Chick-fil-A Play Privacy Policy

Effective as of October 14, 2024

This Chick-fil-A Play Privacy Policy ("**Privacy Policy**") describes how Chick-fil-A, Inc., its affiliates, subsidiaries and related entities (collectively, "**Chick-fil-A**", "we", "us", or "our") process and use the personal information that we collect through the Chick-fil-A Play mobile application ("**CFA Play**"). This Privacy Policy does not apply to other sites or services offered by Chick-fil-A where a different privacy policy is provided. If you would like to learn more about how Chick-fil-A handles personal information of our customers more generally across various services, please visit **Chick-fil-A Privacy Policy**.

CFA Play is intended for families, including children, and this experience complies with the Children's Online Privacy Protection Act ("COPPA"). Children can watch videos, create crafts, listen to podcasts and songs, learn about recipes, play games, and read books on CFA Play.

When you use CFA Play, we only collect, process, and disclose (within Chick-fil-A or to our service providers) personal information for the purpose of supporting the internal operations of CFA Play. Other than this personal information collected for the purpose of supporting internal operations as permitted by COPPA, we do not knowingly collect personal information from users, including children under the age of 13.

Kids Privacy Assured by PRIVO: COPPA Safe Harbor Certification

Chick-fil-A, Inc. is a member of the PRIVO Kids Privacy Assured COPPA safe harbor certification Program (the "**Program**"). The Program certification applies to the digital properties listed on the certification page that is viewable by clicking on the PRIVO Seal. PRIVO is an independent, third-party organization committed to supporting online services to safeguard children's personal information collected online. The PRIVO COPPA safe harbor certification Seal posted on this page indicates Chick-fil-A, Inc. has established COPPA compliant privacy practices and has agreed to submit to PRIVO's oversight and consumer dispute resolution process. If you have questions or concerns about our privacy practices, please contact us at 1-866-232-2040 or privacy@chick-fil-a.com. If you have further concerns after you have contacted us, you can contact PRIVO directly at privacy@privo.com. To find out more about our COPPA safe harbor Seal visit: https://cert.privo.com/#/companies/chick-fil-a.



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. If our information practices change, we will post an updated policy on CFA Play. If we change the policy in a material way, we will provide appropriate notice to you such as posting a prominent notice on CFA Play prior to making the change.

2. Categories of Personal Information We Collect and Process

We collect and process the following categories of personal information in the course of providing CFA Play:

- (a) **Identifiers**, such as Internet Protocol addresses or other similar unique persistent identifiers. We collect persistent identifiers from your device.
- **(b) Internet or other similar network activity**, including information regarding your interaction with CFA Play.
- **(c) Geolocation data** of your coarse location, such as city, region, country, for the operation of CFA Play. We do not collect geolocation data sufficient to identify both your street name and name of city or town.

3. How We Use Your Information

We do not sell or share for cross-context behavioral advertising or targeted advertising and, have not sold or shared for cross-context behavioral advertising or targeted advertising, any personal information, including personal information of individuals we know to be under the age of 16, collected on CFA Play.

We use personal information solely for the purpose of supporting the internal operations of CFA Play, including to maintain or analyze the functioning of CFA Play, perform network communications, protect the security or integrity of you or CFA Play, or ensure legal or regulatory compliance. Such purpose also includes the following business purposes:

- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors in our systems;
- Short-term, transient use; and
- Verifying and maintaining the quality of CFA Play.

We do not process personal information collected on CFA Play for the purpose of profiling in furtherance of "decisions that produce legal or similarly significant effects," as such term is defined under applicable law.

4. Retention

We retain personal information only for the length of time needed to carry out the purpose of supporting the internal operations of CFA Play as described in the "How We Use Your Information" section.

5. How We Disclose Your Information

We may disclose personal information within Chick-fil-A and to our service providers who provide services only as necessary to support the internal operations of CFA Play.

CFA Play uses the following service provider:

- Google Analytics to help us understand your use of CFA Play and improve the experience. Any information collected is not disclosed to any other third parties and is used solely for the operation of CFA Play.
- Unity 3D to help us detect crashes, bugs, and other technical issues of CFA Play. Any information collected is not disclosed to any other third parties and is used solely for the operation of CFA Play.

If you are a parent and have any questions about the information collected from your child, please contact us using the details provided in the "Contact Us" section.

6. 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 request that we delete personal information collected from or about you.

Please note, we do not associate any information we collect on CFA Play with any specific individual, and therefore, we are unable to verify your identity to process your request related to your use of CFA Play.

However, if you are a user of additional products or services provided by Chick-fil-A, 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 <u>here</u> if you do not have a Chick-fil-A One account.

To learn more about what may be asked of you to complete a privacy rights request, please visit the "Additional U.S. State-Specific Privacy Rights Addendum" section or "Your California Privacy Rights" section in the Chick-fil-A Privacy Policy.

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.

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.

You also have the right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by applicable law, including the right not to be retaliated against for the exercise of your rights.

7. Information Security

We seek to keep your personal information secure by implementing reasonable technical, administrative, and physical safeguards to help us protect personal information from unauthorized access, use, and disclosure. We also ask our 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.

8. 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. CFA Play is a mobile application, and it does not respond to opt-out preference signals from Global Privacy Control, which is currently offered only as a browser-level technical specification that you can use to inform websites that you opt out of sale or sharing of personal information for cross-context behavioral advertising or targeted advertising. Please note CFA Play does not collect personal information for advertising purposes, and we do not sell or share personal information collected on CFA Play for cross-context behavioral advertising or targeted advertising.

9. 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 by visiting the website at http://www.chickfil-a.com/Connect/Contact-Us-CARES or calling us at 1-866-232-2040. You may also

contact us by email at privacy@chick-fil-a.com or by mail addressed to: Chick-fil-A, Inc., ATTN: Privacy Team, 5200 Buffington Rd., Atlanta, GA 30349.