

PRIVACY POLICY FOR FRANCHISEE CANDIDATES
LAST UPDATED AND EFFECTIVE AS OF
February 23, 2026

Chick-fil-A, Inc., its subsidiaries, and related entities ("**we**", the "**Company**" or "**CFA**") are committed to protecting the privacy and security of personal information of all individuals in our possession and/or control, including candidates for a CFA restaurant 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 Franchisee Candidates ("**Privacy Policy**"). If your application is successful, we also use your personal information to manage our franchise relationship with you. 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 FranchiseePrivacy@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. Certain countries where we operate have laws that require us to provide specific privacy information to individuals located in those jurisdictions. Our privacy practices may vary among the regions in which we operate to reflect local practices and legal requirements. Please refer to region-specific addenda in this Privacy Policy to learn more.

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 from other third parties (such as sources used for background checks) or our 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, as relevant to a particular country:

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 (or Social Insurance Number in some jurisdictions), driver's license, national or state identification number, or passport number), or other similar identifiers.	Yes
B. Personal information categories including those listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	The "identifiers" listed above, signature, education, or financial information, interests and aspirations. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics.	Race/ethnicity, national origin, marital status, 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; and information obtained through background, credit or similar due diligence checks (e.g. checks carried out on international Franchisee Candidates (to the extent permitted by applicable law) for compliance with applicable antibribery and anti-corruption laws, and anti-money laundering and counter-terrorist financing requirements, fraud prevention, and other legal or regulatory obligations).	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
I. Professional or employment-related information.	Current or past job history, experience 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 (or Social Insurance Number in some jurisdictions), 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*
M. Other Personal Information	Information that you voluntarily provide to us such as records of statements made in interviews or correspondence. This may include statements that you make about your family or personal life.	Yes

Franchisee Candidates interact with us in different ways. Accordingly, the types of information collected may vary depending on the country and the stage of the selection process and applicability. CFA collects this information to engage with Franchisee Candidates, to select qualified Franchisee Candidates, to manage the Franchise relationship and to comply with applicable law. To the extent we or our service providers collect additional categories of information beyond those discussed above, we will do so in accordance with

applicable law and only to the extent necessary and proportionate for the franchisee opportunity in question.

Personal information does not include information excluded from the scope of personal information (or analogous term) under applicable law, including in certain countries (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 extend care to Franchisee Candidates.
- To reimburse Franchisee Candidates.
- To protect the Company, Customers, and Franchisee Candidates' business interests and legal rights, property, equipment, and confidential information; to assess Franchisee Candidates candidacy (which may include carrying out additional background screening checks); and to enforce brand standards and operational requirements to ensure consistency across the chain.
- 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 on our websites or mobile apps that impair existing intended functionality. To undertake internal research for technological improvement, 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 record and retain your interview sessions (such as video interviews, phone interviews, or online chat or other text-based interviews) to transcribe the sessions, summarize our communications, and evaluate your candidacy (collectively, "**Evaluation Purposes**"), including by analyzing the sessions with artificial intelligence and other automated processing technologies (collectively "AI Tools").

We may use AI Tools to process your personal information for Evaluation Purposes. For example, we may use AI Tools to analyze interview sessions, professional or employment-related information (such as your application, resume, or work experience), education information (such as your educational background), or other information you submit or we collect in connection with your Franchisee Candidate application, together with inferences drawn from the foregoing, to generate insights, recommendations, scores, or other reference points. We may use these outcomes of AI Tools' analyses as factors in evaluating your candidacy or as a guide to our review.

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. Some of the above personal information may be collected through cookies and other tracking technologies. For more information on our use of these technologies, see our cookie notice at <https://www.chick-fil-a.com/legal/privacy/cookie-interest-based-advertising-policy>.

We may use personal information of Franchisee Candidates as necessary to comply with applicable legal and

regulatory obligations, including conducting required anti-money laundering, counter-terrorist financing, and antibribery or anti-corruption due diligence; responding to law enforcement and governmental agency requests (i.e., subpoenas); fulfilling contractual obligations; or establishing, exercising or defending legal or contractual right and claims.

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

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

Limited contact and other application information may be collected by or disclosed to background screening companies and other sources to facilitate reference and other background checks (including employers, educational and financial establishments, referees, government agencies, credit reference agencies, courts and public registers). 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. Your personal information will also be shared with government / regulatory authorities, courts/ tribunals, and/or law enforcement authorities, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

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.

ADDENDA

A: CALIFORNIA

1. 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](tel: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.

2. 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.

3. NON-DISCRIMINATION

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

4. 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.

