

# Privacy Policy

**Privacy Policy Update:** The Privacy Policy below goes into effect on January 1, 2023.

Last Updated: January 1, 2023

## Welcome

Thank you for shopping at an Albertsons Companies Store! You clicked to get to this page, so we know that you are interested in our privacy practices and want to learn more. That is great, and we want to explain it to you. While we would love you to read this entire privacy policy (please do, we spent a lot of time drafting this), we know that you may not have time today. To make it easier for you to find how this policy impacts you and your information, we have broken it down into how you interact with our company and our banners. Hopefully, this helps you find your answer quickly.

## We are Albertsons Companies, Inc.

We are Albertsons Companies, Inc. (“Company,” “we,” “us,” and “our”). Our banners serve customers, guests, and patients across the United States.

This Privacy Policy outlines how we collect, use, process, and share the Personal Data that you entrust to us (including health data covered by the Health Insurance Portability and Accountability Act (HIPAA)). At this time, this Privacy Policy does not include our United banner. The United privacy policy is available [here](#).

## Personal Data

---

What is Personal Data and why should you care about what we do with it? Let's start with how we define Personal Data:

*Personal Data is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked – directly or indirectly – to you or your household.*

So, what does that really mean? Personal Data is more than your name, address, and phone number - it includes all types of "identifiers" that can tie back to you. The crumbs of data connected to you when you create an account, purchase items, shop online, and share your preferences are all Personal Data. While we collect some of this information directly from you, a lot is collected behind the scenes. We use this information to better understand you as a shopper and your journey with us so that we can personalize your experience.

## The Parking Lot

---

In some of our store locations you may have noticed the signs in our parking lots related to our use of cameras. The cameras capture **video** and **images** of **you**, your **vehicle**, and **others** in our parking lot. They are there to keep an eye on the area, deter crime, and to help promote safety. In some states, our cameras may capture license plate information. Our asset protection team and others at our Company review the recordings and data throughout the year as part of our commitment to the community and to help keep the products you love in the stores.



You may also see that we have reserved Drive-Up & Go spots near the front of many of our stores (there are signs there too). When you take advantage of Drive-Up & Go, you simply place your order online, park in your designated spot at the estimated time, and let us know you have arrived. We may ask for your **name, vehicle information**, and parking spot to make sure your groceries make it into your trunk. After your groceries are safely delivered to your vehicle, the information is retained for a limited period of time (just in case there was a mix up).

While we don't regularly provide the information we capture in the parking lot to law enforcement, insurance carriers, and other third parties, from time to time we may be asked to do so. For more information on our data collection, use, and sharing practices in the parking lot, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Entrance – Come on in

---

We have cameras in various locations throughout our stores. The cameras capture **video** and **images** of **you** as you shop. This technology helps us understand how traffic flows throughout our store, what's on our shelves, and detect and respond to theft.

In addition, you may also get to test drive our smart shopping carts in some places. These carts capture details about what products are in your cart and provide payment options to help speed up the checkout process.

As members of your community, your store may also have package storage lockers and other kiosks that support your delivery and entertainment needs. We do not receive your Personal Data from third party companies providing these options.

While we don't regularly provide the information we capture as you walk through our stores to law enforcement, from time to time we may be asked to do so. For more information on our data collection, use, and sharing practices at the store entrance, see *Data Collection*, *Data Use*, and *Data Sharing*.



## Coffee – Caffeination on the Go

---

We get it, sometimes you just need a little java to get shopping. That's why some of our stores have coffee shops at the entrance. The limited Personal Data captured when you purchase your iced latte may be shared between the third-party brand and Albertsons to help us better understand the service.

For more information on our data collection, use, and sharing practices at the coffee shops, see *Data Collection*, *Data Use*, and *Data Sharing*.



## Shopping & Aisle Browsing

---

Sometimes we may not have what you are looking for on our shelves. Don't worry, we have alternative ways to get you what you need. Speak with a store associate or go online to check out broader availability and have the item delivered to your home from us or one of our third-party vendors. To do this, we may need your **name, email address, phone number, home address,** and **billing information** to get you your items.



From time to time, we may offer some instore games and activities. You may need a **loyalty account** to participate fully in these offerings. More details on these programs are available online, as you walk through our store, and at checkout.

We may also offer free in store Wi-Fi to our loyalty members so that you can look up a recipe online, text someone for help, or generally surf the web. When you log into our Wi-Fi, we may capture your device's **MAC address, IP address,** and **unique device identifier** such as a **name or number assigned to the device,** along with your **loyalty account** details. We may also receive the real-time **location** of your device while it is accessing the Wi-Fi. For more information on our guest Wi-Fi see our [Wi-Fi terms and conditions](#).

For more information on our data collection, use, and sharing practices in the aisles, see *Data Collection, Data Use,* and *Data Sharing*.



