

## Chick-fil-A Privacy Policy

Effective as of January 1, 2024

[View our prior Privacy Policy here](#)

Your privacy is very important to us. This Chick-fil-A Privacy Policy (“**Privacy Policy**”) describes how Chick-fil-A, Inc., its affiliates, subsidiaries and related entities such as CFA Properties, Inc., CFA Servco, Inc., Chick-fil-A Canada ULC, and Chick-fil-A (PR) LLC (collectively, “**Chick-fil-A**”, “**CFA Group**”, “**we**”, “**us**”, or “**our**”) process and use the personal information that we collect through our websites and mobile apps (“**Online Services**”), our restaurant technologies such as Wi-Fi services at your favorite Chick-fil-A Restaurant, our interactions with you over the phone or offline related to our products and services (collectively, together with Online Services, the “**Services**”), and other sources.

We would love for you to know how we gather information about you and use that information to make your Chick-fil-A experience more remarkable across both online and offline worlds. So, this Privacy Policy describes the types of personal information we collect about you and how we process personal information. We have tried to make this Privacy Policy clear and easy to navigate, but if you don’t understand something, please feel free to reach out. You can contact us as described in the “**Contact Us**” Section.

Please note this Privacy Policy describes how Chick-fil-A generally handles personal information across various Services, so we will let you know when a specific Service is subject to a separate privacy policy that supplements or supersedes this Privacy Policy.

This Privacy Policy does not apply to any affiliate or related entity of Chick-fil-A, Inc. that maintains and publishes its own privacy policy. Also, this Privacy Policy does not apply to the privacy practices of any Franchised Operator or Licensee because Chick-fil-A restaurants are owned and operated by Franchised Operators and Licensees who are independent third parties. Please see the “**Franchised Operator and Licensee Online Services**” Section for more information.

### 1. We Make Updates to This Privacy Policy

We may update this Privacy Policy from time to time, and the updated Privacy Policy applies to you after the effective date stated in the revised Privacy Policy. Please come back to this page occasionally to check to see if it has been updated. You can also contact us as described in the “**Contact Us**” Section to receive a copy of the current Privacy Policy. If our information practices change, we will post an updated policy on our website. If we change the policy in a material way, we will provide appropriate notice to you such as posting a prominent notice on our website or emailing you if you provided your email to us.

## **2. Information You Provide to Us**

We collect information that you provide to us, depending on how you interact with us. For example, you may provide information to us when you:

### **(a) Sign up for our loyalty programs, events, or communications, manage your account with us**

During the sign-up or registration process, when you manage or update your account with us, or when you communicate with us, you may provide information such as your name, email address, physical address, phone number, mobile phone number, date of birth and/or age.

### **(b) Participate in promotions and events, respond to surveys and market research, or provide feedback to us**

You may provide information to us about you, your household and/or other personal attributes through promotions, events, surveys, market research and feedback. This information may include your name, your contact information, name and age of your family members (including your children), and demographic and other information (e.g., household income, gender, age group, race or ethnicity, etc.) if you choose to share this information with us. We may use this information to administer your participation in the promotion, event or survey and to respond to your feedback as well as market research and marketing analysis purposes, either on an aggregate or identifiable basis.

### **(c) Order or purchase our products or services**

You may provide your payment information to us (or we may process your payment information on behalf of another CFA Group entity or Franchised Operators and Licensees), such as credit and debit card numbers, expiration date, and CVV as well as mailing address through orders, purchases, or other payment or subscription services. You may also provide additional information such as the type and color of your vehicle and delivery addresses to help us serve you better.

### **(d) Share stories, content or suggestions, or submit requests for information**

We collect information when you share stories, content, experiences, suggestions, preferences or other input (e.g., expressing your preferences, comments, complaints, etc.), or submit requests for information from us. This includes information you share when you access or interact with Chick-fil-A pages or accounts on any third-party social media platforms such as Facebook, Twitter, Instagram, or LinkedIn or contact us by email or phone or in-person. This may also include recordings of telephone conversations you may have with our CARES customer support personnel.

Content you share on our Online Services or social media pages (e.g., stories, comments, blogs, postings, etc.) may include personal information. You are

responsible for all actions resulting from any information you post on our Online Services or social media pages. Please remember that any information you post on social media pages may become publicly available and is not subject to this Privacy Policy, and Chick-fil-A is not responsible for the results of such postings.

### 3. Information We Collect Automatically or from Others

We may obtain some information automatically, for example, when you:

#### (a) Access or use the Online Services

**Traffic Data.** Our Online Services automatically track and collect your IP address, domain server, type of computer or device, and type of web browser. This helps us customize your online experience and assists with our marketing. We use this information to make our online experience better and more relevant for you. For example, we can show you menu items for the correct time of day in your location.

