

## SUPPLEMENTAL NOTICE FOR RESIDENTS OF COVERED U.S. STATES

Effective Date: July 1, 2023

This Privacy Notice (“**Notice**”) supplements our [Privacy Policy](#), and describes how Arby’s Restaurant Group, Inc. (“**Arby’s**,” “**us**,” “**we**,” or “**our**”) processes personal information about consumers who live in California, Colorado, Connecticut, Utah and Virginia, as well as California vendors, franchisees, prospective franchisees and other business contacts. We maintain separate notices for California employees and job applicants.

### **How and Why We Collect Personal Information**

Arby’s may, and in the previous twelve (12) months, has collected and used the following categories of personal information:

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES	PURPOSES FOR COLLECTION
<p><b>Identifiers and Personal Records</b>, including name, postal address, telephone number, signature, unique personal identifier, online identifier, IP address, email address, account name or other similar identifiers, social security 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 <i>(This category includes information described in Cal. Civ. Code § 1798.80(e).)</i></p> <p><b>Commercial information</b>, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</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 services</p> <p>Providing, developing, and maintaining our 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> <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><b>Characteristics of protected classifications</b>, including age and gender</p>	<p>Directly from you</p> <p>Affiliates</p>	<p>To comply with law</p> <p>Customer service</p> <p>To support our contests, promotions, loyalty programs, coupons, and sweepstakes</p> <p>Marketing and advertising</p>

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES	PURPOSES FOR COLLECTION
		<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> <p>Tailoring our content or otherwise personalizing the websites and apps</p>
<p><b>Internet or other electronic network activity information</b>, including browsing history, search history, and information regarding interactions with our websites, applications, or advertisements</p> <p><b>Geolocation data</b></p>	<p>When you use our websites and apps</p> <p>Internet service providers</p> <p>Data analytics providers</p> <p>Vendors that help us to fulfill and deliver orders, and provide communications, marketing, or other services on our behalf</p>	<p>Processing your purchases of or requests for products or services</p> <p>Providing, developing, and maintaining our 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>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>
<p><b>Audiovisual information</b></p>	<p>Directly from you</p> <p>Closed Circuit Television System</p>	<p>Customer Service</p> <p>Video conferencing</p> <p>Franchisee support and evaluation</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>
<p><b>Professional or employment-related information</b></p> <p><i>If you are a Arby's employee, please see our California Employee Privacy Notice for additional disclosures. Job applicants can find additional disclosures in our</i></p>	<p>Directly from you</p>	<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>

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES	PURPOSES FOR COLLECTION
<i>California Applicant Privacy Notice.</i>		
<b>Inferences</b> reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Drawn from the other categories of personal information we collect  Data analytics providers	To support our contests, promotions, loyalty programs, coupons, and sweepstakes  Marketing and advertising  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  Tailoring our content or otherwise personalizing the websites and apps  As part of our application process for potential franchisees, and relationship with current franchisees

Among the categories of personal information listed above, the following categories of personal information we collect may be considered “sensitive” under some state privacy laws:

CATEGORY OF SENSITIVE PERSONAL INFORMATION	CATEGORIES OF SOURCES	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
Precise geolocation (location within a radius of 1,850 feet)	Through our mobile applications	Processing your purchases of or requests for products or services (e.g., helping you to find one of our locations or facilitating delivery services)  Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity

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 necessary or permitted for the purposes described in this Notice 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.

**Disclosure of Personal Information**

The following charts summarize how we disclose personal information. 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 some state privacy laws. The second chart shows the categories of personal information we share for purposes of targeted / cross-context behavioral advertising or otherwise “sell” for non-monetary consideration. We do not have actual knowledge that we sell or share the personal information of consumers under 16 years of age.

**Disclosures for a Business or Commercial Purpose**

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF RECIPIENTS	PURPOSES FOR DISCLOSURE
<i>Personal Information</i>		
Identifiers Personal records Commercial information Internet or other electronic network activity information	Affiliates Service providers that we use to support our business and operations Franchisees	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

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF RECIPIENTS	PURPOSES FOR DISCLOSURE
		<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> <p>Franchisees</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>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>
Geolocation data	<p>Service providers that we use to support our business and operations</p> <p>Franchisees</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, or helping you find one of our locations)</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, or helping you find one of our locations)</p>

## Targeted Advertising, Sales, and Sharing of Personal Information

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF THIRD PARTIES TO WHICH SOLD OR SHARED	PURPOSES FOR SELLING / SHARING
Identifiers Personal records	Advertising partners Certain data analytics providers Social networks Affiliates Franchisees Data brokers	To show you relevant ads  Analytics, data strategy, consultation on, development or improvement of products and services, marketing, advertising, and related services

### **California Privacy Rights**

If you are a California resident who interacts with us as a consumer, franchisee, prospective franchisee, vendor, or business contact (collectively “**California residents**”), you have the right to submit requests relating to your personal information in accordance with the California Consumer Privacy Act (“**CCPA**”) as described below.

**Right to Know.** You have the right to know what personal information we have collected about you, which includes:

- The categories of personal information we have collected about you, including:
  - The categories of sources from which the personal information was collected
  - Our business or commercial purposes for collecting, selling, or sharing personal information
  - The categories of recipients to which we disclose personal information
  - The categories of personal information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of personal information
  - The categories of personal information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of personal information
- The specific pieces of personal information we have collected about you.

**Right to Delete Your Personal Information.** You have the right to request that we delete personal information we collected from you, subject to certain exceptions. Where we use deidentification to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not to attempt to reidentify the information.

