

**SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**  
**Privacy Statement: May 1, 2014 - May 31, 2014**

Subway Franchisee Advertising Fund Trust, Ltd. (“SFAFT”) is the Promoter (“PROMOTER”) of the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** (“PROMOTION”) located at: [www.facebook.com/subway](http://www.facebook.com/subway). Whereas SFAFT is the Promoter of the Promotion, the Administrator, HelloWorld, Inc. located at: [www.helloworld.com](http://www.helloworld.com) (“ADMINISTRATOR” or “HelloWorld”), is administering the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**.

The Administrator and Promoter value your privacy and want to give Participants the opportunity to know what Personal Information is collected about them, and that it is protected, used, disclosed, and otherwise managed in conformance with applicable law. This Privacy Statement applies to the collection of Personal Information **solely** in connection with the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**.

In an effort to comply with the law and our commitment to protect your Personal Information, HelloWorld encourages you to review its website Privacy Policy, which discloses its full online privacy practices and procedures. For your convenience, we have provided the website Privacy Policy link below:

**HelloWorld** - <http://www.helloworld.com/privacy-policy>

The **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** Privacy Statement does not govern the privacy practices and procedures of independently owned and operated SUBWAY® Restaurants. Nor does the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** Privacy Statement govern the Personal Information handling practices and procedures of SFAFT or its affiliates within the FAF Group and the SUBWAY® Group. The FAF Group administers national and local advertising funds and activity for SUBWAY® restaurants and SUBWAY® franchisees worldwide. The SUBWAY® Group includes, but is not limited to: Franchise World Headquarters LLC (“FWH”), which operates as a service-oriented company for and on behalf of the SUBWAY® System worldwide by providing core business related services to the SUBWAY® franchising entities, Doctor’s Associates Inc. (“DAI”), which owns and licenses the SUBWAY® trademark and SUBWAY® Restaurant System to its affiliates in order to develop SUBWAY® restaurants worldwide. SFAFT encourages you to review SFAFT, FWH, and DAI’s, respective online Privacy Notice located at: <http://www.subway.com/subwayroot/PrivacyNotice.aspx>.

**Introduction:**

HelloWorld is an agency that assists other businesses in promoting their products and services, such as, operating sweepstakes, contests, and promotions. Specifically, SFAFT hired HelloWorld to run and administer the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**. HelloWorld’s role in the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** is limited to the administering of the promotion, including posting of the Promotion rules, via the [www.facebook.com/subway](http://www.facebook.com/subway) website. HelloWorld will also conduct the drawing of the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** Prize Winners from all eligible entries received during the Promotion Period. The **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** gathers Personal Information from those individuals who choose to enter the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**. HelloWorld and SFAFT take their privacy obligations both to its clients and to the Participants who enter **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** very seriously.

**Purpose**

This Privacy Statement outlines the treatment of Personal Information collected from Participants **solely** in connection with the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**.

**Personal Information Collected**

The Administrator and/or the Promoter 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. This Personal Information is only collected when volunteered by the Participant. Upon entering your Personal Information for the Promotion, you may have the opportunity to **Opt-in** (which may require Participants **express consent**) and receive specific information or materials, such as, a coupon, newsletter, informational materials, marketing communications, or other special promotions or offers, from the FAF Group, the SUBWAY® Group, or our third-party service provider (located in the United States of America). Upon entering your Personal Information regarding the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**, the Promoter, SFAFT’s affiliates within the FAF Group, the SUBWAY® Group, or our third-party service providers, are contractually obligated to provide the same level of guarantees regarding the

confidentiality and security of your Personal Information as SFAFT, as well as, to allow for oversight, monitoring, and auditing of the services being provided **solely** in connection with the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**.

### **Non-Personal Information**

The Administrator and/or the Promoter 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 Promoter may place and store Internet cookies on the Participants 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.

### **Mobile Information**

The Administrator and the Promoter 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 and Facebook. If you post updates to or receive updates from any other social networking websites during the Promotion 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 and Facebook, are governed by the privacy practices of those websites. Neither the Administrator nor the Promoter captures or stores your login information or any other Personal Information for Twitter, Facebook, and other social networks, (except where access to profile data is expressly granted, e.g., Facebook log in). However, session information or cookies may be stored on your wireless phone, by their websites.

### **Social Media**

Please note, if the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** is being run via a Social Media Platform(s) such as, but not limited to: Facebook, Instagram, Pinterest, Twitter, etc., all Participants acknowledge that the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES** 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 Participant 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 Participant for any reason, as a result of, or in connection with the **SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES**.

