

Privacy Policy

Privacy Policy Update Note: The Privacy Policy updates are going into effect on October 1, 2022. The changes relate to clarity around the sale of data and the opt-out rights for California residents.

Last Updated: October 1, 2022

Albertsons Companies, Inc. including its subsidiaries and affiliated entities (“Company,” “we,” “us,” or “our”), respects your privacy and is committed to protecting it. This Privacy Policy describes what personal information is collected through our websites, online services, call centers, Interactive Voice Response System, and stores, how that information is used, to whom it’s disclosed, how it is safeguarded, and the choices you have regarding the collection and use of such information. Unless indicated otherwise, this Privacy Policy applies to personal information collected through our websites, microsites, mobile applications, stores, products, services, programs (including loyalty or rewards programs), or otherwise through any interaction you have with us (collectively “Services”). The information collected or maintained by our pharmacies is also subject to our HIPAA Notice of Privacy Practices, which more specifically describes how we may use or disclose your protected health information (including information that you, your physician or other health care provider, or insurance carrier provides to our pharmacies). A copy of our HIPAA Notice of Privacy Practices is below. A copy may also be obtained from any of our pharmacies or by contacting us (see the “How to Contact Us” section below). To the extent this Privacy Policy and our HIPAA Notice of Privacy Practices are in conflict, we will follow whichever document provides the most protection to your protected health 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 Services, you are consenting to our use of such information, subject to applicable laws, and agreeing to the terms of this Privacy Policy.

This Policy addresses these topics:

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1. What Is Personal Information?

By “personal information” we mean any information that can be directly associated with or used to identify a specific person. This may include information such as an address, phone number, email address, or fax number, a username or other online registration information; and a financial account or credit card number, as well as other information (e.g., employment-related or transactional information, purchase history, tastes and/or preferences) when coupled with a person’s identifying information.

2. What Personal Information Do We Collect?

2.1. Personal Information You Provide

We may request or give you the opportunity to provide personal information when you shop in our stores or online, register as a user of our website or one of our mobile applications, sign up for our programs, offers, or sweepstakes, take a survey, use our products or Services, cash a check, contact us about a prior purchase, apply for or inquire about employment with us, or email, call, or otherwise communicate with us. The types of personal information you provide differs based on how you choose to interact with us, but may include your name, address, phone number, email address, date of birth, identification information (which, in some situations, may include your social security number), personal preferences, payment card information, purchase and ordering information, demographic information, citizenship and work history information, and any other information you choose to provide.

2.2. Automatically Collected Information

- **Location Information.** Location information may be collected when you access our Services. For information on how to opt out of this collection see “Opt-Out Choices” below.
- **Navigational Information.** When you access our Services, your computer, phone, or other device provides navigational information, such as browser type and version, service-provider identification, IP address, the site or online service from which you came, and the site or online service(s) to which you navigate.

- **Transactional Information.** When you shop in our stores or online or register for or use any of our online, mobile, or other Services, transactional and other information such as the date of your purchase, the items purchased, the dollar amount or value of the transaction, registration for or service usage, their descriptions and, if applicable, your IP address, browser type, domain names, access times, operating systems, mouse clicks and movements, and scrolling activities may be collected automatically or “passively”. For example, we may use analytics tools that collect information about the use of our websites and user traffic.
- **Device Information.** Beacons technology may be used to collect mobile device information such as the device type, model and operating system version, identification numbers assigned to your mobile device (e.g., the ID for Advertising on Apple devices and the Advertising ID on Android devices), mobile network information; and website or app usage behavior.
- **Audio and Video Information.** Audio or video records may be collected for quality control, training, security, and analytic purposes when you call us or visit one of our stores. For instance, we may use video monitoring technology at our stores for fraud and theft prevention, analytics, and security. We may or may not be able to associate such information with you.
- **Cookies, Web Beacons, and Similar Technologies.** Cookies, local shared objects (or Flash cookies), web beacons, Uniform Resource Locators (URL), and similar technologies may be used 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 IP 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 and interact with our Services, your preferences, and what products and services you purchase. Device identifiers, web storage, and other technologies may be used to collect information about your interactions with our content and Services. We deliver a customized experience and do not currently respond to “Do Not Track” signals of web browsers.

