

Privacy Policy

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Welcome

Thank you for shopping at an Albertsons Companies Store! You clicked to get to this page, and we appreciate your interest in learning more about our privacy practices. While we would love you to read this entire privacy policy (please do, we want you to know what this means for you), we also understand that you may not have the 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

We are Albertsons Companies, Inc., including its subsidiaries and affiliated entities (“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 your Personal Data.

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.

Deidentified Data

We may use or share data that has been **deidentified**, meaning it can no longer reasonably be linked to you. When we deidentify Personal Data, we use technical safeguards and maintain business processes to help prevent reidentification. Where we maintain deidentified data, we do not attempt to reidentify it and require recipients of that data to commit not to reidentify it or use it in ways that could link back to you.

We take your privacy seriously and apply these safeguards to responsibly use data in a way that supports better products, services, and innovation—without compromising your Personal Data. [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*.

California residents - you can read our Automated License Plate Reader Policy [here](#).

Entrance – Come on in

We have cameras and other location-aware technologies in various locations throughout our stores. They can help us understand traffic flows and counts throughout our store, what's on our shelves, or detect and respond to theft or issues such as spills on the floor. The cameras capture **video** and **images** of **you** as you shop. In some states, our cameras may capture biometrics (e.g., facial recognition technology). In these store locations, you may have noticed the signs in our entrance related to our collection of biometrics. 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 to promote safety, deter crime, and to help keep the products you love in the stores.



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

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 or issues such as spills on the floor.



You may have noticed that we've added screens in our stores. We wanted to enhance your shopping experience by providing in-store displays that highlight new deals, showcase products, provide recipes for inspiration, and keep you in the know of beneficial programs and services offered by your store. We want to know what matters to you and may use location-aware technologies to make sure these in-store displays present the content most interesting to our shoppers however, we don't always relate this location data to individuals or households. While this location-aware technology can help us determine aggregate store sales lift, identify impressions, traffic patterns, and dwell times around our in-store displays, we want to be clear that no directly identifiable information or biometric data is collected or stored through our collection or processing of this location data.

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 **device name** or **assigned number**, 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](#).

If you choose to use our app and location-based services to navigate the aisles or find products in our stores, then we may receive realtime **location** and **motion** data via Wi-Fi, Bluetooth, and/or your mobile device to orient you in the store and to inform you of deals near you. Motion data uses your phone's sensors to help with the accuracy of your location within the store, like what level you are on or what aisle you are browsing. It is your choice whether you share this data and you can enable or disable this through your device or in the app at any time.

For more information on our data collection, use, and sharing practices at checkout, see *Checking Out*.

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 and immunization 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 purchasing. 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 and manage your prescriptions through the Sincerely Health™ 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 may also be able to access your vaccination records digitally by downloading 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 explains 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").

Pet Medicine

Sometimes your dog Fiona 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 Fiona 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**, **message**, or **photo** 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.

Also, keep your eyes out for kiosks near our deli (in some locations). You may use these kiosks to enter your deli order. Log in with your loyalty account or order as a guest with your **name** and **phone number**, place your order, then continue shopping and we'll alert you when your order is ready.

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 a shorter or longer retention period is required by law or special circumstances require us to keep it longer. The information collected 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 from our cameras to law enforcement or other 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*.

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 (Sincerely Health™), 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 **interests** and how you **interact** with us - at our stores (in store and online) 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.

We may also provide special tailored promotions and discounts for our loyalty members. To do this we may ask for additional personal data to confirm your eligibility such as information about your **job**, **student status**, and other information that is program specific. We or a third party may also need to collect and/or share those details to offer or verify your eligibility.

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

For more information on our data collection, use, and sharing practices as part of our app, see *Mobile*.

Colorado residents—see the [Colorado section](#) below for additional loyalty program notice details.



Customer Service (In Store & Online)

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. If you decide to chat with us online, our chatbot is AI-powered and may record, store, and share information collected during your chat.

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 a shorter or longer retention period is required by law or special circumstances require us to keep it longer. The information collected is not used for marketing purposes.

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.

