



Lenny's Franchise Systems, LLC

Privacy Statement

February 2019

Safeguarding your privacy and the security of your personal information is important to us. Please take a few minutes to read the following statement so that you understand how we treat your personal information.

This Privacy Statement ("Statement") applies to the website located at lennys.com, lennysfranchise.com, Lennys Grill & Subs® mobile app, and any other websites or applications associated with the Lennys brand or products that direct the viewer or user to this Statement. In this Statement, the terms "Lennys," "we," and "us" refers to Lenny's Franchise Systems, LLC, and its respective subsidiaries and affiliated companies. The term "your device" refers to any computer, tablet, smart phone or other device you are using to access our websites or to operate the Lennys mobile app. Websites that are owned and operated by Lennys may contain links to websites that are owned and operated by other companies and this Statement does not apply to any websites and/or services that are owned and operated by third parties. If you have questions about our privacy statement, please contact us at info@lennys.com.

Information We Collect:

We collect information from you when you use our website, register on our website, our mobile app, or when you submit an inquiry. When registering on our website or mobile app, as appropriate, you may be asked to enter your: first and last name, username, password, email address, postal address, phone number, financial account information such as a credit card number, birthday, and any other information you give us. Therefore, if you do not want us to obtain any information about you, please do not submit it to us.

As you use our website and mobile app or visit a Lennys Grill & Subs location, we collect information about you and the services you use. The information we collect falls into three different categories: (1) information you give us; (2) information we collect from you automatically; and (3) information we collect from other sources. Some examples of when we collect this information include when you browse or make a purchase on one of our websites; create a Lennys VIP Rewards account; use our website or mobile app to purchase, use the order and pay functionality in our mobile app; or participate in a survey or promotion.

Information Collected Automatically:

Some information is collected automatically, including when you access our websites, download and use the Lennys Grill & Subs® mobile app or otherwise use our services or install our applications. This information includes:

- **Purchase Information & Transaction History** – We may collect information about your transactions in our stores, on our website or via our Lennys Grill & Subs® mobile app including what products you purchase, how frequently you purchase them, or any rewards or promotions associated with a purchase.
- **Device and Usage Information** – We may collect information about your browser or device. This information may include the type of device you are using, your operating system, your browser, your internet service provider, your domain name, your

internet protocol (IP) address, your device and mobile ad identifiers, if applicable, the website that referred you to our website, the web pages you view (including the date and time you viewed them), the services or functionality you access or use (including the date and time of your access or use), and the subject of the ads you click or scroll over. To collect this information, we use cookies and other similar technologies.

- **Location Information** –We may collect information about the location of your device, including GPS location, for purposes of enhancing or facilitating our services, such as enabling the functionality of our website or mobile app that provide you with information about locations near you, enabling you to place orders and pay for our products. We may also use information about the location of the device you are using to help us understand how our website, mobile app, and other services and functionality are being utilized and to deliver more relevant advertising.

Information We Collect from Other Sources:

Some information we collect is publicly available. For example, we may collect information you submit to a blog, a chat room, or a social network like Facebook. We may also collect information about you from other companies and organizations. By gathering additional information about you, we can correct inaccurate information, enhance the security of your transactions, and give you product recommendations and special offers that are more likely to interest you.

What Do We Use Your Information For?

Any of the information we collect from you may be used in one of the following ways:

- process your purchases of or requests for products and services;
- communicate with you about orders, purchases, services, accounts, programs, and contests;
- respond to your guest service inquiries and/or requests for information;
- post your comments or statements on our website;
- send you personalized promotions and special offers;
- inform you about products, events, or other promotional purposes;
- maintain, improve, and analyze our website, mobile app, ads, and the products and services we offer;
- detect, prevent, or investigate security breaches or fraud;
- maintain appropriate records for internal administrative purposes;
- facilitate the functionality of our website and mobile app;
- provide important product safety information and notice of product recalls.
- Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

Do We Provide Information to Outside Parties?

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.

We may provide your information in the following circumstances:

We may share information between and among Lenny's Franchise Systems, LLC, its subsidiaries, and affiliated companies for purposes of management and analysis, decision making, and other business purposes. For example, we may share your information with our subsidiaries and affiliated companies to administer our loyalty program, process orders and requests, and expand and promote our product offerings.

Service Providers - We may share your information with service providers that provide us with support services, such as credit card processing, website hosting, email and postal delivery, location mapping, analytics services, or conducting academic research.

Lawful Interests – We may disclose your information in connection with legal requirements, such as in response to an authorized subpoena, court order, warrant, or as otherwise permitted by law. We may also disclose your information if we believe that the disclosure is necessary to enforce our agreements or policies, or if we believe that the disclosure will help us protect the rights, property, or safety of Lennys or our guests or partners.

Marketing Promotions - We may share your information with marketing service providers to assess, develop and provide you with promotions and special offers that may interest you, administer contests, events, or for other promotional purposes.

When You Give Consent – We may share information about you with other companies if you give us permission or direct us to share the information.

When the Information Does Not Identify You – We may share your information in a way that does not directly identify you. For example, we may share information about your use of our websites and mobile app in a manner that does not identify you or may combine information about the nature or frequency of your transactions with similar information about other people and share the aggregated information for statistical analysis and other business purposes.

Third Party Links:

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Cookies:

Cookies are small data files that are sent from a website's server and are stored on your device's hard drive either for only the duration of your visit ("session cookies") or for a fixed period ("persistent cookies"). Cookies contain information that can later be read by a web server.

We use cookies to help us remember and process the items in your shopping cart, understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

How Do We Protect Your Information?

We implement a variety of security measures to maintain the safety of your personal information when you submit personal information.

We offer the use of a secure server. All supplied sensitive information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential.

Childrens Online Privacy Protection Act Compliance:

We are in compliance with the requirements of COPPA (Childrens Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

Online Privacy Statement Only:

This online Privacy Statement applies only to information collected through our website and not to information collected offline.

Your Consent:

By using our site, you consent to our Privacy Statement.

Changes to Our Privacy Statement:

If we decide to change our Privacy Statement, we will post those changes on this page.

Contacting Us:

If there are any questions regarding this Privacy Statement you may contact us using the information below.