These technologies help us to recognize you, customize or personalize your shopping experience, associate your online navigational information or purchases and interactions (both online and offline) with any personal information you provide (such as name, address, phone number, survey response, and email address), 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 include personal information.

2.3. Other Information

We may obtain information about you from other parties such as demographic marketing information, address verification, or mailing list information and may combine it with other personal information pertaining to you.

2.4. Health Information

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 information 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 also subject to our Notice of Privacy Practices which 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). To the extent this Privacy Policy and our HIPAA Notice of Privacy Practices are in conflict, we will follow whichever document provides the most protection to your protected health information.

2.5. Information Pertaining To Children

Our Services 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.

3. How Do We Use Personal Information?

3.1. Primary Business Purposes

We or our service providers on our behalf may use your personal information for a variety of business purposes including:

- Providing customer service, including 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.
- Personalizing your experience with our Services with content and offers that are tailored to you, including special offers from other companies.
- Providing you with newsletters, articles, product or service alerts, new product or service announcements, savings awards, event invitations, and other information.
- Including you in market research, surveys, promotions, sweepstakes, and contests.
- Improving our Services such as the way offers are made for our Services based on the purchasing decisions of our customers and improving the interactions visitors have with our Services.
- 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.
- Keeping a record of our interactions with you if you place an order or otherwise deal with our representatives over the telephone or online.
- Verifying and validating your identity or otherwise preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal information, and our website or data systems.
- Complying with our legal obligations, including complying with law enforcement or governmental authority requests, participating in judicial proceedings, responding to requests from third parties based on their statutory rights against us (IP infringement, piracy, other unlawful activity) and investigating fraudulent activity.
- Processing and evaluating your application and related materials you submit as a job applicant.
- Interacting with you when you contact us as a vendor or on behalf of another business.

- Enabling you to interact with content service providers, whether by linking to their sites, viewing their content within our online environment, or by viewing our content within their online environment.
- Creating aggregated, pseudonymized, or anonymized information for analytical and statistical purposes.
- As permitted by applicable laws including for enforcing our [Terms of Use](#), other agreements and policies.

3.2. Advertisements

We may contract with advertising companies to collect information about online use and interactions with the Services, over time and across other websites and Services, for use in delivering tailored online display and banner advertising to your device(s) on other websites and online services. To serve this advertising, these companies place, use, or rely on the technologies described above, including cookies, clear gifs, device identifiers, and similar technologies to obtain information about interactions with us through our Services and interactions with other online services. These companies use the information they collect to serve ads to your device(s) that are targeted to your interests.

We may also work with third-party platforms, directly or through our service providers, to serve ads to you as part of a customized campaign on these platforms. As part of these ad campaigns, information about you, such as your email address and phone number, is converted into a unique value that can be matched with a user account on these platforms to allow us to learn about your interests and to serve advertising that is customized to your interests. Note that the third-party platforms may offer you choices about whether you see these types of customized ads.

Additionally, we may use automatically collected information to allow other parties to serve ads to you on our websites or mobile applications or to serve our ads to you on another party's website. If you "click through" to or otherwise visit third-party websites or mobile applications, 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 other third parties that collect your personal information. We 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.

For information about opt-out programs that these advertising companies participate in and to opt-out of the use of website browsing data for interest-based advertising by companies that participate in these programs, click the following: [NAI Opt Out](#) or [DAA Opt Out](#). To opt out of the use of data collected from the mobile applications on your device to serve ads that are targeted to your interests, consult the settings on your device. You can also click the preference icon that may appear on some of our advertising served through use of these technologies.

We may also use analytics providers, such as Google Analytics, to measure traffic and usage trends and to help us better understand your use of, and interaction with, our Services. For more information on how Google uses data when you use our Sites, [click here](#).

3.3. 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.

