

Subway® Group

Prospective Employees Privacy Notice

Subway® Group, and its subsidiaries and affiliates (“Subway®”, “us” or “we”), understand that your privacy is important to you. This Prospective Employees Privacy Notice describes:

- What information we collect during our application and recruitment process;
- How and why we collect it;
- How we use and share that information; and
- How you can access and update that information.

This Privacy Notice only applies to the Personal Information of job applicants, potential candidates for employment, and our optional recruiting programs and events. It ***does not*** apply to Subway® restaurant applicants or employees, consumers, Franchisees, Development Agents and their employees, or other personal information Subway® collects for other purposes.

Subway® Group Defined

“Subway®” means the specific Subway® affiliates, subsidiaries, and contracted service providers who will collect, use and maintain your Personal Information in connection with your application for employment, our recruiting, talent management processes, and any hiring process if you are extended an offer of employment.

Prospective Employee Acknowledgements

By submitting your Personal Information to us, you acknowledge that:

- ✓ You have read and understood this Privacy Notice and agree to the use of your Personal Information as set out herein.
- ✓ Your Personal Information may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice.
- ✓ You are not required to provide any requested information to us, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.
- ✓ All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.
- ✓ This Privacy Notice does not form part of any contract of employment offered to candidates hired by Subway®.

Personal Information We Collect

As used in this Privacy Notice, “Personal Information” means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels (e.g., written application or via professional recruiting firms).

Personal Information collected may include, but is not limited to:

- Your Name
- Date of Birth
- Job Qualifications
- Personal Email
- Banking Information
- Employment History

- Physical Home Address
- Personal Phone Number(s)
- Government Issued Id (Passport, Driver's License #, SSN)
- Education
- Criminal Background
- Financial Statements
- Electronic Signature
- Physical limitations & Special Needs

There may be instances in which the Personal Information that you provide to us is considered “Sensitive Personal Information” under the privacy laws of some countries. Sensitive Personal Information is a subset of Personal Information that includes, but is not limited to:

- Racial or Ethnic Origin
- Philosophical Beliefs
- Nationality
- Trade Union Membership
- Sexual Orientation
- Political Opinion
- Health Information
- Citizenship
- Other Categories Allowed by Law

To the extent you make Sensitive Personal Information available to Subway®, you consent to Subway® processing such information in accordance with this Privacy Notice.

How We Collect Your Personal Information

Generally, we collect your personal information directly from you in circumstances where you provided information (e.g. during the application process). However, Subway® may need to obtain Personal Information about you from third parties in order to supplement, update or verify your information, and/or to process your application for consideration as a Subway® employee. Applicable law may require that you authorize a third party to share your Personal Information with the Subway® before we can acquire it. Failure to provide any requested information may negatively impact consideration of your employment application. By applying to become an employee of Subway®, you consent to our collection, use, and disclosure of your Personal Information in this manner.

Information Regarding Children

We do not intend for our employment services to be used by anyone under the age of 13. If you are a parent or guardian and believe we may have collected information about a child, please contact us as described in the “Contact Information” section, below.

How We Use Your Personal Information

We collect and use your Personal Information for legitimate human resources and business management reasons, including:

- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- provide applicant support and respond to and communicate with you about your requests, questions and comments;
- process Sensitive Personal Information, such as citizenship or nationality information or health information, when relevant for a position and permitted by law;
- establish and manage your Careers Sites account;
- obtain background check information where permitted by law;
- contact you regarding possible employment;
- operate, evaluate and improve our business;
- perform data analyses to improve our recruitment and hiring process;
- if you have a disability and would like Subway® to consider an accommodation;
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;

- ensuring compliance with legal requirements, including diversity and inclusion requirements and practices, and our policies;
- even if we do not employ you, we may nevertheless continue to retain and use your Personal Information in accordance with specific country requirements for system administration purposes, to consider you for potential future roles, and to perform research.

We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

All information, including Personal Information submitted by you as part of the application process, will become part of your employee file should you become an employee. Employees' Personal Information is governed by separate policies and not by this Prospective Employees Privacy Notice.

Sharing Your Personal Information

In general, access to your Personal Information will be restricted to minimize the number of people in Subway® Group who need it in order to evaluate your application for employment or perform functions supporting our recruiting and talent managing functions. To carry out its hiring and recruiting processes and programs, the affiliated entities within the Subway® may share your Personal Information amongst themselves.

