

Privacy Policy

Last Updated: November 25, 2015

We respect your privacy and are committed to protecting it. This Privacy Policy describes the types of information we may collect from you when you visit our websites, use our mobile applications, shop at our stores, use our products, access our services, participate in our programs, or otherwise interact with us. It also describes how we use and disclose the information we collect, how we protect information from unauthorized use or disclosure, and the choices you have regarding our collection and use of such information. Additional practices or terms may apply to special offers, promotions, contests or specific services, such as those provided by our pharmacies. You should also refer to any separate notices we provide regarding those terms or practices.

CONSENT TO PRIVACY POLICY

By accessing our website to obtain information or services; by providing solicited or unsolicited personal information to us online, at any of our retail locations, or through one of our mobile applications (“apps”); by enrolling in one of our customer loyalty or other programs, or through other means, you are consenting to our use of such information, subject to applicable laws, and agreeing to the terms of this Privacy Policy.

DEFINITION OF PERSONAL INFORMATION

We define the term “personal information” to mean any information that we directly associate with, or use to identify, a specific person. This may include information such as an address, phone number, email address, or fax number; a user name or other online registration information; a financial account or credit card number, and transaction information or purchase history, when associated with a person’s name. Personal information does not include “aggregated information,” which is information that we collect about a group or category of persons or services. It also does not include “de-identified information,” which is information from which we or our agents have removed any information that can be used to specifically identify a person. This policy does not restrict or limit our collection, use, or disclosure of aggregated or de-identified information.

COLLECTION OF INFORMATION

We may collect your personal and other information described below in various ways, including, but not limited to, the following:

- **Personal Information You Provide.** We may request, or give you the opportunity to provide, personal information when you register as a user of our website or one of our mobile applications, shop online or in our stores, sign up for our programs, offers, or sweepstakes, take one of our surveys, use our products or services, cash a check, contact us about a prior purchase, or email, call, or otherwise communicate with us. Similarly, if you contact us regarding a product or service that you are interested in or concerned about, we may request that you provide personal information that will enable us to respond to your inquiry.
- **Automatically Collected Information.** When you shop online or in our stores or register for or use any of our online, mobile or other services, transactional and other information, such as the date of your purchase, registration, or service usage, their descriptions and, if applicable, the dollar amount or value of the transaction, your Internet protocol address, browser type, domain names, access times, operating systems, mouse clicks and movements, and scrolling activities may be collected automatically or “passively” by us or by one or more of our third party service providers. For example, we may use third-party analytics tools that collect information about use of our websites and user traffic. We treat this information as personal information if we combine it with or link it to other information that may identify you.
- **Location Information.** If you use one of our mobile applications and your mobile device’s settings allow it, we may collect information about your real-time location. You may adjust the settings on your mobile device to allow or prevent the sharing of location information. For example, you can disable

“Location” (or “Location Services” on iOS-based devices) on your mobile device to prevent sharing your location information with us. Please refer to instructions provided by your mobile service provider or the manufacturer of your mobile device to learn how to adjust your mobile device settings. Please note that if you disable the sharing of location information, you may be unable to access some features of our services that are designed for mobile devices.

- **Mobile Device Information.** We may also collect mobile device information using beaconing technology, such as: the device type, model and operating system version, and current IP address. We do not use this technology to collect personal information such as name, mobile telephone number, or email address. To disable our ability to identify your mobile device, you can delete our app, adjust the in-app settings, or turn your Bluetooth to “off” on your device.
- **Other Information.** We may obtain information about you from third parties such as demographic marketing information, address verification, or mailing list information and combine it with other personal information pertaining to you.
- **Cookies, Web Beacons and Similar Technologies.** MyWebGrocer is a third party service provider we use to host some of our websites and also to provide content on some of our websites that are not hosted by them. We and/or MyWebGrocer may use cookies, web beacons, Uniform Resource Locators (URL), and similar technologies to manage our websites and email messages and to collect and track information about you and your activities online at our websites over time and across third-party websites or online services including, but not limited to, your computer’s Internet protocol address and operating system, your browser type, the site from which you linked to our site, the time and date of your visit, how you use our services, and what products and services you purchase. In addition, we may use local shared objects (or Flash cookies) to collect and store information about your preferences and how you interact with our websites and mobile applications. These technologies help us to recognize you, customize or personalize your shopping experience, store items in your online shopping cart between visits, and analyze the use of our services and solutions to make them more useful to you. These technologies also allow us to aggregate demographic and statistical data and compilations of information, which may or may not include personal information, and provide this information to our service providers.

