

CCPA NOTICE AT COLLECTION

<p>Category of Personal Information</p>	<p>Categories of Sources from which Information was Collected</p>	<p>Purposes for Collection</p>
<p>Identifiers, including real name, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers</p>	<p>Directly from you or someone you know</p> <p>Automatically when you use our websites and apps</p> <p>Advertising networks</p> <p>Data analytics providers</p> <p>Social networks</p> <p>Vendors that help us to fulfill and deliver orders, process payments, support our promotions, contests, gift cards, loyalty programs, and sweepstakes, and provide communications, marketing, or other services on our behalf</p> <p>Affiliates</p> <p>ARBY’S franchisees</p>	<p>Processing your purchases of or requests for products or websites and apps</p> <p>Maintaining your account with us</p> <p>Communicating with you, and facilitating communications through our websites and apps</p> <p>To support our contests, promotions, loyalty programs, coupons, and sweepstakes</p> <p>Customer service</p> <p>Marketing and advertising</p> <p>To better understand how users access and use the websites and apps, to improve the Websites and apps, to respond to user desires and preferences, auditing, and for other research and analysis</p> <p>To help maintain the safety, security, and integrity of our websites and apps, databases and other technology assets, as well as your account, orders, and deliveries</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>

Category of Personal Information	Categories of Sources from which Information was Collected	Purposes for Collection
		<p>Tailoring our content or otherwise personalizing the websites and apps</p> <p>As part of our application process for potential franchisees, and relationship with current franchisees</p>
<p>Personal records, including name, signature, social security number, address, telephone number, passport number, driver’s license or state identification card number, education, employment, employment history, bank account number, credit card number, debit card number, or other financial information</p> <p>This category includes the information described in Cal. Civ. Code § 1798.80(e).</p>	<p>Directly from you</p> <p>Vendors that help us to fulfill and deliver orders, process payments, support our promotions, contests, gift cards, loyalty programs, and sweepstakes, and provide communications, marketing, or other services on our behalf</p> <p>Affiliates</p> <p>ARBY’S franchisees</p>	<p>Processing your purchases of or requests for products or services</p> <p>Maintaining your account with us</p> <p>Communicating with you, and facilitating communications through our websites and apps</p> <p>To support our contests, promotions, loyalty programs, coupons, and sweepstakes</p> <p>Customer service</p> <p>Marketing and advertising</p> <p>To better understand how users access and use the websites and apps, to improve the websites and apps, to respond to user desires and preferences, auditing, and for other research and analysis</p> <p>To help maintain the safety, security, and integrity of our websites and apps, databases and other technology assets, as well as your account, orders, and deliveries</p>

Category of Personal Information	Categories of Sources from which Information was Collected	Purposes for Collection
		<p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p> <p>Tailoring our content or otherwise personalizing the websites and apps</p> <p>As part of our application process for potential franchisees, and relationship with current franchisees</p>
<p>Characteristics of protected classifications under California or federal law, including birthday, and gender</p>	<p>Directly from you</p> <p>Affiliates</p>	<p>Customer service</p> <p>To support our contests, promotions, loyalty programs, coupons, and sweepstakes</p> <p>Marketing and advertising</p> <p>To better understand how users access and use the websites and apps, to improve the websites and apps, to respond to user desires and preferences, auditing, and for other research and analysis</p> <p>To help maintain the safety, security, and integrity of our websites and apps, databases and other technology assets, as well as your account, orders, and deliveries</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>

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		Tailoring our content or otherwise personalizing the websites and apps
<p>Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>Directly from you</p> <p>Automatically when you use our websites and apps</p> <p>Vendors that help us to fulfill and deliver orders, process payments, support our promotions, contests, gift cards, loyalty programs, and sweepstakes, and provide communications, marketing, or other services on our behalf</p> <p>Affiliates</p> <p>ARBY’S franchisees</p>	<p>Processing your purchases of or requests for products or services</p> <p>Communicating with you, and facilitating communications through our websites and apps</p> <p>To support our contests, promotions, loyalty programs, coupons, and sweepstakes</p> <p>Customer service</p> <p>Marketing and advertising</p> <p>Tailoring our content or otherwise personalizing the websites and apps</p> <p>To better understand how users access and use the websites and apps, to improve the websites and apps, to respond to user desires and preferences, auditing, and for other research and analysis</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>
<p>Internet or other electronic network activity information, including search history, and information regarding interactions with</p>	<p>Automatically when you use our websites and apps</p> <p>Internet service providers</p> <p>Data analytics providers</p>	<p>To better understand how users access and use the websites and apps, to improve the websites and apps, to respond to user desires and</p>

