

**SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**  
**Privacy Statement**  
**DATE: April 24, 2017**

Subway Franchisee Advertising Fund Trust Ltd. (“SFAFT”) on behalf of Markets #037, #099, #108, #124, #159 is the Sponsor (“SPONSOR”) of the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST** (“Contest”) located at: [www.YourStandoutCoach.com](http://www.YourStandoutCoach.com). Whereas SFAFT on behalf of Markets #037, #099, #108, #124, #159 is the Sponsor of the Contest, the Administrator (“Administrator”), The Summit Group located at: <http://www.summitslc.com/privacy.html>, is running and administering the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**.

The Administrator, Sponsor, and third-party service providers value your privacy and want to give Eligible Entrant the opportunity to know what Personal Information is collected about Eligible Entrant, that Eligible Entrants Personal Information is protected, used, disclosed, and otherwise managed in conformance with all applicable law. This Privacy Statement applies to the collection of Personal Information *solely* in connection with the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**.

In an effort to comply with the law and our commitment to protect your Personal Information, SFAFT on behalf of Markets #037, #099, #108, #124, #159 encourages you to review the Privacy Policy of Administrator, The Summit Group, which discloses each individual companies full privacy practices and procedures. For your convenience, SFAFT on behalf of Markets #037, #099, #108, #124, #159, has provided, The Summit Group, Privacy Policy links below:

**The Summit Group:** <http://www.summitslc.com/privacy.html>.

The **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST** Privacy Statement does not govern the privacy practices and procedures of independently owned and operated **SUBWAY®** Restaurants. Nor does the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST** Privacy Statement govern the Personal Information handling practices and procedures of its affiliates, the **SUBWAY®** Group, including but not limited to: FAF, the **SUBWAY®** advertising affiliates which administers national and local advertising funds and activity for **SUBWAY®** restaurants and **SUBWAY®** franchisees worldwide; Franchise World Headquarters, LLC (“FWH”) provides core business related services to **SUBWAY®** franchising entities, as well as, other affiliated entities to support the **SUBWAY®** brand; Subway IP, Inc. (“SIP”), the owner of a proprietary system for establishing and operating restaurants featuring sandwiches, pizza and salads under our trade name and service mark **SUBWAY®** (the “System”) in order to develop **SUBWAY®** restaurants worldwide; and the **SUBWAY®** franchisors.

SFAFT on behalf of Markets #037, #099, #108, #124, #159 encourages you to review its affiliates respective Privacy Statements which disclose each company’s privacy practices and procedures. For your convenience, SFAFT on behalf of Markets #037, #099, #108, #124, #159 has provided a link to the **SUBWAY®** Privacy Notice which includes the individual **SUBWAY®** Group franchisor Privacy Statements located at:

**PRIVACY NOTICE:** <http://www.subway.com/subwayroot/privacyNotice.aspx>

To find out more about SFAFT’s privacy practices and procedures, please see our Privacy Statement located at: <http://www.subway.com/en-us/legal/privacystatement-fsb>, which discloses SFAFT’s full privacy practices and procedures.

**Introduction:**

SFAFT on behalf of Markets #037, #099, #108, #124, #159 role in the **SUBWAY® THE FANS ARE STRONG HERE** is limited to promoting the **CONTEST**. The Summit Group is an agency that assists other businesses in promoting its products and services, including operating **Contests**, **Contest**, and **Contests**. Specifically, SFAFT on behalf of Markets #037, #099, #108, #124, #159 hired The Summit Group to run and administer the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**. The Summit Group’s role is limited to drafting the rules of the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**, conducting the selection and verification of Prize Winners from eligible entries received during the **SUBWAY® STANDOUT VOLUNTEER COACH** Period, as well as being the prize fulfiller for the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**. SFAFT on behalf of Markets #037, #099, #108, #124, #159 manages the **SUBWAY®** Card website where each Prize Winner of a **SUBWAY®** Card will