3.4. Loyalty Programs

As part of our Services, we offer loyalty programs that, individually or in combination with each other, use information to provide rewards and/or provide exclusive discounts or offers to program participants. The program details below provide important information about participants' rights and obligations in Company-sponsored loyalty programs. All programs may not be available in all areas, and program functionality may vary by geographic location. All participants are bound to these program details.

Certain Company divisions and/or select locations may run limited-time promotions offering additional single purchase and/or cumulative rewards. Where offered, these promotions may be subject to additional or different advertised terms.

Loyalty Program Participation

Participation in one or more of our loyalty programs is open, where offered, to everyone over the age of 13 who signs up or otherwise chooses to participate. Though registration may be required for participation in some of our programs, membership is not considered to be exclusive to the registered individual and multiple people are permitted to use a single membership account. For instance, participants are free to share their membership number or other account information with family and friends to receive in-store discounts and collectively earn and use Points and redeem special offers. For this reason, information collected through our loyalty programs is not attributable to any individual or household.

Special Promotions

We may make special offers available to loyalty program participants from time to time. If applicable, the terms and conditions for such special offers will be disclosed at the time of the offer or promotion. Please review those terms and conditions carefully, as there may be important conditions or limitations. Availability of any special offer is subject to change without notice.

Communications

We may contact loyalty program participants regarding any matter related to the Program. These Program communications may be in addition to general marketing which you may receive from us. Even if a participant opts out of marketing communications, the account may still continue to receive relationship/operational communications related to the Program.

General Terms

Participation in a loyalty program and its benefits are offered at our sole discretion and may vary from brand to brand and location to location. We may change a loyalty program, including any special promotions, benefits, or these program details at any time and for any reason. We also reserve the right to alter loyalty program benefits and special promotions based on account activity, volume or purchases, geographic location, or other non-discriminatory factors. We can delay enforcing our rights under a loyalty program without losing them. In addition, our failure to exercise rights on any one occasion, or even on more than one occasion, does not constitute a waiver of our rights for any future occasion. All waivers must be in writing. Participants are solely liable for any applicable federal, state or local income, sales, use, or other taxes arising out of the accrual or use of Points or Rewards.

Terms and Conditions

To know more about the Albertsons Companies **[Banner] for U™** (i.e., “Albertsons for U™,” “Safeway for U™,” “Randalls for U™,” etc.) Program terms and conditions (Terms and Conditions), please click [here](#).

4. What Choices Do You Have Over How Your Information Is Used?

We give you choices about the information we collect and how we communicate with you.

- **Printed Materials.** To opt out of receiving printed marketing materials at your postal address, such as advertisements, flyers or postcards, write to us at Albertsons Companies, Attn: Albertsons Customer Support Center, M.S. 10501, P.O. Box 29093, Phoenix, AZ 85038 or submit your request online by clicking [here](#). 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 our Customer Support Center by clicking [here](#) 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 our Customer Support Center by clicking [here](#).
- **Voice or Text Messages.** To opt out of receiving calls from our live representatives by telephone, contact our Customer Support Center by clicking [here](#). 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.
- **Mobile Push Notifications/Alerts.** With your consent, we may send push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.
- **Location Information.** You may have the ability to turn location-based services on and off by adjusting the settings of your internet browser or mobile device or, for some devices, by revoking permission for our mobile app to access your location information.
- **Custom Audience Campaigns.** As noted above, we sometimes work with third party platforms to serve ads to you as part of a customized campaign on those platforms. You may be able to opt-out of receiving these ads by adjusting your preferences within these third-party platforms.

- **Cookies, Web Beacons, and Similar Technologies.** Your browser may offer the ability to block or delete cookies from your device. Simply follow your browser's instructions on how to block and clear cookies. Flash cookies operate differently than browser cookies and cookie management tools available in a web browser may not remove Flash cookies. To learn more about Adobe's cookies and about how you can manage your Flash cookie settings, please visit Adobe's website at <https://www.adobe.com/privacy/cookies.html>. To learn more about cookies visit www.allaboutcookies.com. Please note, however, that disabling our cookies may result in your inability to take full advantage of all of the features of our Services. For easy access, here are links on how to clear, manage and delete cookies from some of the more popular browsers:
 - [Google Chrome: Manage Cookies](#)
 - [Firefox: Enable and Disable Cookies](#)
 - [Internet Explorer: How to Manage Cookies](#)
 - [Edge: Allow or Block Cookies](#)
 - [Safari: Managing Cookies](#)