## Pharmacy

---

Feed two birds with one scone, and drop off or pick up your scripts while you shop. The Personal Data we capture when you are at the pharmacy counter, by your pharmacists and telehealth professionals, and within our pharmacy systems is generally protected health information (PHI) covered under HIPAA. If you've been to a doctor, you may be familiar with these terms, but we wanted to break it down a little more clearly for you here. As your pharmacy health care provider, we have access to your **prescription**, the related Personal Data (e.g., **name**, **date of birth**), **prescription history**, and **profile information** to fulfill your pharmacy order. We may also have access to other **health-related information** you, your doctor, or your insurance carrier provides to us.

This information is most often used to fill your prescriptions, provide you with health care information or services, or contact you with questions and respond to your inquiries about our pharmacy Services.

When you come to pick up your prescription you will be asked to verify either your **name** and **birthdate** or the **name** and **birthdate of the person for whom you have authorized to pick up** the prescription. This information is needed to provide you with the medications you are collecting. As a reminder, please be respectful of those at the pharmacy counter. While our pharmacy associates work hard to keep your PHI



confidential, we ask that you keep your distance from other patients undergoing a pharmacist consultation, dropping off or picking up their prescription, or receiving other pharmacy-related or health related services.

You can also easily schedule appointments for immunizations through the app or online. Each time you go into our pharmacy area for a vaccine you will be asked to fill out a vaccine authorization form. You will be asked for your **name, birthdate, contact information**, and some **health related information** (additional information may be needed for Medicare participants including **Social Security Number**). For your convenience, you can also access your Covid-19 vaccination records digitally. You can access and download your Smart Health Card via your mobile device or online. You will be asked to verify your identity by entering your **name, birthdate, and phone number**.

PHI collected and/or maintained by our pharmacies is subject to our HIPAA Notice of Privacy Practices, which more specifically describes how we may use or disclose PHI. You can find a copy of this notice [here](#), at your local pharmacy, or by requesting a copy directly from the Privacy Office (see the “How to Contact Us”). If there are any conflicts between this Privacy Policy and our HIPAA Notice of Privacy Practices, we will follow whichever document provides the most protection to your PHI.

For more information on our data collection, use, and sharing practices at the pharmacy, see *Data Collection, Data Use, and Data Sharing*.

## **Pet Medicine**

---

Sometimes your dog Stella needs some medicine to feel better or live a healthier life. When you fill a pet prescription at our pharmacy there is some information that we need to collect about every pet parent. You



will be asked for your **name**, **birthdate**, and **pet's name**. If you and Stella don't already have a pet profile in our system you will also need to provide your **phone number**, **address**, and **insurance information** (if relevant) to complete your profile. We use that information to fill your pet's prescription, contact you with questions, and respond to your inquiries about the medication (although the benefits to your pet should be discussed with your veterinarian).

For more information on our data collection, use, and sharing practices for your pet, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Deli & Bakery Counters

---

Special events sometimes call for delicious Albertsons' goodies, whether that be a cake, a meat/cheese/nuts/fruit spread sometimes called a charcuterie board (char·cu·te·rie - hard to say, but so yummy), or anything else that catches your eye. When you place your order we may capture your **name**, **phone number**, **email address** and the **name or message** you want added to a bakery item (for example, *Happy Birthday Sam*). We use this information to fulfill your order and prepare it for pick up.



For more information on our data collection, use, and sharing practices at the deli and bakery counters, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Wine, Beer & Spirits

---

In some locations (depending on where you live), we may sell wine, beer and spirits in our stores. To provide you with these items we must check your **license** (or acceptable form of ID) and **date of birth** to ensure that you are legally permitted to purchase those items (we posted signs letting you know that we card). We may also digitally **scan your ID** in some locations as part of our alcohol and spirits compliance protocol. The information captured from your license is kept for 60 days, unless special circumstances require us to keep it longer. The information scanned is not used for our marketing purposes.



In addition, some of our stores may have special concierge or marketing lists tailored to wine, beer and spirit aficionados. To participate you may be asked for your **name, email address, phone number, wine preferences,** and **other information** to tailor the program to your preferences. We use this information to update you on deals, events, and other wine, beer and spirit-related promotions.

For more information on our data collection, use, and sharing practices as you purchase wine, beer and spirits, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Checking Out

---

Whether you checkout with a store associate, complete your order online, use self-checkout or one of our other seamless checkout options, there is certain information we collect from you to process your transaction and get your groceries to your fridge and pantry. Depending on the method used to purchase, we may collect your **name, email address, shipping address, phone number, store location, purchase information, and payment information**. In addition, if you are a loyalty member enjoying the additional benefits of membership (e.g., greater rewards and discounts), we capture your **loyalty account information** see *Customer Service (In Store & Online) Loyalty for additional information*.



