

PRIVACY POLICY

Effective Date: March 8, 2024

Last Updated: March 8, 2024

SSP America, Inc. (“SSP,” “we,” “our,” or “us”) and its subsidiaries provides this privacy policy to describe how we collect, use, and share personal information. This privacy policy applies to the restaurant brands, franchises and locations that we own and/or operate in airport locations. Please see the “*Canada*” section below for additional information that applies to our practices in Canada.

Information we may collect

We may collect and process the following data about you:

- Information that you voluntarily provide by interacting with our websites, mobile applications, or other digital assets linking to this policy (our “Sites”). This information may include your name, contact information and any other information you choose to provide. For example, we collect this information when you make purchases, subscribe to services we offer, or request further information or services. We may also ask you for information when you complete a survey, enter a competition or promotion and when you report a problem with our Sites.
- Records of your correspondence with us.
- Details of your visits to our Sites and locations including, but not limited to, transaction data and payment information, traffic data, location data, weblogs and other communication data and details of the resources that you access.

We may combine information from other sources with information you give to us and information we collect about you.

We (and other entities) may collect information relating to your interactions with us and our Sites, including, where available, your IP address, operating system and browser type via cookies and similar technology. See the “[Cookies](#)” and “[Digital Advertising & Analytics](#)” sections of this privacy policy to learn more about the use of this information and the choices available to you.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our Sites. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#).

Uses made of the information

We use information about you in the following ways:

- To operate, personalize, and improve the Site, including for diagnostic, debugging, and analytics purposes, and to ensure that content from our Sites is presented in the most effective manner for you and for your device.
- To operate and improve our products and services, including market research and product development.
- To provide you with information, updates, promotions, marketing materials, products or services that you request from us or which we feel may interest you.
- To advertise and market our products and services, as well as products and services of third parties we think may interest you.
- To process payments.
- To carry out our obligations arising from any contracts entered into between you and us.
- To respond to your inquiries or otherwise contact you.
- To notify you about changes to our services.
- To use for our internal business purposes.
- To evaluate or conduct a corporate transaction.
- To protect against fraudulent or illegal activity and to maintain the security of the Site.
 - To comply with the law and to maintain the security of our Site.
 - With your consent, or as otherwise disclosed at the time information is collected.

Disclosure of information

We may disclose information we collect to other parties, including the following:

- With third parties for advertising and marketing purposes, including to provide you with information about goods and services which may be of interest to you.
- With third-party service providers that process information on our behalf, such as auditors, payment processors, online ordering platforms, data analytics providers and advertising networks.
- Any member of our corporate group, which includes our corporate parents, affiliates, and subsidiaries.
- In the event of a proposed or completed corporate sale, merger, acquisition or other transfer of all or part of our assets, including as part of a bankruptcy proceeding.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers,

suppliers, landlords, brand licensors, or other third parties. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

- With your consent or as otherwise disclosed at the time of data collection or sharing.

We may share information that has been de-identified or aggregated to the extent permitted by applicable law.

Digital Advertising & Analytics

We may partner with ad networks and other ad serving providers (“**Advertising Providers**”) that serve ads on behalf of us and others on non-affiliated platforms. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information Advertising Providers collect about your use of the Sites and other websites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

You may visit the DAA Webchoices tool at www.aboutads.info/choices to learn more about this type of advertising and how to opt out of this advertising on this browser by companies participating in the DAA self-regulatory program. You can also exercise choices regarding interest-based advertising on your mobile device by downloading the appropriate version of the DAA’s AppChoices tool at <https://youradchoices.com/appchoices>. In Canada, you can visit the DAAC opt-out tools available at <https://youradchoices.ca/en/tools>.

If you delete your cookies, use a different browser or mobile device, or reset your identifiers, you may need to renew your opt-out choices. Note that electing to opt out will not stop advertising from appearing in your browser or applications. It may make the ads you see less relevant to your interests.