We do not sell or otherwise share your Personal Information, except as described in this Privacy Notice. We may share the Personal Information we obtain with our affiliates for the purposes described in this Privacy Notice. We also share Personal Information with third parties who perform services on our behalf based on our instructions. These third parties are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

Subway® may be required to disclose certain Personal Information to other third parties (i) as required by law; (ii) to protect Subway®'s legal rights to the extent authorized or permitted by law; or (iii) in an emergency where the health or safety of a prospective employee or other individual may be endangered. In addition, we reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Cross-Border Transfers & Privacy Shield

Due to our global operations, prospective employee Personal Information may be transferred to and processed in the United States and other countries that may not be deemed to provide the same level of data protection as your home country. Subway® maintains and applies data protection standards regarding prospective employee Personal Information consistent with those specified in this Privacy Notice to its operations globally.

Additionally, Subway®'s Franchise World Headquarters and other U.S. affiliates comply with the EU-US and Swiss-US Privacy Shield Frameworks and adheres to the Privacy Shield Principles as set forth by the U.S. Department of Commerce ("DoC") and the Federal Trade Commission ("FTC") regarding the collection, use, and retention of personal information transferred from the European Union ("EU") and Switzerland to the United States, respectively. If there is any conflict between the terms in this Privacy Notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Program, and to view our certification page, visit <https://www.privacyshield.gov>.

In compliance with the EU-US and Swiss-US Privacy Shield Principles, Franchise World Headquarters and other U.S. affiliates commit to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Privacy Notice should first contact the Subway® Group’s Privacy Officer (*see* **Contact Information** below).

Franchise World Headquarters and other U.S. affiliates are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) with respect to the Privacy Shield. Under certain conditions, if your complaint is not satisfactorily resolved with us directly, you may submit Privacy Shield-related complaints to the attention of your DPA: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm, which will establish a panel to investigate and resolve complaints brought under the Privacy Shield. We will fully comply with the advice given by the DPAs and take necessary steps to remediate any non-compliance with the Privacy Shield Principles. Such independent dispute resolution mechanisms are available to EU and Swiss citizens free of charge. Additionally, you may have a right to invoke binding arbitration under the Privacy Shield.

Retention of Your Personal Information

Except as otherwise permitted or required by applicable law or regulatory requirements, Subway® endeavors to retain your Personal Information only for as long as it believes is necessary to fulfill the purposes for which your Personal Information was collected as outlined in this Privacy Notice. We may, instead of destroying or erasing your Personal Information, make it anonymous such that it cannot be associated with or tracked back to you.

Security

Although “guaranteed security” does not exist, we are committed to protecting the security of the personal information we collect about you, and we take reasonable physical, electronic, and administrative safeguards (including all steps required by law) to help protect your personal information from unauthorized or inappropriate access, use, loss or modification.

Accessing Your Personal Information

You may reasonably access your personal information by contacting the Subway® Group’s Privacy Officer with regard to the accuracy of your personal information.

Please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information we have about you.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous. In the event that we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Updating or Deleting Your Personal Information

We endeavor to ensure that personal information in our possession is accurate, current and complete. If you believe that the personal information about you is incorrect, incomplete or outdated, you may request the revision or correction of that information. We will use reasonable efforts to revise it and, if necessary,

to use reasonable efforts to inform agents, service providers or other third parties, which were provided with inaccurate information, so records in their possession may also be corrected or updated. However, we reserve the right not to change any personal information we consider accurate.

You may request that we delete the personal information about you that we hold. There are instances where applicable law or regulatory requirements allow or require us to refuse to delete this personal information. In the event we cannot delete your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Automated Decisions

Subway® generally does not make recruiting or hiring decisions based solely on automated decision-making within the meaning of the EU Data Protection Directive. In the event that Subway® relies solely on automated decision-making that could have a significant impact on you, we will provide you an opportunity to express your views and will provide any other safeguards required by law.

Inquiries, Complaints and Objections

You may withdraw consent to the processing of your Personal Information or submit inquiries, complaints and/or objections to the processing of your Personal Information by contacting the Subway® Group's Privacy Officer. We will try to find a reasonable way to address your concerns. However, we must process personal information where required by law. In other cases, if we cannot process your personal information, you may be denied employment.

If you believe that your personal information is not handled in accordance with applicable law or our Privacy Statement, you may submit a complaint to the Subway® Group's Privacy Officer. We will investigate the complaint.

Contact Information

This notice provides basic information about our processing of your personal information and your privacy rights. Should you have additional questions, you may contact the Subway® Group's Privacy Officer:

Subway® Group's 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: privacyofficer@subway.com

Changes to this Privacy Notice

We may change this Privacy Notice at any time. The effective date of each version of this Privacy Notice is identified below as the "Last Revised" date and will take effect immediately after being posted.

Last Revised: February 28, 2018