Where you enable **location** services, we may collect real-time **location** details to help provide that functionality, such as searching for nearest store fuel station and redeeming fuel rewards.



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*.

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 will be processed by the pharmacy for the delivery fee, when applicable, prior to delivery to your door.

Our delivery partner works with 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 within the third party app to receive your loyalty program benefits, or create a loyalty account without having to leave the third party app. 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*.

Advertising

Personalized Advertising

We may use your **purchase history**, **online interactions** across websites that you visit, **in-store activity**, 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 third party brands and advertising partners, may use information collected from you to help:

- 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 and when you view one of our ads.
- Customize the content that you are shown while visiting our websites and potentially other websites.
- Improve the quality and presentation of our content, websites, and advertisements.
- Personalize your user experience.

Just like watching dough rise in the oven, we keep an eye on our websites, apps, and ads to see how they are doing by measuring performance and the effectiveness of the ads and content.

Third Party Promotions and Advertisements

We may provide third party brands with the opportunity to promote their product or brand directly to you. When content is displayed from these third party brands, we try to 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, who shop for organic products, or who have shown an interest in baking. These groupings may be shared with a third party to provide the promotion or advertisement.

- We'll show the requested content from the third party to the selected audience on our website or on a relevant platform once we find a match. Typically, this does not require us to share your direct identifying information with these third party brands, websites, or platforms.

When a third party brand wants to measure how well their ads and content are working on our website or relevant platform, they may ask for a report. The data we provide is in an aggregated format, meaning we don't include individual details. So, instead of saying "John Smith and Jane Doe viewed the ad," we would report that 75% of visitors saw the ad.

Sometimes companies that show ads on websites, apps, or other platforms collect information from your **browsers** or **devices** using cookies or other online tracking technologies. In some instances, those third party brands may do their own measurement through relationships with their own service providers and third parties. We may also partner with third parties to help us better understand shoppers, to personalize marketing, and to provide data analytic services, including using pseudonymized or deidentified data to create lookalike models.

For more information on our data collection, use, and sharing practices for Advertising, see *Cookies, Pixels & Other Online Tracking Technologies* and *Data Collection, Data Use, and Data Sharing*.

Cookies, Pixels & Other Online Tracking Technologies

We use cookies, pixels, and other tracking technologies to collect and store information about your interactions with our website and app, including information about your browsing behavior. Our website and app also support third-party cookies, pixels, and other tracking technologies placed by our service providers and third parties, including those placed by our advertising partners. This means that service providers and advertising partners can collect and use information regarding your interactions with our website, app, and advertisements as further detailed below.

What are these technologies? These cookies, pixels, and other online tracking technologies are not the delicious cookies we sell in our bakery, but a piece of code that lets us or another party recognize you and your device and remember certain information about your browsing behavior. For example, to count users who have visited certain pages, to understand usage patterns, and for some third parties to support ads and websites that we own.

In general, we use cookies, pixels, and other tracking technologies as follows:

- Where necessary to run our website
- To optimize the functionality of our website
- For analytics purposes
- For purposes of targeted advertising and marketing

For example, cookies, pixels, and other online tracking technologies help us with security, to prevent fraud, to remember visitors to our website and app, to pre-fill information for you on forms and searches, and to better understand our website's and app's performance. These technologies also help us and third party brands deliver ads that are more relevant to you, and help us understand the effectiveness of those ads.

We understand that cookies, pixels, and other online tracking technologies aren't for everybody, and you have options.

You may have noticed a message pop up when you first visited our website. You might also notice the cookie icon in the bottom, left-hand corner of our website. If you click to manage your settings, you can control some of the cookies while you are on our website. Not all cookies can be turned off – for example, some are necessary for our website to function or may be used in ways where applicable privacy laws do not require an opt out. You can also adjust your browser settings to refuse cookies before accessing our website. Different browsers have different cookie-blocking features, so please review your browser's Help Menu for instructions.

You can opt out of interest-based advertising from participating advertising companies through the [Digital Advertising Alliance's consumer choice tool](#) and the [NAI Consumer Opt-Out Tool](#). You can personalize the ads you receive or opt out of ads from Google by visiting the [Google Ads Settings Page](#).