We also use cookies, which are small text files that are stored on your computer and allow websites to remember information about you (“**Cookies**”). You may adjust your browser and/or Chick-fil-A's Cookie Preference Center settings to accept or reject certain Cookies. However, if you decide not to accept certain Cookies from our Online Services, you may not be able to take advantage of all available features. Please see our **Cookie and Interest-based Advertising Policy** to learn about the types of Cookies we use, how we use them, and your choices for Cookies. Additionally, we process opt-out preference signals from Global Privacy Control (“**GPC**”). GPC is a browser-level technical specification that you can use to inform websites that you opt-out of sales or sharing of data for cross-context behavioral advertising or targeted advertising. If you use GPC, our website will treat the browser and device you use to access our website as opted-out from sales or sharing to the extent we engage in such processing. You may learn how to set up GPC by visiting <https://globalprivacycontrol.org/>.

**Web Beacons.** Certain pages on the Online Services and social media pages may contain web beacons (also known as Internet tags, pixel tags, and clear GIFs), which are small bits of code embedded in pages or images on the Online Services and social media pages (“**Web Beacons**”). The Web Beacons may be used with Cookies to understand how you interact with us, so we can manage and improve those interactions. We may also include Web Beacons in e-mails we send to you to learn if messages have been opened, acted on, or forwarded. This helps us improve future messages and makes them more meaningful to you.

**Other Technologies.** We also utilize other tracking technologies. For example, if permitted by applicable law, we may collect “referrers”. A “referrer” is information your web browser passes along to web servers that refers to the URL from which you accessed the Online Services.

Like most websites, we may also collect environmental variables, which include, among other things, the domain from which you access the Internet, the time you accessed the Online Services or social media pages, the type of web browsers and operating system or platform used, the Internet address of the website you left to visit the Online Services or social media pages, the names of the web pages you visit, the Internet address of the website you visit next, and your browser settings (e.g., language preference). We and our third-party service providers may monitor visits to our Online Services and sessions of users; this monitoring may log the details of your visits to our Online Services and information generated in the course of using our Online Services, such as clicks, page visits, text entered, how long you spent on a page, and other details of your visits to or actions on our Online Services. We use these technologies to collect and retain usage data for the purposes described in this Privacy Policy, including for marketing and security purposes and to improve your experience with our Online Services. We may also share any of the data collected by these technologies with third parties for our business purposes.

Information collected automatically may be combined with other personal information we have about you so that we can improve and customize the Online Services and our communications and promotions. When we know how you interact with our Online Services, we can serve you better.

In a nutshell, the following are examples of information we collect with these automated technologies:

- your IP address, browser type, and operating system;
- the mobile device you use and its temporary or persistent unique device identifiers;
- pages you view within the Online Services;
- websites you visited before coming to the Online Services;
- video viewing history for videos you watch on the Online Services;
- emails from us that you open and/or forward;
- clicks, scrolling, text entered in the course of using our Online Services;
- how long you spend on pages, actions you take on pages; and/or
- offers or links from us to which you connect.

**(b) Use location-enabled devices like a mobile phone to access the location-based services**

If you utilize any of the location-based services such as “Find a Restaurant” on our Online Services or from location-enabled devices like your mobile phone or tablet, with your consent where required, we may collect, use, store, and disclose

location data, including the real-time geographic location of your device (e.g., when you permit our access to GPS location on your device). We use the location data to provide Services such as mobile order fulfillment, and to improve location-based services, to enhance your experience and our operations, and for marketing and promotions. We may disclose your location data to third-party service providers who help us provide the Services such as identifying nearby restaurants, surfacing available market offers, and estimating mobile order pickup or delivery timing. You may limit access to your location data by adjusting the permissions in your device. If you grant us permission, we may collect location information when the app is running in the foreground or background.

### **(c) Order or purchase our products or services**

We also collect information, through our business partners, relating to your purchases from us and our Franchised Operators and Licensees to process your transactions and to perform research and marketing analytics, such as the authorization code of the transaction, payment method, the date and time of the transaction, items purchased, the purchase price, and other order or purchase related information.

### **(d) Use social media platforms or other connected third-party services**

The Online Services and our communications may contain links to third-party websites, including social media platforms such as Facebook, Twitter, Instagram, or LinkedIn (collectively, “**Linked Sites**”). We are not responsible for the privacy practices, policies, or content of any Linked Sites, even if you followed a link to them from the Online Services or our communications. This Privacy Policy does not apply to any Linked Sites. We encourage you to read and understand the privacy policies of any Linked Sites that you visit.