There are also cameras that we use to analyze lines and monitor the checkout area to detect potential theft. These cameras may capture your **image**. While we don't regularly provide the information we capture at checkout to third parties, from time to time we may choose or be asked to do so.

For more information on our data collection, use, and sharing practices at checkout, see *Data Collection, Data Use, and Data Sharing*.

## Customer Service (In Store & Online)

---

### Loyalty

We love being part of your community and supporting you. So, we created a loyalty program that helps maintain our relationship and strengthen your loyalty to our family of stores by delivering an elevated shopping experience personalized to you. Our loyalty program offers a seamless experience in and out of our stores through many engagement opportunities, including through our pharmacy and health and wellness app, and benefits during and between your weekly shopping trips – hoping to make your experience feel easy, exciting, and friendly.



When you sign up for a loyalty account, we may collect your **name, email, phone number**, and ask you to create a **password**. You can enter other details, such as your **birthday** (we may just surprise you with a birthday treat). If you want to shop online and get groceries delivered to you, we will ask for **payment details** and **delivery address**. Outside of what you provide to us directly, we also collect data about your **shopping preferences** and how you **interact** with us - at our stores and on our apps. We collect this data to better understand you and your journey with us as a shopper, offer personalized deals, and help us make better business decisions and continuously improve.

For more information on our data collection, use, and sharing practices as party of loyalty, see *Data Collection, Data Use, and Data Sharing*.

### Refunds and Complaints

Our commitment to service doesn't end once you leave the store. Whether you are dealing with a missing product, not entirely satisfied with your experience, or have other comments or questions, you can reach our customer support center by phone, chat, or sending us a message online. Depending on the specific issue, we may need to collect information from you to look into the matter and respond, such as your **name**, **loyalty card** or **phone number** used at checkout, and other relevant **contact information**. Sometimes you may just want a refund, in that case we will need to collect **transaction data** and your **payment information**. If you decide to call us, the call may be recorded, and your **voice** may be captured as part of that recording.

For more information on our data collection, use, and sharing practices for customer support, see *Data Collection*, *Data Use*, and *Data Sharing*.

### **Money Transfers & Money Order Services**

Sometimes you need to transfer or receive funds, some of our stores have partnered with a third party to allow you to do so when you shop with us. To use this service, you may be asked for your **name**, **birthdate**, **social security number**, **address**, **occupation**, and **license** (or valid ID). This information may be maintained by us or our third-party partner that enables the transaction (the personal data provided to the third party partner is governed by their privacy policy).

### **Carding for Tobacco Products**

Tobacco products are subject to age restrictions, meaning we must check your **license** (or valid ID) and **date of birth** to ensure that you are legally permitted to purchase those items (we have posted signs letting you know that we card). In some locations, we may also digitally scan your license as part of our

compliance protocol. The information captured from your license is kept for 60 days, unless special circumstances require us to keep it longer.

For more information on our data collection, use, and sharing practices as part of our Customer Service support, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Fuel

---

As a member of our loyalty program, you can earn and redeem rewards for discounts at the pump with our partnering fuel stations (where we own and operate them, or when run by a third-party partner). To administer the gas rewards, we will use your **transaction data** to keep track of the available reward points and to adjust your balance after each use. When you enter your **loyalty number** at the pump, we will confirm that you are an Albertsons loyalty member and send information on the points available back to your pump so that you can redeem them.



Our third-party fuel station partners may also have their own apps where you can link your Albertsons gas rewards balance. If you allow it, then our fuel reward partners may have the ability to validate your loyalty number and the points available through their apps. Any data collected on these apps are subject to those partners' privacy terms.



For more information on our data collection, use, and sharing practices at the pump, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Events & Contests

---

As a recipe for success, we are constantly looking for ways to better engage with you and bring you opportunities to learn and have fun. In some locations, we offer special in-store events (who doesn't love National Donut Day), live and virtual classes, promotions, and sweepstakes. We may collect Personal Data such as information requested as part of the registration, typically your **name** and **contact information**, as well as transaction-related details tied to a particular promotion or sweepstake. Information collected will be used to manage attendees and contact you regarding the event or class or if you have won a prize or promotion.

For more information on our data collection, use, and sharing practices for events and contests, see *Data Collection*, *Data Use*, and *Data Sharing*.

## At Home

---

### FreshPass®

FreshPass® is a subscription grocery delivery program offered to our loyalty members. We can't deliver the seasoning you forgot at the store if we don't first gather some information from you, such as the basket information for your online order, your payment details, and delivery address. To get you cooking, we



sometimes use third parties to deliver your items, in which case we will need to share your delivery address and contact information with them so that your items can make it to your door.

For more information on our data collection, use, and sharing practices for delivery, see *Data Collection, Data Use, and Data Sharing*.