We and/or MyWebGrocer may also link this information with other personal information about you and may use this linked information to allow third parties to serve ads on our websites or mobile applications or to serve our ads to you on a third party’s website. If you “click through” to or otherwise visit third-party websites, they may also collect information about you and your visit. This Privacy Policy does not apply to, and we are not responsible for, the practices of MyWebGrocer or other third parties that collect your personal information. For additional information on the privacy practices of MyWebGrocer, please [click here](#). We also encourage you to check the privacy policies of other third parties whose information you find on our website to learn about their practices with respect to the collection, use, disclosure, and protection of your personal information.

Most Internet browsers allow you to remove or manage cookie functions and adjust your privacy and security preferences. For information on how to do this, access the “help” menu on your Internet browser. Flash cookies operate differently than browser cookies and cookie management tools available in a web browser may not remove Flash cookies. To learn how you can manage your Flash cookie settings, please visit Adobe’s website. Please note, however, that disabling our cookies may result in your inability to take full advantage of all of the features of our services.

We also offer AdChoices on some of our websites which provides you with the ability to opt out of certain third party services that may involve tracking. For more information, click on the AdChoices link listed under “About This Site” on our websites that offer this service.

HOW WE RESPOND TO DO NOT TRACK SIGNALS

Currently, our web servers do not recognize or respond to “Do Not Track” signals. Our websites and mobile applications may continue to collect information in the manner described in this Privacy Policy.

OUR USE OF PERSONAL INFORMATION

We may use your personal information for a variety of purposes, including but not limited to:

- Responding to your requests or inquiries.
- Processing and completing your transactions including, as applicable, order confirmation, billing, enrollment in our loyalty or other programs, and delivering products or services.
- Providing you with newsletters, articles, product or service alerts, new product or service announcements, savings awards, event invitations, and other information.
- Contacting you about programs, products, or services that we believe may be of interest to you, or sharing with you special offers from other companies.
- Providing you with personally tailored coupons, programs, promotional information, and offers.
- Conducting market research, surveys, and similar inquiries to help us understand trends and customer needs across product categories or customer groups.
- Analyzing transactions or purchase histories to present customized offers to you or to improve our products, services, programs, and other offerings.
- Evaluating your shopping experience or existing products and services, or to create new items.
- Alerting you about a product safety announcement or recall or correction of an offer, promotion, or advertisement.
- Entering you into sweepstakes and promotions or contacting you regarding a contest prize.
- Verifying and validating your identity.
- Keeping a record of our interactions with you if you place an order or otherwise deal with our representatives over the telephone or online.
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal information, our website or data systems; or to meet legal obligations.
- Enforcing our [Terms of Use](#) and other agreements.

DISCLOSURE OF PERSONAL INFORMATION

We do not sell or rent your personal information to third parties in the ordinary course of our business, nor do we disclose to them the personal information we collect for their own direct marketing purposes. However, upon the occurrence of certain corporate transactions, we may disclose or transfer your personal information as described under the “Certain Business Transfers” section below. We may also share your personal information with our parent or affiliated companies for their use in a manner similar to the purposes described in the “Our Use of Personal Information” section above. Though not an exhaustive list, our most common practices with respect to the disclosure of personal information are described below.