We may obtain information about you from Linked Sites. For example, when you link your account or engage with the Online Services through Linked Sites such as third-party social media sites, you may be allowing us to have ongoing access to certain information stored on those Linked Sites as described to you by those Linked Sites (e.g., your public profile, profile photo, friends list). We may receive certain information about you which is stored on Linked Sites if other users of those sites give us access to their profiles and you are one of their friends or connections, depending upon your settings on those Linked Sites. The information we have access to from Linked Sites varies and is controlled by your privacy settings on each Linked Site and by your consent.

We also obtain some personal information from others, for example:

**Your Friends and Family.** We may obtain additional information about you when someone, like your friend or family member, provides your information to us as part of their transaction with us (e.g., facilitating an order pick-up) or a referral or promotional program (e.g., refer-a-friend program).

If we offer you the ability to share information with a friend or family member through email or other means, we rely on you to ensure that you only share information with individuals with whom you have a personal or family relationship and who would want to receive the communication. We will use the contact information you provide to communicate with your friend or family member on your behalf.

**Franchised Operators and Licensees.** We process information about you from our Franchised Operators and Licensees when we provide certain services for them. We may access and process personal information to provide these services, for example, to process your payment and manage mobile orders and other services like third-party delivery service order fulfillment on behalf of Franchised Operators and Licensees or at your direction. For more information, please see the **“Franchised Operator and Licensee Online Services”** Section.

**CFA Group Entities and Other Third Parties.** We may also collect personal information from CFA Group entities, third-party providers and business partners, including delivery partners, public databases, social media platforms, or third parties such as analytics or advertising and marketing providers, where permitted under applicable law.

## **Do Not Track**

We do not currently take actions to respond to “Do Not Track” signals from browsers because a uniform technological standard has not yet been developed. However, we respond to the GPC signals as the opt out preference signal as described in this Section.

## **4. How We Use Your Information**

We use substantially all categories of the information we collect, on its own and combined with other information we collect about you, for the following purposes:

### **(a) Providing our products or services to you**

We use your information to process your orders and payments, including on behalf of another CFA Group entity and Franchised Operators and Licensees, and for operation of our business.

### **(b) Communicating with you**

We use your information to communicate with you regarding our restaurants, products, services, events, promotions and other offers and respond to your inquiries, comments, feedback, stories, or postings. We may also provide information on our employment opportunities and job openings. You can



unsubscribe from our email marketing communications at any time. See the “**Communication Preferences**” Section for more information.

### **(c) Customizing and improving your experience**

We use your information to tailor our products, services, promotions, communications and the Services so that they are more useful and relevant to you, such as through targeted advertising and messaging personalization.

### **(d) Creating and managing your accounts with us**

We use your information to create and manage your accounts (e.g., Chick-fil-A One accounts, registration for events, authentication, online ordering, mobile payments, contests, promotions, etc.) and administer your participation in our programs, events and other offerings. More information on the information we collect as part of the CFA One<sup>®</sup> Program is available in the **Notice of Financial Incentives** Section.

### **(e) Getting to know our customers**

Your information helps us understand your preferences and provide and improve support related to our product and service offerings and marketing efforts. For example, we may use your information to:

- develop our products, services, promotions, and other offers;
- respond to your requests, suggestions, and other communications;
- improve our Services and business operations; and
- conduct research and analysis for marketing, business and other operational purposes.

### **(f) Marketing and advertising**

We promote our products and services and aim to provide tailored ads to you and others. We may advertise our products and services using third-party websites or online services. Please see our **Cookie and Interest-Based Advertising Policy** to learn more about our advertising and marketing partners. You may opt out of targeted advertising by accessing our Cookie Preference Center located in the footer of each website we operate through which we disclose your information for targeted advertising.

### **(g) Fraud detection, security, legal enforcement and compliance**

We use each category of your information to protect the security and integrity of our business and the Services, for enforcement of our agreement with you, for example, Chick-fil-A, Inc. Terms and Conditions of Use, Chick-fil-A One Terms & Conditions, and Chick-fil-A Canada ULC Terms and Conditions of Use, as applicable, and our compliance with applicable law.

We may combine personal information about you with other information we have acquired from third parties in accordance with applicable law. We will treat the combined information as personal information under this Privacy Policy.

When we process information as de-identified information, we will not re-identify such de-identified information, except as permitted under applicable law.

Unless we notify you separately, we do not process your personal information for profiling in furtherance of “decisions that produce legal or similarly significant effects” as such term is defined under applicable law.

## **5. How We Disclose Your Information**

To perform our Services, we may disclose substantially all categories of your information within Chick-fil-A and to third parties as necessary to complete your order, to provide our products and services, for purposes described in the **“How We Use Your Information”** Section, or with your consent. However, we do not sell your personal information to third parties for their marketing purposes.

