



## PRIVACY POLICY

### APPLICABILITY

This Policy describes Miller's Famous Sandwiches online and offline information collection and use practices. This includes our websites and apps (both franchise & consumer). It applies to information we collect from you when you interact with us.

### CATEGORIES OF INFORMATION WE COLLECT

Listed below are details about the categories of information we collect:

Contact information. We collect your name and phone number. We also collect your street address and email address.

Payment information. We collect payment information when you make a purchase digitally or by physically calling one of our locations and providing this information to Miller's representatives. This might include credit card or debit number & related information such as zip code, security code and/or expiration date.

Demographic information. We collect your gender or age. We collect your zip code. If you complete a survey we may collect your ethnic background and the number and ages of children in your household. We may also collect your household income. We collect location information from website visitors and app users. This may include precise location information.

Biometric information. We may collect voice recordings and license plate information at certain drive-thrus.

Employment information. We collect name, email, social security number, birthdate, age, phone number, and address from job applicants and employees. We may also collect background check results and drug screening results. We may also collect bank account information.

Site usage information. We collect logs and session data when you visit our website or use our applications. We collect browser and operating system information. We collect what site you came from or what site you visit when you leave us. We collect your IP address. We also collect device identifiers.

## **BUSINESS PURPOSES FOR INFORMATION USE**

We use the categories of information for the business and commercial purposes outlined here:

We use information to respond to your requests. We use contact information to respond to you. We also use contact information to communicate with you about our policies and terms. We use employment information to process your application.

We use information for transactional communications. We use contact and payment information to process payments. We use contact information for order delivery. If you sign up, we use contact information to send you our newsletter. We use contact and demographic information for our loyalty programs. We use biometric information to recognize you.

We use information for marketing purposes. We use contact information to notify you about new products and special offers or new features. This may be by email or text. It may also be on social media platforms. This includes information about Miller's Famous Sandwiches and related brands. It also includes information we think you would find interesting. We use contact information to notify you if you win a promotion or sweepstakes.

We use information to improve our products and services. We use site usage information to make our website and products better. We use your contact, demographic, and site usage information to customize your experience with us. We use your demographic information for market research.

We use information to protect our company and constituents. We use contact, demographic, and site usage information to protect our company and customers. We use this same information to identify fraud and secure our systems. This includes measures to detect potential fraudulent credit card purchases. We use all categories of information for other purposes as permitted by law.

## **HOW WE COLLECT INFORMATION**

We collect categories of information in the following ways:

We collect information directly from you. We collect your contact, demographic, payment, and biometric information from you. This could be in person. It could also be on our website, over the phone or one of our apps.

We collect information passively. We use tracking tools to collect site usage and demographic information. Tracking tools include browser cookies and web beacons. We do this on our websites and in emails that we send to you. We collect information about users

over time when you use our websites or apps. We have third parties collect personal information this way.

We collect information about you from third parties. We collect contact, demographic, and site usage information from our business partners. Social media platforms give us information about you. We purchase demographic information from third parties. We may collect information about you from other third parties & related companies.

## **WE COMBINE INFORMATION**

We combine information collected in-person with that we receive online. We may also combine information we get from a third party with information we already have. We also combine information we have with information we get from our related brands.

## **WHEN WE SHARE INFORMATION WITH OTHERS**

We share categories of information as described here:

We share information with related companies. We share information with our affiliates and subsidiaries. It also includes our parent company and other related entities. This includes new brands bought by our parent entity. We will share information with future related companies. Information we share includes contact and payment information. It also includes demographic, biometric, and site usage information.

We share information with vendors who perform services on our behalf. We share contact, demographic, payment, site usage and biometric information.

We share information if we think we have to in order to comply with the law or to protect ourselves. We share information we collect about you to respond to a court order or

subpoena. We share information in response to a government agency or investigatory body request. We share information we collect when we investigate potential fraud.

We share information in connection with a business transfer or transaction. If all or part of our business is or was sold, we may share your information as part of that transaction. If there is a merger or acquisition, we may also share your information. If there is a financing or bankruptcy, we may share your information. Parties we share information with include lenders, auditors, and advisors.

We share information as permitted by law and for other reasons we may describe to you.

## **YOU HAVE CERTAIN CHOICES**

We provide you with options on how we use your information, as described here:

You can opt out of receiving our marketing emails. To stop receiving our promotional emails, follow the “unsubscribe” instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions, confirmation of orders placed or other necessary information about your account.

You can control cookies and tracking tools. To learn how to manage how we and our vendors use cookies and other tracking tools, and to read our Do Not Track Policy at the end of this privacy policy.