5. What Personal Information Do We Share And For What Purpose?

We disclose personal information for business purposes as described below:

- **Our Subsidiaries.** Our subsidiary entities may also collect and share the personal information described in this Privacy Policy with their parent, subsidiary, and affiliate entities for use in the ways described in this policy.
- **Service Providers.** We may disclose your personal information to our service providers to help handle parts of our business because of their expertise, resources, or scale. They help us do things like fulfill orders, process your payments and requests, verify your information, monitor activity on our Services, provide analysis and analytics, maintain databases, administer, and monitor emails and marketing, administer, and send mobile messages, serve ads on this and other services, provide consulting services, and otherwise perform actions consistent with the uses described above. We may also use them to host our sites, microsites, mobile sites, and mobile applications, conduct market research, or

send you information regarding our products or Services or those of other companies with whom we conduct business.

- **Third Parties.** We share your PI with companies such as advertisers, marketing partners and platforms, data analytics providers, social media networks, and others to provide services that include, but is not limited to, product recommendations, delivering marketing messages, and sending you relevant offers. The types of PI shared may include unique identifiers (e.g., cookies and similar technologies), device information, geolocation data, commercial data, behavioral data, and inferences.
- **Legal Process and Emergency Response.** We may also disclose specific information about visitors to our Services if we have a good-faith belief that it's necessary or authorized under the law or to protect our customers, the public, or our business.
- **Certain Business Transfers.** Your personal information may be disclosed as part of a corporate business transaction, such as a merger, acquisition, or joint venture, or for the financing or sale of Company assets and could be transferred to another party as one of the business assets in such a transaction. It may also be disclosed in the event of insolvency, bankruptcy, or receivership.

6. How Do We Protect 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 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.

7. Where Is Personal Information Stored And Processed?

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.

8. Will There Be Changes To This Policy?

We will modify this Privacy Policy if our practices change or if the law requires it. We will notify you of such changes by posting the modified version on our website and indicating the date it was last modified. 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.

9. 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, Inc. Attn: Albertsons Privacy Office 250 Parkcenter Blvd. Boise, ID 83706
Email Address:	privacyoffice@albertsons.com
Toll-free Number:	(877) 251-6559 (toll free)

- **California Consumer Requests**

[Use our online form to submit a privacy request \(Right to Know / Right to Delete\).](#)

[Use our online form to submit a privacy request \(Opt Out of Sale\).](#)

- **Nevada Consumer Requests**

[Use our online form to submit a privacy request \(Right to Know / Right to Delete\).](#)

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UPDATED Supplemental Privacy Statement For California Consumers

Effective: October 1, 2022

In addition to our Privacy Policy, this Supplemental Privacy Notice (“CA Statement” or “Notice”) provides information to California residents whose personal information is collected by us about their rights under California laws, including the California Consumer Privacy Act (“CCPA”). If you are not a California Resident, this Notice does not apply to you. Capitalized terms that are not defined in this Notice have the same definition as in CCPA, California Civil Code § 1798.100, et seq. (together with the regulations thereunder, the “CCPA”), as applicable.

Consistent with the CCPA, information concerning job applicants, current and former employees, and independent contractors (collectively, “Personnel”), and subjects of certain business-to-business communications acting solely in their capacity (“B2B data subjects”) as representatives of another business is exempt from some or all of the requirements of the CCPA. This Notice does not apply to B2B data subjects, and only Sections 1 and 2 apply to Personnel. Publicly available information is also not treated as Personal Information (“PI”) under the CCPA, so this notice is not intended to apply to that data and your Consumer privacy rights do not apply to that data.

This Notice applies to the Personal Information we collected from you during the 12 months prior to the effective date of this Notice, dependent upon how you have interacted with us.

