

Privacy Policy

Last Revised: July 8, 2022

This privacy policy (“Privacy Policy”) discusses how Galardi Group Franchise & Leasing, LLC (“Company,” “we,” “our”, or “us”) collects, uses and shares the personal information of users of the websites located at www.wienerschnitzel.com and www.wienerschnitzelfranchise.com, and/or other related online services (collectively, the “Site”). There is no need to register on our website to participate in the majority of activities. By registering for, downloading, using, or accessing any part of the Site, you freely consent to the information collection and use practices described herein and accept and agree to this Privacy Policy, whether or not you are a registered user or have an account. You should not use the Site if you don’t agree with this Privacy Policy or any other agreement that governs your use of the Site.

1. Information We Collect and How We Collect It

We get information about you in a range of ways.

a. Information You Give UsWe may collect and store personal information about you in connection with your access and use of the Site, including any personal information you transmit to or through the Site in connection with registering for the Site, joining the Wiener Lovers’ Club, joining a contest or participating in a promotion, requesting information from us and/or submitting a comment or complaint, requesting a voucher, purchasing food or merchandise, or requesting franchise information. If you choose to register for the Site, join the Wiener Lovers’ Club, join a contest or participate in a promotion, request information from us and/or submit a comment or complaint, or request a voucher, we will collect personal information such as your full name, email address, telephone number, birth date, physical address, and zip code in order to process your requests. We may also collect your IP address and geolocation data that may be used for promotional campaigns. If you purchase food and merchandise through the Site, we will also collect typical financial information such as account or credit card information in addition to the other personal information described above. If you request franchise information through the Site, we will collect personal information such as your full name, physical address, zip code, email address, phone numbers, date of birth, driver’s license number, financial status, and other information used to analyze your potential qualifications to obtain a franchise.

b. Information We Get From OthersWe may also get personal information about you that is of the same type as described above in the “Information You Give Us” section from other sources such as third-party service providers, franchise coordinators, partner sites, business partners, and social media platforms. We may add this to information we get from the Site.

c. Information Automatically CollectedWe may automatically log information about you and your computer. For example, when visiting our Sites, we may log your geolocation data and internet or other electronic network activity information such as IP addresses, computer operating system type, browser type, browser history, browser language, links clicked, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site. The above-described personal information is required to provide the Site and our products and/or services to you. If you do not provide the personal information we ask for, it may delay or prevent us from providing products and/or services to you or some of the features and functionality of the Site.

2. How We Use Information We Collect

We use your personal information as follows:

- We use your personal information to provide, operate, maintain, and improve our products and services and the Site.
- We use your personal information to process transactions, bill for food and merchandise, ship and deliver food and merchandise,

communicate regarding purchases and transactions, and populate forms for future transactions.

- We use your personal information to manage your registered account or Wiener Lovers' Club membership, if applicable, and to respond to comments, questions, and complaints, and provide customer service.
- We use your personal information to send information including, confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- We use your personal information to communicate about contests, winnings, promotions, upcoming events, newsletters, and other news, including about products and/or services offered by us, our affiliates, and our selected partners.
- We use your personal information to analyze our customer bases, products and services, and trends and traffic, to track purchases, and to track usage data.
- We use your personal information to personalize your Site experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Site, through third-party sites and applications, and via email or text message (with your consent, where required by law).
- We use your personal information to address technical issues, and protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

3. **How We Share Information We Collect**

We do not sell your personal information. We may share personal information as follows:

- We may share personal information in a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- We may share personal information for legal, protection, and safety purposes.
- We may share information to comply with laws.
- We may share information to respond to lawful requests and legal processes.
- We may share information to protect the rights and property of the Company, our affiliates, our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use.
- We may share information in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- We share personal information with our affiliates.
- We may share personal information with third-party service providers, including but not limited to third-party payment processors and digital ordering and delivery companies, who perform services or functions for us or on or behalf relating to the Site, our products and services, and franchise inquiries and submissions to us.
- We may share personal information with third-party service providers that help us run and improve our Site and our business operations and/or who create, deliver and assess our advertising or marketing campaigns, such as third-party web analytics providers, marketing companies, data storage providers, and website hosts.
- We may share personal information with your consent or otherwise at your direction.

We may also share aggregated and/or de-identified data which no longer constitutes personal information with others for their own uses.

4. **Cookies and Web Beacons**

a. Cookies

We and our third-party service providers may log your information using “cookies.” Cookies are small data files stored on your hard drive by a website. We and our third-party service providers may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to analyze trends, administer the website, track users’ movements around the website, and to gather demographic information about our user base as a whole in order to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs. You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you reject cookies by changing your browser settings, be aware that this may disable some of the features and functionality on our Site.

b. Web Beacons The Site may also contain electronic images known as web beacons – sometimes also called single-pixel gifs – that allow us to count users who have visited those pages and to deliver co-branded services. We may include also web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon. Some of these web beacons may be placed by third-party service providers to help determine the effectiveness of our advertising campaigns or email communications. These web beacons may be used by these service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages or emails and compile anonymous information in relation to those page views, which in turn enables us and our service providers to learn the effectiveness of our marketing campaigns. Information collected through web beacons is used to report anonymous individual and/or aggregate information about our website visitors to our partners. The aggregated information may include demographic and usage information. We prohibit web beacons from being used to collect or access your personal information.