- **With Your Consent.** We may disclose your personal information to third parties with your consent. You may give your consent in several ways, such as through a written agreement that you sign or acknowledge; an online method, such as a “click through” agreement or registration page; through a mobile application which you install on your mobile device or by enrolling in a text alert program; an oral statement, such as by way of an interactive voice response; or through the terms and conditions under which we provide you a particular product, service, or program. Sometimes your consent may be implicit. For example, if you purchase products with a credit card and have them shipped to your home, you implicitly consent to the disclosure of your name and address to a third-party shipping company to complete the delivery, and of your credit card number to the credit card processor to authorize the transaction and to the bank to collect payment.
- **Service Providers.** We may disclose your personal information to third parties who complete transactions or perform services on our behalf or for your benefit. Information provided to such parties

for payment authorization or verification purposes may be retained by them in a database that is used to provide similar services to others. We may also utilize the services of third parties to verify customer data, such as mailing addresses or to supplement other information we have collected. We may also contract with third parties to host a site, conduct market research, or send you information regarding our products or services or those of other companies with whom we conduct business.

- **Legal Process.** We may disclose your personal information to legal or government regulatory authorities in response to their requests for such information or to assist in investigations of theft, fraud or abuse. We may also disclose your personal information to third parties in connection with claims, disputes or litigation, when otherwise required by law, or if we determine its disclosure is necessary in an emergency.
- **Certain Business Transfers.** Your personal information may be disclosed as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction. It may also be disclosed in the event of insolvency, bankruptcy or receivership. We will use reasonable efforts to direct any such transferee to use your personal information in a manner that is consistent with our Privacy Policy.

HEALTH INFORMATION/PHARMACIES

We collect protected health information in our capacity as a pharmacy health care provider, which includes your prescription and personal information, prescription history and profile for fulfillment of pharmacy orders, and other health-related information that you, your doctor, or your insurance carrier provides to us. This information is most often used to process your prescriptions, provide you with health care information or services, or to contact you with questions and respond to your inquiries pertaining to our pharmacy services. The information collected or maintained by our pharmacies is subject to our Notice of Privacy Practices that more specifically describes how we may use or disclose your protected health information. You may [click here](#) to access our Notice of Privacy Practices. A copy may also be obtained from any of our pharmacies or by contacting us (see the “How to Contact Us” section below).

TEXT MESSAGING SERVICES

When you sign up for one of our text messaging programs, you are expressly consenting to receive text messages on your cell phone or other mobile device about our products, services, and/or programs which may be sent by automated means. Text messages will only be sent to the mobile phone number used to opt into the applicable text message program. Some programs may send you up to the specified number of messages per month, dependent on the program, and each program in which you enroll will increase the total number of messages you receive each month. Details on how many messages you should expect to receive are provided at the time of enrollment. In some instances, you may have the opportunity to reply to a message, which may result in additional response messages. Your consent to enrollment in any text message program is not a condition of purchase. For information about a text message program you may text **HELP** to the applicable short code.

Message and data rates may apply. This means that your carrier may charge you for each message we send to you or that you send to us. It is your responsibility to know whether your carrier will charge you a per-message fee. We do not charge a fee for our text message programs and assume no responsibility for charges by your carrier you may incur when you sign up to receive text messages from us.

You may opt out of a text message program at any time by texting the word **STOP** to the applicable short code from an enrolled device. You will receive a final confirmation message that will confirm that you will no longer receive text messages from the applicable text message program unless you opt back into such program. Different instructions may apply to health care text messages related to our pharmacy services.

INFORMATION PERTAINING TO CHILDREN

Our websites are not directed to, and we do not intend to, or knowingly, collect or solicit personal information

online from children under the age of 13. We encourage parents or guardians to participate in and monitor their children's online activity. If a child under 13 has provided personal information to us without parental or guardian consent, we encourage the child's parent or guardian to contact us (see the "How to Contact Us" section below) to have the information removed from our systems. If you are under the age of 13, do not provide us with any personal information either directly, on any website bulletin boards, or by other means.