For more information on our data collection, use, and sharing practices, including through cookies, pixels, and other online tracking technologies, see *Data Collection*, *Data Use*, and *Data Sharing*.

Mobile

We understand that life happens, and it is not always easy to get to the store. For those occasions, we have an app to make shopping more convenient to get the groceries that you need when you need it, to find deals, and access other features on your mobile device. Download our app in the app store - we have an app for each of our store brands that we refer to as the “[Banner] Deals & Delivery” (e.g., “Albertsons Deals & Delivery,” “Safeway Deals & Delivery,” “Randalls Deals & Delivery,” etc.) or “Shop [Banner]” (e.g., “Shop United Supermarkets”).

Once you download it you will be asked to sign up for a loyalty account by providing either your **phone number** or **email address**, but you can choose to continue as a guest. Users and guests may be asked to share your **location** or **zip code** so that we can provide services relevant to your area and to find the nearest location, for more information see the *Location* section below.

Once you start using our app, we may also collect data about your **shopping preferences** and how you interact with us. We use that information to support the services you are requesting and to improve the app experience. We may also use your device's mobile advertising identifiers (unique IDs tied to your mobile device) to deliver ads and to see how they perform. But, similar to cookies, you have choices and can go to your device settings and turn off the sharing of this data.

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

Health and Wellness

Health and wellness and how to define success is your personal journey. To help along the way, we offer Sincerely Health™, a health and wellness mobile app experience, to help support our customers and patients on their health and wellness path. You can even earn “healthy points” that can be redeemed for grocery savings.

For those who choose to use it, you start by creating an individual authenticated Sincerely Health™ profile within the grocery app (click on Health or Pharmacy icons within the grocery app), which collects **health, wellbeing, and similar information**. How you engage with it and the amount of data you choose to share is up to you. If you decide to use Sincerely Health™, the information collected may include your **height, weight, date of birth, sex**, survey responses to questions about your **daily behaviors, lifestyle, and other similar details** to measure your health score and offer a personalized experience (like recommending goals and recipes that align with your objectives).

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, and activity data** to maximize the app and take advantage of other features (like earning rewards for your health and wellness path).

We may disclose your Sincerely Health™ data to our service providers and processors to provide the features and functionalities offered within the Sincerely Health experience and to help provide a requested product or service, but we do not sell or share Sincerely Health™ data with third parties unless we obtain your consent or believe that doing so is necessary to comply with applicable law or respond to valid legal process (legal process and emergency response or certain business transfers).

If you manage your prescriptions or pharmacy services through the website or app, see the *Pharmacy* section for more details about how we safeguard protected health information.

CT, WA, NV residents, see our [Consumer Health Data Privacy Policy](#) for details about collection and use of Sincerely Health™ data.

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

Location

Where you enable **location** services, we may collect real-time **location** and **motion** details to help provide the requested functionality, such as searching for the nearest store, pharmacy, or fuel station, heading to pick up a Drive-Up & Go order, using fuel rewards, or navigating our stores.

We may use or share this information to determine the relevancy and effectiveness of the location services we provide to our customers. Don't worry, if you don't want to share your location with us, you can adjust your permissions in your mobile device settings and within the app.

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, 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, take advantage of our Sincerely Health™ offerings, and more. Our customer service team is also available through the website or app, 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, Sincerely Health™, and use our other services (age, date of birth, gender, food preferences, etc.)
- Medical and Health Information when you use our pharmacy or our Sincerely Health™ offerings
- Driver's License Number or government-issued ID when you purchase age-restricted items
- Job or student status when you take advantage of specially tailored promotions and discounts for our loyalty members (e.g., student, teacher, military, first responder discounts)
- Payment Details (when you shop in stores, order online or subscribe to our delivery services)
- Customer Accounts/Commercial information such as products or services purchased
- Sensory information such as voice recordings/messages, images, visual recordings of consumers in stores and other personal details (when you contact us, leave reviews, participate in feedback or focus groups, or respond to surveys)

- Characteristics such as race and ethnicity, ancestry, national origin, religion, medical condition, sex, mental or physical disability, and other demographic data when you use our Order Ahead special occasions or celebration services (if you choose to share what holiday or occasion you're celebrating with us), pharmacy, and Sincerely Health™ offerings (if you choose to provide this information)
- Posts, Reviews, and Ratings (when you post a review, comment, or leave a rating on our website, social media pages, or other user generated content on our websites or mobile services)

See our HIPAA Notice of Privacy Practices for additional details regarding how we may use or disclose PHI. You can find a copy of this notice [here](#).

