

Safeway Privacy Policy (United States)

Introduction

Safeway Inc. is committed to providing our customers with the finest quality and service. This commitment includes protecting the privacy of your information. You can be confident that we have safeguards to protect the personal information you give us.

The World of Safeway

In order to facilitate access to the products and services we offer, Safeway operates many retail outlets as well as mobile application(s) and several websites directly and through its related companies and service providers. Our family of web sites includes:

- www.safeway.com
- www.vons.com
- www.pavilions.com
- www.randalls.com
- www.tomthumb.com
- www.carrsqc.com
- www.safewayfoundation.org

This privacy policy applies to your use of any Safeway mobile software application ("Application") on a mobile device, our websites, and all information collected or submitted to us through an Application, website and use of a Safeway Club Card (collectively referred to as "Services").

Collecting Personal Information

We receive and may store information you provide when you download and register an Application, register at our websites, or register for a Safeway Club Card.

Registration with us is mandatory in order to be able to benefit from the basic features of these Services. The information we may collect includes:

- Name, age, address, telephone number, email address, user name, password and other registration information
- Credit card information or bank card number for purchase and use of the Services
- Transaction related information associated with a Safeway Club Card, such as when you make purchases, respond to offers, download or use mobile applications from us, and other purchase information and purchase history (as non-aggregated data)
- Information you enter into our system when using the Services, such as contact information and project management information

Safeway collects personal information in the course of providing retail goods and services, program memberships, promotions, surveys or sweepstakes offers. We may collect other personal information you provide us, including information about other people, such as the name and address of a gift recipient or a job reference.

Using Personal Information

By providing us with solicited or unsolicited personal information, you consent to our using such information, subject to applicable laws and the terms of this Privacy Policy. We may use personal information to confirm your orders, deliver products and services that you purchase or request, register you as a user of our website(s), prevent criminal activity on your account, bill you for your purchases, conduct market research via surveys sent to you, respond to your inquiries, or verify and ship a contest prize.

Safeway Club Card information and other personal information may be used to help make Safeway's products, services and programs more useful to its customers. Additionally, Safeway may use personal information to provide you with newsletters, articles, product or service alerts, new product or service announcements, saving awards, event invitations, personally tailored coupons, program and promotional information and offers, and other information, which may be provided to Safeway by other companies. If you prefer not to receive this type of information from us, you can contact us at 1-877-723-3929 or online, [click here](#).

Collection and Use of Non-Personal Information

When using our Services we may also collect non-personal information – data in a form that does not permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as occupation, language, zip code, area code, unique device identifier, location, and the time zone where a Safeway website is accessed or a mobile software application is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We also may collect information regarding customer activities on a mobile software application, and from our other products and services we may offer. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our mobile software applications, websites, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

As you navigate our Website, certain information may also be passively collected by us or our third party advertising partners. This information includes your Internet protocol address, browser type, domain names, access times, operating system, mouse clicks, mouse movements, scrolling activity. We also use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit. This type of information is collected to

analyze the use of our services and solutions to make them more useful to you and to provide you with relevant advertisements.

Aggregate Data, Cookies and Tracking

We may, directly or through a service provider, aggregate information through cookies, or alphanumeric identifiers that we transfer to your computer's hard drive through the web browser. This allows us to automatically collect and track information about you and your activities online at our website over time and across third-party websites or online services including, but not limited to, your computer's network address and operating system, the site from which you linked to our site, the time and date of your visit, how you use our services and what products you purchase. We may also link this information with other personal information about you and may use this linked information to allow third parties to serve ads on our websites or to serve our ads to you on a third party's website. This helps us to recognize you, customize or personalize your shopping experience and store items in your cart between visits. It also allows us to aggregate demographic and statistical data and compilations of information that may or may not include personal information and provide this information to our partners and service providers. By doing so, we hope to understand our customers' needs so that we can provide them with new products and services or tailor existing products and services to fit their needs.

Our web systems do not recognize browser "Do Not Track" signals. However, we utilize AdChoices to provide you with the ability to opt-out of certain third party services that may involve tracking. For more information, click on the AdChoices link, which is listed under the "About This Site" section at the end of our web site homepage at www.safeway.com.