### **Pharmacy Delivery**

Where permitted by law, we may provide prescription delivery from your local store. If you're interested in home delivery, you can request pharmacy delivery through our mobile app, at the pharmacy, or by calling your local pharmacy. To fulfill the delivery request, we will need to collect your **name, delivery address, payment details, and contact information**. Once the prescription is ready for delivery, the medication is packaged in tamper-proof packaging, and Albertsons' delivery partner is notified. Your payment details will be sent to our local delivery partner to pay the delivery fee and for delivery to your door.

Our delivery partner works with specially trained drivers to deliver the prescriptions while protecting private patient information. The drivers use a special app that tracks their progress and sends live text updates to you when your prescription is out for delivery. When they get there, you or your authorized representative must sign for the prescription.

For more information on our data collection, use, and sharing practices for delivery, see *Data Collection, Data Use, and Data Sharing*.

### **Third Party Grocery Delivery and Pick-Up Services**

Life gets busy; we get it. That's why we've partnered with third party grocery delivery and pick-up services to make shopping for your groceries with us that much easier. Now instead of hoping between apps, there are even more ways that you can shop with us. If you still want to use a third-party app to shop with us, the collection of Personal Data will be subject to their privacy policies.

In some cases, you may have the option to link your loyalty account with us with an account you have with that third party. If you do so, we will typically receive details on **your basket** (what you ordered from our stores) and perhaps some **basic demographic information** (typically your **name** and **contact information**). But before this information gets sent to us, the third parties will usually inform you of what will be transferred, and you will have the choice to opt-in.

For more information on our data collection, use, and sharing practices for delivery and pick-up services, see *Data Collection*, *Data Use*, and *Data Sharing*.

## **eCommunity**

Our eCommunity offers a friendly place for food lovers and home chefs to become inspired and engage with others to share, learn, gather, and act on ideas. You can sign in with your loyalty account or create a member account to check eCommunity out.

We use your account details to administer our eCommunity program, which includes setting up and verifying your account and providing a forum where you can **message**, post **comments** and **photos**, attend events, and share your food journey and experiences. Be aware that anything you post or share on the eCommunity is public, meaning anyone accessing these areas may read, collect, and use the information you provide. If you don't want it to be public, don't post it.

You can also “share” or link content from our eCommunity to third-party sites such as Facebook, Twitter, and Pinterest, or share directly with your friends and family by email. If you interact with these third-party sites by sharing or posting, that information may become public, and the third-party sites may also gain knowledge about you and your participation in our eCommunity. Your availability and your activity on those third-party sites are governed by their privacy policy. If you ask us to share a link to interesting recipes or other content with your friends or family, we will send the information to the **email addresses** you provide.

For more information on our data collection, use, and sharing practices for eCommunity, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Advertising

---

### Purchase Based Advertising

We may use your **purchase history** and **online interactions** across websites that you visit and devices you use to predict your preferences and show you promotions and ads that are likely of interest to you. To provide relevant content and offers, we and our advertising partners use information collected from you to help us:

- Recognize your computer as a previous visitor and save and remember any preferences that you may have while you were visiting one of our websites or a co-branded website.
- Customize the content that you are shown while visiting our websites and potentially other websites.
- Improve the quality and presentation of our content and websites.
- Personalize your user experience.

We also track, accumulate, and create reports related to our website and apps and measure the effectiveness of ads and content viewed on our websites or a co-branded website.

For more information on our data collection, use, and sharing practices for advertising, see *Data Collection*, *Data Use*, and *Data Sharing*.

### **Third Party Promotions**

We may provide third-party brands with the opportunity to promote their product or brand to you. When we display content from these third-party brands, we do so without revealing your identity. Let us explain.

- Third Party Brand puts together a list of desired demographics and interests for audiences they want to reach to sell a product or generally raise awareness about their product or company.
- We match that list against groupings we have created or can create about our customers. For example, customers who have purchased ketchup in the last 6 months.
- Once we find a match, we display the third-party's requested content to the selected audience. Because the content shown is based on a set of demographics and interests and not to specific individuals. These third-party brands do not know your identity.

The third-party brand may request a report to measure the effectiveness of the advertisement and content viewed on the website. That data is provided in an aggregated format and not reported out at the individual level. In other words, we would report that 75% viewed the ad, instead of John Smith and Jane Doe viewed the Ketchup ad.

We may allow companies that show advertisements on our websites or apps to collect information from your **browsers** or **devices** through cookies or other technologies. We may also work with third parties to

help us better understand you, to help us personalize marketing to you, and to provide data analytic services.

For more information on our data collection, use, and sharing practices for Third Party Promotions, see *Data Collection*, *Data Use*, and *Data Sharing*.

### **Cookies, Pixels & Other Trackers**

These are not the delicious cookies we sell in our bakery, but a piece of code that lets us recognize you and your device(s) on, off, and across different services and devices where you interact with us or our ads. We also allow some third parties to use cookies on the ads and websites that we own. What does this mean? Cookies and similar technologies help us remember the website you've visited, help pre-fill information for you on forms and searches to make it easier for you, and help us deliver ads that are more relevant to you while letting us understand the effectiveness of those ads.