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:

- Online Activity and Browsing Behavior while on our website or app, which we use cookies, pixel tags, software development kits (SDKs) and other similar technologies to automatically collect information about your interaction with our website, app, and communications you receive from us. This information includes links clicked, page views, purchases, searches, features used, items viewed, time spent on the website, app, or communications and ads or coupons clicked
- 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 and Motion 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, to determine whether to provide you with content, deals, notices, or other information, and to understand the relevancy and effectiveness of our location-based services, including through our in-store displays)
- Characteristics such as race and ethnicity, ancestry, national origin, religion, medical condition, sex, mental or physical disability, and other demographic data indirectly captured through the use of cameras
- Inferences derived from personal data/profiling such as your purchase preferences, interests, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes (to improve the way offers are made based on the purchasing decisions of our customers and improving the interactions visitors have with our Services). For example, we want to offer you relevant content including product recommendations

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 banner

Our banners serve customers, guests, and patients across the United States. We may collect information about you from another store banner within our family of companies, such as ACME, Jewel Osco, Safeway, and United (see *We are Albertsons Companies, Inc.*, section for a listing of our store banners).

Personal Data we collect from Third Parties

We may 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. We may also receive information about you from other sources such as public databases, joint marketing partners, data analytics and enrichment providers, or consumer research providers to help us correct or add to our records which improves the way we personalize our services, increases the relevance of advertising, and helps us to prevent or detect fraud. For example, we may receive information from a third party that a phone number has been reassigned since it was provided to us, that you may be interested in outdoor activities, or that you have recently moved so that we can update our records.

If you use a third party for shopping (we get it, sometimes we want groceries instantly or dashed right to our door) you may be given the option to link their app within your “**[Banner] for U™**” account (i.e., “Albertsons for U™,” “Safeway for U™,” “Randalls for U™,” etc.). If you choose to link your accounts then those third parties may share data with us and we may share data with them so that we can provide better offers, surveys, and special promotions.

We may receive information from our service providers or processors 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. For example, a delivery service provider may need to collect a signature from you when they drop-off your items and provide that back to us for our records, or our service provider that sends emails or mobile messages may need to tell us that messages were undeliverable so we can stop sending messages to an old email or phone number.

We may also receive information from government entities and other public sources for crime prevention, public safety, and the like.

Personal Data you provide to us about others

You may also provide us information about family members, friends, or others, such as when you refer a friend to join our loyalty program, share your shopping list, or provide the name and contact information for someone who will pick up your groceries.

Children

While children are welcomed guests and patients, our online Services and loyalty program are not directed towards children, and we do not knowingly collect Personal Data online from children under the age of 13. We do not sell Personal Data of consumers we know to be under the age of 16 or process such Personal Data for targeted advertising or profiling in furtherance of decisions that produce legal or similarly significant effects.