Category of Personal Information	Categories of Sources from which Information was Collected	Purposes for Collection
our websites, applications, or advertisements	Vendors that help us to fulfill and deliver orders, and provide communications, marketing, or other services on our behalf	<p>preferences, auditing, and for other research and analysis</p> <p>Marketing and advertising</p> <p>To help maintain the safety, security, and integrity of our websites and apps, databases and other technology assets, as well as your account, orders, and deliveries</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p> <p>Tailoring our content or otherwise personalizing the websites and apps</p> <p>Customer service</p>
Geolocation data	Automatically when you use our websites and apps	<p>Processing your purchases of or requests for products or services</p> <p>Customer service</p> <p>Marketing and advertising</p> <p>To better understand how users access and use the websites and apps, to improve the websites and apps, to respond to user desires and preferences, auditing, and for other research and analysis</p> <p>To help maintain the safety, security, and integrity of our websites and apps, databases and other technology assets,</p>

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		<p>as well as your account, orders, and deliveries</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p> <p>Tailoring our content or otherwise personalizing the websites and apps</p>
Audio, electronic, visual, thermal, olfactory, or similar information	WE DO NOT COLLECT	N/A
<p>Professional or employment-related information</p> <p><i>If you are an ARBY'S employee, please see our California Employee Privacy Notice for additional disclosures. Job applicants can find additional disclosures in our California Applicant Privacy Notice.</i></p>	Directly from you	<p>As part of our application process for potential franchisees, and relationship with current franchisees</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>
<p>Inferences used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>	Drawn from the other categories of Personal Information we collect	<p>To support our contests, promotions, loyalty programs, coupons, and sweepstakes</p> <p>Marketing and advertising</p> <p>To better understand how users access and use the websites and apps, to improve the websites and apps, to</p>

Category of Personal Information	Categories of Sources from which Information was Collected	Purposes for Collection
		<p>respond to user desires and preferences, auditing, and for other research and analysis</p> <p>Tailoring our content or otherwise personalizing the websites and apps</p> <p>As part of our application process for potential franchisees, and relationship with current franchisees</p>

Among the categories listed above are the following categories of sensitive personal information:

Category of Sensitive Personal Information	Categories of Sources from which Information was Collected	Purposes for Collection
Personal Information that reveals a Social Security, driver’s license, state identification card, or passport number	Directly from you	As part of our application process for potential franchisees, and relationship with current franchisees
Personal Information that reveals an account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	Directly from you	Maintaining your account with us
Personal Information that reveals precise geolocation (location within a radius of 1,850 feet)	Automatically when you use our websites and apps	Processing your purchases of or requests for products or services

Category of Sensitive Personal Information	Categories of Sources from which Information was Collected	Purposes for Collection
		Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity Tailoring our content or otherwise personalizing the websites and apps

In addition to the purposes described above, we may use and disclose any category of personal information or sensitive personal information we collect to respond to law enforcement requests, or as otherwise required or authorized by applicable law, court order, or governmental regulations; to protect our rights and interests and those of others (including our franchisees); to resolve any disputes; to enforce our policies; and to evaluate or conduct a merger, sale, or other acquisition of some or all of our assets.

How Long We Keep Your Personal Information

We keep the categories of personal information described above for as long as is necessary for the purposes described in this Privacy Policy or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your personal information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which—we collected the information;
- Your personal information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected;
- The information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where personal information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

We disclose personal information as shown below. The first chart shows the categories of personal information we disclose to our service providers and contractors for business or commercial purposes. Although we do not sell personal information in exchange for money, some of the ways in which we disclose personal information for advertising or to our affiliated brands and companies may be considered “sales” or “sharing” under California law. The second chart shows the categories of personal information we share for purposes of cross-context behavioral advertising or otherwise “sell,” as that term is defined under California law. We do

not have actual knowledge that we sell or share the personal information of consumers under 16 years of age.

