

## THE SUBWAY MEETINGS & EVENTS PRIVACY NOTICE

**Last Updated: June 3rd, 2024**

Your privacy is important to us. When you share your personal and business information with the Subway Group, you trust us with your information. This notice is meant to help you understand what data we collect, why we collect it and what we do with it in relation to our meetings and events.

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### 1. ABOUT THIS NOTICE

**The Subway Group.** The Subway Group (we, us or our) is made up of a variety of companies including but not limited to, Subway IP LLC (the owner of our proprietary system for establishing and operating restaurants in order to develop Subway® restaurants worldwide), FWH Technologies, LLC (the owner and licensor of the SubwayPOS® software for use in Subway® restaurants worldwide), Franchise World Headquarters, LLC (a service-oriented company that provides core business related services to other Subway Group entities), the Subway® franchisors (which offer and sell franchises worldwide), and the Subway® advertising entities (which administers national and local advertising funds and activity for Subway® restaurants and Subway® franchisees worldwide). To see a list of the Subway Group entities that may come in contact with your personal information, please see "Our Group Companies" section below.

**What this notice applies to.** This Privacy Notice applies to the personal information that the Subway Group collects and uses to facilitate the organization of our meetings, events and online events (collectively, "Subway Meetings & Events"), which include but are not limited to:

North American MUO Meeting  
FAF Local Market Leadership Summit  
Road Shows  
Global & Regional Conventions  
Legal Symposium  
Global Business Development Agent Leadership  
Conference (BDALC)

#### **SUBWAY GROUP EMPLOYEES ONLY:**

Anniversary Gift Order  
Holiday Party  
Children's Holiday Party  
Anniversary Party  
Corn & Turkey Giveaway  
T-shirt Giveaway

**Changes to this notice.** If we make a change to this Notice, we will make previous versions available upon request so that you can see when changes occurred and what they are. If we make any material changes to this Notice, we will notify you by means of a notice on this site or by an email (sent to the email address specified in your account). Where we are required by applicable data protection laws, we will also seek your consent to any material changes that affect how we use your personal information.

We encourage you to periodically review this page for the latest information on our privacy practices.

## 2. PERSONAL INFORMATION WE COLLECT

We collect personal information in different ways. The majority is collected when you register for Subway Meetings & Events through one of our service providers, like CVENT or DocuSign.

### Types of Personal Information We Collect:

The personal information we collect from you depends on the nature of your interaction with us and the type of Subway Meetings & Events you register for, but it may include the following:

- *Contact Information.* We may collect personal and/or business contact information including your first name, last name, mailing address, telephone number, fax number, email address, Job title, Employer and other similar data.
- *Payment Information.* When registering for an event, you will be required to provide a credit/debit card number and related financial information (such as expiration data, security code and billing address).
- *Dietary Requirements.* During registration, we may ask you to provide any dietary restrictions, food allergies and religious restrictions if food will be provided at a Subway Meets & Events.
- *Health Information.* We may ask if you would like to make any special requests regarding medical conditions, such as vision impairment, physical disabilities, etc.
- *Travel Details.* Travel details may include hotel accommodations (e.g. check-in dates) and transportation information (e.g. airline flight information).
- *EU Citizenship.* We may ask whether you are a citizen of the European Union to ensure we are aligned with data protection laws.

### Information Received from Third Parties

In some circumstances, the Subway Group receives personal information about individuals from third parties. For example, this may happen if your employer, spouse or colleague registers you for Subway Meetings & Events on your behalf. We may also collect information about you from other companies and organizations. For example, independent purchasing organizations may provide us suppliers' and vendors' contact information to facilitate registration for an event.

### What Happens if You Don't Give Use Your Personal Information

All Subway Meetings and Events require some personal information in order for an individual to participate. If you do not provide such information, we will not be able to complete your registration and you will not be able to take part in the event.

### Anonymous and Aggregated Information

Anonymized and aggregated information does not identify a specific person and is not personal information. We use this type of information for a variety of functions, including measuring users' interest in and use of Subway Services, conducting internal analysis, data analytics and research. We may also share anonymized or aggregated information with third parties for our or their purposes, but none of this information can be used to identify you or determine anything else personal about you.