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 or other offers, promotions, and discounts based on your loyalty account and shopping preferences.
- Provide advertising and marketing services, including personalized advertising.
- 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.
- Train our artificial intelligence or machine learning algorithms or models (or those provided by our service providers) for our business purposes and to improve our products and 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, online, or through the mail.
- 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.
- 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, anonymized, or deidentified information for analytical and statistical purposes, which may be shared with third parties.
- To carry out any other purpose described to you at the time the personal data was collected.
- 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 or Processors.** We may disclose your Personal Data to our service providers or processors 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.
- **Ad Tech Companies and other Providers.** We may share with or make limited personal data available to Ad Tech companies and other online tracking providers. The type of information shared with Ad Tech companies and other providers may include unique identifiers (e.g., cookies and similar technologies), device information, geolocation, and other online activity information.
- **Co-Branded Offerings.** We may offer you a co-branded product, service, or other promotion in cooperation with another business, such as our co-branded fuel rewards program or grocery and pharmacy delivery partners. If you choose to take advantage of the co-branded offer, the personal data that you provide directly to our co-branding partner will be subject to their privacy practices. For those products and services, this Privacy Policy will apply only to our collection of your personal data.
- **Third Parties.** We may share or make limited personal data available to third parties such as advertisers, marketing partners and platforms, data analytics providers, social media networks, and others. As described in our *Personalized Advertising* section, we typically share this data in an anonymized or pseudonymized format and try not to share your direct identifying information with these third parties to help preserve privacy. The type of information shared with third parties may include unique identifiers (e.g., cookies and similar technologies), device information, loyalty information, geolocation, and commercial information.
- **Legal Process, Governmental Authorities, 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 required 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.

Remember that when it comes to data sharing you can opt out of sale or share of data and targeted advertising at any time. *See Privacy Choices and Rights* section for details.

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.

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 outlined in this Privacy Policy and to adhere to our policies on keeping records. 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.

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. Some states have enacted privacy laws where certain "choices" are actually "rights." Instead of affording those rights only to residents of those states that require it, we want to extend certain choices to our customers, no matter what state you shop in. Therefore, we offer the following choices to all of our customers:

- **Request to know/access.** You can request access to and obtain a copy of your personal data that we have collected and maintain. Use our online form to submit a [Request to Access/Know](#). For verified requests from residents of states where consumers have the right to request a list or categories of third parties with whom we've shared Personal Data, we will include that information in our response.
- **Request to delete.** You can request that we delete your personal data that we have collected and maintain. Use our online form to submit a [Request to Delete](#). 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).
- **Request to correct.** You can request that we correct inaccuracies in your personal data that we maintain. You can update your phone number, email address, birthday, payment method, and address through account settings (Account and Wallet menus). You can also use our online form to submit a [Request to Correct](#).
- **Request to opt out of the sale or sharing of personal data, targeted advertising, and profiling.** You can opt out of the sale or sharing of your personal data, targeted advertising, and profiling in furtherance of decisions that product legal or similarly significant effects concerning consumers by using our online form to submit an [Opt-out request](#).
- **Authorized Agent.** You may designate an authorized agent to exercise any of the above privacy requests on your behalf. Authorized agents may make requests to access/know or delete by using our [online form](#) and requests to opt-out by using our [online form](#). 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.
- **Request to Appeal.** In certain cases, we may decline to act on your privacy request (as permitted by law). Should we decline your request, we will provide you with a written explanation of the reasons for our decision, and an opportunity to appeal the decision. Instructions for appealing decisions will be provided directly to you within our response.

If you are interested in exercising any of these options, you can select the preferred link from above or call us at (877) 251-6559 (toll free).

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. Depending on the type of request, the verification process may consist of validating the email address (requires you to click a link in the email we send), and matching identifying information provided by you with the information we have about you in our records. It is important that the information you provide in the privacy request online form matches the information we have about you, or else we may need to reach out for additional information if we cannot verify your identity. If we cannot verify your identity, we will not be able to respond to your request.

We may retain correspondence, documents and information related to privacy requests for 24 months as required by law.

You will not receive discriminatory treatment for exercising your privacy choices or rights. We do not use the fact that you have submitted a privacy request for any purpose other than processing and facilitating a response to your request.

California residents please see the [State Specific Disclosures](#) section 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.
- **Marketing Email 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 Addon.
- **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 have the ability to turn location-based services on and off by adjusting the settings in your profile preferences or 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.
- **Interest-based Advertising**. You can opt out of interest-based advertising from participating advertising companies through the Digital Advertising Alliance's consumer choice tool and the NAI Consumer Opt-Out Tool. You can also personalize the ads you receive or opt out of ads from Google by visiting the Google Ads Settings Page.