We may disclose your information to the following types of third parties:

### **(a) Within Chick-fil-A, with CFA Group Entities and Franchised Operators and Licensees**

We disclose personal information within Chick-fil-A, Inc. and to CFA Group entities and Franchised Operators and Licensees to provide our products, services, promotions and other Services to you and for our marketing purposes, in accordance with applicable law. We may also disclose personal information to CFA Group entities and Franchised Operators and Licensees at your direction or request.

### **(b) Service providers**

We disclose personal information to third-party service providers that provide a variety of services on our behalf or at your direction, for the purposes described in this Privacy Policy, including but not limited to the development, maintenance, and support of the Services and social media pages, payment processing, fraud detection, online and mobile application ordering, delivery of products and services, the distribution of email and mobile messages, promotions, advertising services, and marketing research and analysis. Our service providers may be located outside of the jurisdiction in which you reside. Please see the **“Transfers of Personal Information Outside Your Jurisdiction”** Section for more information.

We may also disclose the personal information we collect to our analytics vendors and partners to develop aggregate analytics and business intelligence for our



advertising and marketing purposes. For example, we use personal information to create custom audiences and measure the success of promotions.

When you watch videos on the Online Services, you agree that we may disclose your video viewing to or obtain information about your video viewing from analytics service providers, advertising partners and social media platforms.

### **(c) Other entities**

In addition, we may disclose personal information with other entities for additional purposes. For example, we may share personal information with our business partners and other third parties upon your request or at your direction. We may also share personal information as part of a sale, merger or change in control, or in preparation for these corporate events. An entity that buys us or part of our business may continue to use your data in accordance with the Privacy Policy, unless you request otherwise.

We may also share personal information as may be necessary to detect security incidents and fraudulent or illegal actions or to protect the safety, property, or other rights of Chick-fil-A, Inc. and CFA Group entities, Franchised Operators and Licensees, and their respective employees, customers, visitors, users, service providers, or any other person or entity; to comply with law, a court order, or other legal process (which may include access by courts, law enforcement or governmental authorities in the US or other jurisdictions), or in connection with a legal investigation; to enforce any applicable terms and conditions and other agreements; as otherwise may be required or permitted by applicable law; or in accordance with your consent.

## **6. Access to Information and Your Choices**

We provide you with the opportunity to access, update or delete certain information and to unsubscribe or opt-out from certain communications. For example, you may exercise your choices as described below. Please be aware that, if you do not allow us to collect and use your personal information, we may not be able to deliver certain products, services, promotions, or offerings to you.

### **(a) Opportunity to access, update and delete your information**

- You may access, correct or update certain personal information you have provided to us at any time by accessing your Chick-fil-A One account (U.S.) or Chick-fil-A account (Canada) online or through the Chick-fil-A App, where offered.
- If you are a resident of the United States, you can also request to access, correct, or delete your personal information by:

- Calling us toll-free at Chick-fil-A CARES at 1-866-232-2040; or
  - Completing a privacy rights request form. If you have a Chick-fil-A One account, please complete the privacy rights request form available [here](#). Please complete the form available [here](#) if you do not have a Chick-fil-A One account.
- If you are a resident of Canada, you may submit your request to access or delete your personal information by emailing our Privacy Officer at [privacy.canada@chick-fil-a.com](mailto:privacy.canada@chick-fil-a.com).

### **(b) Communication preferences**

You may choose how and whether to receive promotional or marketing communications from us. You may exercise your choices by following instructions available on the Online Services or in communications sent to you. For example, to unsubscribe from our email communications, follow the unsubscribe instructions contained in each of our email messages. Please note that we may continue to send transactional or account-related messages to you.

You may also receive communications from our Franchised Operators and Licensees. To opt out of these communications, please refer to the unsubscribe instructions contained in those communications.

Because we plan our communications in advance, it may take up to 3-5 business days for your “unsubscribe” request to become effective. If you continue to receive our communications after submitting an “unsubscribe” request, please let us know by contacting us using one of the methods listed in the **“Contact Us”** Section so that we can investigate the situation.

### **(c) Account deactivation**

You may close your account by accessing your profile online. If a resident of the United States, you may also close your Chick-fil-A One account via your profile within the Chick-fil-A App or by calling Chick-fil-A CARES at 1-866-232-2040. Please note, you may not be able to close your account when you have a remaining balance on your Chick-fil-A One account or associated gift cards. Please contact us at the toll-free number as listed in the **“Contact Us”** Section if you wish to close your account but have a remaining balance on your Chick-fil-A One account or associated gift cards. When you close your account, we may keep some of your information for legal or our internal business purposes.

