized personnel only.

### *Online Protections*

Your account information is protected by the password you use to access your online account. Please keep this password confidential. We also use an encryption technology called Secure Sockets Layer (SSL). When you enter a secure portion of a website, you will see https (instead of http) in the address bar, and an image of a closed lock or a solid key should appear in the address bar or bottom bar of your browser window. If you click on this image, website security information will appear. This indicates that your personal information is transmitted in encrypted form, not to some unknown or unauthorized server. Walmart.com has also obtained a digital certificate from Verisign, Inc., a leading provider of Internet trust services.

### *Hard Copy and Electronic Storage Protections*

Personal information that is maintained in our offices or stores is subject to physical, administrative, and technical controls as well. Hard copies of private information are maintained in locked locations or cabinets with similar restrictions for electronic storage of private information. When disposed of, the information is shredded, destroyed, erased, or otherwise made unreadable.

## **Privacy Protections for Specific Types of Information**

### *Pharmacy and Optical Departments*

When you use our Pharmacies or Vision Centers, you may provide us with your health information so that we may process your request. We understand the sensitive nature of such information and respect your privacy by keeping it confidential. This includes complying with federal law (the Health Insurance Portability & Accountability Act or HIPAA) and applicable state laws. Our Notice of Privacy Practices describes how we protect your information maintained by our Pharmacies and Vision Centers, and how you can access your records. A copy of the Notice of Privacy Practices is available online by visiting Pharmacy or Vision Center. A copy of the Notice is also provided to you by the Pharmacy or Vision Center at the first time of service, or can be requested at any time at your local Walmart.

## *Financial Products and Services*

As you use Walmart financial products and services, the privacy of your personal information is protected under the federal Gramm-Leach-Bliley Act (GLB) and applicable state laws. Your personal information is protected whether you are a current or former customer. These financial products and services include money orders, money transfers, credit card offerings, bill payment, and check cashing.

Walmart provides you check cashing services directly. This privacy policy describes how we collect, use, disclose, and protect your information related to this service.

For all other services, we serve as an agent for suppliers to offer you financial products and services. Even though we are an agent for these services, we work with our partners to ensure they provide appropriate privacy policies and protections. Below is the list of our financial services partners, along with a link to their privacy policies:

- Credit Cards offered through GE Money Bank
- Money Transfers, Money Orders, and Express Bill Pay offered through MoneyGram
- Money Card offered through Green Dot and GE Money
- Bill Payment offered through CheckFreePay

We also protect the credit or debit card information we collect during transactions. We comply with industry requirements known as the Payment Card Industry Data Security Standards (PCI Standards). These standards require safeguards for handling and securing customer information. These include using secure networks; encryption or other protection of cardholder data; physical and technical access controls; monitors and tests of security systems; and information security policies.

## **Privacy of Children Online**

We are committed to protecting children's online privacy. In order to protect children's personal information, and to meet the standards of the Children's Online Privacy Protection Act (COPPA), we do not knowingly collect personally identifiable information from children under the age of 13 on Walmart websites without prior parental consent.

Walmart.com is a general audience website not geared towards children. In several areas of Walmart.com, such as when customers contact us via email, create a Walmart.com account, or sign up for e-mail newsletters and alerts, we ask for birth year information. We ask for this to help us ensure that children do not provide us personal information on the site. Please contact us at the email or postal address provided in the "Contact Us" section of this policy if you believe we may have collected information from your child and we will work to delete it.

## **International**

As a global company, Walmart has separate privacy policies for its international offices. When you give us personal information on a website or in a store, the information may be sent to servers outside of the country where you provided the information. Walmart takes steps to ensure that your information is treated securely and in accordance with this privacy policy or any privacy policy that applies to a Walmart international site or store where you provided your information.

## **Changes to the Walmart Privacy Policy**

Please check our privacy policy periodically for changes. We will also notify you of significant updates and will post the date it was last updated at the bottom of the privacy policy.

## Contact Us

Please feel free to contact us with any questions or comments about this policy or about how your information is handled. You can contact us via the addresses below:

**Email:**

Privacy@wal-mart.com

**Mail:**

Walmart Corporate  
Privacy Office, MS #505  
508 SW 8<sup>th</sup> Street  
Bentonville, AR 72716-0505

## Your California Privacy Rights

Our privacy policy describes how we share information for marketing purposes. The policy and rights apply to all customers, including California residents:

- We share information with others outside of Walmart only if we have your express consent (opt-in). See [How We Share Your Information Outside Walmart](#).
- We also share information with other businesses within our corporate family, such as Sam's Club. See [How We Use Your Information](#).

Please contact us with any questions, or to request a list of third parties to whom we may disclose information for marketing purposes and the categories of information we may disclose, via the Contact Us section above.

**Effective: August 23, 2009**