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 date (at the top of the screen). We will obtain consent

to changes in how we process Personal Data if and to the extent required by law. 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

Toll-free Number: (877) 251-6559

State Specific Disclosures (California & Colorado)

([California](#) | [Colorado](#))

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 California Notice does not apply to workforce-related personal data collected from California-based employees (current or former), independent contractors, or job applicants. They get a separate privacy notice for that personal data, but we do make the privacy rights request form available for former employees and independent contractors within the Your California Privacy Rights section below for convenience. This California Notice does apply to personal data collected in the context of business-to-business (B2B) transactions. Additionally, under the CCPA, personal data does not include:

- Publicly available information from government records.
- Deidentified or aggregated information.
- Information excluded from the CCPA's scope, such as health or medical information covered by the Health Insurance Portability and Accountability Act (HIPAA) and the California Confidentiality of Medical Information Act (CMIA).

This California Notice supplements the other sections of the Privacy Policy where we provide contextual examples throughout our store, online, and at delivery and applies to the Personal Data we may have 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: Below is a list of categories and the *Data Collection* section above provides additional context.

- **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.

(b) Categories of Sources of Personal Data that We Collect: See *Data Collection* section above.

(c) Business or Commercial Purposes: See *Data Use* section above.

Additional Business Purposes for which we collect, and may disclose, Personal Data include sharing Personal Data 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 Personal Data 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 Personal Data as required or permitted by applicable law. We treat all of these purposes as Other Business Purposes.

(d) Retaining Your Personal Data: See *Data Storage & Processing* section above.

2. Categories of Personal Data Disclosed

2.1 We may disclose the following categories of Personal Data to Service Providers for a Business Purpose, or 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
1. Identifiers	• Service Providers
2. Personal Records	• Marketing/Advertising Agencies
3. Characteristics	• Analytics & Retail Merchandising Vendors
4. Internet/Network Activity	• Marketing Mix Measurement Providers, Compliance, Tech Performance
5. Customer Records/Commercial Information	Measurement, and other Service Providers
6. Geolocation Data	• Social Networks
7. Sensory Information	• Albertsons’ Affiliates
8. Inferences	• Governmental Authorities and Agencies

2.2 Categories of Personal Data Sold to Third Parties

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 Personal Data 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 Personal Data of consumers under 16 years of age.

3. Your California 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.

To make a customer request to know, please submit a verifiable consumer request pursuant to the instructions in *Your Privacy Choices & Rights* section.

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

California resident vendors, suppliers, clients, or other business-to-business partners [click here](#).

You can also make a request by phone by calling us at (877) 251-6559 (toll free).

We will acknowledge your request within 10 business days and will attempt to respond substantively within 45 days. If we need additional time, we will let you know.

Please see *Your Privacy Choices & Rights* section for additional information on the privacy request process.

(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.

If you request to delete your Personal Data, your loyalty program member account, any subscription delivery services (such as FreshPass and Subscribe & Save) and all related points, deals, rewards, and perks will be deleted. You will also lose the ability to receive support for past activities, including returns without receipts and may forfeit any subscription fees already paid. Without your Personal Data, your loyalty account will no longer exist, and we won't know who you are to reward you (i.e., we can't reward 1 point for every \$1 spent on groceries because we can't link shopping data to a loyalty account that no longer exists).

However, we still want to provide you with privacy rights that allow you to delete some Personal Data and remain a loyalty member. This is why we provide you with two options for deletion: (1) delete all your Personal Data; or (2) delete your shopping history only. If you select shopping history only, your Personal Data will be maintained for loyalty program operations and you will continue to receive the benefits of our loyalty program moving forward. We will retain some of your Personal Data for continued program participation; however, your prior shopping history will reset as of the date of the deletion request and clipped rewards will be removed. You will also lose the ability to receive support for past activities, including disputes related to loyalty points and returns without receipts. Any additional shopping you do after the reset will be collected, unless you also terminate your applicable loyalty accounts using the online contact form [here](#) or by calling customer service at 877-723-3929.

