

## Shaw's Rewards Card Privacy Policy

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

**Simply stated, our privacy policy is this:** Shaw's and Star will not sell or disclose any personally identifiable information about you to any Third Parties for their personal or commercial use without your consent. Any personal information that Shaw's and Star collect about you will only be used by Shaw's and Star for the purposes detailed below.

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### 1.0 Overview

In order to provide benefits and services to you in connection with your Shaw's Rewards Card, Shaw's and Star Market gather certain types of information about you. This privacy statement is intended to explain what information Shaw's and Star gather, how Shaw's and Star use that information, how that information is distributed and how a Shaw's Rewards Cardholder can correct or change the information provided and the use of such information. This policy is intended to prevent the unauthorized disclosure of your information to any "Third Parties." The term "Third Parties," as used in this Privacy Statement, means anyone other than you, Shaw's and Star or their successors-in-interest.

### 2.0 Special Notice to Former Star Advantage Cardholders

If your Star Advantage Card has been replaced by a Shaw's Rewards Card, your Shaw's Rewards Card will have exactly the same features as your old Star Advantage Card unless you ask Shaw's and Star to provide the additional features that are now available with the Shaw's Rewards Card. Information about you will be handled and protected as described in this policy. Like any Shaw's Rewards Cardholder, you have the right to accept or decline any of the Shaw's Rewards Card features at any time, as described below.

### 3.0 Collection of Personally Identifiable Information

"Personally identifiable information" is any information that allows others to identify you or contact you. Shaw's and Star do not collect any personally identifiable information about you unless you register to become a Shaw's Rewards Cardholder. When you register and become a Shaw's Rewards Cardholder, Shaw's and Star collect the following personally identifiable information:

- Your first and last name.
- Your home address.
- Your e-mail address (optional).
- Your phone number (optional).
- Your driver's license or social security number (for check cashing privileges only).

In addition, in order to provide you with the discounts and benefits associated with the Shaw's Rewards Card, Shaw's and Star collect the following specific information about your purchases every time you use the your Rewards Card in connection with the purchase of groceries at Shaw's or Star:

- The date that your order was rung up.
- The items that you purchased.
- The total dollar amount of your purchases on that visit.

Shaw's and Star collect this information for all Rewards Cardholders. When you agree to become a Shaw's Rewards Cardholder, you agree that Shaw's and Star may collect and retain such information. Shaw's and Star will only use such information for the purposes described in this Privacy Statement. We do NOT track any purchases made at the Pharmacy. Pharmacy records are kept separate from the Shaw's Rewards Card databases and are not used for marketing-related purposes.

#### **4.0 Use of Personally Identifiable Information and Purchase Information**

Shaw's and Star will only use personally identifiable information and purchase information for the following purposes:

- To verify your identity in connection with check-cashing privileges associated with the Shaw's Rewards card.
- To mail or email information to you about promotions and services that Shaw's and Star believe may be of interest to you. Shaw's and Star will only send you such information if you asked to receive it when you registered for your Shaw's Rewards Card or subsequently asked us to begin sending you such information. If you have not requested that Shaw's and Star provide such information to you, your personally identifiable information will not be used for this purpose.
- To return lost keys to you that are attached to a key tag version of the Shaw's Rewards Card.
- To attempt to contact you concerning product safety and recall issues.

The personally identifiable information and purchase information collected by Shaw's and Star will not be sold or disclosed to any Third Parties for their personal or commercial use without your consent.

Customers will be allowed timely access upon written request to any information about their data profile if such information is retrievable in the ordinary course of business and if providing access does not impose an unreasonable burden. Customers will be allowed to correct or update their information through a simple written request.

#### **5.0 Shaw's Website - [http:// www.shaws.com](http://www.shaws.com)**

Please see our Website Terms and Conditions

#### **6.0 Collection and Use of General/Aggregate Information by Shaw's and Star**

In addition to the personally identifiable information and purchase information discussed above, Shaw's and Star collect aggregate information concerning the purchases of all Shaw's Rewards Cardholders. On a program-wide basis, Shaw's and Star keep track of certain types of aggregate statistical information about Shaw's Rewards Cardholders (for example, amounts and types of groceries purchased by a typical Shaw's or Star customer). Shaw's and Star use this general, anonymous information to obtain a better understanding of Shaw's Rewards Cardholders. This information helps Shaw's and Star to identify the effectiveness of their promotional activities, provide better service to their customers, offer a competitive range of products and new items, and pass on savings to customers by operating a more efficient business. Also, we use this information to provide special savings offers such as free samples, coupons, rebates and other promotions to those Shaw's Rewards Cardholders who have elected to receive such offers. If you have elected to receive such offers from us, these offers may be mailed to you at home, sent to you electronically or given to you in our stores.

