

## SHAW'S REWARDS CARD PRIVACY POLICY

*Important note: This Privacy Policy applies to Rewards Cardholders who enroll in our Rewards Card program on or after October 1, 2009. If you enrolled in our Rewards Card program before October 1, 2009, visit our website at [www.Shaw's.com](http://www.Shaw's.com) to view our Privacy Policy applicable to persons who enrolled before that date.*

### PURPOSE

We respect your privacy and are committed to safeguarding your personally identifiable information or "personal information" from unauthorized use or disclosure. This policy describes how your personal information may be collected when you visit our website, shop at our stores, use our products or access our services, enroll in our loyalty card program, or otherwise interact with us. It also describes how your personal information is used or disclosed, and the steps we take to protect it from unauthorized use or disclosure. For special offers, promotions, contests, or specific services, such as those provided by our pharmacies, we might advise you that additional or different personal information practices or terms exist. You should refer to those terms or practices as well.

### CONSENT TO PRIVACY POLICY

By accessing our website to shop or obtain information or services, enrolling in our loyalty card program or providing personal information to us through other means, you are agreeing to the terms of this Privacy Policy.

### DEFINITION OF PERSONAL INFORMATION

We define the term "personal information" to mean any information that we directly associate with or use to identify a specific person. This may include an address, phone number, email address, fax number, or information pertaining to a rewards program, online registration or financial account, when associated with a person's name. Our definition does not include "aggregate personal information," which is information that we collect about a group or category of persons or services, or "de-identified information," which is information from which we or our agents have removed any information that can be used to specifically identify a person, and this policy does not restrict or limit our collection or use of those types of information.

### COLLECTION OF PERSONAL INFORMATION

We may collect your personal information through one or more of the following methods.

**Personal Information You Provide.** We may request or give you the opportunity to provide personal information when you register as a user of our website, shop online or in our stores, sign up for or use our products or services, enroll in our loyalty card program, cash a check, contact us about a prior purchase, or email, call, or otherwise communicate with us. For example, when you enroll in our loyalty card program, we may request that you provide your home or email address. If you do not provide such information, your participation in such program may be limited. Similarly, if you contact us regarding a product or service that you are interested in or concerned about, we may request that you provide personal information that will enable us to respond to your inquiry.

**Automatically Collected Personal Information.** When you shop at our website or in our stores, or register for or use our services, transactional information such as the date of your purchase, registration or service usage, their description and if applicable, the dollar amount or value of the transaction may be collected automatically. We treat this information as personal information if we combine it with or link it to other information that may identify you.

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

**Cookies, Web Beacons and Similar Technologies.** We may use cookies, web beacons and similar technologies to manage our website and email messages, and we may collect information about your activities online at our website. We may link this information with other personal information about you. We may also allow third parties to serve ads on our websites, and if you visit their websites, they may collect information about your visit. This Privacy Policy does not apply to, and we are not responsible for, the practices of third parties that collect your personal information. We encourage you to check the privacy policies of such third parties to learn about their practices with respect to the collection, use, disclosure, and protection of your personal information.

## OUR USE OF PERSONAL INFORMATION

We may use your personal information for a variety of purposes, including but not limited to:

- Responding to your requests;
- Processing and completing your transactions, including the delivery of products or services;
- Contacting you about products or services that we believe may be of interest to you, or sharing with you special offers from other companies;
- Conducting market research, surveys, and similar inquiries to help us understand trends and customer needs across product categories or customer groups;
- Evaluating your shopping experience or existing products and services, or to create new items;
- Attempting to contact you regarding product safety or recall issues;
- Applying discounts for loyalty card program specials when you shop with your card;
- Entering you into sweepstakes and promotions;
- Verifying and validating your identity;
- Contacting you regarding items lost in our stores, such as your keys, purse, or wallet;
- Keeping a record of our interactions with you if you place an order or otherwise deal with our representatives over the telephone or online; and
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal information, our website or data systems; or to meet legal obligations.

## DISCLOSURE OF PERSONAL INFORMATION

We do not sell or rent your personal information to third parties in the ordinary course of our business, nor do we share it with them for their own direct marketing purposes. Notwithstanding, upon the occurrence of certain corporate transactions, your personal information may be disclosed or transferred as described under the caption “Certain Business Transfers” below. We may also share your personal information with our parent corporation or affiliated companies for their use in a manner similar to the purposes described above under the caption “Our Use of Personal Information.” Our practices with respect to the disclosure of personal information are described below.

- **With Your Consent.** We may disclose your personal information to third parties with your consent. You may give your consent in several ways, such as through a written agreement that you sign or acknowledge; an online method, such as a "click-through" agreement or registration page; an oral statement, such as by way of an interactive voice response; or through the terms and conditions under which we provide you a particular product or service. Sometimes your consent may be implicit. For example, if you purchase products with a credit card and have them shipped to your home, you implicitly consent to the disclosure of your name and address to a third-party shipping company to complete the delivery, and of your credit card number to the credit card processor to authorize the transaction and to the bank to collect payment.
- **Service Providers.** We may disclose your personal information to third parties we contract with to complete transactions or perform services on our behalf or for your benefit. Information disclosed to third parties who provide payment authorization or identity verification services may be retained by them in a database used to provide similar services to others. We also share personal information with third parties whose services we utilize to verify customer data, such as mailing addresses, or to supplement other information we have collected. In addition, we contract with third parties to host websites, conduct research, or send you information regarding our products or services or those of other companies with whom we conduct business. When sharing personal information with third parties, we endeavor to restrict their use of such information to the services provided.
- **Legal Process.** We may disclose your personal information to legal or government regulatory authorities in response to their requests for such information or to assist in investigations of theft, fraud, or abuse. We may also disclose your personal information to third parties in connection with claims, disputes, or litigation, or if we determine its disclosure is necessary in an emergency.
- **Certain Business Transfers.** Your personal information may be disclosed as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be

transferred to a third party as one of the business assets in such a transaction. It may also be disclosed in the event of insolvency, bankruptcy, or receivership.