1. Collection And Use Of Personal Information

(a) Categories of Personal Information We Collected About California Consumers:

- **Identifiers** such as name, alias, postal address, unique personal identifier (such as pixels, cookies, web beacons), social security number, IP address, email address, phone number, passport number, customer number, account name, ID card information, or other similar identifiers;
- **Personal records** such as physical characteristics or descriptions, signature, education, employment history, bank account information, medical information, financial information, or health insurance information;
- **Characteristics** such as age, race, color, ancestry, national origin, marital status, religion, sex, veteran or military status, medical condition, and mental or physical disability, and other demographic data;
- **Customer Accounts/Commercial information** such as records or personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies;
- **Online usage information** such as Internet and other electronic network activity information including, but not limited to, browsing history, search history, information on a consumer's interaction with a website, application, or advertisement;
- **Geolocation data** such as physical location;
- **Sensory information** such as audio recordings of customer service calls, visual recordings of consumers in stores; and
- **Inferences Derived From Personal Information/Profiling** such as your purchase preferences, interests, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

There may be additional information that we collected that meets the CCPA's definition of PI but is not reflected by a category, in which case we will treat it as PI as required by the CCPA but will not include it when we are required to describe our practices by category of PI.

As permitted by applicable law, we do not treat De-identified data or Aggregate Consumer Information as PI and we reserve the right to convert or permit others to convert your PI into De-identified or Aggregate

Consumer Information. We have no obligation to re-identify such information or keep it longer than we need it for our own purposes.

(b) Categories of Sources of Personal Information that We Collect:

- Directly from you. For example, when you create an account, make a purchase, browse our website, or use our app(s), interact with our third-party social media pages or services, or apply for or accept an employment position with us.
- Albertsons Customers - Your friends, family, or associations, including through their use of the Services.
- Directly and indirectly from activity on our Services, and Third-Party social media pages and other services. For example, see the types of collection in the “Automatically Collected Information” section above.
- Social Networks.
- Advertising Companies.
- Service Providers who provide services on our behalf such as those used to fulfill orders, process your payments and requests, verify your information, monitor activity on our Services, provide analysis and analytics, maintain databases, administer and monitor emails and marketing, administer and send mobile messages, serve ads on this and other services, and provide consulting services.
- Third Party data providers Operating systems and platforms
- Credit agencies or bureaus
- Government entities and other public sources
- Albertsons family of brands Creation by us.

(c) Business or Commercial Purposes:

- Providing customer service, including 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.

- Personalizing your experience with our Services with content and offers that are tailored to you, including special offers from other companies.
- Providing you with newsletters, articles, product or service alerts, new product or service announcements, savings awards, event invitations, and other information.
- Including you in market research, surveys, promotions, sweepstakes, and contests.
- Improving our Services such as the way offers are made for our Services based on the purchasing decisions of our customers and improving the interactions visitors have with our Services.
- 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.
- Keeping a record of our interactions with you if you place an order or otherwise deal with our representatives over the telephone or online.
- Verifying and validating your identity or otherwise preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal information, and our website or data systems.
- Complying with our legal obligations including complying with law enforcement or governmental authority requests, participating in judicial proceedings, responding to requests from third parties based on their statutory rights against us (IP infringement, piracy, other unlawful activity) and investigating fraudulent activity.
- Processing and evaluating your application and related materials you submit as a job applicant.
- Interacting with you when you contact us as a vendor or on behalf of another business.
- Enabling you to interact with content service providers, whether by linking to their sites, viewing their content within our online environment, or by viewing our content within their online environment.
- Creating aggregated, pseudonymized, or anonymized information for analytical and statistical purposes.
- As permitted by applicable laws including for enforcing our [Terms of Use](#), other agreements, and policies.

Additional Business Purposes for which we Collect, and may disclose, PI include sharing PI with Third Parties for one of the foregoing Business Purposes as required or permitted by applicable law, such as to

our vendors that perform services for us, to the government or private parties to comply with law or legal process, to the Consumer or other parties at the Consumer's request or direction, for the additional purposes explained in our online Privacy Policy or at the point of collection, and to assignees as part of a merger or asset sale ("Other Business Purposes"). Subject to restrictions and obligations of the CCPA, our vendors may also use your PI for some or all of the above listed Business Purposes and engage subcontractors to help them perform services for us. In addition, we may Collect, retain, use, and disclose your PI as required or permitted by applicable law. We treat all of these purposes as Other Business Purposes.