register their SUBWAY® Card. SFAFT on behalf of Markets #037, #099, #108, #124, #159, may send Eligible Entrant opt-in information or materials specifically requested by Eligible Entrant at the time of entering the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**. The **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST** gathers Personal Information from those individuals who choose to enter the Contest and may also gather anonymous data regarding the Contest itself. The Summit Group and SFAFT on behalf of Markets #037, #099, #108, #124, #159 take its privacy obligations both to its clients and to the Eligible Entrants who enter this Contest very seriously. The **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST** gathers Personal Information from Eligible Entrants who choose to enter the Contest. SFAFT on behalf of Markets #037, #099, #108, #124, #159, The Summit Group, take our privacy obligations both to our customers and Eligible Entrants who choose to enter the “**SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**” very seriously and will take all reasonable steps to protect Eligible Entrants Personal Information which may be in our control.

## **Purpose**

This Privacy Statement outlines the treatment of Personal Information collected from Eligible Entrants *solely* in connection with the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**.

## **Personal Information Collected**

The Administrator and/or the Sponsor may collect Personal Information, which may include, but is not limited to: name (full name or first initial and last name), maiden name, nickname, email address, home address, home postal code, home telephone number, mobile telephone number, date of birth, Social Security Number and/or Identification Number, photographic images (especially of face or other identifying characteristics, or other identifying characteristics such as eye, skin, and hair color, facial features, and personal marks such as tattoos, birthmarks, moles and scars) and video or voice recording. This Personal Information is only collected when volunteered by the Entrant. Upon entering your Personal Information for the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**, you may have the opportunity to *Opt-in* (which requires Eligible Entrant's *express consent*) and receive specific information or materials, such as, a coupon, newsletter, informational materials, marketing communications, or other special Contests or offers, from the FAF Group, the SUBWAY® Group, or our third party service provider (located in the United States of America), who are contractually obligated to provide the same level of guarantees regarding the confidentiality and security of your Personal Information, as well as, to allow for oversight, monitoring, and auditing of the services being provided.

## **Non-Personal Information**

The Administrator and/or the Sponsor may also collect Non-Personal Information, such as Internet Protocol (IP) addresses, "cookies," and Internet tags and navigational data (server log files). "Cookies" are small pieces of information that are stored by your web browser software on your computer's hard drive or temporarily in your computer's memory. The use of cookies is now an industry standard and users will find them on most major websites. The Administrator and/or the Sponsor may place and store Internet cookies on the Eligible Entrants hard drive. Cookies can save any of the types of information noted above. Although most web browsers are initially set up to accept cookies, if you prefer, you can decline the placement of a cookie on your hard drive by using the appropriate feature(s) of your web browser software (if available) to delete the cookie. The Contest website, however, requires cookies to be enabled to participate.

## **Mobile Information**

The Administrator and/or the Sponsor use a variety of new technologies and Social Media options to communicate and interact with consumers. These websites and mobile applications include popular social networking and media sites, such as, Twitter, Instagram and Facebook. If you post updates to or receive updates from, and other social networking websites, during the Contest Period via SMS from your wireless phone, your wireless-service provider may charge you for each text message you send and receive. You must consult your wireless service provider regarding its pricing plans, as rates may vary. Use of third-party social networking websites, such as, Twitter, Instagram and Facebook, are governed by the privacy practices of those websites. Neither, the Administrator and/or the Sponsor, captures or stores your login information or any other Personal Information for Twitter, Instagram, Facebook, and any other social networks, however, session information or cookies may be stored on your wireless phone, by their websites.

## **Social Media**

Please note, if the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST** is being run via a Social Media Platform(s) such

as, but not limited to: Facebook, Instagram, Pinterest, Twitter, etc., all Eligible Entrants acknowledge that the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST** is in no way sponsored, endorsed, administered by, or associated with the Social Media Platform(s) and to the full extent permitted by law, the Social Media Platform(s) will not be liable to any Entrant in respect to any claim whatsoever including, but not limited to: any loss, damage or injury, or for any physical or mental injury suffered by any Entrant for any reason, as a result of, or in connection with the **SUBWAY® STANDOUT VOLUNTEER COACH CONTEST**.