Disclosing Personal Information

We may disclose personal information to our related companies and to third parties for purposes outlined in this Privacy Policy. We do not sell, rent, lease, share or disclose personal information to any non-related companies or to third parties without your consent, except for the following purposes:

- **Filling Orders.** We may provide personal information to a third party to fill your order. For example, if you purchase a product or service using a credit or debit card, your card number and transaction information will be shared with the payment processor or card issuer. In order to ship your product, we will provide your shipping information to the carrier.

- **Business Purposes.** We may provide personal information to our partners and suppliers for customer support services and processing of personal information on behalf of Safeway. We partner with MyWebGrocer and other third party vendors to source or provide certain ads and other pages or content on our website. Your personal information may be shared with those vendors via cookies or other tracking mechanisms when you click on that content or click through to the third party's website. We may also share personal information with our affiliate

companies, or in the course of an actual or potential sale, re-organization, consolidation, merger or amalgamation of our business or businesses.

• **Other Purposes.** We may disclose personal information as required by law; such as in response to a subpoena, court order or a specific request by a law enforcement agency or as otherwise required by law. We may also disclose personal information to third parties investigating potential fraud or questionable activities regarding your account or the use of our Services.

You may also provide your personal information separately to third parties that provide products, services or content to Safeway. If you do so, your personal information will be subject to the third party's privacy policies. For additional information on the privacy practices of MyWebGrocer, please [click here](#).

Accessing Your Personal Information

We update your personal information as required. We will be able to serve you best, however, if you provide us with notification of any changes. If you find errors, you can request that changes be made. We may be prevented from allowing you to have access to some information, in which case you will be so advised. You can update your information via our website or mobile application, or you may submit a written request for changes to any customer service representative at a Safeway store.

We retain your personal information only for as long as reasonably required. The length of time information is retained depends upon the purpose for which the information was collected

Safeguarding Personal Information

The fact that you have trusted Safeway with your personal information is important to us and we take steps to maintain its security. We have appropriate physical, electronic and procedural safeguards in place to protect and secure the information we collect. To safeguard against unauthorized access, you are required to login to certain secure areas of our web site using a user name and a password. Both user name and password are encrypted when sent over the Internet. If you are unable to provide the correct password, you will not be able to access these areas.

Links to and from Other Web Sites

Our websites may offer links to other third party web sites for your convenience and information only. These web sites have their own privacy and information collection practices and security measures.

Prescription Refills

When you use our online prescription refill service, you provide us with your prescription so that we can process your refill request. We understand the confidential nature of such information. Your prescription number is treated as protected information as described in our Pharmacy Privacy Policy. All other information you provide when you use the online prescription refill service is treated as otherwise described in this Privacy Policy.

Children

Safeway does not knowingly collect personal information from minors; however, we cannot always determine the age of persons who access and use our Services. If a minor (as defined by law) provides us with his/her personal information without parental or guardian consent, we encourage the parent or guardian to contact us to have this information removed and to unsubscribe the minor from future Safeway marketing communications.

Consent

You always have a choice as to whether you provide us with personal information. By using our mobile application, website or accepting certain services offered at our retail outlets, you consent to our use of personal information that is collected or submitted as described in this Privacy Policy. Withholding certain information, however, may prevent us from providing you with products and services. For instance, withholding a name will prevent us from processing your order online. Withholding a government issued identification card will prevent us from selling you tobacco or alcohol products or prescriptions.

Updates to Privacy Policy

We may add, modify or remove portions of our Privacy Policy, so we encourage you to review it periodically. If you have previously accepted one of our special offers or agreements, those applicable terms and your continued use will apply to our collection, use and disclosure of personal information. In the case of a conflict, however, this privacy policy supersedes those prior policies or agreements. If our practice in using and/or sharing personal information changes in the future, those changes will be reflected in this Privacy Policy. You can determine the date this Privacy Policy was last updated by referring to the modification date found at the end of the policy.

Questions

If you have questions regarding our Privacy Policy, please contact Safeway's General Counsel & Chief Privacy Officer at:

Safeway Inc.
5918 Stoneridge Mall Road
Pleasanton, California 94588-3229

For answers to questions related to private health information, please direct your inquiry to Safeway's HIPAA Privacy Officer at the above address. Safeway's current HIPAA Privacy Policy is incorporated here by this reference. Safeway strongly urges you to review the [HIPAA Privacy Policy](#).

Modification Date: Last updated August 13, 2015