But we understand that cookies (pixels and other trackers) aren't for everybody, and you have options.

You may have noticed a message pop-up when you first visited our website. If you click to manage your settings, you can control what types of cookies you permit while you are browsing through our website. Now some are strictly necessary for our website to function, but there are others that you choose to turn on or off. You can also opt-out of cookies by going to your device settings for mobile apps, or you can opt-out of interest-based advertising for the web through the Digital Advertising Alliance's consumer choice tool at [WebChoices: Digital Advertising Alliance's Consumer Choice Tool for Web US \(aboutads.info\)](https://aboutads.info). You can read more about opting out of interest-based ads at [NAI Consumer Opt Out \(networkadvertising.org\)](https://networkadvertising.org) and opt-out of interest-based Google ads at [Ad Settings \(google.com\)](https://ads.google.com).

For more information on our data collection, use, and sharing practices cookies, pixels, and other trackers, see *Data Collection*, *Data Use*, and *Data Sharing*.

## Mobile

---

### Health and Wellness

Health and wellness and how to define success is your personal journey. To help along the way, we have created an app to support our customers and patients on their health and wellness path. For those who choose to use it, you start by creating an individual authenticated profile within the grocery app, which collects **health, wellbeing, and similar information**. But at a minimum, we require your **height, weight, date of birth, gender, and other similar details** to provide you with your wellness score.

You can then choose to provide other details (or instruct wearable device operators or mobile app providers to provide additional details) such as certain **contact information, health data, activity data**, and information about your **lifestyle** to maximize the app and take advantage of other features (like earning rewards for your health and wellness path).

For more information on our data collection, use, and sharing practices for mobile, see *Data Collection*, *Data Use*, and *Data Sharing*.

### Location

We may collect your location details to help you search for or provide you with the address of our nearest store or pharmacy. We may use your location to help you find products, navigate the store, or access free WiFi where those services are offered within our stores.

Mobile devices often provide the ability to adjust settings related to location, so if you do not want us to collect specific location information, you can check your mobile device's setting to see if you can modify it.

For more information on our data collection, use, and sharing practices for mobile, see *Data Collection*, *Data Use*, and *Data Sharing*.

## **Data Collection**

---

As you've read (well, we hope you've read this far), we collect Personal Data as part of the services we provide to understand you as a shopper, personalize your experiences with us, and to help us make business decisions. We collect your Personal Data in a variety of ways, but broadly there is information you give to us directly, the information we collect automatically or by observation from you, and finally, information we get about you from third parties. We've consolidated the list below to highlight the types of data we capture. This includes:

### **Personal Data we collect from you**

We provide a variety of ways for you to shop and engage with us and others. For example, you can join our loyalty program, use seamless checkout, place orders online, subscribe to delivery services, participate in contests, sweepstakes, and promotions, join our eCommunity, and more. Our customer service team is also



available through the website or app, as well as by phone, email, or postal mail to address your questions or concerns. To provide these services and engagement opportunities, we will need to collect some Personal Data. This includes:

- Name and Contact Details (address, email, and phone number)
- Your Loyalty ID created when you sign up for our loyalty program
- Demographic and Lifestyle Information when you sign up for our loyalty program, health and wellness app, and use our other services (age, date of birth, gender, food preferences, etc.)
- Medical and Health Information when you use our pharmacy or our health and wellness app
- Driver's License Number or state-issued ID when you purchase age-restricted items
- Payment Details (when you shop in stores, order online or subscribe to our delivery services)
- Voice recordings/messages, images, and other personal details (when you contact us, leave reviews, participate in our eCommunity, and respond to surveys).
- Posts, Reviews, and Ratings (when you post a review, comment, or leave a rating on our website, eCommunity, social media pages, or other user generated content on our websites or mobile services)
- Job Application related information (employment history, background and criminal information, education information, and other items including interests that you may voluntarily disclose on your resume, cover letter, or during interviews)

### **Personal Data we collect automatically when you use our services**

We also collect information about you when you use our services, whether that is visiting our stores, using our app, or browsing our website. The types of information we collect include:

- Browsing Behavior while on our website or app, which we collect using cookies or similar technologies (items you looked at, items put in the cart, ads or coupons clicked, and searches)
- Device Information across your different devices to help us personalize and be more consistent with what we serve to you (IP address, browser type, mobile device and advertising ID, operating system, carrier, language, and similar information)
- Location Information (to help you find the nearest store or pharmacy, use special mobile features such as finding items or map of the store in some locations, and to determine whether to provide you with content, notices, or other information)

### **Store Cameras**

You can find our cameras in the store, and in some locations, in our parking lot. We use these cameras for both security and operational purposes, such as measuring traffic patterns, analyzing wait times in lines, and other analytical ways to help us improve our business.