### **Special Note about Children**

**The SUBWAY® STANDOUT VOLUNTEER COACH CONTEST is not targeted towards children under the age of thirteen (13). We do understand that children may try to enter the SUBWAY® STANDOUT VOLUNTEER COACH CONTEST and in so doing may voluntarily provide us Personal Information. If you are a child under the age of thirteen (13), PLEASE DO NOT submit any Personal Information for this Contest. If you still choose to enter the SUBWAY® STANDOUT VOLUNTEER COACH CONTEST, the Administrator and the Sponsor ask you not to enter the Contest without getting permission from your parent(s) or guardian(s) first.**

Children's privacy is very important to the Administrator and Sponsor. SFAFT on behalf of Markets #037, #099, #108, #124, #159, an affiliate of the SUBWAY® Group, whose servers are located in the United States, adheres to the United States Children's Online Privacy Protection Act ("COPPA"). The Federal Trade Commission ("FTC") has the authority to issue regulations and enforce COPPA, which applies to websites and online services operated for commercial purposes that are directed at, and are collecting Personal Information from children under thirteen (13) years of age. COPPA explains what a website operator must include in their Privacy Statement, what responsibilities a website operator has to protect children's privacy and safety online, including restrictions on marketing to those under thirteen (13) years of age, it also requires that we inform parents and/or legal guardians how we collect, use, and disclose Personal Information from children under thirteen (13) years of age, as well as, how to obtain verifiable consent from a parent in order for children to use certain features of on a website. The Administrator and/or Sponsor will not knowingly allow anyone under thirteen (13) years of age to provide us with any Personal Information about themselves (such as their names, e-mail address, and phone number) over the Internet. If a child has provided the Administrator and/or Sponsor with Personal Information without the consent of a parent, we ask the parent of that child to contact The Summit Group's Privacy Officer immediately at: <http://www.summitslc.com/privacy.html>, or SFAFT on behalf of Markets #037, #099, #108, #124, #159 Privacy Officer at: [fafprivacyofficer@subway.com](mailto:fafprivacyofficer@subway.com). We will use all reasonable efforts to promptly delete the child's information from our servers. Please note, that when we use the term "parent", we mean to include legal guardians.

### **The Summit Group's Security**

The Summit Group endeavors to protect your Personal Information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in its control. These measures include safeguards to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use and modification. The Summit Group safeguards your Personal Information on the Internet by using industry-standard practices. Although "guaranteed security" does not exist either on or off the Internet, The Summit Group makes commercially reasonable efforts to make the collection and security of such information consistent with its Privacy Policy and all applicable laws and regulations. The Summit Group maintains physical, electronic and procedural safeguards as appropriate to safeguard your Personal Information.

### **SFAFT's Security**

SFAFT on behalf of Markets #037, #099, #108, #124, #159 endeavors to protect your Personal Information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our control. We safeguard your Personal Information on the Internet by using industry-standard practices. Although "guaranteed security" does not exist either on or off the Internet, we make commercially reasonable efforts to make the collection and security of such information consistent with our Privacy Statement and all applicable laws and regulations.

Currently, our website utilizes a variety of different security measures designed to protect Personal Information by users both inside and outside SFAFT on behalf of Markets #037, #099, #108, #124, #159, including the use of encryption mechanisms (e.g., Secure Socket Layers or SSLs), password protection, and other security measures to help prevent unauthorized access to your Personal Information. This helps maintain the confidentiality, privacy, and integrity of your transactions, and helps to protect your confidential information - such as, credit card numbers, online forms, and financial data from loss, misuse, interception and hacking.

### **The Summit Group's Storage, Retention, and Accuracy of Personal Information**

The Summit Group ensures that Personal Information is safeguarded against loss, access, use, modification, disclosure or other misuse. All reasonable steps are taken to prevent unauthorized use or disclosure of your Personal Information.

The Summit Group may retain the Personal Information of all Eligible Entrants for up to 2 years subject to all applicable laws governing the use and retention of such Personal Information. The Summit Group will then destroy all Personal Information in its possession that was collected in connection with this Contest.