5. **Retention and Security**

We keep your personal information for the length of time needed to carry out the purposes outlined in this Privacy Policy. We are committed to keeping your personal information secure and confidential. We have taken measures to protect your personal information from improper use and unauthorized access. However, no method of transmission over the internet or via mobile device, or method of electronic storage is 100% secure and, no security measures are perfect or impenetrable. Therefore, while we use commercially reasonable means to protect your personal information, we cannot guarantee its absolute security. It is important to take personal measures in safeguarding your password and computer.

6. **Children Under Thirteen**

The Site is intended for general audiences and our services are not directed at children under the age of 13 and we do not knowingly collect personal information from children under 13. We recognize the special obligation to protect personally identifiable information obtained from children and request that if you are 16 years old or younger to please not submit any personally identifiable information to us or to our Site. If you are aware that a child has provided us with personal information, please contact us at privacy@wienerschnitzel.com. If we become aware that a child has provided us with personal information, we will take the necessary steps to terminate their account and remove their information.

7. **Promotional Communications and Opt-out.**

If you join the Wiener Lovers’ Club, our newsletter, or our other promotional communications programs, we may use your personal information to send you updates (by email or text message) about our or our affiliates’ products and/or services, including exclusive offers, promotions or new products and/or services. You have the right to opt out of receiving such promotional communications at any time by: (1) updating your preferences on your registered account; (2) emailing us at privacy@wienerschnitzel.com; (3) writing us at the address listed in Section 14

(Contacting Us) below; or (4) using the “unsubscribe” link in emails or “STOP” number in texts. Please note that changes to your preferences may not be effective immediately. If you opt out, we may still send you non-marketing communications. Non-marketing communications include emails about your accounts and our business dealings with you.

8. **Text Message Program**

If you join our text message program, you consent to receive recurring messaging from us. Message and data rates may apply. You can text HELP for more information. You can also text STOP at any time to opt out. No purchase is necessary to participate in the text message program.

9. **California Privacy Rights**

a. Your California Consumer Privacy Act (CCPA) Rights and Choices For California consumers, this section describes how we collect, use, process, and disclose personal information of California consumers and the rights you may have under California law. We collect various categories of personal information from California consumers when you access and use the Site, including personal details, contact information, or identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and inferences about your preferences or interests. For detailed information about the categories of sources from which we obtain personal information, or for additional details about the specific types of personal information we collect and how we use it, please refer to the “Information We Collect and How We Collect It” and “How We Use Information We Collect” sections of this Privacy Policy. We may also share your personal information with third parties for business purposes as described in the “How We Share Information We Collect” section of this Privacy Policy, such as disclosures to service providers who assist us with securing our Site, delivering our products and/or services, or creating and delivering our marketing messages and advertisements. We may disclose the following categories of personal information for our business purposes: (1) personal details, contact information, or identifiers; (2) geolocation data; (3) commercial information; (4) internet or other electronic network or device activity information; and (5) inferences about preferences and interests. We do not sell your personal information. Our business practice is not to sell personal information that is subject to the CCPA even within the meaning of the broad definition of “sale” in the CCPA, and we are not selling and do not have plans to sell personal information of California consumers. California law grants certain rights to California consumers. These include the rights to: (1) request (up to twice a year) that we disclose to you what personal information we have collected about you during the preceding 12 months, the sources and purposes for collecting such information, and how such information has been used and/or shared; (2) request deletion of personal information; (3) opt out of “sales,” as that term is defined under the CCPA (we do not sell your personal information); and (4) not to be discriminated against for exercising these rights such as by being denied goods or services or being charged different prices. You may exercise your other rights under California law by contacting us by email

at privacy@wienerschnitzel.com, by telephone at our toll-free hotline at 1-800-764-9339, or by postal mail at Galardi Group Franchise & Leasing, LLC, Privacy Questions, 1775 Flight Way, Suite 125, Tustin, CA 92782. We will not discriminate against you for exercising any of your rights under California law.

b. Your Other California Privacy Rights Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of personal information to third parties for such third parties’ direct marketing purposes. If you are a California resident and you wish to opt out, please send an e-mail to privacy@wienerschnitzel.com, call our toll-free hotline at 1-800-764-9339, or contact us by mail at Galardi Group Franchise & Leasing, LLC, Privacy Questions, 1775 Flight Way, Suite 125, Tustin, CA 92782.

