

ARBY'S PRIVACY POLICY

Updated July, 1, 2023

APPLICABILITY

This Policy describes ARBY'S online and offline information collection and use practices. This includes for our websites and apps. It applies to information we collect from you when you interact with us.

CATEGORIES OF INFORMATION WE COLLECT

Listed below are details about the categories of information we collect:

Contact information. We collect your name and phone number. We also collect your street address and email address.

Payment information. We collect payment information when you make a purchase. This might include credit card or debit card number.

Demographic information. We collect your gender or age. We collect your zip code. If you complete a survey we may collect your ethnic background and the number and ages of children in your household. We may also collect your household income. We collect location information from website visitors and app users. This may include precise location information.

Biometric information. We do not collect biometric information.

Employment information. We collect name, age, phone number, and address from job applicants and employees. We also collect background check results and drug screening results. We may also collect bank account information.

Site usage information. We collect logs and session data when you visit our website or use our applications. We collect browser and operating system information. We collect what site you came from or what site you visit when you leave us. We collect your IP address. We also collect device identifiers.

BUSINESS PURPOSES FOR INFORMATION USE

We use the categories of information for the business and commercial purposes outlined here:

We use information to respond to your requests. We use contact information to respond to you. We also use contact information to communicate with you about our policies and terms. We use employment information to process your application.

We use information for transactional communications. We use contact and payment information to process payments. We use contact information for order delivery. If you sign up, we use contact information to send you our newsletter. We use contact and demographic information for our loyalty programs.

We use information for marketing purposes. We use contact information to notify you about new products and special offers or new features. This may be by email or text. It may also be on social media platforms. This includes information about Arby's and other Inspire Brand companies. It also includes information we think you would find interesting. We use contact information to notify you if you win a promotion or sweepstakes.

We use information to improve our products and services. We use site usage information to make our website and products better. We use your contact, demographic, and site usage information to customize your experience with us. We use your demographic information for market research.

We use information to protect our company and constituents. We use contact, demographic, and site usage information to protect our company and customers. We use this same information to identify fraud and secure our systems. This includes measures to detect potential fraudulent credit card purchases. We use all categories of information for other purposes as permitted by law.

HOW WE COLLECT INFORMATION

We collect categories of information in the following ways:

We collect information directly from you. We collect your contact, demographic, and payment information from you. This could be in person. It could also be on our website or one of our apps.

We collect information passively. We use tracking tools to collect site usage and demographic information. Tracking tools include browser cookies and web beacons. We do this on our websites and in emails that we send to you. We collect information about users over time when you use our websites or apps. We have third parties collect personal information this way.

We collect information about you from third parties. We collect contact, demographic, and site usage information from our business partners. Social media platforms give us information about you. We purchase demographic information from third parties. We may collect information about you from other Inspire Brands companies.

WE COMBINE INFORMATION

We combine information collected in-person with that we receive online. We may also combine information we get from a third party with information we already have. We also combine information we have with information we get from our related brands.

WHEN WE SHARE INFORMATION WITH OTHERS

We share categories of information as described here:

We share information with related companies. We share information with our affiliates and subsidiaries. These related entities include Sonic Drive-In, Dunkin, Baskin Robbins, Buffalo Wild Wings, and Jimmy John's. It also includes new brands bought by us. We will share information with future related companies. Information we share includes contact and payment information. It also includes demographic and site usage information.

We share information with vendors who perform services on our behalf. We share contact, demographic, payment and site usage information.

We share information if we think we have to in order to comply with the law or to protect ourselves. We share information we collect about you to respond to a court order or subpoena. We share information in response to a government agency or investigatory body request. We share information we collect when we investigate potential fraud.

We share information with any successor to all or part of our business. If all or part of our business was sold, we may share your information as part of that transaction. If there is a merger or acquisition, we may also share your information. If there is a financing or bankruptcy, we may share your information.

We share information as permitted by law and for other reasons we may describe to you.

YOU HAVE CERTAIN CHOICES

We provide you with options on how we use your information, as described here:

You can opt out of receiving our marketing emails. To stop receiving our promotional emails, follow the “unsubscribe” instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions or other necessary information about your account.

You can control cookies and tracking tools. To learn how to manage how we and our vendors use cookies and other tracking tools, and to read our **Do Not Track Policy**, [click here](#).