We may also work with third parties that collect data about your use of the Sites and other websites or apps over time for non-advertising purposes. SSP uses Google Analytics and other third-party services to improve the performance of the Site and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Site, visit www.google.com/policies/privacy/partners, and to opt out of Google Analytics, visit tools.google.com/dlpage/gaoptout.

Additionally, your browser may offer tools to limit the use of cookies or to delete cookies; however, if you use these tools, our Site may not function as intended.

U.S. State Privacy Rights

California, Colorado, Connecticut, Utah, and Virginia residents have certain rights under state privacy laws with respect to personal information we collect. If you are a resident of such states, this section of the Privacy Policy contains disclosures required by law and explains rights that may be available to you. In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

Personal Information We Collect and Disclose. In the preceding 12 months, SSP or service providers operating on SSP's behalf collected and disclosed the following categories of personal information:

- Personal and online identifiers (such as first and last name, email address, or unique online identifiers);
- Recordkeeping information (such as credit card number, debit card number or any other financial information);
- Commercial or transactions information (such as records of personal property or products or services purchased, obtained, or considered);
- Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement);
- Sensory information (such as call recordings or other audio, electronic, visual, thermal, olfactory, or other similar information);
- Inferences drawn from the above information about your predicted characteristics and preferences; and
- Other information about you that is linked to the personal information above.

Categories of Sources. We collect personal information from the following categories of sources:

- You;
- Our affiliates and joint venture partners;
- Our business partners;
- Our service providers; and
- Advertising companies and networks.

Our Purposes for Processing Personal Information. We use and disclose the personal information we collect for our commercial and business purposes, as further described above in the ["Uses made of the information"](#) section of this Privacy Policy.

We may use and share aggregated and deidentified information to the extent permitted by applicable law. When we use deidentified information, we maintain and use the information in

deidentified form and do not attempt to reidentify it, except to check whether our deidentification processes satisfy the requirements of applicable law.

Additionally, we do not knowingly sell or share personal information of individuals under 16.

Recipients of Personal Information. We disclose the categories of personal information designated above to the categories of third parties listed above in the “Disclosure of information” section of this Privacy Policy for commercial and business purposes.

Data Retention. We will retain each category of personal information we collect in accordance with applicable laws and as reasonably necessary for our processing purposes set out under this Privacy Policy. When it is no longer necessary to process personal information for these purposes, we will deidentify, aggregate, or delete this data to the extent possible.

Your Rights. Residents of certain states have rights with respect to the personal information collected by SSP. You may be able exercise the following rights regarding personal information, subject to certain exceptions and limitations:

- The **right to confirm** whether we are processing personal information about you.
- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you; the categories of sources from which we collected personal information about you; our purposes for collecting or selling personal information about you; the categories of personal information about you that we have sold or disclosed for a business purpose; and the categories of third parties with which we have shared personal information.
- Depending on your state, the **right to receive a portable and readily usable copy** of the personal information we have collected about you, to the extent feasible.
- The **right to correct inaccuracies** in the personal information we have collected about you.
- The **right to request that we delete** the personal information we have collected about you.
- The **right to opt out** of (i) the sharing of personal information for targeted advertising; (ii) the sale of personal information; or (iii) profiling for decisions that have significant effects. Please note that if you opt out of certain practices, we may be unable to provide you with some services.
- **Choice regarding sensitive information.** Depending on your state, you can
 - **Limit** our processing of certain “sensitive” personal information;

- **Opt out** of our processing of certain “sensitive” information; or
- **Withdraw consent** for such processing if you previously gave it.
- The **right not to receive discriminatory treatment** for the exercise of the above privacy rights.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

- Online at “Your Privacy Choices.”
- By phone at 1.833.777.2747

Additionally, if your state law allows, if you have submitted a request that we have not reasonably fulfilled, you may contact us to appeal our decision by contacting us [as set forth below](#) and indicating in the subject line of your message as that you are seeking an “Appeal.”

Verification Process and Required Information: Note that we may need to request additional information from you to verify your identity or understand the scope of your request. You will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, basic contact information, such as your name and email address, and may request other information within our records that would allow us to verify your identity, such as receipts of payment or loyalty card numbers.