### **Special Note about Children**

**The SUBWAY® FIRECRACKER 250 FACEBOOK SWEEPSTAKES is not available to anyone under the age of thirteen (13). Personally identifiable information will not be collected from children under the age of thirteen (13) without parental consent in compliance with the Children's Online Privacy Protection Act ("COPPA") guidelines.**

Children's privacy is very important to the Administrator and Promoter. SFAFT the Promoter, and affiliates of the SUBWAY® Group, whose servers are located in the United States, adheres to 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 Promoter 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 Promoter with Personal Information without the consent of a parent, we ask the parent of that child to contact the Administrator at: [questions@eprizefulfillment.com](mailto:questions@eprizefulfillment.com) or the Promoters Privacy Officer at: [privacyofficer@subway.com](mailto:privacyofficer@subway.com). We will use all reasonable efforts to promptly delete the child's Personal Information from our servers. Please note, that when we use the term "parent", we mean to include legal guardians.

## **Your California Privacy Rights (As provided by California Civil Code Section 1798.83)**

A California resident who has provided personal information to a business with whom he/she has established a business relationship for personal, family, or household purposes ("California customer") is entitled to request information about whether the business has disclosed personal information to any third parties for the third parties' direct marketing purposes. In general, if the business has made such a disclosure of personal information, upon receipt of a request by a California customer, the business is required to provide a list of all third parties to whom personal information was disclosed in the preceding calendar year, as well as a list of the categories of personal information that were disclosed. However, under the law, a business is not required to provide the above-described lists if the business adopts and discloses to the public (in its privacy policy) a policy of not disclosing customer's personal information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of personal information and providing a cost free means to exercise that right.

### **HelloWorld's Security**

HelloWorld 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. HelloWorld safeguards your Personal Information on the Internet by using industry-standard practices. Although "guaranteed security" does not exist either on or off the Internet, HelloWorld makes commercially reasonable efforts to make the collection and security of such information consistent with its Privacy Statement and all applicable laws and regulations. HelloWorld maintains physical, electronic and procedural safeguards as appropriate to safeguard your Personal Information.

### **SFAFT's Security**

We endeavor 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, 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.

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

HelloWorld 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.

HelloWorld will retain your Personal Information in accordance with applicable laws governing the use and retention of such Personal Information. HelloWorld will then destroy all Personal Information in its possession that was collected in connection with this Promotion.

HelloWorld 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. SFAFT takes all reasonable steps to insure that your Personal Information is accurate, up-to-date, complete, relevant and not misleading. SFAFT 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.

SFAFT 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 SFAFT.

### **HelloWorld's Access, Control, and Update of Personal Information**

You may contact HelloWorld to access, correct or delete your Personal Information. We want to be sure that we keep only the most accurate and up-to-date Personal Information in our records. You can email HelloWorld at: [questions@eprizefulfillment.com](mailto:questions@eprizefulfillment.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.

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

You may contact SFAFT'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 the Privacy Officer at: [privacyofficer@subway.com](mailto:privacyofficer@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.

### **HelloWorld's Privacy Officer Contact Information**

If you have any questions or concerns, please contact HelloWorld as follows:

1. Mail to:  
Privacy Policy  
c/o HelloWorld  
One ePrize Drive  
Pleasant Ridge, MI 48069 or
2. Email: [questions@eprizefulfillment.com](mailto:questions@eprizefulfillment.com)
3. Phone: 248.543.6800
4. Facsimile: 248.543.3777

### **SFAFT's Privacy Officer Contact Information**

If you have any questions or concerns, please contact SFAFT's Privacy Officer as follows:

SFAFT Privacy Officer  
c/o Franchise World Headquarters  
325 Bic Drive  
Milford, CT 06461  
Telephone: (203)877-4211 or  
Toll Free: 1-800-888-4848  
Facsimile: (203) 783-7479  
Email: [privacyofficer@subway.com](mailto:privacyofficer@subway.com)

We will address your concerns and attempt to resolve any problem.

***\*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 website Privacy Statement, SFAFT will notify you by email, or by means of a notice on our website located at: <http://www.subway.com/subwayroot/PrivacyPolicy-SFB.aspx>. SFAFT encourages you to periodically review our full website Privacy Statement at: <http://www.subway.com/subwayroot/PrivacyPolicy-SFB.aspx> 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 full website Privacy Statement. Lastly, your continued use of SFAFT's website after posting an amended website Privacy Statement shall constitute your agreement to be bound by any such changes, which are effective immediately after being posted on SFAFT's website.***