## **7. Information Security**

We seek to keep your personal information secure by implementing reasonable technical, administrative, and physical safeguards to help us protect such information

from unauthorized access, use, and disclosure. When we collect or transmit sensitive information such as a credit card number, we endeavor to use industry standard methods to protect that information. We also ask our third-party service providers to use reasonable security measures to protect your information from unauthorized access, use and disclosure. However, please be aware that no method of electronically transmitting or storing information is ever completely secure.

## **E-mail Security & How You Can Help**

“Phishing” is a scam designed to steal your personal information. If you receive an e-mail that looks like it is from us asking you for your personal information which you suspect may be a scam, please notify us as provided in the **“Contact Us”** Section.

## **8. Retention**

We retain personal information for the length of time needed to carry out the processing purposes described in the Privacy Policy. We also retain information for related business purposes, security, legal compliance, and disputes and claims handling, consistent with our retention policy and as permitted by applicable law.

## **9. Notice of Financial Incentives**

This Notice of Financial Incentives is provided by Chick-fil-A and applies to the Chick-fil-A One® loyalty program (the **“Program”**). We are providing this Notice of Financial Incentives because applicable law may require us to provide certain information about the Program and obtain your opt-in consent prior to entering you into the Program.

We reserve the right to add financial incentives to this Notice of Financial Incentives and to terminate the Program at any time at our sole discretion.

### **Chick-fil-A One® Program Details**

#### **Summary of the Incentives**

Your account receives points on qualifying purchases at eligible restaurants. Points are accumulated to get rewards that may be redeemed for discounts on future purchases. You may also be granted rewards for being a member, such as for your birthday, and receive access to insider content or personalized experiences.

#### **Material Terms**

Consumers can view the Program’s full **Terms and Conditions**. The categories of personal information collected include:

- Identifiers (e.g., name, email address, password, physical address, phone number, date of birth and/or age).

- Personal information described in Subdivision (e) of Section 1798.80 (California customer records statute) (e.g., credit card number or other payment information).
- Commercial Information (e.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies).
- Internet/Network Activity (e.g., browsing history or search history on the Chick-fil-A website or app).
- Geolocation Data (e.g., physical location or movements).
- Sensory Data (e.g., electronic, visual, or similar information).
- Inferences from personal information collected (e.g., customer profiles such as shopping preferences).

We may share this personal information with the categories of third parties listed in **“How We Disclose Your Information.”** We do not disclose personal information collected in connection with the Program to data brokers. We may disclose substantially all categories of personal information above to our social media, advertising, and analytics partners. We may process and share this information for targeted advertising.

### **How to Opt In to the Program**

Register for an account online at Chick-fil-A.com or on the Chick-fil-A App.

### **Value of Consumer Data**

In our good faith calculation, we consider the value of consumer data collected through the Program as the equivalent of relevant expenses related to the collection and retention of consumers’ personal information as part of the Program. The financial incentive we offer to consumers through the Program is reasonably related to the value of the consumer’s data.

### **Withdrawal from the Program**

You have the right to withdraw from the Program at any time. Please note, withdrawing from the Program will result in the loss of earned points, unredeemed rewards, and eligibility to participate in events and promotions, and will also limit your ability to utilize the full suite of features available in the Chick-fil-A One<sup>®</sup> program because we will no longer be able to associate you with any points, rewards, or other events or promotions. You may withdraw by closing your Chick-fil-A One<sup>®</sup> account via your profile within the Chick-fil-A App or website or calling Chick-fil-A CARES (1-866-232-2040). Please call Chick-fil-A CARES (1-866-232-2040) if you have a remaining balance on your Chick-fil-A One<sup>®</sup> account or associated gift cards as you may not be able to close your account within the Chick-fil-A One<sup>®</sup> program.

## 10. California Addendum – California Consumer Privacy Policy

If you are a California consumer, the following provisions apply to our processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“**California Personal Information**”). For California consumers, the provisions of this California Addendum prevail over any conflicting provisions in other sections of this Privacy Policy. We share, and in the past 12 months have shared California Personal Information such as California residents’ use of our Online Services with our marketing and advertising partners for cross-contextual advertising purposes as further described below. Otherwise, we do not sell, and in the past 12 months we have not sold, California Personal Information. Additionally, we do not sell or share, and in the past 12 months we have not sold or shared, California Personal Information of individuals we know to be under 16 years of age.

We have collected the following categories of California Personal Information within the last 12 months from the sources listed below:

**(a) Identifiers**, such as a real name, physical address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers. This category of information is collected from you, your devices, and third parties such as Linked Sites, your family and friends, Franchised Operators and Licensees, and public databases.

**(b) Personal information described in subdivision (e) of Section 1798.80** (California customer records statute), such as a name, address, telephone number, credit card number, debit card number, or other payment information. This category of information is collected from you, your devices, other CFA Group entities, Franchised Operators and Licensees or other third parties such as our business partners.

