

# **Privacy Policy - ADDO Worldwide, LLC**

*LAST UPDATED: January 1, 2020*

## **1. Introduction**

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Chick-fil-A Leader Academy, sponsored by Chick-fil-A, Inc., is owned and operated by ADDO Worldwide, LLC (“ADDO Worldwide, LLC,” “we,” “us,” “our”). We at ADDO Worldwide, LLC are concerned about privacy issues and we want you to be familiar with how we collect, use and disclose personal information. This Privacy Policy applies to information we collect from all sources including in connection with our websites, social media sites, mobile sites, applications (“apps”), and electronic newsletters (collectively, the “Services”) that link to this Privacy Policy. Our website includes [www.chickfilaleaderacademy.com](http://www.chickfilaleaderacademy.com) (the “Website”).

## **2. Relationship between ADDO Worldwide, LLC and Chick-fil-A, Inc.**

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ADDO Worldwide, LLC is a service provider to Chick-fil-A, Inc. and Chick-fil-A, Inc. is a sponsor of the Chick-fil-A Leader Academy without any ownership therein.

## **3. Personal Information We May Collect**

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We collect personal information through the Services and other means described below, including:

- first and last name, preferred name
- parent or guardian first and last name
- e-mail address
- parent or guardian e-mail address
- phone number
- school of association
- graduation year
- gender
- username and password
- social media profile identifying information

We do not collect highly sensitive data (e.g., medical, credit card or other personal financial information). We may collect information about your internet connection, the equipment you use to access our Website and usage details.

## **4. How We May Collect Personal Information**

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We (and our service providers) may collect personal information in a variety of ways, including:

- ***Through the Services*** - We may collect personal information through the Services, such as when you apply for Chick-fil-A Leader Academy, subscribe to or use the Chick-fil-A Leader Academy website, volunteer for a Chick-fil-A Leader Academy event, apply to sponsor a Chick-fil-A Leader Academy event, complete forms or surveys on our Website, or when you correspond with us.
- ***Automatic Data Collection*** - As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including: Details of your visits to our Website and the resources that you access and use on the Website, information about your computer and internet connection, including your IP address, operating system, and browser type.
- ***Offline*** - We may collect personal information from you offline, such as when you attend a Chick-fil-A Leader Academy event.
- ***From Other Sources*** - We may receive your personal information from other sources, such as school databases, social media platforms, joint marketing partners, and from people with whom you are friends or otherwise connected on social media platforms, as well as from other third parties. For owners and operators of Chick-fil-A, Inc. restaurant locations participating in Chick-fil-A Leader Academy through sponsorship or otherwise, we maintain obtain your personal information from @CFA.

## **5. How We May Use Personal Information**

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We may use personal information to:

- Present our Website and its contents to you.
- Respond to your inquiries and fulfill your requests, such as to send you newsletters, brochures, catalogs and e-mails regarding Chick-fil-A Leader Academy.
- Send administrative information to you, for example, information regarding the Services and changes to our terms, conditions, and policies.
- To facilitate participation in the Services through which you are able to post and share information and materials including, without limitation, on discussion pages, evaluations, surveys, self-assessments, progress monitoring, and other services available via the Chick-fil-A Leader Academy website.
- To send you marketing communications regarding products and services that we believe may be of interest to you.
- To facilitate social sharing functionality through the Services.
- To allow you to send messages through the Services.

- To allow you to participate in our sponsored promotions and to administer these activities.
- For our business purposes, such as data analysis, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Some of these activities have additional rules, which could contain additional information about how we use and disclose your personal information, so we suggest that you read these rules carefully when presented to you.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please send an email to [info@chickfilaleaderacademy.com](mailto:info@chickfilaleaderacademy.com) and write “no contact” in the subject line, and we will remove your name from our marketing listings.

## **6. How Personal Information May Be Disclosed**

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We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose your personal information collected or provided as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To the selected educator leader(s) of the Chick-fil-A Leader Academy at your respective school in order to select participants in the Chick-fil-A Leader Academy and to communicate before, during and after the Chick-fil-A Leader Academy in relation to the Services.
- To our third party service providers who provide services such as data analysis, service fulfillment, information technology, survey feedback, customer service, email delivery, and other similar service; all of whom have specific privacy policies that pertain to individual aspects of their engagement.
- By you, on message boards, chat pages, profile pages, blogs and other services to which you are able to post information and materials (including, without limitation, on the Websites and our social media pages and on discussion pages, evaluations, surveys, self-assessments, progress monitoring, and other services available via the Chick-fil-A Leader Academy Website). Please note that any information you post or disclose through these services will become public information and may be available to users of the Services and to the general public. We urge you to be very careful when deciding to disclose your personal information, or any other information.

- To Chick-fil-A, Inc. and other sponsors of Chick-fil-A Leader Academy to facilitate the Chick-fil-A Leader Academy and the Services.
- To a buyer or other successor of ADDO Worldwide, LLC in the event of any reorganization, merger assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- For any other purpose or to any third party described by us when you disclose the information.
- With your consent.