You may also see smart carts in our stores, which use cameras and sensors to tally items as you grab them off the shelf and place them in your cart. As an added bonus, you can pay through the cart and skip the checkout lines.

### **Personal Data we collect from another store brand**

We may collect information about you from another company within our family of companies, such as ACME, Jewel Osco, Safeway, and United.

### **Personal Data we collect from Third Parties**

We receive information such as device, browsing, and offline information from third parties for marketing purposes, such as to help deliver personalized ads on Albertsons owned and third-party websites and mobile services.

### **Personal Data you provide to us about others**

You may also provide us information about family members, friends, or others, such as when you provide the name and contact information for someone who will pick up your groceries, pick up or refill prescriptions, or when you send content from the eCommunity to others who may find it interesting. If you provide us with this information, we will use it only for the specific purpose you provided it.

### **Children**

While children are welcome customers, guests, and patients, we do not collect Personal Data online from children under the age of 13.

### **Data Use**

---

There are many ways that we use data, check out the other sections of the Privacy Policy where we provide contextual examples throughout our store, online, and at delivery. Generally, we use Personal Data to:

- Process and complete your transactions including, as applicable, order confirmation, billing, enrollment in our loyalty or other programs, and delivering products or Services.
- Provide customer service, including responding to your requests or inquiries.

- Personalize your experience with content and offers that are tailored to you, including special offers from other companies.
- Provide you with newsletters, articles, product or service alerts, new product or service announcements, savings awards, event invitations, and other information.
- Include you in market research, surveys, promotions, sweepstakes, and contests.
- Improve the way offers are made based on the purchasing decisions of our customers and improving the interactions visitors have with our Services.
- Evaluate your shopping experience or existing products and Services or to create new items.
- Alert you about a product safety announcement or recall or correction of an offer, promotion, or advertisement.
- Keep a record of our interactions with you if you place an order or otherwise deal with our representatives over the telephone or online.
- Verify and validate your identity or otherwise prevent, investigate, or provide notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Data, and our website or data systems.
- Comply 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 potentially fraudulent activity.
- Process and evaluate your application and related materials you submit as a job applicant.
- Interact with you when you contact us as a vendor or on behalf of another business.
- Enable 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.
- Create 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

## Data Sharing

---

In order to provide our grocery and pharmacy services and all of the other things that we have outlined in this Privacy Policy, we do share some of your Personal Data. In some cases, we couldn't provide those services without sharing your Personal Data. In addition to what we have already described in this Privacy Policy, we disclose your Personal Data to the following:

- **Our Subsidiaries.** Our subsidiary entities may also collect and share the Personal Data 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 Data 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-Party Sellers.** In order to offer the greatest selection possible to customers, certain products are offered to you online from third-party sellers (don't worry these will always be clearly marked). If you purchase products from third-party sellers, we will disclose the Personal Data necessary for those sellers to fulfill your order.
- **Legal Process and Emergency Response.** We may also disclose specific information about our customers, guests, and patients 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 Data 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 the company's insolvency, bankruptcy, or receivership.

## Protecting Your Data

---

We use various physical, electronic, and procedural measures designed to protect your Personal Data from unauthorized access, disclosure, or misuse. We use strong encryption when transmitting your Personal Data. However, because no data security systems are completely secure, we do not warrant that the Personal Data that you provide to us will be secure or safe from unauthorized access. While we work hard to keep your Personal Data safe, we want you to know there is always a risk. So, when you provide your Personal Data to us it is at your own risk.

## Data Storage & Processing

---

Our stores and services are provided to customers, patients, and guests in the United States. For the most part, the Personal Data described in this Privacy Policy is stored in the United States. However, we may transfer, process, and store this information in some other countries. By shopping with us, using our websites and mobile applications, you consent to the transfer to, and to the processing and storage of your Personal Data in countries outside of the United States where data protection laws may differ.

## Privacy Choices & Rights

---

We love having you as a customer, guest, and patient! We will continue to innovate to live up to your shopping expectations and find ways to engage with you so that you will keep coming back to us for years to come. To provide you with the level of service you expect, we need to collect information about you, which we've done our best to describe here in this Privacy Policy. But when it comes to your data, you have choices too. This includes the ability to ask for [access to the information we have collected about you](#) or to ask us to [delete your data](#). In some cases, we may not be able to delete your Personal Data, but if that is the case, we will let you know why (e.g., we need to comply with the law, to complete the transaction, and so on). Additionally, you can ask to [opt out of the sale or sharing of your data](#). If you are interested in exercising any of these options, you can select the preferred link from above. Please see your relevant State Specific Disclosures for those states where these choices are rights for additional information.