2. Categories of Personal Information Disclosed

2.1 We may disclose the following categories of PI to Service Providers for a Business Purpose, or, at your direction, with Third Parties such as sponsors of promotions, sweepstakes, or contests. We disclosed the following

Category of Personal Information Disclosed for a Business Purpose	Categories of Recipients
<ol style="list-style-type: none">1. Identifiers2. Personal Records3. Characteristics4. Internet/Network Activity5. Customer Records/Commercial Information6. Geolocation Data7. Sensory Information8. Inferences	<ul style="list-style-type: none">• Service Providers• Marketing/Advertising Agencies• Analytics & Retail Merchandising Vendors• Marketing Mix Measurement Providers, Compliance, Tech Performance Measurement, and other Service Providers• Social Networks• Albertsons' Affiliates• Governmental Authorities and Agencies

2.2 Categories of Personal Information Sold for a Business Purpose

We share your PI with companies such as advertisers, marketing partners and platforms, data analytics providers, social media networks, and others to provide services that include, but is not limited to, product recommendations, delivering marketing messages, and sending you relevant offers. The types of PI shared may include unique identifiers (e.g., cookies and similar technologies), device information, geolocation data, commercial data, behavioral data, and inferences. We do not knowingly sell the PI of consumers under 16 years of age.

3. Deidentified Patient Information

We collect and deidentify certain health care patient information in our capacity as a pharmacy health care provider. In some instances, we disclose, license, and/or sell the deidentified information derived from this health care patient information. To deidentify this health care patient information, we use either the deidentification methodology (1) described in Section 164.514(b)(2) of Title 45 of the Code of Federal Regulations, commonly known as the HIPAA safe harbor method or (2) described in Section 164.514(b)(1) of Title 45 of the Code of Federal Regulations, commonly known as the HIPAA expert determination method. As such, this deidentified information is not PI.

4. California Consumer Privacy Rights

(a) Right to Know:

You have the right to request that we disclose to you the following information about Personal Information we Collect from you:

- categories of personal information collected;
- categories of sources of personal information collected;
- the business or commercial purpose for collecting or selling personal information;
- the categories of third parties with whom we share personal information; and
- the specific pieces of personal information we have collected about you over the past 12 months.

You also have a right to know if we have sold or disclosed your personal information for a business purpose over the past 12 months and, if so, the categories of personal information sold or disclosed and the categories of third parties to whom the personal information was sold or disclosed, along with the business or commercial purpose for which the personal information was sold or disclosed. You may make a request via our online webform [click here](#).

Once we receive your Request to Know, we are required to verify that you are the person that is the subject of the request (the "Verification Process"). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. Upon making a request, you will be asked to provide your name, email address, phone number, and request details. A confirmation email will be sent to the email address you provide to begin the process to verify your identity. If we cannot verify your identity, we will not be able to respond to your request.

(b) Right to Request Deletion of Personal Information

You have the right to request the deletion of your Personal Information collected or maintained by us ("Request to Delete"), subject to certain exceptions permitted by law. Examples of such exceptions include: to complete transactions and provide services you have requested from us or that are reasonably anticipated, for security purposes, for legitimate internal business purposes, including maintaining business records, to comply with law, to exercise or defend legal claims, and to cooperate with law enforcement. If we deny your request, we will explain the reasons in our response and, if applicable, will provide guidance to cure deficiencies in your request.

To make a request to delete, please submit a verifiable consumer request pursuant to the instructions below. We will acknowledge your request within 10 business day and will attempt to respond substantively within 45 days. If we need additional time, we will let you know

- You may make a request via our online webform [click here](#)
- You may also make a request by phone by calling us at (877) 251-6559 (toll free).