**(c) Characteristics of protected classifications** under California or federal law such as age, gender, race, ethnicity or national origin. This category of information is collected from you when you choose to provide it to us directly or indirectly through our service providers and business partners as part of our surveys and market research.

**(d) Commercial information**, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. This category of information is collected from you, your devices, other CFA Group entities, Franchised Operators and Licensees or other third parties such as our business partners.

**(e) Internet or other similar network activity**, including, but not limited to, browsing history, search history, browser settings like language preference, and information regarding a consumer’s interaction with a website, application, or

advertisement. This category of information is collected from you and your devices.

**(f) Geolocation data**, including physical location or movements. This category of information is collected from you and your devices.

**(g) Sensory data**, including electronic, visual, or similar information. This category of information, such as photos, is collected from you and third parties such as Linked Sites, CFA Group entities, our service providers, or Franchised Operators and Licensees.

**(h) Inferences**, such as a profile about a consumer's preferences, characteristics, and behavior, drawn from information we collect and insights we receive from third parties such as our marketing and advertising partners and data analytics providers.

**(i) Sensitive personal information**, such as account login information allowing access to an account, precise geolocation data, race, and ethnicity, in each case as further described above in the relevant categories. If you win a promotional prize or sweepstakes, we may also collect your W9 information, including FEIN or SSN for legal compliance. Please note we do not collect sensitive personal information for the purpose of inferring characteristics about you.

Please see the **“Information You Provide to Us”** and **“Information We Collect Automatically or from Others”** Section to learn more about the types of information we collect and how we collect them. We retain each category of California Personal Information as described in the **“Retention”** section of the Privacy Policy.

For each of the above categories, we use the California Personal Information for a variety of purposes such as:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- Helping to ensure security and integrity to the extent the use of a consumer's personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors in our systems;
- Short-term, transient use including contextual non-personalized advertising shown as part of a consumer's current interaction with us;
- Providing services on our behalf or on behalf of another, including maintaining or servicing accounts, providing customer service, fulfilling transactions, verifying identity information, processing payments, and other services;
- Conducting internal research to develop and demonstrate technology;



- Conducting activity to verify, enhance, and maintain the quality or safety of services or devices which we may own, control, or provide;
- Providing the rewards and other perks that come from being a member of the CFA One® Program. More information on how we use personal information as part of the CFA One® Program is available in the **“Notice of Financial Incentives”** Section;
- Other purposes described in the **“How We Use Your Information”** Section.

We may also use the information we collect for our operational purposes, purposes for which we provide you additional notice, provided that such additional purposes are compatible with the context in which the California Personal Information was collected, or with your consent.

Within the last 12 months, we have disclosed California Personal Information for our business purposes. To learn more about the categories of third parties with whom we share such information, please see the **“How We Disclose Your Information”** Section.

## Your California Privacy Rights

If you are a California consumer, you have certain rights related to your California Personal Information, including:

- The Right to know what California Personal Information we have collected about you, including the categories of personal information, the categories of California Personal Information, the categories of sources from which the California Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing California Personal Information, the categories of third parties to whom we disclose California Personal Information, and the specific pieces of California Personal Information we have collected about you.
- The right to correct inaccurate California Personal Information that we have collected about you.
- The right to delete California Personal Information that we have collected from you, subject to certain exceptions. For example, we may not be able to delete your information when you have an unused gift card balance on your CFA One mobile app account. If you have an unused gift card balance on your CFA One mobile app account and would like to understand options available to you, please contact our CARES center at 1-866-232-2040.
  - Please note, processing your deletion request will result in the elimination of your CFA One account, which will also limit your ability to utilize the full

suite of features available in the Chick-fil-A App. Terminating your CFA One account will also result in the loss of earned points and unredeemed rewards.

- The right to opt out of the sale or the sharing of California Personal Information.
  - We do not sell California Personal Information, but if you wish to opt out of the sharing of California Personal Information for cross-context behavioral advertising, please visit our Cookie Preference Center, located in the footer of each website we operate through which we share your information.
- The right to limit the use or disclosure of your sensitive personal information.
  - We do not use or disclose sensitive personal information for purposes that, under applicable law, require us to support the right to limit the use or disclosure of sensitive personal information.
- The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by applicable law, including the right not to be retaliated against for the exercise of your rights.
  - We will not discriminate against you for exercising your privacy rights. As further detailed in the **“Notice of Financial Incentives”** Section, however, we may make different offers available to customers that have opted into a financial incentive. The value of the financial incentive to you will reasonably relate to the value of your California Personal Information.