## 3. HOW WE USE YOUR PERSONAL INFORMATION

We may use your personal information for the following purposes:

- *Registration Process.* When you wish to attend or participate in Subway Meetings and Events, you will register for those events online through our service providers or over the telephone. We use your Contact Information to register you for the event, to send you a registration confirmation email and to verify your identity at check in. We also provide registration services for some events hosted by independent purchasing organizations (e.g. shareholder or partner meetings), in which case the registration process is identical with the addition that we share the attendee list with the applicable hosting organization.
- *Payment Processing.* When you pay for event registration fees or other products and services associated with Subway Meetings and Events using your debit/credit card, our service providers will collect your Payment Information and pass it to payment card processors to validate payment information and complete the transactions.
- *Name Badges.* Your name and company details will be printed onto a badge and will be at a registration desk until you check-in unless badges are printed on-demand. For security reasons, we ask that you wear your name badge for the entire event you are attending. Exhibitors at our events may wish to scan your badge so they can contact you with more information. By allowing an exhibitor to scan your badge, you are consenting to have your contact information provided to the exhibitor, and thereafter may be contacted by the exhibitor post-event. If you do not wish the exhibitor to contact you, please communicate this directly with the exhibitor at the event or thereafter.
- *Tracking Attendance.* We keep a record of your participation in Subway Meetings and Events as an attendee or presenter. This information may be used to tell you about other events and to help us better understand our attendees' needs and interests to better tailor our products and services. Depending on your relationship with the Subway Group, we may also track your attendance as part of your contractual obligations with us to attend required meetings.
- *Dietary Requirements.* In an effort to provide you with the best experience possible at Subway Meetings and Events, we ask for your dietary restrictions. We do not collect this information without your explicit consent. Your name and dietary requirements will be sent encrypted to the venue to ensure your dietary requirements are catered for at the event.
- *Health Information.* If you are registering for an event, we may ask if you have any special health requests in order for us to accommodate you. We will not collect this information without your explicit consent. Your name and special requests may also be sent encrypted to the hotel and/or the venue to ensure your special requirements are accommodated.
- *Travel Information (Subway Group Employees Only).* When an overnight accommodation is required as part of the event, your name and company details will be sent to the event venue to book your room.
- *Mobile App.* We may offer a crowd polling mobile app for some of our larger events. The app captures your Contact Information and photo to support its functionality including: facilitating interactive sessions, increasing attendee participation and creating attendee lists. Your Contact Information and photo will automatically be added to the event's attendee list. Any individual that downloads the app and accesses the Subway Group event will have access to the attendee list for networking purposes. If you would like to remove yourself from the attendee list, you can do so by going into the app settings.
- *Place Cards.* Your name any company details may be displayed in a place card format at the event you are attending.

- *Audience Engagement Software.* Your name and company may be displayed on screens at the event when using our audience interaction platforms. For some of our events, we work with vendors that provide web-based audience response systems. The system increases audience interaction by allowing you to respond to questions on the web or via SMS texting.
- *Photos and Videos.* Photos and video recordings of you may be taken at our events, and used in internal and external publications, across both printed and digital channels. Your name and company details may be displayed alongside the image or video.
- *Presenter Information.* If you are a presenter at one of our events, we may display your Contact Information and photograph and may collect information provided by event attendees who evaluated your performance as a presenter. We may also make and store a recording of your voice and likeness in certain instances.
- *Feedback.* If you provide feedback or complete an event survey, your quotes, names and company details may be used to promote further events and may be used to improve future Subway Group Meetings & Events.
- *Prizes.* If you win a prize at an event, we may need to use your personal details to administer your prize or pass it to the supplier fulfilling the prize. We may also include your details in post-event communications relating to the prize you win.
- *Awards.* If you win an award at any of our events, your name and company details will be displayed on screen at the event, engraved into the award and used in both internal and external communications about the award.
- *Social Media.* We may use your name and company details on our social media channels to promote the Subway Meetings and Events you attend.
- *Business Cards.* If you choose to bring business cards to an event, they are your responsibility to distribute or dispose of, and we will not be held responsible for your personal information being shared directly from your business cards.