Once we receive your request to delete, we are required to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. Upon making a request, you will be asked to provide your name, email address, phone numbers and request details. A confirmation will be sent to the email address you provide to begin the process to verify your identity and to confirm that you want to delete your information. If we cannot verify your identity, we will not be able to respond to your request.

If you make a CCPA deletion request, your personal information will be maintained for loyalty program operations, unless you also terminate your applicable loyalty accounts using the online contact form: [here](#) or by calling customer service at 877-723-3929. You also have the option of requesting the deletion of your shopping history only.

(c) Right to Opt-Out of Sale of Personal Information

You have the right to opt out of the sale of your PI to third parties by [clicking here](#) and opting out. You may also request to opt-out by calling us at (877) 251-6559 (toll free). If you decide to opt-out, we will stop sharing your information with third parties. But please note that your use of our website may still be tracked by us and our service providers to perform functions that are necessary for our business such as hosting our website, ensuring there is no fraud, etc. These entities are contractually obligated to keep this information confidential and will not use it for any purpose other than for the services they provide to our business.

We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt-Out for 24 months as required by law.

(d) Right to Non-Discrimination and Notice of Financial Incentives

You have the right to not receive discriminatory treatment for exercising your CCPA privacy rights. We do not use the fact that you have exercised or requested to exercise any CCPA rights for any purpose other than facilitating a response to your request.

5. Notice of Financial Incentive

Our loyalty program, Albertsons Companies “[Banner] for U™” (i.e., “Albertsons for U™,” “Safeway for U™,” “Randalls for U™,” etc.) provides you with Rewards (i.e., Gas Rewards and Grocery Rewards) for your eligible in-store and online purchases. Our “just for U” loyalty program has been rebranded as “[Banner] for U™” but with new deals, Rewards, and perks. This Program is subject to termination at any time at our sole discretion.

Program	Incentive Offered	Material Terms	How to Opt-In
“[Banner] for U™” (i.e., “Albertsons for U™,” “Safeway for U™,” “Randalls for U™,” etc.)	Provides consumers with customized discount coupons, complimentary in-store Wi-Fi, and birthday treat (optional). Your Albertsons Companies “[Banner] for U™” account earns points for every dollar spent on eligible purchases. Points are accumulated to earn Rewards that may be redeemed on future gas or grocery purchases.	<ul style="list-style-type: none">• Available at participating stores.• Categories of personal information collected:<ul style="list-style-type: none">○ Identifiers such as name, email address, telephone number, zip code, month and date of birth (optional).○ Customer Accounts /Commercial Information such as shopping history, coupons/points redeemed, points earned, preferred Market Store.○ Internet/Network Activity such as IP address, activity logs, browsing history.○ Geolocation Data.○ Inferences drawn from one or more of the above, including a consumer’s shopping history, that reflects a consumer’s shopping preferences.	<ul style="list-style-type: none">• Register for an account online or on the mobile app.

Program	Incentive Offered	Material Terms	How to Opt-In
		<ul style="list-style-type: none"> Additional information available at https://www.albertsons.com/justforu-guest.html 	

NOTE: As of August 3, 2021, we will begin phasing out the Club Card program. However, consumers who have active Club Card memberships will not be affected and will continue to receive the incentive offered under the Club Card loyalty program.

The notices of financial incentive for Albertsons previously offered loyalty programs “**just for U,**” and **Gas Reward/Grocery Reward/Club Card’s** are as follows:

Program	Incentive Offered	Material Terms	How to Opt-In
“just for U” (including Gas Rewards and Grocery Rewards)	<p>Provided consumers with customized discount coupons.</p> <p>Your “just for U” account earned points for every dollar spent on eligible purchases. Points were accumulated to earn Rewards that were redeemed for future gas or grocery purchases.</p>	<ul style="list-style-type: none"> Available at participating stores. Categories of personal information collected: <ul style="list-style-type: none"> Identifiers such as name, email address, telephone number, zip code. Customer Accounts /Commercial Information such as shopping history, coupons/points redeemed, points earned, preferred Market Store. Internet/Network Activity such as IP address, activity logs, browsing history. 	<ul style="list-style-type: none"> Register for an account online or on the mobile app.