Authorized Agent: Depending on your state of residence, you may also designate an authorized agent to make requests on your behalf by designating such an agent in writing or through a power of attorney. We will require the agent to provide us with proof that you have authorized the agent to make requests on your behalf prior to accepting requests from the agent.

Canada

This section provides additional information about how we collect, use and disclose personal information about our consumers, passengers, website visitors and other individuals in Canada.

Please note that SSP America, Inc. operates our Sites, including <https://america.foodtravelexperts.com>. The restaurants that we own and/or operate in airport locations are operated by SSP Canada Food Services Inc. or one of our local subsidiaries. This Privacy Policy describes the practices of SSP America, Inc., SSP Canada Food Services Inc. or our local subsidiaries, as applicable. If you are a job applicant, please click [here](#) for our SSP America – Candidate Privacy Notice.

Information we may collect, and how we collect it

- In addition to information we collect when you visit our Sites, when you make a purchase at one of our restaurants or kiosks, we collect your name and payment card information from you in order to process your payment. We may also collect an email address or mobile phone number to send you an e-receipt, if you request.
- When you visit our Sites, we do not collect precise location data without your consent.
- We will not send you marketing communications unless you provide your consent. You can withdraw your consent any time.
- When you visit our restaurant locations, we collect video footage using closed-circuit television (CCTV) technology for loss prevention and security purposes.

Your rights

Subject to limited exceptions under applicable law, you have the right to access, update, rectify and correct inaccuracies in your personal information in our custody or control. You may also withdraw your consent to our use and disclosure of personal information. Depending on your province, you may also have additional rights such as the right to request that we cease disseminating or de-index (or re-index) your personal information, if applicable.

You may request access, updating, rectification and corrections of inaccuracies in your personal information in our custody or control or withdraw your consent by contacting our Privacy Manager at the contact information set out below or click [here](#) for our Privacy Choices form. We may request certain personal information for the purpose of verifying the identity of the individual seeking access to his or her personal information records.

Your personal information will be transferred to or processed outside of Canada or your province by us and our service providers. We and our Canadian, US and other foreign service providers may provide your personal information in response to a search warrant to other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise may be required or permitted by applicable Canadian, U.S. or other law or legal process, which may include lawful access by US or foreign courts, law enforcement or other government authorities. For information about our use of service providers outside of your jurisdiction, please contact us as set out below.

Data Governance Policies and Procedures

We are committed to protecting personal information and have implemented policies and practices that govern our treatment of personal information. These policies and procedures include:

- a privacy framework that defines the roles and responsibilities for our employees and personnel with respect to the treatment of personal information throughout the lifecycle of the information,
- processes to handle data subject requests and complaints concerning the handling of personal information, and
- a framework governing the retention and destruction of personal information in accordance with our legal obligations.

If you have questions about our personal information practices, including our use of service providers outside of your province or Canada, please contact our Privacy Manager at privacySSP@foodtravelexperts.com.

Your Choices

Email Marketing Opt-Out

You have the right to ask us to opt out of our email marketing. You can exercise your right to opt out by using the link provided at the bottom of each marketing message. You can also exercise the right at any time by contacting us [here](#). If you opt out of our email marketing, we will still send you messages related to our transactions and relationship with you, such as order confirmations.

For choices with respect to third-party interest-based advertising activities, please see the “Digital Advertising & Analytics” section above.

Third-Party Links and Tools

Our Sites may, from time to time, contain links to and from the websites or apps of our partner networks, advertisers, affiliates or other third parties. If you follow a link to any of these websites, please note that these websites or apps have their own privacy policies that cover their respective privacy practices and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The Site also includes integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share personal information or you otherwise interact with these features on the Site, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Contact

Questions, comments and requests regarding this privacy policy are welcomed; please contact us as follows.

- For consumers, passengers, and website visitors, you may contact us our Privacy Manager at privacySSP@foodtravelexperts.com.

- For job applicants, our Candidate Privacy Notice is [here](#), and you may contact us as set out in that policy.