#### **4. LEGAL BASIS FOR PROCESSING**

We only collect and process your personal information where we have a lawful basis to do so. Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to process personal information about you, or may need to process personal information in order to exercise, establish or defend legal claims, which is given when you register for our event. There may also be instances when we process your personal information for the public interest.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information (including any legitimate interests relied upon), please send an email to [privacy@subway.com](mailto:privacy@subway.com).

#### **5. SHARING YOUR INFORMATION**

We do not sell, trade or rent your personal information to others.

### Sharing Within the Subway Group

The Subway Group may share your information amongst our entities in order to administer Subway Meetings & Events. Members of the Subway Group who receive your personal information are not authorized to use or share the information, except as set out in this Privacy Notice.

### Sharing With Third Parties

*Hotel and Venue Staff.* We may share your personal information with the hotel and venue staff to book your room, to accommodate dietary and health requests, and for attrition purposes.

*Third Party Service Providers.* We may share your personal information with vendors who provide services to us, such as business, professional or technical support functions. This includes, but is not limited to: service providers that host or operate Subway Meetings and Events online registration; payment processors; data processing or other information technology services for carrying out research and analysis, providing attendee experience management services and personalizing individual attendee experiences. We do not allow these vendors to use or share this information for any purpose other than to provide services on our behalf.

*Sweepstakes, Contests, and Promotions.* If you choose to enter into one of our sweepstakes, contests, or other promotions, we may disclose your information to third parties or the public in connection with the administration of such promotion, as required by law, as otherwise permitted by the promotion's official rules, or otherwise in accordance with this Privacy Notice.

*Business Developers.* Business Developers ("BD") are independent contractors of the Subway Group who are responsible for the growth of the franchise in a specific territory. If you are franchise owner, franchise owner employee, or a BD employee, we may share your Contact Information with your BD or their staff to assist with the registration process and schedule activities during the event (e.g. meetings, dinners, etc.).

*Other Third Parties:* Your personal information may also be shared with our sponsors, partners, advertisers, advertising networks, advertising servers, and analytics companies or other third parties in connection with marketing, promotional, and other offers, as well as product information. Your information may also be shared with third parties we identify at the time you provide your personal information or otherwise with your consent.

*Business Transfers.* Your Personal Information is considered a company asset and may be disclosed or transferred to a third party in the event of a proposed or actual purchase, any reorganization, sale, lease, merger, joint venture, assignment, amalgamation or any other type of acquisition, disposal or financing of all or any portion of our business or of any of the business assets or shares (including in connection with any bankruptcy or similar proceeding) of the Subway Group or a division thereof, in order for you to continue to receive the same products and services from, or to continue the same or similar relationship with, the third party.

*Legal Disclosures.* We may disclose your information if we believe that the disclosure is required by law, a subpoena or other legal process, if we believe that the disclosure is necessary to enforce our agreements or policies, or if we believe that the disclosure will help us protect the rights, property or safety of the Subway Group or our customers or partners.

*When You Consent.* We may share your information with other companies if you give us permission or direct us to share the information.

## **6. INTERNATIONAL TRANSFERS**

Due to our global operations, your personal information may be transferred to and processed in the United States and other countries that may not provide the same level of data protection as your home country. The Subway Group's privacy practices are consistent with all applicable country, national, state, and local data protection and security laws.

For our users whose use of Subway Services results in the transfer of personal information from the European Economic Area (EEA), United Kingdom, Switzerland, or other jurisdictions with adequacy provisions to non-adequacy country, we rely on one or more of the following legal mechanisms: the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework (collectively referred to as the "Data Privacy Framework"), the Standard Contractual Clauses, and consent of the individual.