## **HEALTH INFORMATION/PHARMACIES**

Our pharmacies collect protected health information, which includes your medical and personal history, prescription profile for fulfillment of pharmacy orders, and other health related information that you, your doctor, or your insurance carrier provides to us. This information is most often used to process your prescriptions, provide you with health care information or services, or to contact you with questions and respond to your inquiries. This information is subject to our notice of privacy practices that more specifically describes how we may use or disclose your protected health information. You may request a copy of our notice of privacy practices when you visit any of our pharmacies or by contacting us using one of the methods listed under the caption "How to Contact Us" that appears below.

## **INFORMATION PERTAINING TO CHILDREN**

We do not intend to or knowingly collect personal information online from children under the age of 13 and we encourage parents or guardians to participate in and monitor their children's online activity. If a child under 13 has provided personal information, a parent or guardian may inform us of that fact by contacting us using one of the methods listed under the caption "How to Contact Us" that appears below, and we will then delete the information from our database. If you are under the age of 13, do not provide us with any personal information either directly, on any website bulletin boards, or by other means.

## **ACCESS TO AND RETENTION OF PERSONAL INFORMATION**

We do not maintain all of your personal information in a form that you can access or update, and some items, such as transaction records, may not be changed. Accordingly, we will determine and may limit what may be accessed and how, and we may keep a record of changes (including deletions) and disclose them for lawful purposes. We keep your personal information for as long as we think is necessary or advisable and we reserve the right to retain it to the full extent not prohibited by law. You may review your personal information that is readily accessible or request that it be updated by contacting our Customer Interaction Center using one of the methods listed under the caption "How to Contact Us" that appears below.

## **SECURITY OF PERSONAL INFORMATION**

We take various physical, electronic, and procedural measures to protect your personal information from unauthorized disclosure or misuse. We employ Secure Sockets Layer (SSL) technology, a commonly employed method of encrypted communication used on the Internet, to encrypt during transmission, sensitive personal information you input, including credit card numbers. However, because no data security systems are completely secure, we do not warrant that any personal information that you provide to us will be secure or safe from unauthorized access. If you provide any personal information to us, you do so at your own risk.

## **LINKS TO OTHER WEBSITES**

Our website may contain links to websites operated by third parties. When you visit their websites, they may collect information about your visit and use it to provide advertisements to you. This Privacy Policy does not apply to, and we are not responsible for, the practices of third parties that collect your personal information. Each of these linked websites may maintain its own policies about the collection, use, and protection of your personal information. We encourage you to check the privacy policies of such third parties to learn about their practices.

## **CHANGES TO THIS POLICY**

We will modify this Privacy Policy if our practices change. We will notify you of such changes by posting the modified version on our website and indicating the date, it was last modified. We encourage you to visit our website periodically to view the latest version of this Privacy Policy.

## OPT-OUT CHOICES

We may send you email messages, direct mail offers, or other communications regarding products or services unless you specifically ask us not to do so when you enroll in our loyalty card program, access our website, or change your preferences by updating any accounts you may have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request to our Customer Interaction Center (see “How to Contact Us” below) or by following the instructions in the form of the communication you received, as described below. We will endeavor to process your opt-out request in a commercially reasonable time.

- **Printed Materials:** To opt-out of receiving printed marketing materials at your postal address, such as catalogs, flyers or postcards, contact our Customer Interaction Center.
- **Emails:** To opt-out of receiving marketing materials via email, use the method provided in the email, or contact our Customer Interaction Center.
- **Facsimiles:** If you have consented to receiving facsimile messages, you may opt-out of receiving them by using the method provided in the facsimile message or contacting our Customer Interaction Center.
- **Voice or Text Messages:** To opt-out of receiving in-person voice messages by telephone, contact our Customer Interaction Center. If you have consented to receiving pre-recorded voice messages or text messages, you may opt-out of receiving them by using the method provided in the pre-recorded voice message or text message, or contacting our Customer Interaction Center.

## HOW TO CONTACT US

If you have any questions, comments or concerns about this Privacy Policy, or privacy related comments or questions, please contact our Customer Interaction Center, by mail, email or telephone as follows:

<u>Email Address</u>	<u>Mailing Address</u>	<u>Telephone No.</u>
<a href="mailto:privacypolicy@supervalu.com">privacypolicy@supervalu.com</a>	Customer Interaction Center Attn: Customer Service 250 Parkcenter Blvd. Boise, ID 83706	1-877-932-7948

**Effective Date: October 1, 2009**

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