1. Disclosures for a Business or Commercial Purpose

Category of Personal Information	Categories of Recipients	Purposes for Disclosure
<i>Personal Information</i>		
Identifiers	Affiliates Service providers that we use to support our business and operations	Processing your purchases of or requests for products or services Performing services on our behalf (e.g., fulfilling and delivering orders, processing payments, supporting our promotions, contests, gift cards or loyalty programs, and providing communications, technical, analytical, web hosting, cloud hosting and mobile application support, or other services on our behalf) Providing advertising and marketing services (except for cross-context behavioral advertising) Short-term, transient use, including, but not limited to, non-personalized advertising Auditing, related to ad impressions Ensuring security and integrity of personal information Debugging to identify and repair errors that impair existing intended functionality Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity
Personal records	Affiliates	Processing your purchases of or requests for products or services

Category of Personal Information	Categories of Recipients	Purposes for Disclosure
	Service providers that we use to support our business and operations	<p>Performing services on our behalf (e.g., fulfilling and delivering orders, processing payments, supporting our promotions, contests, gift cards or loyalty programs, and providing communications, technical, analytical, web hosting, cloud hosting and mobile application support, or other services on our behalf)</p> <p>Providing advertising and marketing services (except for cross-context behavioral advertising)</p> <p>Short-term, transient use, including, but not limited to, non-personalized advertising</p> <p>Auditing, related to ad impressions</p> <p>Ensuring security and integrity of personal information</p> <p>Debugging to identify and repair errors that impair existing intended functionality</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>
Characteristics of protected classifications	<p>Affiliates</p> <p>Service providers that we use to support our business and operations</p>	Performing services on our behalf (e.g., fulfilling and delivering orders, processing payments, supporting our promotions, contests, gift cards or loyalty programs, and providing communications, technical, analytical, web hosting, cloud hosting and mobile application support, among other services)

Category of Personal Information	Categories of Recipients	Purposes for Disclosure
		<p>Providing advertising and marketing services (except for cross-context behavioral advertising)</p> <p>Short-term, transient use, including, but not limited to, non-personalized advertising</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>
Commercial information	<p>Affiliates</p> <p>Service providers that we use to support our business and operations</p>	<p>Processing your purchases of or requests for products or services</p> <p>Performing services on our behalf (e.g., fulfilling and delivering orders, processing payments, supporting our promotions, contests, gift cards or loyalty programs, and providing communications, technical, analytical, web hosting, cloud hosting and mobile application support, among other services)</p> <p>Providing advertising and marketing services (except for cross-context behavioral advertising)</p> <p>Short-term, transient use, including, but not limited to, non-personalized advertising</p> <p>Auditing, related to ad impressions</p> <p>Ensuring security and integrity of personal information</p> <p>Debugging to identify and repair errors that impair existing intended functionality</p>

Category of Personal Information	Categories of Recipients	Purposes for Disclosure
		Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity
Internet or other electronic network activity information	Service providers that we use to support our business and operations	<p>Processing your purchases of or requests for products or services</p> <p>Performing services on our behalf (e.g., fulfilling and delivering orders, processing payments, supporting our promotions, contests, gift cards or loyalty programs, and providing communications, technical, analytical, web hosting, cloud hosting and mobile application support, among other services)</p> <p>Providing advertising and marketing services (except for cross-context behavioral advertising)</p> <p>Short-term, transient use, including, but not limited to, non-personalized advertising</p> <p>Auditing, related to ad impressions</p> <p>Ensuring security and integrity of personal information</p> <p>Debugging to identify and repair errors that impair existing intended functionality</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>
Geolocation data	Service providers that we use to support our business and operations	Processing your purchases of or requests for products or services

Category of Personal Information	Categories of Recipients	Purposes for Disclosure
		<p>Performing services on our behalf (e.g., fulfilling and delivering orders)</p> <p>Short-term, transient use, including, but not limited to, non-personalized advertising</p>
Inferences	<p>Affiliates</p> <p>Service providers that we use to support our business and operations</p>	<p>Performing services on our behalf (e.g., providing communications, technical, analytical, web hosting, cloud hosting and mobile application support, among other services)</p> <p>Providing advertising and marketing services (except for cross-context behavioral advertising)</p>
<i>Sensitive Personal Information</i>		
Precise geolocation	Service providers that we use to support our business and operations	<p>Processing your purchases of or requests for products or services</p> <p>Performing services on our behalf (e.g., fulfilling and delivering orders)</p>

2. Sales and Sharing of Personal Information

Category of Personal Information or Sensitive Personal Information	Categories of Recipients	Purposes for Selling / Sharing
<p>Identifiers</p> <p>Personal Records</p>	<p>Service Providers</p> <p>Affiliates</p>	<p>To show you relevant ads</p>

Category of Personal Information or Sensitive Personal Information	Categories of Recipients	Purposes for Selling / Sharing
		Analytics, data strategy, consultation on, development or improvement of products and services, marketing, advertising, and related services