B: SINGAPORE

This section provides additional information that applies to personal information collected from Franchisee Candidates, or is otherwise processed in, Singapore. If you are located in Singapore, the following additional terms shall apply. In the event of a conflict between the following additional terms and the provisions of the main body of this Privacy Policy, the following additional terms shall prevail.

1. WHAT RIGHTS DO YOU HAVE UNDER SINGAPORE PRIVACY LAW?

To the extent permitted by applicable law, you have the following rights related to personal information:

- The right to access your personal information in our possession and/or control.
- The right to rectify / correct your personal information where it is inaccurate, incomplete or outdated.
- The right to withdraw consent to the processing of your personal information, where the legal basis relied upon is consent.

You may request to exercise your rights by:

- Emailing us at FranchiseePrivacy@chick-fil-a.com

C: UK AND EEA

This section provides additional information for Franchisee Candidates in the European Economic Area (EEA) and in the United Kingdom (UK). It refers to the GDPR and the UK GDPR (collectively, the “GDPR”). In the event of a conflict between the following additional terms and the provisions of the main body of this Privacy Policy, the following additional terms shall prevail.

1. CONTROLLER

When we process your personal information, Chick-fil-A (UK) Limited acts as a “controller” under the GDPR. You can contact us by emailing FranchiseePrivacy@chick-fil-a.com.

2. EXPLANATION OF THE DIFFERENT LEGAL BASES WHICH WE MAY RELY ON TO PROCESS YOUR PERSONAL INFORMATION

We have to have a legal basis to process your data. We explain each of these legal bases below:

- Contractual necessity – sometimes we will need to process your personal information in order to perform a contract with you or to take steps at your request prior to entering into a contract with you.
- Legitimate interests – we can process your personal information when this is necessary for us to achieve a business purpose, or where this is necessary for someone else to achieve their purpose. We explain below what interests we, or others, are trying to achieve when we process your personal information relying on this legal basis. Where we process personal information on the basis of a legitimate interest, then – as required by the GDPR – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on you and other individuals and to determine whether individuals’ interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details above.
- Legal obligation – we have obligations to comply with legal and regulatory requirements under law in various jurisdictions in which our business operates. In certain cases, we have to use or disclose your personal information to meet these obligations.
- Consent – sometimes we ask for your consent to use your personal information.

The legal bases we rely on to process the personal information listed in Section 1 and the purposes of processing are as follows:

- Legitimate interests:
 - 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 protect the Company, Customers, and Franchisee Candidates' business interests and legal rights, property, equipment, and confidential information; to assess Franchisee Candidates candidacy (which may include carrying out additional background screening checks to verify/vet Franchisee Candidate); and to enforce the Company's policies.
 - 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 on our websites or mobile apps that impair existing intended functionality.
 - To undertake internal research for technological improvement, 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.
 - To perform business research and analytics.
 - To comply with legal requirements applicable to CFA outside of the EEA and UK.

- Contractual necessity:
 - 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 for expenses related to the selection process.

- Compliance with law:
 - To comply with applicable laws and regulatory requirements, including fraud prevention and tax-related obligations.

- Your consent:
 - To monitor the 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 via cookies or similar technologies, 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.

To the extent we process information about your criminal convictions and offences as part of the application process, the lawful basis we rely on is our legitimate interests. In addition, we rely on the processing condition at Schedule 1, Part 2, paragraph 10 of the Data Protection Act 2018 (preventing or detecting unlawful acts).

To the extent we process any special category information about you as part of the application process, we rely on the condition in Article 9 (2)(g) GDPR – necessary for substantial public interest and the additional condition in Schedule 1 Part 2, para 8 of the Data Protection Act 2018 (equality of opportunity or treatment).

3. WHERE WE TRANSFER YOUR PERSONAL INFORMATION

Due to the global nature of our business, your personal information may be transferred (including remotely

accessed) outside of the UK/EEA including, in particular, to the United States. Where these locations do not provide an adequate level of data protection, we ensure appropriate safeguards are in place to protect the transfer of your personal information to these countries. In the majority of cases, we will rely on lawful data transfer mechanisms. For example, CFA’s IntraGroup Data Transfer Agreement (“**IDTA**”) governs data sharing between CFA entities. This IDTA incorporates the Standard Contractual Clauses for the transfer of personal data to third countries pursuant to the GDPR, adopted by the European Commission under Commission Implementing Decision (EU) 2021/914 (“**EU SCCs**”) as supplemented by the International Data Transfer Addendum to the EU SCCs (“**UK Addendum**”).