California residents may have additional personal information rights and choices. Please see paragraph 13, California Residents, for more information.

## **7. Automatic Data Collection and Use of Cookies**

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Cookies are small text files placed on your computer or mobile device, which are widely used in order to make websites work, or work in a more efficient manner. We may use cookies and similar tools when you access or use the Services. For example, session cookies are required to use the Websites. Session cookies help us improve the functionality of the Websites by enabling you to move from page to page on the Websites and allowing information you enter to be remembered. We only use cookies to record current session information, and we do not use permanent cookies on the Website. We also do not use flash cookies or third party advertising cookies when you access or use the Services.

The information we collect automatically is only statistical data and does not include personal information. We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

We utilize statistical services, such as Google Analytics, to review how visitors use the Services—further detail of this aspect of data privacy can be found here: [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). This information helps us improve our website navigation and the content we offer. Google and other service providers use cookies as part of this process to collect anonymous information, including the number of visitors to our Websites, how visitors are entering our site, the pages they visit and the length of time they spend on our site.

Cookies may be disabled, by changing the settings on your browser. If you decide to disable cookies, certain areas and features of the Website and other of the Services may not perform as designed. By using the Website and/or the Services, you consent to our use of cookies as described in this Privacy Policy. Please note that other websites you are directed to from our Website may have their own cookies policies.

California residents may have additional personal information rights and choices. Please see paragraph 13, California Residents, for more information.

## **8. Emails; Opt-out**

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We do not buy, sell, rent or trade email lists. As described above, however, we may use information volunteered via the Services for our own marketing and educational efforts and to send emails on topics we feel would be of interest (e.g., with respect to relevant leadership events, ADDO Worldwide, LLC events and co-sponsored events, and ADDO Worldwide, LLC specific products). If you do not wish to receive such informational and marketing emails, please send an email to [info@chickfilaleaderacademy.com](mailto:info@chickfilaleaderacademy.com) and write “no email” in the subject line, and we will remove your name from our marketing email listing. Please note that if you do opt out of receiving marketing emails from us, we may still send you important administrative emails (including, but not limited to, such information related to your Chick-fil-A Leader Academy subscription and your continued use of the Services).

## **9. Minors and Sensitive Information**

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Our Website is not intended for children under 13 years of age and upon applying for the Chick-fil-A Leader Academy you acknowledge you are over the age of 13. We do not knowingly collect personal identifiable information from anyone under the age of thirteen (13). No one under age 13 may provide any information to or on the Website. If you are under 13, do not use or provide any information on this Website or through any of its features, register on the Website, use any of the interactive or public comment features of this Website or its affiliated social media accounts, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [info@chickfilaleaderacademy.com](mailto:info@chickfilaleaderacademy.com).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information, please see paragraph 13, California Residents, for more information.

## **10. User Access**

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We are committed to providing reasonable and practical access to allow you to identify inaccuracies in your personal information. You can review and change certain of your personal information by logging into the Website and visiting your account profile page. You may also send us an email at [info@chickfilaleaderacademy.com](mailto:info@chickfilaleaderacademy.com) to request access to, correct or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

California residents may have additional personal information rights and choices. Please see paragraph 13, California Residents, for more information.

## **11. Data Security and Retention**

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The security of the information you provide to us is important to us. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Information you enter is encrypted using secure socket layer technology (SSL) and our Website is hosted and managed through Amazon Web Service (AWS) technology. Our Website runs within its own environment, isolating processes, memory and file systems, and is protected by host-based firewalls restricting interaction with other applications from establishing local network connection to prevent security and stability issues.

Personal information we collect is stored in our database for a reasonable time period. We will retain your information for as long as needed to provide you the Services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Please note that we do not collect or store personally sensitive credit card information.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards or social media sites associated with the Chick-fil-A Leader Academy. The information you share in public areas may be viewed by any user of the Website.

If you are visiting our Services from outside of the United States, please be aware that your personal information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By

providing your information, you understand that it may be transferred to our facilities and to those third parties with whom we share it as described in this Privacy Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **12. Promotion of Third Party Services and Websites**

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We may link to, or promote, websites or services from other companies. For example, we may link to third party websites of other organizations ADDO Worldwide, LLC partners with, that promote the programs Chick-fil-A Leader Academy or permit you to purchase books and other materials featured on the Websites and in the Chick-fil-A Leader Academy program. This Privacy Policy does not address the privacy, information or other practices of any third parties, including, without limitation, any third party operating any site or service to which the Services link or any Chick-fil-A Leader Academy third party service provider or sponsor. The inclusion of a link on the Services does not imply our endorsement of the linked site or service nor their privacy policies. Please note that we are not responsible for the privacy, collection, usage and disclosure policies and practices (including the data security practices) of other organizations, any Chick-fil-A Leader Academy third party service providers, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any personal information you disclose to other organizations through or in connection with the Websites or our social media pages. We encourage you to review each third party site's privacy policy prior to entering the third party linked sites.