You may request to exercise these rights by:

- Calling us toll-free at Chick-fil-A CARES (1-866-232-2040); or

Completing our privacy rights request form. If you have a Chick-fil-A One account, please complete the privacy rights request form available [here](#). Please complete the form available [here](#) if you do not have a Chick-fil-A One account. As required under applicable law, we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide your first name, last name, email address, the amount of your last transaction and the date of your last transaction to verify your identity in response to exercising requests of the above type. We may limit our response to your exercise of the above rights as permitted under applicable law. When you submit a request to exercise your

rights above, we will use the information you provide to process your request and to maintain a record of your request and our response, as permitted under applicable law.

Under California law, you may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. We will require the agent to provide proof of that written permission. To the extent permitted by law, we may require you to verify your own identity in response to a request, even if you choose to use an agent.

If you are an authorized agent submitting a request on behalf of a California consumer, please complete our privacy rights request form available [here](#).

### Statistical Information

We publish metrics regarding the number of requests we have received, complied with (in whole or in part) or denied, and also the median number of days in which we responded to such requests, in the previous year, as applicable to the time period in which the CCPA was in effect.

The following details the metrics regarding consumer rights requests we received from all individuals, regardless of their state of residence, from January 1, 2022 to December 31, 2022.

Total Requests Received in 2022: 459

<b>Request Type</b>	<b>Received</b>	<b>Granted (in whole or in part)</b>	<b>Denied</b>	<b>Median Days to Respond</b>
Request to Know	<b>293</b>	<b>211</b>	<b>82</b>	Median: 21
Request to Delete	<b>166</b>	<b>105</b>	<b>61</b>	Median: <b>20</b>

This California-specific addendum was last reviewed and updated as of January 1, 2024.

### **11. Additional U.S. State-Specific Privacy Rights Addendum**

If you are a resident of a state in which state-level privacy law is enacted (e.g., Colorado, Connecticut, Montana, Oregon, Texas, Utah, or Virginia), additional rights described in this Section may apply to you as applicable law comes into effect. Please note, at Chick-fil-A, we endeavor to respond to your privacy requests even if you are not a resident of a state in which state-level privacy law applies.

### **Your Privacy Rights**

You may have the following rights, in each case to the extent set out in applicable law:

- The right to confirm whether we process personal information about you and request access to such personal information (including, if applicable, in a portable and readily usable format);
- The right to correct inaccuracies in certain personal information we may hold about you; and
- The right to delete personal information we have collected from or about you. Note, processing your deletion request will result in the elimination of your CFA One account, which will also limit your ability to utilize the full suite of features available in the Chick-fil-A App. Terminating your CFA One account will also result in the loss of earned points and unredeemed rewards.
  - Additionally, we may not be able to delete your information when you have an unused gift card balance on your CFA One mobile app account. If you have an unused gift card balance on your CFA One mobile app account and would like to understand options available to you, please contact our CARES center at 1-866-232-2040.

You may request to exercise these rights by:

- Calling us toll-free at Chick-fil-A CARES (1-866-232-2040); or
- Completing our privacy rights request form. If you have a Chick-fil-A One account, please complete the privacy rights request form available [here](#). Please complete the form available [here](#) if you do not have a Chick-fil-A One account.

If your rights request is denied, you may lodge an appeal with us. The response to your rights request will inform you of any appeal rights you may have and how you may exercise them.

We do not sell personal information, but if you wish to opt out of our targeted advertising as defined under applicable law, please visit our Cookie Preference Center, located in the footer of each website we operate through which we disclose your information for targeted advertising.

As required under applicable law, we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide your first name, last name, email address, the amount of your last transaction and the date of your last transaction to verify your identity in response to exercising requests of the above type. We may limit our response to your exercise of the above rights as permitted under applicable law. When you submit a request to exercise your rights described above, we will use the information you provide

to process your request and to maintain a record of your request and our response, as permitted under applicable law.

Under applicable law, you may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. We will require the agent to provide proof of that written permission. To the extent permitted by law, we may require you to verify your own identity in response to a request, even if you choose to use an agent. If you are an authorized agent submitting a request on behalf of a consumer, please complete our rights request form available [here](#).

## 12. Children's Privacy

The Online Services are not intended for children under the age of 13, without parental or legal guardian consent. We do not knowingly collect personal information from users in this age group. We may, from time to time, provide special features such as games, animations, stories and downloadable books that children may use in a designated area of the Online Services. When we do so, we do not collect personal information from children on such designated areas other than personal information used for the support of the internal operations of such designated area of the Online Services. If you believe your child has provided personal information to us, please contact us via the email listed in the **“Contact Us”** Section and we will work to delete it.

