

MR. MEN & LITTLE MISS COLLECT & WIN

MR. MEN & LITTLE MISS COLLECT & WIN Privacy Statement

DATE: April 21, 2017

Subway Franchisee Advertising Fund Trust Ltd. (“SFAFT”) is the Sponsor (“SPONSOR”) of the **MR. MEN & LITTLE MISS COLLECT & WIN** (“Promotion”). Whereas SFAFT is the Sponsor of the Promotion, the Administrator (“Administrator”), Prize Logic, LLC, located at <http://www.prizelogic.com>, is administering the **MR. MEN & LITTLE MISS COLLECT & WIN**.

The Administrator, Sponsor, and third-party service providers value your privacy and want to give each participant the opportunity to know what Personal Information is collected about the participant, that each participant’s 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 **MR. MEN & LITTLE MISS COLLECT & WIN**.

In an effort to comply with the law and our commitment to protect your Personal Information, SFAFT encourages you to review the Privacy Policy of Administrator, Prize Logic, LLC, third-party service providers, Value Pay Services (“VPS”), and Customer Portfolios, LLC’s (“CP”), which discloses each individual companies full privacy practices and procedures. For your convenience, SFAFT, has provided, Prize Logic, LLC, VPS, and CP’s, Privacy Policy links below:

Prize Logic, LLC: <http://www.prizelogic.com/privacy-policy/>

VPS: <https://www.mysubwaycard.com/ContentManager/Controller.aspx?page=English/privacy/privacy>

CP: <http://www.customerportfolios.com/privacy-policy/#privacy>

The **MR. MEN & LITTLE MISS COLLECT & WIN** Privacy Statement does not govern the privacy practices and procedures of independently owned and operated SUBWAY® Restaurants. Nor does the **MR. MEN & LITTLE MISS COLLECT & WIN** Privacy Statement govern the Personal Information handling practices and procedures of its affiliates, the FAF Group, including but is not limited to: SFAFT. The FAF Group administers national and local advertising funds and activity for SUBWAY® restaurants and SUBWAY® franchisees worldwide. The SUBWAY® Group, an affiliate of the FAF Group, includes, but is not limited to: Franchise World Headquarters LLC (“FWH”) and Doctor’s Associates Inc. (“DAI”). FWH 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. DAI owns and licenses the SUBWAY® trademark and SUBWAY® Restaurant System in order to develop SUBWAY® restaurants worldwide to its affiliates within the SUBWAY® group. DAI is the franchisor licensed to sell SUBWAY® restaurants in the USA.

SFAFT encourages you to review its affiliates, FWH and DAI’s, respective Privacy Statements which disclose each company’s privacy practices and procedures. For your convenience, SFAFT has provided links to FWH and DAI’s individual Privacy Statements, as well as, the SUBWAY® Privacy Notice which includes the individual SUBWAY® Group franchisor Privacy Statements located at:

FWH: <http://www.subway.com/subwayroot/PrivacyPolicy-FWH.aspx>

DAI: <http://www.subway.com/subwayroot/PrivacyPolicy-DAI.aspx>

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's role in the **MR. MEN & LITTLE MISS COLLECT & WIN** is limited to promoting the **MR. MEN & LITTLE MISS COLLECT & WIN**. Prize Logic, LLC is an agency that assists other businesses in promoting its products and services, including operating contests, sweepstakes, and promotions. Specifically, SFAFT hired Prize Logic, LLC to administer the **MR. MEN & LITTLE MISS COLLECT & WIN**. Prize Logic, LLC's role is limited to drafting the rules of the **MR. MEN & LITTLE MISS COLLECT & WIN**, developing the **MR. MEN & LITTLE MISS COLLECT & WIN** website, and being the prize fulfiller for the **MR. MEN & LITTLE MISS COLLECT & WIN**. SFAFT's third party service provider, VPS, manages the SUBWAY® Card website where each Prize Winner of a SUBWAY® Card will register their SUBWAY® Card. SFAFT's third-party service provider CP, may send a participant opt-in information or materials specifically requested by a participant at the time of playing the **MR. MEN & LITTLE MISS COLLECT & WIN**. The **MR. MEN & LITTLE MISS COLLECT & WIN** gathers Personal Information from those individuals who choose to participate in the **MR. MEN & LITTLE MISS COLLECT & WIN** and may also gather anonymous data regarding the promotion itself. SFAFT, Prize Logic, LLC, VPS, and CP, take our privacy obligations both to our customers and participants who choose to participate in the "**MR. MEN & LITTLE MISS COLLECT & WIN**" very seriously and will take all reasonable steps to protect participants' Personal Information which may be in our control.

Purpose

This Privacy Statement outlines the treatment of Personal Information collected from participants *solely* in connection with the **MR. MEN & LITTLE MISS COLLECT & WIN**.

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 a participant. Upon entering your Personal Information for the **MR. MEN & LITTLE MISS COLLECT & WIN**, you may have the opportunity to *Opt-in (which requires a participant's 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), 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 a participant's 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 promotion 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 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, 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 **MR. MEN & LITTLE MISS COLLECT & WIN** 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 **MR. MEN & LITTLE MISS COLLECT & WIN** 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 **MR. MEN & LITTLE MISS COLLECT & WIN**.

Special Note about Children

The MR. MEN & LITTLE MISS COLLECT & WIN is not targeted towards children under the age of thirteen (13). We do understand that children may try to play the MR. MEN & LITTLE MISS COLLECT & WIN 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 promotion. If you still choose to play the MR. MEN & LITTLE MISS COLLECT & WIN, the Administrator and the Sponsor ask you not to play the game without getting permission from your parent(s) or guardian(s) first.

Children's privacy is very important to the Administrator and Sponsor. SFAFT, 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 Prize Logic, LLC's Privacy Officer immediately at: privacy@prizelogic.com, or SFAFT's Privacy Officer at: 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.

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.

Prize Logic, LLC's Security

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

SFAFT's Security

SFAFT 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, 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.

Prize Logic LLC's Storage, Retention, and Accuracy of Personal Information

Prize Logic, LLC 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.

Prize Logic, LLC may retain the Personal Information of all participants for up to 2 years subject to all applicable laws governing the use and retention of such Personal Information. Prize Logic, LLC will then destroy all Personal Information in its possession that was collected in connection with this promotion.

Prize Logic, LLC 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.

Prize Logic, LLC's Access, Control and Update Personal Information

You may contact Prize Logic, LLC'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 privacy@prizelogic.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'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 SFAFT's Privacy Officer at faprivacyofficer@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.

Prize Logic, LLC's Contact Information

If you have any questions or concerns, please contact:

Information Security Director
PrizeLogic, LLC
25200 Telegraph Rd, Suite 405
Southfield, MI 48033
Telephone : (480) 685-3573
Fax Number: (480) 270-3020
Email: privacy@prizelogic.com

SFAFT 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, 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: faprivacyofficer@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 and 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.***