## **13. California Residents**

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This policy is intended to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice. Our Website collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("CCPA Personal Information"). In particular, we have collected the following categories of personal information from consumers within the last twelve months:

- **Identifiers.** For example, a name, alias, postal address, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).** For example, a name, signature, physical characteristics or description, address, telephone number, or education.

- **Protected classification characteristics under California or federal law.** For example, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions).
- **Internet or other similar network activity.** For example, browsing history, search history, information on your interaction with the Website.
- **Geolocation data.** For example, physical location or movements.
- **Inferences drawn from other personal information.** For example, profiles reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Please see paragraph 3, Personal Information We May Collect, and paragraph 4, How We May Collect Personal Information, for more information about the personal information we collect and how we collect it.

We may use the CCPA Personal Information we collect:

- To fulfill the reason you provided the information, such as for the enrollment, involvement and completion of the Chick-fil-A Leader Academy. Use of the CCPA Personal Information for operational purposes of ADDO Worldwide, LLC may include disclosure to third party service providers or sponsors to fulfill such operational purposes.
- To provide the Services and support the delivery of the Website to you in a personalized manner, provided that we do not send your personal information to third party advertisers.
- To create and maintain your profile page with our Website.
- To provide you with support, including your inquiries.
- To maintain the safety and security of our Website and the Services.
- For testing, research and development to improve our Website, the Services or other services which ADDO Worldwide, LLC provides.
- To comply with applicable law, including, but not limited to, requests from law enforcement or under a court order or government regulation.
- As described when we collect the CCPA Personal Information or otherwise set forth in this Privacy Policy, including paragraph 5, How We May Use Personal Information.
- For other purposes which we provide additional notice to you for.

Within the last 12 months, we have disclosed CCPA Personal Information for business purposes. Please see paragraph 6, How Personal Information May Be Disclosed, for more information about to whom we may disclose personal information, including to third parties and sponsors.

We do not sell and, within the last 12 months, have not sold, CCPA Personal Information.

California residents have specific rights and regarding their personal information under the CCPA. Below are rights you, as a California resident, are entitled to. To exercise any of the below rights, send a detailed request to [support@chickfilaleaderacademy.com](mailto:support@chickfilaleaderacademy.com) with and write "PERSONAL INFORMATION REQUEST" in the subject line. We endeavor to respond to verifiable consumer requests within thirty (30) days.

- **Access.** You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months, including:
  - the categories of personal information we collected about you;
  - the categories of sources for the personal information we collected about you;
  - our business or commercial purpose for collecting your personal information;
  - the categories of third parties with whom we share that personal information; and
  - the specific pieces of personal information we collected about you (also called a data portability request).
- **Deletion.** You have the right to request we delete any of your CCPA Personal Information we collected from you; provided that, we may retain the CCPA Personal Information collected from you to complete your involvement with the Chick-fil-A Leader Academy, to comply with applicable data retention laws or legal obligations we may have, or to prosecute or maintain a legal right afforded to us.

We may require certain identifying information to verify your identity to process your request and you may need access to your e-mail address to take steps to confirm your identity before we can process your request. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- deny you goods or services;
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- provide you a different level or quality of goods or services; or
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

We do not sell CCPA Personal Information knowingly collected from a California resident under the age of 16 and will not engage in such sale without the affirmative opt-in consent of the minor if over the age of 13, or the minor's guardian if under the age of 13.

## **14. Mobile Privacy**

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If you specifically consent to receive SMS text messages, push notifications, or other messages from us, you may from time-to-time receive SMS text messages push notifications, or other messages from us. Such messages may be subject to fees and charges from your service provider. We will only use information you provide to transmit your message, and we will not share or use your mobile number for any other purpose. Nonetheless, we reserve the right at all times to disclose any information as necessary to satisfy any law, regulation or governmental request, to avoid liability, or to protect our rights or property. To opt-out of such push notifications, you can simply respond to the text message with SMS Code “STOP”.

## **15. Updates to Our Privacy Policy**

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We reserve the right, at our discretion, to change, modify, add, or remove portions of this Privacy Policy at any time, so please review it frequently, and note the “LAST UPDATED” legend at the top of this page to see when this Privacy Policy was last revised. If we make changes to this Privacy Policy that we consider material, we will notify you here, by email (if you have provided us with your email address), or by means of a prominent notice on our the home page(s) of the Websites prior to the change becoming effective. Your use of the Services following these changes means that you accept the revised Privacy Policy.

## **16. Our Contact Information**

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Any requests, questions, comments, or concerns with respect to our Privacy Policy should be addressed to ADDO Worldwide, LLC, Chick-fil-A Leader Academy Privacy Policy, 2030 Powers Ferry Road SE, Suite 160, Atlanta, GA 30339, [email: info@chickfilaleaderacademy.com](mailto:info@chickfilaleaderacademy.com) Please note that email communications are not always secure; so please do not include sensitive information in your emails to us.