## 13. Transfers of Personal Information Outside Your Jurisdiction

Please be aware that your personal information will be transferred to, stored or processed by us or our service providers in the United States, where our servers are located and our central database is operated, or other jurisdictions where our service providers are located for the purposes set out in this Privacy Policy.

While your personal information is outside of your jurisdiction, it is subject to the laws of the country in which it is located, which may have different data protection laws than in your jurisdiction. Those laws may require disclosure of your personal information to authorities in that country.

***For Canadian residents:*** For more information about our policies and practices regarding service providers outside of Canada, contact us using the contact information listed in the **“Contact Us”** Section.

## 14. Contact Us

If you have any questions or complaints about this Privacy Policy or how we or our service providers collect, use or disclose your personal information, or if you need accessibility assistance, please contact us using any of the methods below:

- If you are a resident of the United States (excluding Puerto Rico), by visiting the website at <<http://www.chick-fil-a.com/Connect/Contact-Us-CARES>> or calling us at 1-866-232-2040. You may also contact us by emailing us at [privacy@chick-fil-a.com](mailto:privacy@chick-fil-a.com).
- If you are a resident of Puerto Rico, by emailing us at [privacy.puertorico@chick-fil-a.com](mailto:privacy.puertorico@chick-fil-a.com).
- If you are a resident of Canada, by calling us at 1-866-232-4020 or emailing our Privacy Officer at [privacy.canada@chick-fil-a.com](mailto:privacy.canada@chick-fil-a.com).

## **15. Please see below for important additional information:**

### **The Chick-fil-A Franchise System**

The Chick-fil-A franchise system is a restaurant network made up of company-operated, franchised, and licensed Chick-fil-A restaurant businesses. This means that Chick-fil-A franchisees (“**Franchised Operators**” or “**Operators**”) own and operate their own individual franchised businesses and may do certain things differently than us. Franchised Operators and Chick-fil-A licensees (“**Licensees**”) are independent third parties, and this Privacy Policy does not apply to the privacy practices of any Franchised Operator or Licensee. Please see the “**Franchised Operator and Licensee Online Services**” Section for more information.

### **Franchised Operator and Licensee Online Services**

Chick-fil-A Franchised Operators and Licensees are independent third parties and may own, operate, and maintain their own website, social media page or other online service or communication channels (“**Franchised Operator or Licensee Online Services**”). This Privacy Policy does not apply to the privacy practices of any Franchised Operator or Licensee. Questions or concerns regarding any Franchised Operator or Licensee Online Services should be directed to the applicable Franchised Operator or Licensee.

We may allow a Franchised Operator or Licensee to link to the Online Services. Chick-fil-A, however, is not responsible or liable for any Franchised Operator or Licensee Online Services, even if it is linked to our Online Services, or for any Franchised Operator's or Licensee's online conduct and privacy practices.

### **Collection and Use of Personal Information of Prospective Chick-fil-A Franchised Operators**

If you complete an application for a franchise opportunity with Chick-fil-A, Inc., Chick-fil-A (PR) LLC, or Chick-fil-A Canada ULC, or express interest or otherwise request information about franchise opportunities, we collect personal information that you provide in connection with your request for information and/or to evaluate your



application for a franchise restaurant business opportunity. We may also collect personal information about you from third parties to supplement, update, or verify your information, and/or to process your application for consideration as a Franchised Operator. Applicable law may require that you authorize a third party to disclose your personal information to us before we can acquire it. Failure to provide any requested information may negatively impact consideration of your application to become a Franchised Operator. By expressing interest in becoming and/or applying to become a Franchised Operator, you consent to our collection, use, and disclosure of your personal information in this manner, to the extent permitted by applicable law. If you are a California resident, you may have additional privacy rights in your California Personal Information that we collect in connection with your application for a franchise opportunity. For more information, please see our **Privacy Policy for Franchisee Candidates**.

### **Collection and Use of Personal Information of Chick-fil-A, Inc. Employment Applicants**

If you complete an application for employment with Chick-fil-A, Inc., or request information regarding such opportunities, we may collect personal information that you provide (such as information contained in a resume or cover letter) in connection with your request for information and/or to evaluate your application for employment with Chick-fil-A, Inc. We may also collect personal information about you from third parties to supplement, update, or verify your information, and/or to process your application for consideration as a Chick-fil-A, Inc. employee. Applicable law may require that you authorize a third party to disclose your personal information to us before we can acquire it. Failure to provide any requested information may negatively impact consideration of your employment application. By applying to become an employee of Chick-fil-A, Inc., you consent to our collection, use, and disclosure of your personal information as described above, to the extent permitted by applicable law. If you are a California resident, you may have additional privacy rights in your California Personal Information that we collect in connection with your application for employment. For more information, please see our **Privacy Policy for Candidates**.