There are some other choices you can make related to your Personal Data that we have outlined below:



- **Printed Marketing Materials Opt-Out** (including **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 Opt-Out**. 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 to unsubscribe.
- **Facsimiles Opt-Out**. Use the methods provided in the communication or by contacting our Customer Support Center by clicking [here](#).
- **Voice or Text Messages Opt-Out**. Contact our Customer Support Center by clicking [here](#). If you have consented to receive prerecorded or automated 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 above.
- **Google Analytics Opt-Out**. 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.
- **Disable Mobile Push Notifications/Alerts**. To deactivate mobile push notifications and alert messages that you enabled, and you can always change the notification settings on your mobile device.
- **Turn Off 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 Opt-Out**. 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.

For information on Cookies, Pixels & Other Trackers see the Advertising section of this Privacy Policy.

## Policy Changes

---

We strive to be transparent with you about our data privacy practices and comply with the law. To do that, we may need to modify this Privacy Policy from time to time. When changes are made, we will post the updated version and include the new effective date (at the top of the screen). We encourage you to visit our website periodically to view the latest version of this Privacy Policy.

## Contact Us - Privacy Office

---

We hope that we answered your privacy questions, and you enjoyed reading this privacy policy. If you have additional questions or comments about our Privacy Policy or other privacy-related matters, you can contact us at:

**Mailing Address:** Albertsons Companies, Inc.  
Attn: Albertsons Privacy Office  
250 Parkcenter Blvd.  
Boise, ID 83706

**Email Address:** [privacyoffice@albertsons.com](mailto:privacyoffice@albertsons.com)

**Toll-free Number:** (877) 251-6559

## **State Specific Disclosures (California & Nevada)**

### **California Residents**

If you're a resident of California, there are a few more things that we need to explain regarding Personal Data as outlined in several California laws (including the California Consumer Privacy Act (CCPA) as amended from time to time). Any capitalized term (yes, our capitalization efforts are intentional) that we haven't otherwise defined in this privacy policy have the same definition as in the CCPA, California Civil Code § 1798.100, et seq. (together with the regulations thereunder, the "CCPA"), as applicable.

This section doesn't apply to Personal Data we capture from job applicants, current and former associates and independent contractors, and business-to-business activities. With one exception, sections 1 and 2 below apply to Albertsons associates, candidates, and independent contractors. De-identified, aggregated, and some publicly available data are not considered Personal Data under California law and does not apply to this section, or the rights outlined below.

This Notice applies to the Personal Data we collected from you during the 12 months prior to the effective date of this Notice. The information we have collected and process depends on what services and interactions you have had with us (e.g., if you haven't signed up for a FreshPass, we won't have FreshPass information).

### **1. Collection and Use of Personal Data**

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

- **Identifiers** such as name, alias, physical address, unique personal identifier (see our cookies and trackers section for more details), 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 and ethnicity (through the use of our video) 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 Data/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 Personal Data.

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 Data that We Collect:

- Directly from you. For example, when you create an account, make a purchase, browse our website, 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 Data, 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 other than a Sale or 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.

#### (d) Retaining Your Personal Data

Except as otherwise permitted, required by applicable law or regulation, to satisfy any legal or regulatory obligations, or to resolve disputes, we will retain your Personal Data (including the categories of Personal Data discussed in the sections above) for as long as necessary to fulfil the purposes for which we collected it. In determining what constitutes an appropriate retention period for Personal Data, we consider applicable legal requirements, the amount, nature, and sensitivity of the Personal Data, the potential risk of



harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data, and whether those purposes can be achieved through other means.

## 2. Categories of Personal Data 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"><li>1. Identifiers</li><li>2. Personal Records</li><li>3. Characteristics</li><li>4. Internet/Network Activity</li><li>5. Customer Records/Commercial Information</li><li>6. Geolocation Data</li><li>7. Sensory Information</li><li>8. Inferences</li></ol>	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Marketing/Advertising Agencies</li><li>• Analytics &amp; Retail Merchandising Vendors</li><li>• Marketing Mix Measurement Providers, Compliance, Tech Performance Measurement, and other Service Providers</li><li>• Social Networks</li><li>• Albertsons' Affiliates</li><li>• Governmental Authorities and Agencies</li></ul>

## 2.2 Categories of Personal Data Sold for a Business Purpose

We share your Personal Data 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 Data we Collect from you:

- categories of Personal Data collected;
- categories of sources of Personal Data collected;
- the business or commercial purpose for collecting or selling Personal Data;
- the categories of third parties with whom we share Personal Data; and
- the specific pieces of Personal Data 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 Data for a business purpose over the past 12 months and, if so, the categories of Personal Data sold or disclosed and the categories of third parties to whom the Personal Data was sold or disclosed, along with the business or commercial purpose for which the Personal Data was sold or disclosed.

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.

California resident candidates, current and former employees, and independent contractors [click here](#).

