

## **AMERICAN DAIRY QUEEN CORPORATION FAN FEEDBACK WEBSITE PRIVACY STATEMENT**

This privacy statement describes how American Dairy Queen Corporation ("we" or "us") as "Data Controller" collects, uses, shares, and otherwise processes individually identifiable information ("**Personal Information**" or "**Personal Data**") on the *DQ@* fan feedback website for the following countries (the "**Feedback Websites**"):

- Indonesia
- Philippines

### **Collection of Personal Data**

When you engage with the Feedback Website, the following types of "Personal Data" are collected directly from you and the devices you use to access the Feedback Website:

- Contact information, including name, email address and phone number;
- Data related to your use of the Feedback Website, such as IP address and domain, cookie information, software and hardware attributes, and geolocation information through your device's location settings. When you take surveys online, we collect multiple unique attributes about your device for purposes of detecting and preventing fraud; and
- Data you provide us via feedback submissions.

### **Use of Personal Data**

We use Personal Data for the following purposes:

- To facilitate your participation in surveys;
- To follow-up with you regarding your survey participation;
- For certain internal purposes, including:
  - To help us improve our products and services;
  - To protect the security and effective functioning of our information technology systems;
  - To detect and prevent fraud;
  - To address our compliance and legal obligations and exercise our legal rights; and
  - For statistical purposes.

We have a legitimate interest in receiving, and acting upon, your feedback or issues.

In addition, we may use your Personal Data for the following secondary purposes of:

- Marketing and advertising; and
- Commercial prospecting.

We have a legitimate interest in sharing information about our products or services. For the secondary purposes established in the previous paragraph, you may have the right to object to the processing by sending an email to [privacy@idq.com](mailto:privacy@idq.com).

### **Sharing of Personal Data**

We share Personal Data with the following recipients:

- **Franchisees:** We share Personal Data with the franchisee store or stores about which your survey response relates (as identified by the code provided to you to complete the survey) so that

they can address any issues raised, generally receive your feedback, and potentially follow-up with you.

- **Service providers:** We share Personal Data with service providers to perform functions on our behalf, including hosting and administering the surveys and performing related tasks. We require service providers to provide reasonable and appropriate security for Personal Data and to use and process such Personal Data only on our behalf. In particular, the Feedback Website is hosted and administered by our third party service provider, Service Management Group, LLC ("SMG"). Further information regarding SMG's privacy practices in its role as a service provider is provided [here](#).

## **Cookies and Web Beacons**

When you browse our Feedback Website, cookies, web beacons, and similar tracking technologies ("**cookies**") collect certain information. Such information is collected through your use of and interaction with our Feedback Website, and includes IP address, operating system, browser type, mobile device, and the path you take within the Feedback Website.

Such information is used only for statistical purposes regarding the time spent on our Feedback Website as well as the third party sites that brought you to our Feedback Website.

Cookies can be disabled in all browsers. To learn more about cookies or determine the procedure for your specific browser, you can consult <http://allaboutcookies.org/es/>.

Disabling or blocking cookies may block certain features on our Feedback Website.

## **Your Privacy Rights**

### **Philippines**

Under the terms of Information Privacy Act of 2012 or Republic Act No. 10173 (the "Act"), you may have certain rights regarding the Personal Data we collect. Specifically, you have the right to be informed whether Personal Data is being processed; object to the processing of Personal Data; request reasonable access to your Personal Data; dispute the inaccuracy or error in Personal Data and have us correct the same; suspend, withdraw or order the blocking, removal or destruction of Personal Data from our filing system; and be indemnified for any damages sustained due to any inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of Personal Data. However, it is important to note that your request will not always be effective, as we may be required by law to continue the processing of your Personal Data. If you would like to inquire about exercising your rights with respect to your Personal Data, please send an e-mail to [privacy@idq.com](mailto:privacy@idq.com). If you are not satisfied with our response, you may have the right to lodge a complaint with the National Privacy Commission.

### **Indonesia**

You may have certain rights regarding the Personal Data we collect. Specifically, you may have the right to access the Personal Data we have collected about you or request deletion of the Personal Data. You may also have the right to restrict or object to our use of your Personal Data. You may also withdraw the consent you have given to us. However, it is important to note that your request will not always be effective, as we may be required by law to continue the processing of your Personal Data. If you would like to inquire about exercising your rights with respect to your Personal Data, please send an e-mail to [privacy@idq.com](mailto:privacy@idq.com).

## **Overseas Transfer**

We may transfer your personal information outside your country to our affiliates and our external service providers (such as our information technology providers) as part of our normal business operations to provide our services. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible we take steps to

treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your personal information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to information when it goes to another jurisdiction you can contact us using the contact information below.

### **Information Retention**

Your Personal Data that is collected, used or disclosed in connection with the Feedback Website will be stored only to the extent necessary for the period necessary to achieve the objectives of the Feedback Website, and to fulfill any obligations regarding information retention as required by applicable law. Following the expiration of an applicable retention period, we will delete your Personal Data from our systems and records, or de-identify, aggregate or anonymize your Personal Data.

### **Changes to this Privacy Statement**

We may update this privacy statement from time to time as our services and privacy practices change, or as required by law. The date this privacy statement was last updated is posted below, and we encourage you to visit this privacy statement periodically to stay informed about our privacy practices. We will post the updated version of the privacy statement on the Feedback Website and ask for your consent to the changes if legally required.

### **Contact Us**

If you have questions or comments regarding this privacy statement or our privacy practices, please contact our privacy compliance officer at: [privacy@idq.com](mailto:privacy@idq.com)

Last updated: February 4, 2022