The Summit Group takes all reasonable steps to ensure that your Personal Information is accurate, up to date, complete, relevant and not misleading.

### **SFAFT's Storage, Retention, and Accuracy, of Personal Information**

All reasonable steps are taken to safeguard your Personal Information against loss; unauthorized access, use, modification, disclosure; or any other misuse. The Sponsor takes all reasonable steps to insure that your Personal Information is accurate, up-to-date, complete, relevant and not misleading. The Sponsor will retain your Personal Information only for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. Your consent to such purpose(s) remains valid after termination of our relationship with you.

The Sponsor may store your Personal Information in its databases located in the United States and/or other countries outside of the European Union and Canada. Additionally, some of our service providers may be located in the United States or other countries outside of the European Union and Canada and will be subject to the laws of the local jurisdiction. As a result, in certain circumstances, the United States and other foreign governments, courts, law enforcement agencies or regulatory agencies may be entitled to access the Personal Information collected and held by the Sponsor.

### **The Summit Group's Access, Control and Update Personal Information**

You may contact The Summit Group's Privacy Officer to access, correct or delete your Personal Information. If necessary, the Privacy Officer will contact another individual to assist in completing your requested task. We want to be sure that we keep only the most accurate and up-to-date Personal Information in our records. You can email us at [Privacyofficer@summitslc.com](mailto:Privacyofficer@summitslc.com) to update your contact information. To protect your privacy, we will take reasonable steps to help verify your identity before granting access or making changes.

### **SFAFT's Access, Control and Update Personal Information**

You may contact SFAFT on behalf of Markets #037, #099, #108, #124, #159 Privacy Officer to access, correct or delete your Personal Information. If necessary, the Privacy Officer will contact another individual to assist in completing your requested task. We want to be sure that we keep only the most accurate and up-to-date Personal Information in our records. You can email SFAFT on behalf of Markets #037, #099, #108, #124, #159 Privacy Officer at [fafprivacyofficer@subway.com](mailto:fafprivacyofficer@subway.com) to update your contact information. To protect your privacy, we will take all reasonable steps to help verify your identity before granting access or making any changes.

### **The Summit Group's Contact Information**

If you have any questions or concerns, please contact:

Privacy Policy c/o The Summit Group  
117 W. 400 South  
Salt Lake City, Utah  
[Privacyofficer@summitslc.com](mailto:Privacyofficer@summitslc.com)  
**Tel:** (801) 595-1155  
**Fax:** (801) 595-1165

## SFAFT Privacy Officer Contact Information

If you have any questions or concerns, please contact SFAFT on behalf of Markets #037, #099, #108, #124, #159 Privacy Officer as follows:

SFAFT Privacy Officer  
C/o Franchise World Headquarters, LLC  
325 Sub Way  
Milford, CT, 06461  
USA  
Telephone Number: (203) 877-4281 or Toll Free: 1-800-888-4848  
Facsimile: (203) 783-7479  
Email Address: [fafprivacyofficer@subway.com](mailto:fafprivacyofficer@subway.com)

We will address your concerns and attempt to resolve any privacy issues that may arise.

*\*SFAFT may update its Privacy Statement occasionally. When SFAFT posts changes to its Privacy Statement, we will also revise the "LAST REVIEWED" date on SFAFT's Privacy Statement. If there are material changes to our Privacy Statement, SFAFT will notify you by email, or by means of a notice on our websites located at: [www.subway.mobi](http://www.subway.mobi) and [www.subwaykids.com](http://www.subwaykids.com). SFAFT encourages you to periodically review our full Privacy Statement at: <http://www.subway.com/en-us/legal/privacystatement-fsb>, in order for you to stay informed of how SFAFT is protecting your Personal Information and to be aware of any material changes we may make to our Privacy Statement. Lastly, your continued use of SFAFT's websites after posting an amended Privacy Statement shall constitute your agreement to be bound by any such changes, which are effective immediately after being posted on our websites.*