California resident business to business [click here](#).

#### (b) Right to Request Deletion of Personal Data

You have the right to request the deletion of your Personal Data 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 Data 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.

California resident candidates, current and former employees, and independent contractors [click here](#).

California resident business to business [click here](#).

(c) Right to Correct Inaccurate Personal Data

You have the right to request that we correct inaccurate Personal Data that we maintain about you. We will take into account the nature of the Personal Data and the purposes for which we process it. We may require documentation from you in order to process your request, including your name, email address, phone number, and request details.

#### (d) Right to Opt-Out of Sale of Personal Data

You have the right to opt out of the sale of your Personal Data 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 also honor Global Privacy Control (GPC) signals from your browser. You can learn more about GPCs [here](#). If you choose to use the GPC signal, you will need to download and turn it on for each supported browser or browser extension you use.

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

#### (e) Right to Limit the Use of Your Sensitive Personal Data

At this time, we do not process information that is subject to this limitation. At a future point when we do so, you can direct us to limit the use of your Sensitive Personal Data to uses that are reasonably necessary to provide our goods and services, or as needed:

- To ensure security and integrity
- For short-term, transient use, including for non-personalized advertising
- To maintain or service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, provide storage, or other similar services
- To verify or maintain the quality or safety of a service or device owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance such services or devices

(f) 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. This Program is subject to termination at any time at our sole discretion.

Program	Incentive Offered	Material Terms	How to Opt-In
<p><b>“[Banner] for U™”</b> (i.e., “Albertsons for U™,” “Safeway for U™,” “Randalls for U™,” etc.)</p>	<p>Provides consumers with customized discount coupons, complimentary in-store Wi-Fi, and birthday treat (optional). Your Albertsons Companies “<b>[Banner] for U™</b>” 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.</p>	<ul style="list-style-type: none"> <li>• Available at participating stores.</li> <li>• Categories of Personal Data collected: <ul style="list-style-type: none"> <li>○ <b>Identifiers</b> such as name, email address, telephone number, zip code, month and date of birth (optional).</li> <li>○ <b>Customer Accounts /Commercial Information</b> such as shopping history, coupons/points redeemed, points earned, preferred Market Store.</li> <li>○ <b>Internet/Network Activity</b> such as IP address, activity logs, browsing history.</li> <li>○ <b>Geolocation Data.</b></li> <li>○ <b>Inferences</b> drawn from one or more of the above, including a consumer’s shopping history, that reflects a consumer’s shopping preferences.</li> </ul> </li> <li>• Additional information available at <a href="https://www.albertsons.com/justforu-guest.html">https://www.albertsons.com/justforu-guest.html</a></li> </ul>	<ul style="list-style-type: none"> <li>• Register for an account online or on the mobile app.</li> </ul>

**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 Cards** are as follows:

Program	Incentive Offered	Material Terms	How to Opt-In
<p><b>“just for U” (including Gas Rewards and Grocery Rewards)</b></p>	<p>Provided consumers with customized discount coupons.</p> <p>Your “<b>just for U</b>” 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"> <li>• Available at participating stores.</li> <li>• Categories of Personal Data collected: <ul style="list-style-type: none"> <li>○ <b>Identifiers</b> such as name, email address, telephone number, zip code.</li> <li>○ <b>Customer Accounts /Commercial Information</b> such as shopping history, coupons/points redeemed, points earned, preferred Market Store.</li> <li>○ <b>Internet/Network Activity</b> such as IP address, activity logs, browsing history.</li> <li>○ <b>Geolocation Data.</b></li> <li>○ <b>Inferences</b> drawn from one or more of the above, including a consumer's shopping history, that reflects a consumer’s shopping preferences.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Register for an account online or on the mobile app.</li> </ul>



Program	Incentive Offered	Material Terms	How to Opt-In
		<ul style="list-style-type: none"> <li>Additional information available at <a href="https://www.safeway.com/justfor-guest.html">https://www.safeway.com/justfor-guest.html</a></li> </ul>	
<b>Club Card (including Gas Rewards and Grocery Rewards)</b>	<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"> <li>Categories of Personal Data collected: <ul style="list-style-type: none"> <li><b>Identifiers</b> such as telephone number.</li> <li><b>Customer Accounts /Commercial Information</b> such as shopping history, coupons/points redeemed, points earned.</li> <li><b>Inferences</b> drawn from one or more of the above, including a consumer's shopping history, that reflects a consumer's shopping preferences.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Requesting a physical card in-store; providing a 10-digit number (e.g., phone number).</li> </ul>

## Value of the Consumer's Data

We estimate the value of consumers' data to be, on average, approximately \$1.33 per consumer in 2022. 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 2022.

### **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 contacting us [here](#).

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 Data 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](mailto: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.

### **Nevada**

Use our [online form](#) to submit a privacy request.