

PRIVACY POLICY FOR FRANCHISEE CANDIDATES
LAST UPDATED AND EFFECTIVE AS OF JANUARY 1, 2024

Chick-fil-A, Inc. ("**we**", the "**Company**" or "**CFA**") is committed to protecting the privacy and security of personal information of all individuals, including California candidates for a Chick-fil-A franchise ("**Franchisee Candidates**" or "**you**"), in compliance with applicable law. CFA collects personal information in connection with your interest in becoming and/or your application to become a franchised Operator as outlined in this Privacy Policy for California Franchisee Candidates ("**Privacy Policy**"). We do not sell or share, and in the past 12 months have not sold or shared, Franchisee Candidates' personal information as defined under applicable law, including personal information of individuals we know to be under 16 years of age.

If you have any questions about this Privacy Policy or need access to this Privacy Policy in an alternative format for accessibility, please contact us by emailing FranchisePrivacy@chick-fil-a.com. This Privacy Policy may be updated from time to time to reflect changes in our personal information practices, and we will notify you of any such changes pursuant to applicable law.

1. WHAT CATEGORIES OF INFORMATION OF FRANCHISEE CANDIDATES DO WE COLLECT?

We collect, and within the past 12 months have collected, the following categories of personal information directly from Franchisee Candidates, through their access of our online solutions, and other service providers. In connection with your interest in becoming and/or your application to become a franchised Operator, we may collect the following categories of personal information about you.

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, telephone number, online identifier, Internet Protocol address, email address, account name, governmental information numbers (like Social Security Number, driver's license or state identification number, or passport number), or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	The "identifiers" listed above, signature, education, or financial information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Race/ethnicity, national origin, marital status, medical condition, physical or mental disability, gender, veteran or military status through voluntary submission.	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies obtained through background and credit history checks.	Yes
E. Biometric information.	N/A	No
F. Internet or other similar network activity.	Browsing history, search history, and information on a candidate's interaction with a CFA website, CFA application, or CFA advertisement.	Yes
G. Geolocation data.	N/A	No
H. Sensory data.	Audio, visual, or similar information such as voice mail messages and audio recordings.	Yes

Category	Examples	Collected
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records maintained by an educational institution, or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences and characteristics.	Yes
L. Sensitive Personal Information	Social Security Number, driver's license number, state identification card number, or passport number; or race/ethnicity. * Please note we do not collect sensitive personal information for the purpose of inferring characteristics about Franchisee Candidates.	Yes*

Franchisee Candidates interact with us in different ways. Please note that the collection of different types of information varies depending on the stage of the selection process and applicability. CFA collects this information to engage with Franchisee Candidates, to select qualified Franchisee Candidates, and to comply with applicable law. To the extent we or our service providers collect additional categories of information beyond those discussed above, additional notice will be provided.

Personal information does not include information excluded from the scope of personal information under applicable law, including (a) truthful information that is a matter of public concern, (b) publicly available information or (c) deidentified or aggregate information.

2. HOW DO WE USE PERSONAL INFORMATION OF FRANCHISEE CANDIDATES?

Personal information collected from or about Franchisee Candidates may be used for the following business purposes:

- To recruit and select Franchisee Candidates, to manage our relationships with Franchisee Candidates through the recruiting and franchisee selection process, and to foster a culture of care.
- To reimburse Franchisee Candidates.
- To protect the Company, Customers, and Franchisee Candidates' property, equipment, and confidential information; to assess Franchisee Candidates candidacy; and to enforce the Company's policies.
- To perform business research and analytics.
- To comply with applicable law.
- To help ensure security and integrity to the extent the use of the Franchisee Candidates' personal information is reasonably necessary and proportionate for these purposes.
- For debugging to identify and repair errors that impair existing intended functionality.
- For short-term, transient use, provided that a Franchisee Candidate's personal information is not disclosed to another third party and is not used to build a profile about

the Franchisee Candidate or otherwise alter the Franchisee Candidate's experience outside the current interaction with CFA.

- To undertake internal research for technological development and demonstration.
- To undertake activities to verify or maintain the quality or safety of a service or device that is owned by, manufactured by, manufactured for, or controlled by CFA, and to improve, upgrade, or enhance the service or device that is owned by, manufactured by, manufactured for, or controlled by CFA.

We may also monitor visits to our websites or mobile apps and sessions of Franchisee Candidates; this monitoring may log the details of your visits to our websites or mobile apps and information generated in the course of using our websites or mobile apps, such as mouse movements, clicks, page visits, text entered, how long you spent on a page, and other details of your visits to or actions on our websites or mobile apps. We may also share any of the data collected by these technologies with third parties for our business purposes.

While relatively uncommon, there may be occasions when we use personal information of Franchisee Candidates for other purposes permitted under applicable law, for example, when we are required to disclose information in connection with contractual or legal matters such as information necessary to respond to law enforcement and governmental agency requests (i.e., subpoenas); comply with legal and contractual obligations; exercise legal and contractual rights; and initiate or respond to legal claims.

In certain instances, we may maintain and use information in a deidentified form. If we do so, we do not attempt to reidentify the information, except for the sole purpose of determining whether our deidentification processes satisfy the requirement under applicable law.

3. HOW DO WE DISCLOSE PERSONAL INFORMATION OF FRANCHISEE CANDIDATES?

Limited contact information may be collected by or disclosed to background screening companies to facilitate reference checks. We disclose, and in the past 12 months have disclosed, all categories of personal information we collect about Franchisee Candidates, which may include your information, to our IT service providers, data analytics providers, travel agencies, and other service providers so they can perform services on our behalf.

4. HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We retain and process Franchisee Candidates' personal information for the length of time needed to carry out the purposes described in this Privacy Policy, and to the extent necessary to manage our relationships with Franchisee Candidates, comply with our legal obligations, resolve disputes, and enforce our policies and agreements, consistent with our retention policy and as permitted by applicable law.

5. WHAT RIGHTS DO YOU HAVE UNDER CALIFORNIA PRIVACY LAW?

California residents have certain rights related to personal information, including:

- The right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- The right to request that we delete personal information collected from you. However, please note that we may deny your deletion request as permitted under applicable law.
- The right to request that we correct inaccurate personal information we maintain about you.

You may request to exercise these rights by:

- Calling us toll-free at 1-866-232-2040; or
- Completing our rights request form [here](#).

Please note that we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights as required by applicable law. We may require you to provide your name, email address, mobile phone number, and/or applicant tracking system candidate ID number to verify your identity in response to your privacy rights requests. 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.

6. HOW CAN YOUR AUTHORIZED AGENT EXERCISE YOUR RIGHTS ON YOUR BEHALF?

You may designate an authorized agent to make a request on your behalf from [here](#). 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. We may require you to verify your own identity in response to a request, even if you choose to use an agent, to the extent permitted by law.

7. NON-DISCRIMINATION

We will not discriminate against you because of your exercise of any of the above rights or any other rights, subject to the rights and the obligations under the California Consumer Privacy Act. For example, we will not retaliate against you for exercising your rights under applicable law.

8. WHAT IS OUR PRIVACY POLICY FOR CUSTOMERS?

We respect the privacy of our Franchisee Candidates and Customers. CFA's privacy policy that applies to CFA Customers, Prospective Customers, and other third parties is located at: <https://www.chick-fil-a.com/legal/privacy>. We publish metrics regarding the number of requests to exercise certain privacy rights under applicable law that 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 calendar year, including requests submitted by Franchisee Candidates, in our privacy policy for Customers <https://www.chick-fil-a.com/legal/privacy/chick-fil-a-privacy-policy> .