Program	Incentive Offered	Material Terms	How to Opt-In
		<ul style="list-style-type: none"> ○ Geolocation Data. ○ Inferences drawn from one or more of the above, including a consumer's shopping history, that reflects a consumer's shopping preferences. • Additional information available at https://www.safeway.com/justforuguest.html 	
Club Card (including Gas Rewards and Grocery Rewards)	<p>Provides customers with instant advertised discounts on in-store purchases at participating locations.</p> <p>Club Card also earns points for every dollar spent on eligible purchases. Points are accumulated to earn Rewards that may be redeemed on future gas or grocery purchases</p>	<ul style="list-style-type: none"> • Categories of personal information collected: <ul style="list-style-type: none"> ○ Identifiers such as telephone number. ○ Customer Accounts /Commercial Information such as shopping history, coupons/points redeemed, points earned. ○ Inferences drawn from one or more of the above, including a consumer's shopping history, that reflects a consumer's shopping preferences. 	<ul style="list-style-type: none"> • Requesting a physical card in-store; providing a 10-digit number (e.g., phone number).

Value of the Consumer's Data

To form the basis for offering the financial incentive, Albertsons has made the following good faith estimate of the value of consumers' data based on expenses related to the collection, retention, and offering of Albertsons loyalty programs as permitted by Reg. §999.337(a)(5) and (a)(6). The expenses related to the collection and retention of consumer PI as well as expenses related to the total program operating expenses is calculated by measuring the people costs and IT costs incurred by Albertsons in the fiscal year 2020, except for Albertsons Companies "[Banner] for U™" (i.e., "Albertsons for U™," "Safeway for U™," "Randalls for U™," etc.) Program, which was launched in August 2021. However, since "[Banner] for U™" is the rebranded version of "just for U" but with new deals, Rewards, and perks, we estimate the value of consumers' data to be similar.

Loyalty Programs	Value of the Consumer Data
"[Banner] for U™" (including Gas Rewards)	\$0.68/consumer
"just for U" (including Gas Rewards and Grocery Rewards)	\$0.68/consumer
Club Card (including Gas Rewards and Grocery Rewards)	\$0.68/consumer

Withdrawing From Loyalty Programs

You have the right to withdraw from the above programs at any time. You may do so by:

- Using the online contact form: [Here](#) or by calling customer service at 877-723-3929

6. Authorized Agent

You may designate an authorized agent to exercise any of the above California privacy rights on your behalf, subject to the agent request requirements of the CCPA. Authorized Agents may make requests under the CCPA on behalf of California Consumers by clicking on the links noted above.

Please note, for your safety and security, we will require authorized agents to provide proof of the consumer's consent and designation of the authorized agent for the purpose of making the request and will require authorized agents to provide information necessary to verify the identity of the consumer who is the subject of the request. We may also require that a consumer verify his/her own identity directly with us before we respond to an authorized agent's request.

We reserve the right to deny requests in certain circumstances, such as where we have a reasonable belief that the request is fraudulent.

7. CCPA Metrics

You can view the details of Albertsons' CCPA metrics report [here](#)

OTHER CALIFORNIA DISCLOSURE INFORMATION

California Do Not Track Notice

California law requires us to let you know how we respond to web browser Do Not Track (DNT) signals. Because there currently isn't an industry or legal standard for recognizing or honoring DNT signals, we don't respond to them at this time.

California's Shine the Light law

If you are a California resident, you are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of Personal Information to third parties for their direct marketing purposes in the preceding calendar year. To request the above information, please e-mail us at: privacyoffice@albertsons.com, or write to us at Albertsons Companies, Inc. Attn: Albertsons Privacy Office, 250 Parkcenter Blvd. Boise, ID 83706 with a reference to CA Disclosure Information.

8. Changes

We reserve the right to change this California Privacy Notice from time to time. Changes shall become effective on the date they are posted.

9. 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, Inc.
Attn: Albertsons Privacy Office
250 Parkcenter Blvd.
Boise, ID 83706

Email Address: privacyoffice@albertsons.com

Toll-free Number: (877) 251-6559