

Grocery Insiders Privacy Policy

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.

Collecting Personal Information

We receive and may store information you provide when you register for the Community. Registration with us is mandatory in order to be able to benefit from the basic features of the Community. The information we may collect includes:

Name, age, address, telephone number, email address, user name, password and other registration information

Information you enter into our system when using the Community, such as contact information and survey responses

Safeway collects personal information in the course of providing Community membership, promotions, surveys or sweepstakes offers. We may collect other personal information you provide us.

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 register you as a user of the Community, prevent criminal activity on your account, conduct market research via surveys sent to you, respond to your inquiries, or verify and ship a contest prize.

Collection and Use of Non-Personal Information

When using our Community 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.

Aggregate Data, Cookies and Tracking

We 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 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 one of our services and what products you purchase. This helps us to recognize you and customize or personalize your experience.

Disclosing Personal Information

When processing your information, we may disclose personal information to our related companies and third parties for purposes outlined in this Privacy Policy, including to our third party provider who develops/hosts the Community website. We do not sell, rent, lease, share or disclose personal information to any non-related companies or third parties without your prior consent, except for the following purposes:

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 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 agree to 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 those third party privacy policies.

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 Community 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.

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 Community, you consent to our use of personal information that is collected or submitted as described in this Privacy Policy.

Updates to Privacy Policy

We may add, modify or remove portions of our Privacy Policy, so we encourage you to review it periodically. 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

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