The following Subway entities are certified under the Data Privacy Framework:

- Franchise World Headquarters, LLC
- Subway MyWay, LLC
- Doctor's Associates LLC
- FWH Technologies, LLC
- Subway Franchisee Advertising Fund Trust, Ltd.
- Subway IP LLC
- Subway Real Estate, LLC
- Subway Realty, LLC

These Subway entities are subject to the investigatory and enforcement powers of the Federal Trade Commission and have committed to subject all personal information transferred in reliance on the Data Privacy Framework to the Data Privacy Framework's Principles. In the event any such personal information is transferred to another entity, the transferring Subway entity will remain liable for the recipients' violations of the Data Privacy Framework's Principles. You can find additional information about the Data Privacy Framework as well as a list of participating entities [here](#). Where we transfer your personal information in reliance on the Data Privacy Framework, you have a right to object to the disclosure of your personal information to third party controllers. To exercise this right, you can contact us as described in the "How to Contact Us" section above.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, these Subway entities commit to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF. If you have questions or concerns about our processing of your personal information under the Data Privacy Framework, you may contact us at [privacy@subway.com](mailto:privacy@subway.com). If you have not received a timely or satisfactory response from us regarding your Data Privacy Framework question or complaint, please contact the appropriate independent recourse mechanism below:

- If you are located in the EU - [EU Data Protection Authorities \(DPAs\)](#)
- If you are located in Switzerland - [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- If you are located in the UK - [Information Commission Office \(ICO\)](#)

In some circumstances, you may also be able to invoke binding arbitration as provided for by the Data Privacy Framework Principles.

These Subway entities comply with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. These Subway entities have certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. These Subway entities have certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy statement and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, <https://www.dataprivacyframework.gov/>.

## **7. HOW LONG WE KEEP YOUR INFORMATION**

To the extent permitted by applicable law, we retain your personal information as long as (1) it is needed for the purposes for which we obtained it and in accordance with this Privacy Notice or (2) we have another lawful basis, stated in this Privacy Notice or at the point of collection, for retaining that information beyond the period for which it is necessary to serve the original purpose for obtaining the personal information. If the lawful basis for processing that data is based solely on consent, we will delete the personal information if that consent is revoked.

## **8. CHILDREN'S PRIVACY**

We recognize the need to provide further privacy protections with respect to children's personal information we may collect so they can attend Subway Meetings & Events. When we intend to collect information from children, we take additional steps to protect children's privacy, including:

- Notifying parents about our information practices with regard to children;
- In accordance with applicable law, and our practices, obtaining consent from parents for the collection and use of their children's personal information;
- Limiting our collection of personal information about children to no more than what is reasonably necessary to participate in an event; and
- Giving parents access or the ability to request access to personal information we have collected about their children and the ability to request the personal information be changed or deleted by contacting us as described in the "How to Contact Us" section below.

If we learn that we have inadvertently collected the personal information of a child under 13, or equivalent minimum age depending on the jurisdiction, we will take steps to delete the information as soon as possible.

## **9. YOUR DATA PROTECTION RIGHTS**

Subject to local law, you may have certain rights regarding information that we have collected and that is related to you. We encourage you to contact us to update or correct your information if it changes or if you believe any information that we have collected about you is inaccurate. You can also ask us to see what personal information we hold about you, to erase your personal information and you may tell us if you object to our use of your personal information. In some jurisdictions, you may have the right to complaint to your local data protection authority. If you would like to discuss or exercise the rights you may have, send us an email at [privacy@subway.com](mailto:privacy@subway.com).

## **10. OUR SECURITY**

We recognize the importance of maintaining the security of your personal information. We protect your information using security measures, including physical, administrative, and technical safeguards to reduce the risk of loss, misuse, unauthorized access, disclosure or modification of your information.

While we have employed security technologies and procedures to assist safeguarding your personal information, no system can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us. You use Subway Services and provide us with your information at your own risk.

## **11. HOW TO CONTACT US**

If after reviewing this Privacy Notice, you would like to submit a request or you have any questions or privacy concerns, please contact:

The Subway Group Privacy Office  
c/o Franchise World Headquarters, LLC 1  
Corporate Drive, Suite 1000  
Shelton, CT,  
06484 USA  
Email Address: [privacy@subway.com](mailto:privacy@subway.com)

**If we are unable to resolve your concerns, you have the right to contact a data privacy supervisory authority in the country where you live or work, or where you consider that the data protection rules have been breached or seek a remedy through the courts.**