10. **Changes to this Statement**

This Privacy Policy is in effect as of the date noted at the top. We reserve the right to make changes to this Privacy Policy from time to time. Any changes will be

posted to this page with a change to the “Last Revised” date at the top of the Privacy Policy. We encourage you to check here regularly for the most up-to-date version of the Privacy Policy. Your continued access and/or use of our Site following any changes to this Privacy Policy constitutes your agreement to such changes.

11. Links

Our Site may contain links to other websites or services that are not operated by us. If you click a third- party link, you will be directed to that third party’s site. We have no control over and are not responsible for the privacy practices or content of those websites or services. We recommend and encourage that you always review such other websites’ or services’ privacy policies before you provide any personal information or complete any transaction with such other parties.

12. Do Not Track

We do not track website visitors over time and across third-party websites and therefore do not support the necessary technology to respond to “do not track” signals or other similar requests or mechanisms.

13. European Data Subjects

Data protection laws in Europe relate to companies that process personal data for their own use (“controllers”) and companies that process personal data on behalf of others (“processors”). We act as a controller of information provided directly to us and as a processor related to franchise information provided through to a third party. Any questions you have relating to the processing of your personal information by us as a processor should be directed to the third party to whom you provided the information. We process your information for lawful reasons where: (a) you have given consent; (b) processing is necessary for the performance of a purchase and/or request; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests. Your information is securely stored on private servers belonging to us and/or third parties. As a resident of Europe, you have the right to access, correct, erase, restrict, export, and object to our processing of your personal data under certain conditions. You also have the right to request that we do not transfer the data that we have collected to another organization. If you wish to exercise any of these rights, please contact us at the email or mailing address below. We will respond to your request within 30 days. You also have the right to lodge a complaint with a European Economic Area supervisory authority.

14. Contacting Us

If you have questions regarding our Privacy Policy, its implementation, and/or our general practices, please contact us at privacy@wienerschnitzel.com, or send your comments to: **Galardi Group Franchise & Leasing, LLC.**

Privacy Questions
1775 Flight Way, Suite 125
Tustin, CA 92782

15. Accessibility Policy

We are committed to making the Site accessible to all people. The Site has been designed to ensure that it meets or exceeds the requirements of Web Content Accessibility Guidelines (WCAG) 2.0.

This statement was created on 1 March 2019 and updated on July 18, 2022 using the [W3C Accessibility Statement Generator Tool](#).

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Accessibility Statement for Wienerschnitzel

Wienerschnitzel is committed to ensuring digital accessibility for people with disabilities. We are continually improving the user experience for everyone, and applying the relevant accessibility guidelines.

Conformance status

The [Web Content Accessibility Guidelines \(WCAG\)](#) provides guidelines for designers and developers to improve accessibility for people with disabilities. It defines three levels of conformance: Level A, Level AA, and Level AAA. Wienerschnitzel.com is partially conformant with WCAG 2.1 level AA. Partially conformant means that some parts of the content do conform to the accessibility standards while some parts do not fully conform to the accessibility standard.

Feedback

We welcome your feedback on the accessibility of Wienerschnitzel.com. Please let us know if you encounter accessibility barriers on Wienerschnitzel.com:

- Phone: 800-764-9353
- Postal address: 1775 Flight Way, Suite 125, Tustin, CA 92782
- Please provide any comments and feedback by fully completing the online comment form.

<https://www.wienerschnitzel.com/comments/>

Response to customer comments and feedback can usually be provided within one week but may, on occasion, require additional time. If you do not receive a reply within ten business days, please contact us at +1-800-764-9339.

Compatibility with browsers and assistive technology

Wienerschnitzel.com is designed to be compatible with the following assistive technologies:

- Wienerschnitzel.com is designed to be compatible with assistive technologies and the last two versions of major browsers.

- The Wienerschnitzel.com website has been designed to display optimally on modern browsers. Browsers older than Firefox v65+, Chrome v72+, Safari v12+, Opera v58+, Edge v17+, IE v11+ may not optimally display some aspects of the website.

Technical specifications

The accessibility of Wienerschnitzel.com may vary depending upon your selected web browser and the selected assistive technologies or plugins installed on your computer. The website relies upon HTML, WAI-ARIA, CSS, and JavaScript for optimal accessibility

Limitations and alternatives

Please understand that despite our efforts to ensure the accessibility of Wienerschnitzel.com, some limitations may exist.

For example, some potential limitations and solutions appear below for reference:

1. **Currently access to YouTube is required to view some videos on the Wienerschnitzel website.** : Some visitors may not have access to YouTube videos and video functionality because YouTube is the best known video streaming service. We are looking into providing those videos through an alternative method. The current solution for visitors with YouTube viewing issues would be to skip viewing the videos.

Assessment approach

We have assessed the accessibility of Wienerschnitzel.com by the following approaches:

- Self-evaluation
- External evaluation

Formal approval of this Accessibility Statement

This Accessibility Statement is approved by:

Galardi Group, Inc.