. A copy of the relevant data transfer mechanism can be obtained for review on request by getting in touch with our contact details. Where we cannot rely on one of these transfer mechanisms to a country outside the EEA or UK, we rely on one of the derogations under the GDPR (e.g., consent).

4. WHAT RIGHTS DO YOU HAVE UNDER THE GDPR

You have the right to object to the processing of your personal information in certain circumstances, as described in more detail below. You also have the following rights:

Right	Summary
The right of access	Enables you to receive a copy of your personal information
The right to rectification	Enables you to correct any inaccurate or incomplete personal information we hold about you
The right to erasure	Enables you to ask us to delete your personal information in certain circumstances
The right to restrict processing	Enables you to ask us to restrict the processing of your personal information in certain circumstances
The right to object	Enables you to object to us processing your personal information on the basis of our legitimate interests (or those of a third party), including for profiling - your objection will be upheld, and we will cease processing your personal information, unless the processing is based on compelling legitimate grounds or is needed for the exercise or defence of legal claims that may be brought by or against us.
The right to data portability	Enables you in certain circumstances to request we transmit personal information that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible

These rights may be limited, for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

We do not carry out any solely automated decision-making processes with regard to the assessment of your application for a franchisee role.

Wherever we rely on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of these rights, please contact us at the contact details set out above.

If you have unresolved concerns, you have the right to complain to a data protection authority in the country that you reside in or, the country of your place of work or the country where the alleged infringement took place. In the UK, this will be the Information Commissioner’s Office (“**ICO**”), the contact details for which can be found here. For all other EU/ EEA jurisdictions, a full list of data protection authority contact details can be found [here](#).

5. WILL PROVISION OF YOUR PERSONAL INFORMATION BE MANDATORY?

Where we collect personal information to administer a contract with you or to comply with our legal obligations, this is mandatory and we will not be able to manage the application relationship without this information. In all other cases, provision of the requested personal information is optional, but this may affect your ability to participate in certain roles or systems, where the information is needed for those purposes.

6. USE OF YOUR PERSONAL INFORMATION FOR BACKGROUND CHECKS

Sometimes for confidentiality or other contractual purposes, certain background checks can only be carried out with your authorisation (e.g. to obtain qualifications from educational institutions, financial information from banks or from referees, to obtain criminal record checks). References to “authorisation” on any application/background check forms are typically for these purposes and are separate to and different from “consent” as a lawful basis under the GDPR. If your application is successful, we will provide further information about the checks involved and will obtain any necessary authorisations prior to completing such checks.

If you should have any query with respect to any results of such checks, you should contact us using the details above. If these searches result in the recording of any adverse information about you, you will be given the opportunity to make representations.

Where we use a background screening provider to carry out credit, identity and other background checks, we will share some of your personal information listed above with this provider who in turn will share this with relevant third parties to carry out such checks in connection with your Franchisee application. This includes sharing your personal information with credit reference agencies who may also give the information we share with them to other organisations who also want to check your credit status. When our provider asks the credit reference agencies about you or your business, the agencies will note it on your credit file. This is called a credit search and other lenders may see this and we may see credit searches from other lenders].

You can find out more about the credit reference agencies on their websites and how they process your personal data in the Credit Reference Agency Information Notice (CRAIN).

Here are links to the information notice for the Credit Reference Agencies we use

- Equifax
- [Experian](#)

Any one of the above agencies may be used for UK Franchisee Candidates. For non-UK Franchisee Candidates, we may not use these agencies. We may instead use other regional credit reference agencies. Please contact us at the contact details set out above, if you'd like more details on this.

D: CANADA

This section provides additional information regarding the collection, use, and disclosure of personal information from Franchisee Candidates in Canada. If you are located in Canada, please read the following additional information. In the event of a conflict between the following additional information and the main body of this Privacy Policy, the following additional information shall prevail.

1. WHAT RIGHTS YOU MAY HAVE UNDER CANADIAN PRIVACY LAW?

To the extent permitted by applicable law, you may have the following rights related to your personal information

under CFA's control:

- The right to access your personal information;
- The right to correct your personal information where it is inaccurate, incomplete, or outdated; and
- The right to withdraw consent to the collection, use, and disclosure of your personal information.

You may request to exercise your rights or ask us questions about this Privacy Policy by e-mailing our Global Privacy Officer at FranchiseePrivacy@chick-fil-a.com

2. WHERE WE MAY TRANSFER YOUR PERSONAL INFORMATION

We may transfer your personal information for the processing purposes described in this Privacy Policy to service providers who may be located in the following countries: United States