**Right to Correct Inaccurate Information.** If you believe that personal information we maintain about you is inaccurate, you have the right to request that we correct that information.

**Right to Opt Out of Sales and Sharing of Personal Information.** You have the right to opt out of the sale of your personal information, and to request that we do not share your personal information for cross-context behavioral advertising. To opt-out, please follow the instructions provided below. If you choose to use the Global Privacy Control (GPC) browser signal, you will be opted out of cookie-based sales or sharing of personal information, and will need to turn it on for each browser you use.

**Submitting Requests Relating to Your Personal Information.** If you would like to submit a request to delete, request to correct, a right-to-know request, or a request to limit use and disclosure of sensitive personal information, please click [here](#) or call us at 1-800-599-2729. If you would like to opt out of sales

of personal information or sharing of personal information for cross-context behavioral advertising via cookies and other tracking technologies, please adjust “Cookie Settings” in the cookie management banner. To opt out of offline sales and sharing of personal information, please click [here](#). Please note that, if you submit a request to know, request to delete, or request to correct, you will be asked to log into your account or to provide 2-3 pieces of personal information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

#### **Privacy Rights for Consumers in Covered States Other Than California**

If you are a consumer who lives in Colorado, Connecticut, Utah or Virginia, you have the right to submit certain requests relating to your personal information as described below.

**Right to Access and Data Portability.** You have the right to confirm whether we are processing your personal information, to access your personal information, and to obtain a copy of personal information you provided to us in a portable format.

**Right to Correct.** You have the right to request that we correct inaccuracies in your personal information, taking into account the nature of the personal information and our purposes for processing it.

**Right to Delete.** You have the right to request that we delete your personal information, subject to exceptions.

**Right to Opt Out.** You have the right to opt out of the following uses of your personal information: (i) targeted advertising; (ii) the sale of personal information; and (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements. We do not sell personal information in exchange for money or engage in practices that qualify as profiling producing legal or similarly significant effects under applicable state privacy laws. To opt out of targeted advertising and/or non-monetary “sales” of personal information, please submit a request as outlined below. If you are an authorized agent submitting an opt-out request on behalf of a consumer where allowed by law, please follow the instructions provided below and within our webform. We use commercially reasonable efforts to authenticate the identity of the consumer to whom the request relates and the authorized agent’s authority to act on the consumer’s behalf.

**Submitting Requests Relating to Your Personal Information.** To opt out of targeted advertising and/or non-monetary “sales” of personal information via cookies and other tracking technologies, please adjust “Cookie Settings” in the cookie management banner. For all other types of requests, please click [here](#) or call us at 1-800-599-2729. Please note that we may need to authenticate your identity before your request can be processed. For authentication, you will be asked to log into your account or to provide 2-3 pieces of personal information that we will match against our records.

**Right to Appeal.** Sometimes we are unable to process requests relating to your personal information, in which case, your request will be denied. If your privacy rights request has previously been denied by us and you believe we denied it in error, you may appeal for reconsideration of your request. The link to appeal is found in the email communication we send once your original request is completed.

## **Additional Information About Our Loyalty Program**

### **California Notice of Financial Incentive**

We may offer loyalty programs (including Arby's Rewards) that provide benefits such as rewards points and discounts to those who choose to participate. From time to time, we also offer coupons, discount codes, or offers for free products that required a sign-up. Participation requires you to provide some personal information, such as Identifiers, Personal Records, Internet or other electronic network activity information, Characteristics of Protected Classifications (age), and Commercial Information. The incentives associated with our loyalty programs are designed to reward loyal customers for continuing to purchase our products. For the terms and conditions applicable to Arby's Rewards, please click [here](#).

We have made a good faith estimate that the value of consumers' personal information provided in connection with our loyalty programs is roughly equivalent to the relevant expenses related to the collection and retention of that personal information. Any difference in price or benefits provided to customers who participate in our loyalty programs is reasonably related to the value of the personal information provided. By joining our loyalty program, you consent to any financial incentive associated with the program. You have the right to withdraw from the financial incentive at any time by cancelling your participation in the loyalty program.

### **Loyalty Program Disclosures for Colorado Residents**

The purpose of this section is to notify Colorado consumers about how we use personal information in connection with our loyalty program, "Arby's Rewards". You have the right to delete your personal information associated with your Arby's Rewards account; however, if you delete your personal information, we will be unable to link your rewards to your account, and therefore you will be unable to receive benefits from the program. Additionally, we will be unable to recover your account after deletion.

The chart below identifies the categories of personal information collected through the Arby's Rewards program that we sell or process for targeted advertising, and the third parties who receive these categories of personal information.

<b>CATEGORIES OF PERSONAL INFORMATION</b>	<b>THIRD PARTIES</b>
Identifiers	Advertising Partners
Personal records	Franchisees
Date of Birth	Loyalty Program Partners as described below
Commercial information	

The chart below identifies our loyalty program partners, and the program benefits provided by each partner.

<b>LOYALTY PROGRAM PARTNERS</b>	<b>BENEFITS PROVIDED</b>
Arby's Franchisees	Points, discounts, and other rewards associated with Arby's Rewards program
Partner Businesses	Enhanced or additional rewards or discounts

For more information about how we process your personal information, please click [here](#).



### **Contact Us**

If you have questions about this Policy, you can write to us at: Arby's Restaurant Group, Inc., Attn: Legal Department, Privacy Counsel, 3 Glenlake Parkway NE, Atlanta, GA 30328. You can email us at [privacy@inspirebrands.com](mailto:privacy@inspirebrands.com). You can call us at 1-800-599-2729.