Additional Disclosures for CA, CO, CT, UT, and VA Residents

If you work for ARBY’S, please see our California Employee Privacy Notice for additional disclosures. California job applicants can find additional disclosures [here](#). The following section 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>Identifiers and Personal Records, 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</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>

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES	PURPOSES FOR COLLECTION
<p><i>(This category includes information described in Cal. Civ. Code § 1798.80(e).)</i></p> <p>Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</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, 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> <p>To better understand how users access and use the websites and apps, to improve the websites and</p>

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES	PURPOSES FOR COLLECTION
		<p>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>Internet or other electronic network activity information, including browsing history, search history, and information regarding interactions with our websites, applications, or advertisements</p> <p>Geolocation data</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</p>

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES	PURPOSES FOR COLLECTION
		assets, as well as your account, orders, and deliveries Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity Tailoring our content or otherwise personalizing the websites and apps Customer service
Audiovisual information	Directly from you Closed Circuit Television System	Customer Service Video conferencing Franchisee support and evaluation Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity
Professional or employment-related information <i>If you are a Arby's employee, please see our California Employee Privacy Notice for additional disclosures. Job applicants can find</i>	Directly from you	As part of our application process for potential franchisees, and relationship with current franchisees Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES	PURPOSES FOR COLLECTION
<i>additional disclosures in our California Applicant Privacy Notice.</i>		
Inferences 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	<p>Processing your purchases of or requests for products or services (e.g., helping you to find one of our locations or facilitating delivery services)</p> <p>Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity</p>

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 Auditing related to ad impressions

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF RECIPIENTS	PURPOSES FOR DISCLOSURE
		<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>
<p>Characteristics of protected classifications</p>	<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>

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF RECIPIENTS	PURPOSES FOR DISCLOSURE
		Detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity
Geolocation data	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, or helping you find one of our locations) Short-term, transient use, including, but not limited to, non-personalized advertising
Inferences	Affiliates Service providers that we use to support our business and operations	Performing services on our behalf (e.g., providing communications, technical, analytical, web hosting, cloud hosting and mobile application support, among other services) Providing advertising and marketing services (except for cross-context behavioral advertising)
<i>Sensitive Personal Information</i>		

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF RECIPIENTS	PURPOSES FOR DISCLOSURE
Precise geolocation	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, or helping you find one of our locations)

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.

Categories of Personal Information	Third Parties
Identifiers	Advertising Partners
Personal records	Franchisees
Date of Birth	

Commercial information	Loyalty Program Partners as described below
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The chart below identifies our loyalty program partners, and the program benefits provided by each partner.

Loyalty Program Partners	Benefits Provided
Arby's Franchisees	Points, discounts, and other rewards associated with Arby's Rewards program
Partner Businesses	Enhanced or additional rewards or discounts

Nevada resident rights. We also have disclosure obligations in Nevada. We do not exchange Nevada residents' personal information for money with anyone so they may license or sell the personal information to additional parties. Nevada residents may opt out of the future sale of their information to a third party so that they may license or sell information by emailing us at privacy@inspirebrands.com: You may contact us with questions or requests regarding the sale of your information as described below.

WE USE REASONABLE SECURITY MEASURES.

The Internet is not 100% secure. We cannot promise that your use of our sites or apps will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

WE STORE INFORMATION IN THE UNITED STATES

If you live outside of the United States, you understand and agree that we may transfer your information to the United States. This site is subject to U.S. laws, which may not afford the same level of protection as those in your country.

THIRD PARTY SITES AND LINKS

If you click on a link to a third party site, you will be taken to websites we do not control. This includes our pages on social media sites. This policy does not apply to the privacy practices of these websites. Read the privacy policy of other websites carefully. We are not responsible for these third party practices.

INFORMATION COLLECTION FROM CHILDREN

Our sites and apps are meant for adults. We do not knowingly collect personally identifiable information from children under 13 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 13 has given us information, you can email us. You can also write to us at the address listed at the end of this policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line [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. You can call us at 1-800-599-2729.

POLICY UPDATES

We may make changes or updates to this Policy. We will notify you of at your email address we have on file of any material changes to this Policy as required by law. All changes will also be posted on our website. Please check our site periodically for updates.