Shaw's and Star share some of the aggregate information described above with Third Parties in order to allow them to measure the effectiveness of programs and advertisements aimed at Shaw's Rewards Cardholders. When shared, such aggregate information will be in the form of grouped statistics. No personally identifiable information is provided to Third Parties with such aggregate information. The procedures for sharing aggregate information with Third Parties are intended to make it impossible for them to extract personal information from such aggregate information.

### **7.0 Third Party Data Practices**

Shaw's or Star contract with Third Parties to send materials or communications to Rewards Cardholders, such as coupons, rebates or information about promotions or services, or to verify or supplement customer data. Personally identifiable information is shared with Third Parties for such purposes. For example, Shaw's and Star may utilize the services of Third Parties to update or verify a customer's mailing address if it is unable to contact such customer, or it may obtain census data from Third Parties to determine the demographic characteristics of its customers, such as the percentage of residents in a select area who own their own homes. Shaw's and Star employ these processes to provide Rewards Cardholders with offers and content that best meet their specific interests. When Third Parties are employed for such purposes, the confidentiality of members' personal information is maintained in strict conformity with this Privacy Statement.

### **8.0 Your Right to Limit Communications and to Change Your Options**

Shaw's and Star will not send you any e-mail messages, direct mail offers or other communications regarding products or services unless you explicitly ask Shaw's and Star to do so when you apply for your Shaw's Rewards Card. In addition, you can ask Shaw's and Star at any time not to send you such e-mail messages, direct mail offers or other communications. If your cardholder status does not currently call for you to receive such email, direct mail or other communications, you may request at any time to begin receiving such communications.

If, at any time, you elect not to be a Shaw's Rewards Cardholder, Shaw's and Star will delete your information from its active database. Even though you may have cancelled your membership, residual information remains on the Shaw's and Star archived database and records.

If you do not wish to participate in these programs and wish to block the collection of your purchase data, please visit the Customer Service desk at any Shaw's Supermarket or Star Market. You may also contact our Customer Interaction Center 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<br>Attn: Customer Service<br>250 Parkcenter Blvd.<br>Boise, ID 83706 | 1-877-932-7948       |

By requesting to be blocked, you still will receive all advertised sale prices, but will not be eligible for additional offers, savings, and sweepstakes, which are based on card use. You may also, at any time, change, correct or update your name, address, telephone number and other personally identifiable information that you have provided to us. When requesting a change in status or correction of information, please be sure to provide your Shaw's Rewards Card number.

### **9.0 Shaw's/Star Security**

To safeguard all information that we collect, we have instituted strict physical, electronic, and managerial policies and procedures to prevent unauthorized access, to maintain data accuracy and to ensure the appropriate use of all data. At any time, however, you may request to review or correct your data.

Shaw's and Star operate secure data networks protected by industry standard "firewalls" and password protection systems that are intended to keep unauthorized persons from accessing the data on the Shaw's/Star network. Only authorized individuals have access to the information provided by Shaw's and Star customers. Each such individual is aware of the Shaw's Privacy Statement and is obligated to keep confidential all customer information in the Shaw's and Star data network.

Whenever Shaw's and Star handle personal information, they will take steps to ensure your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no data transmission over the Internet is ever 100% secure, and so Shaw's and Star cannot warrant the security of the information you transmit to us. Shaw's and Star do, however, make a best effort to ensure the security of the Shaw's/Star system.

**10.0 Disclosure of Information in Response to a Court Order or in an Emergency**

Shaw's and Star will release information when compelled by a subpoena or court order, or when Shaw's and Star believe, in their reasonable discretion, that such disclosure is warranted to cooperate with inquiries by law enforcement agencies or in emergencies where physical safety is at risk.

**11.0 Amendment or Modification of this Privacy Statement**

Shaw's and Star reserve the right to amend this Privacy Statement at any time and only the current Privacy Statement, as set forth on the Shaw's website ([www.shaws.com](http://www.shaws.com)) will be deemed effective. Shaw's and Star will not implement any amendment to this Privacy Statement that would permit the disclosure of personally identifiable information to Third Parties for their personal or commercial use without providing current Shaw's Rewards Cardholders with prior notice of the amendment and obtaining their consent to any such disclosure. By applying for a Shaw's Rewards Card or using the Shaw's website, you agree to the terms of the Shaw's Privacy Statement and any modifications made to that policy. In the event you do not agree with these terms, please do not use the Shaw's web site or become a Shaw's Rewards Cardholder.

**12.0 Questions**

Questions regarding this Privacy Statement should be directed to the Shaw's and Star Customer Interaction Centers by email, regular mail or telephone at the addresses and phone number listed in Section 8.0 above.

Updated: October 1, 2009