We may provide mobile applications intended for use by children under the age of 13, however we do not collect or solicit personal information from children who use such mobile applications. This Privacy Policy does not apply to, and references in this Privacy Policy to our mobile applications do not include, our mobile applications intended for use by children under the age of 13.

ACCESS TO AND RETENTION OF PERSONAL INFORMATION

We do not maintain all of your personal information in a form that you can access or update, and some items, such as transaction records, may not be changed. Accordingly, we will determine and may limit what may be accessed and how, and we may keep a record of changes (including deletions) and disclose them for lawful purposes. We keep your personal information for as long as we think is necessary or advisable, and we reserve the right to retain it to the full extent not prohibited by law. You may review your personal information that is readily accessible or contact us to request that it be updated by contacting our Customer Interaction Center (see the "How to Contact Us" section below).

SECURITY OF PERSONAL INFORMATION

We use various physical, electronic, and procedural measures designed to protect your personal information from unauthorized access, disclosure, or misuse. We use strong encryption when transmitting your sensitive personal information. However, because no data security systems are completely secure, we do not warrant that any personal information that you provide to us will be secure or safe from unauthorized access. If you provide any personal information to us, you do so at your own risk.

LINKS TO OTHER WEBSITES

For your information and convenience, our websites and mobile applications may contain links to websites operated by third parties. When you visit third party websites, such third parties may collect information about your visit and use it to provide advertisements to you. This Privacy Policy does not apply to, and we are not responsible for, the practices of third parties that collect your personal information. Each of these linked websites may maintain its own policies about the collection, use and protection of your personal information. We encourage you to review the privacy policies of such third parties to learn about their information practices and security measures.

CHANGES TO THIS POLICY

We will modify this Privacy Policy if our practices change. We will notify you of such changes by posting the modified version on our website and indicating the date it was last modified, and if the changes are significant, we will provide a more prominent notice (including by email in certain instances). The date this Privacy Policy was last modified is at the top of this page. We encourage you to visit our website periodically to view the latest version of this Privacy Policy.

OPT-OUT CHOICES

We may send you email messages, direct mail offers, or other communications regarding products or services unless you specifically ask us not to do so when you access our websites or mobile applications, or change your preferences by updating any accounts you may have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request when applicable (see the "How to Contact Us" section below) or by following the instructions in the form of the communication you received, as described below. We will endeavor to process your opt-out request in a commercially reasonable time.

- **Printed Materials:** To opt out of receiving printed marketing materials at your postal address, such as advertisements, flyers or postcards, write to us at the address below. Please be sure to include your name and mailing address exactly as they appear on the printed marketing materials you received.
- **Emails:** To opt out of receiving marketing materials via email, please send an unsubscribe request to the email address below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page.
- **Facsimiles:** You may opt out of receiving communications sent by fax by using the methods provided in the communication or by contacting us at the address below.
- **Voice or Text Messages:** To opt out of receiving calls from our live representatives by telephone, contact us at the address below. If you have consented to receive prerecorded voice messages or text messages, you may opt out of receiving them by using the method provided in the prerecorded voice message or text message or by contacting us at the address below.
- **Google Analytics:** You may opt out of the aggregation and analysis of data collected about you on our website by Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout> and downloading and installing the Google Analytics Opt-out Browser Add-on.

DATA TRANSFERS

We are based in the United States. When we obtain information about you, we may transfer, process, and store such information in the United States and other countries. By using our websites and mobile applications, you consent to the transfer to, and to the processing and storage of your information in, countries outside of your country of residence, which may have different data protection laws than those in the country in which you reside.

HOW TO CONTACT US

If you have questions or comments about this Privacy Policy or other privacy-related matters, you may contact us as follows:

Mailing Address: Albertsons Companies, Attn: Albertson's Customer Service, 250 Parkcenter Blvd., Boise, ID 83706

Email Address: AlbertsonsCustomerInquiries@albertsons.com

Customer Interaction Center: (877) 723-3929

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