To make a customer request to delete, please submit a verifiable consumer request pursuant to the instructions in *Your Privacy Choices & Rights* section.

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

California resident vendors, suppliers, clients, or other business-to-business partners [click here](#).

You can also make a request by phone by calling us at (877) 251-6559 (toll free).

We will acknowledge your request within 10 business days and will attempt to respond substantively within 45 days. If we need additional time, we will let you know.

Please see *Your Privacy Choices & Rights* section for additional information on the privacy request process.

(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.

To make a customer request to correct, please submit a verifiable consumer request pursuant to the instructions in *Your Privacy Choices & Rights* section.

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

California resident vendors, suppliers, clients, or other business-to-business partners [click here](#).

You can also make a request by phone by calling us at (877) 251-6559 (toll free).

We will acknowledge your request within 10 business days and will attempt to respond substantively within 45 days. If we need additional time, we will let you know.

Please see *Your Privacy Choices & Rights* section for additional information on the privacy request process.

(d) Right to Opt-Out of the Sale and Sharing of Personal Data

You have the right to opt out of the sale and sharing 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.

(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

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.

(g) 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.

4. 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
		Available at participating stores. Categories of Personal Data collected:	Register • for an

“[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.

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- - **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.

account
online or
on the
mobile
app.

Additional information available at
<https://www.albertsons.com/justforuguest.html>

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NOTE: As of August 3, 2021, we began 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
“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 Data 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. 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/justforu-guest.html 	<ul style="list-style-type: none"> Register for an account online or on the mobile app.
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>	<p>Categories of Personal Data collected:</p> <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 instore; providing a 10-digit number (e.g., phone number).

Value of the Consumer's Data

We estimate the value of consumers' data to be, on average, approximately \$4.13 per consumer in 2024. 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 Personal Data 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 2024.

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

5. 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. 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.

California Automated License Plate Reader Policy

If you are a California resident, you can read our Automated License Plate Reader Policy [here](#).

6. 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.

Colorado Residents

Colorado Loyalty Program Disclosure

As you've already read in our *Loyalty* section, our loyalty program provides you with rewards for your eligible in-store and online purchases (e.g., gas rewards and grocery rewards).

As part of our Loyalty program and by having an account with us, we may collect the following categories of Personal Data:

- **Identifiers** including name, email, phone number, zip code, birthday (optional)
- **Customer Account / Commercial Information** including shopping history, preferred store
- **Internet/Network Activity** including IP address, activity logs, browsing history
- **Inferences** drawn from one or more of the above, including a consumer's shopping history, that reflect a shopping preferences

We collect this data to better understand you and your journey with us as a shopper, offer personalized deals and targeted ads, and help us make better business decisions and continuously improve.

We may disclose your Personal Data to our processors and third parties, such as analytics companies, third-party advertisers, and other merchants, to help handle parts of our loyalty program because of their expertise, resources, or scale. They help us do things like monitor activity on our services, serve ads on this and other services, and otherwise perform actions consistent with the uses described in this Privacy Policy. We may also use them to host our websites, webpages, 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.

You can opt-out of this data sharing and targeted advertising by using our [online form](#) to submit an Opt-out of Sale or Share request.

The rewards you earn as a loyalty member may be redeemed on future gas or grocery purchases. To provide the benefit of redeeming rewards at the gas pump, we may share your Personal Data (i.e., rewards balance) with our fuel station partners.

If you ask us to delete your Personal Data, your loyalty account, any subscription delivery services (e.g., FreshPass and Subscribe & Save) and all related points, deals, rewards, and perks will be deleted. We won't be able to review or address past issues you may have, including returns without receipts and you may forfeit any subscription fees already paid. If you do not want to lose access to these things, you can ask us to delete your

shopping history only. This lets you keep your loyalty account, and receive future benefits of our loyalty program moving forward (we keep some of your Personal Data, but your prior shopping history resets as of the date of your shopping history deletion request and your clipped rewards will be removed). You can request deletion of your personal data or just your shopping history [here](#) or by calling 877-251-6559. You can close your loyalty account [here](#) or by calling customer service at 877-723-3929.