California disclosures and residents’ rights. (1) Rights. If you reside in California, and are not a job applicant, employee or employee of another company interacting with us in your job role, you have the right to ask us what information we collect and use. You also have the right to ask what information we disclose and sell. You also have the right to request that we

delete information we have collected from you. To exercise your rights contact us at [844.672.3726](tel:844.672.3726). We will verify your request by using the information you provide to us when you submit a request and matching it with information we already have about you. We will not discriminate against you because you have exercised any of your rights under the California Consumer Privacy Act. You can designate an agent to make a request by having them execute a notarized power of attorney to act on your behalf. (2) Sales of information. Under California law we are required to tell you if we “sell” information as that term is defined by applicable law. While we are not in the business of selling personal information, we may sometimes share California residents’ contact, payment, demographic, biometric, and site usage information. It is possible that this may be considered a “sale” as that term is defined under California law. We do not have actual knowledge that we sell personal information of California minors under the age of 16. California residents have the right to opt out of the sale of their personal information by contacting us at [844.672.3726](tel:844.672.3726). To stop receiving marketing communications, review the section above. To manage your preferences for advertising, cookies and other tools, read our Ad and Cookie policy below.

Nevada residents rights. We also have disclosure obligations in Nevada. We do not exchange Nevada residents’ personal information for money with anyone so they may license or sell the personal information to additional parties. Nevada residents may opt out of the future sale of their information to a third party so that they may license or sell information by emailing us at [hello@millersfamous.com](mailto:hello@millersfamous.com). You may contact us with questions or requests regarding the sale of your information as described below.

## **WE USE REASONABLE SECURITY MEASURES**

The Internet is not 100% secure. We cannot promise that your use of our sites or apps will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

## **WE STORE INFORMATION IN THE UNITED STATES**

If you live outside of the United States, you understand and agree that we may transfer your information to the United States. This site is subject to U.S. laws, which may not afford the same level of protection as those in your country.

### **THIRD PARTY SITES AND LINKS**

If you click on a link to a third party site, you will be taken to websites we do not control. This includes our pages on social media sites. This policy does not apply to the privacy practices of these websites. Read the privacy policy of other websites carefully. We are not responsible for these third party practices.

### **INFORMATION COLLECTION FROM CHILDREN**

Our sites and apps are meant for adults. We do not knowingly collect personally identifiable information from children under 13 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 13 has given us information, you can email us. You can also write to us at the address listed at the end of this policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line here [Children's Privacy Online](#).

### **CONTACT US**

If you have questions about this Policy, you can write to us at: Miller's Famous Sandwiches 2345 Pawtucket Avenue, East Providence, RI, 02914. You can email us at [hello@millersfamous.com](mailto:hello@millersfamous.com). You can call us at [844.672.3726](tel:844.672.3726).

### **POLICY UPDATES**

We may make changes or updates to this Policy. We will notify you of any material changes to this Policy as required by law. All changes will also be posted on our website. Please check our site periodically for updates.

## AD & COOKIE POLICY

This Policy was last updated on December 31, 2022.

### We Use Tracking Tools

We collect personal information about users over time and across different websites when you use this website, app or service. We also have third parties that collect personal information this way. To do this, we use several common tracking tools. These may include browser cookies. We may also use web beacons, flash cookies, and similar technologies. To learn more about what tracking tools are and how they work visit [here](#).

Our vendors or third parties may place and use these tools on our sites or apps. In this policy “we” and “us” refers to Miller's Famous Sandwiches and our brands and affiliates. It also includes our vendors and third parties who place tools on our sites or apps.

### Why We Use Tracking Tools

We use tracking tools for many reasons, including to engage in interest-based advertising. Interest-based advertising or “online behavioral advertising” is serving advertising content to you based on information gathered from you over time across multiple sites or other platforms. It includes serving ads to you after you leave our website, encouraging you to return. It also includes serving ads we think are relevant based on your browsing habits or online activities. These ads might be served on websites or on apps. They might also be served in emails. We might serve these ads, or third parties may serve ads. They might be about our products or other companies’ products.

We may also use tracking tools:

1. To recognize new or past website visitors.
2. To improve our website and to better understand your visits on our platforms.
3. To integrate with third party social media websites.
4. To observe your behaviors and browsing activities over time across multiple websites or other platforms.
5. To better understand the interests of our customers and our website visitors.

### How We Gather Information For Interest-Based Advertising

We use information you make available to us when you interact with us, our affiliates, and other third parties to decide what content is relevant to you. We gather this information using the tracking tools described above. For example, we or our partners might look at your purchases or browsing behaviors. We or our partners might also look



at your location. We might look at these activities on our platforms or the platforms of others.

We work with third parties who help gather this information. These third parties might link your name or email address to other information they collect. That might include past purchases made offline or online. Or, it might include online usage information.

### How To Control Certain Tracking Tools

Your browser may give you the ability to control cookies. How you do so depends on the type of cookie. You can set your browser to reject cookies. To find out more about how to control cookies from your web browser, please visit [here](#).

### Online Tracking

To control flash cookies, which we may use, you can go [here](#). Why? Because flash cookies cannot be controlled through your browser settings.

**Our Do Not Track Policy: Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform.** We do not currently respond to those signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.

***Choices you make are both browser and device specific.***

### How To Control Interest-Based Advertising

The Self-Regulatory Program for Online Behavioral Advertising program provides consumers with the ability to opt-out of having their online behavior recorded and used for advertising purposes. To opt out of having your online behavior collected for advertising purposes, click [here](#).

The Digital Advertising Alliance also offers a tool for opting out of the collection of cross-app data on a mobile device for interest-based advertising. To exercise choice for companies participating in this tool, download the AppChoices app [here](#).

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