

PRIVACY POLICY

Last Updated: May 20, 2019

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OUR COMMITMENT TO PRIVACY

White Castle Management Co. (“White Castle” or “we”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy (“Privacy Policy”). We have developed this Privacy Policy to describe the types of information we may collect from visitors to the websites whitecastle.com and online.whitecastle.com and our mobile applications, including any content, functionality and services offered on or through such websites and our mobile applications, in each case whether as a guest or a registered user (the websites, mobile applications and any content, functionality and services are referred to herein collectively as, the “Sites”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Privacy Policy is effective from the effective date noted above. Please read this Privacy Policy carefully to understand our policies and practices regarding your information. If you do not agree with our policies and practices, your choice is not to use our Sites. By accessing or using our Sites, you acknowledge this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of the Sites after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates.

This Privacy Policy applies to information we collect:

- On the Sites.
- In email, text and other electronic messages between visitors to the Sites and the Sites.

This Privacy Policy does not apply to information collected by:

- Us offline or through other means, including on any other website operated by a third party or licensee; or
- Any third party, including through any application or content (including advertising)

that may link to or be accessible from or on the Sites.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

Information Collected Automatically

As you navigate through and interact with our Sites, 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 Sites, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- IP addresses (a number automatically assigned to your computer whenever you are surfing the internet). Web servers automatically identify your computer by its IP address. When visitors request pages from our Sites, our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report aggregate information to others and to track the use of our Sites. IP addresses may also be shared as provided above. It is not our practice to link IP addresses to anything personally identifiable; that is, the visitor's session will be logged, but the visitor remains anonymous to us.
- The type of browser you are using (e.g., Internet Explorer, Firefox, Safari, etc.).
- The third-party website from which your visit originated.
- The operating system you are using.
- The domain name of your internet service provider.
- The search terms you use on our Sites, the specific web pages you visit and the duration of your visits.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services.

We use information in a variety of ways, including to help analyze traffic of the Sites, understand customer needs and trends, carry out targeted promotional activities, store information about your use preferences (allowing us to customize our Sites according to your interests), to speed up your searches on our Sites, to recognize you when you return to our Sites and to improve our services. We may use your information by itself or aggregate it with information we have obtained from others. We may share anonymized information with our affiliated companies and third parties to achieve these objectives and others.

The technologies we use for automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer.
- Web Beacons. Pages of our Sites and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit White Castle, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Third-party Use of Cookies. The Sites use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies,” which are text files placed on your computer to help the website analyze how visitors use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google. Google may use this information for the purpose of evaluating your use of the Sites, compiling reports on activity and providing other services relating to activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. Additional information on how Google Analytics collects and processes data may be made available by Google at the following website: www.google.com/policies/privacy/partners/.

The Sites also use Google Marketing Platform advertising products, including: Display & Video 360, Search Ads 360, and Campaign Manager and Google Ad Manager. These products use cookies to improve advertising. Some common applications are to target advertising based on what is relevant to a user, to improve reporting on campaign performance, and to avoid showing ads the user has already seen. Google indicates that users may opt out of ads personalization by using Google’s Ads Settings available at the following website: <https://www.google.com/settings/ads>

By using this website, you acknowledge the processing of data about you by Google in the manner and for the purposes set out above. If you do not want your data being used by Google Analytics, please note that you may opt-out of having or making your activity on our Sites available to Google Analytics by installing the Google Analytics opt-out browser add-on provided by Google. Additional information may be made available by Google at the following website: https://support.google.com/analytics/answer/181881?hl=en&ref_topic=2919631

Information You May Choose to Provide to Us

The information we collect through the Sites may include:

- Information that you may provide by filling in forms on our Sites at the time of registering for promotions or certain services offered through our Sites. This information might include information such as name, postal address, email address, telephone number or any other identifier by which you may be contacted online or offline;
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to optional surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Sites and of the fulfillment of orders. You may be required to provide financial information before placing an order through our Sites.

Mobile Alerts/Promotional Text Messages

White Castle will not contact you by text message without your prior express written consent. White Castle will not sell or share your mobile phone number with unaffiliated parties other

than with third-party messaging service providers with whom White Castle has contracted. By submitting your mobile phone number and expressing your consent to a text messaging marketing campaign, alert service, or the like, you agree to the terms of that promotion made available to you when you provide your prior express written consent, which likely includes that White Castle may send to you updates or offers, information about promotions, new menu items, merchandise, events, and other relevant information by text message. You may opt out of receiving text messages or notifications by following the opt-out instructions included with all such messages or by calling 1-800-843-2728 (1-800-THE-CRAV) toll free.

ONLY INDIVIDUALS THIRTEEN (13) YEARS OF AGE OR OLDER MAY REQUEST EMAIL UPDATES OR MOBILE ALERTS/PROMOTIONAL TEXT MESSAGES.

Sweepstakes/Contests

We may, at various times, use the Sites to collect information for contests, promotions or sweepstakes. The information you enter for contests, promotions or sweepstakes is voluntarily submitted by you. You may also receive informative email messages as a result of your entrance unless you have chosen to opt out of receiving such messages, either at the time of sign up or in accordance with the opt-out instructions included with the informative message(s) delivered to your email inbox.

Contact Us Information

If you choose to contact us, we may collect information potentially including your name, email address, mailing address, phone number and your suggestion, question, comment or customer service request. We use the information to process your suggestion or customer service request. We may also use this information to improve our products and services. For more information, please see the [Terms and Conditions of Use](#).

Third-Party Service Providers, Material or Links

We may use third-party service providers for things such as the sale of gift cards or White Castle-branded apparel and gifts, or the provision of marketing services on behalf of White Castle. If you would like to purchase White Castle products through an online store, you may do so by navigating through the appropriate link on our Sites. Apparel, gift cards and other services may be provided by a third party, and you may have to leave our Sites in order to visit the store or to make a purchase. Please note the domain address after clicking a link on our Sites, and please review any terms and conditions and privacy policy or notice postings that appear through the links on the individual web pages. We may also, from time to time, contract with advertisers or other third parties who place information, advertisements or other promotional material or links on our Sites. If you click on an advertisement or other link provided by a third party and leave our Sites, whether through a link or through visiting another website framed within our Sites, you are subject to the privacy policies of these advertisers or other third parties. We do not have responsibility for or access to the information collected through an online store or other online function provided by a third party and are therefore not responsible for the security of that information and not liable for any breach of that security.

Employment Information

If you would like to become a White Castle employee, you may choose to search for job

openings or submit an employment application online through the “Join Our Team,” “Job Search,” “Careers” or other similarly titled link. All information entered by you through the Employment function of the Sites is collected by a third-party service provider responsible for collecting the information and matching the information with White Castle job openings. The information collected through the application will be used by the service provider to match your credentials with White Castle job openings, of which you will be informed via your email address. White Castle is not responsible for the security of the information while retained exclusively by the third party service provider and is not liable for any breach of that security.

You may apply for employment with White Castle by performing a job search, clicking on the job title, and then clicking the “Apply” link.

Public Forums/User Contributions

We may offer chat rooms, blogs, message boards, bulletin boards or similar public forums where you and other users of our Sites can communicate or post photographic or other content (collectively, “User Contributions”). Your User Contributions are posted at your own risk. We may use information about you to identify you with a posting in a public forum. Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Sites with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. Any information you share in a public forum may be seen or collected by anyone, including third parties that do not adhere to our Privacy Policy. We are not responsible for events arising from the distribution of any information you choose to publicly post or share through our Sites.

Information of Others

If you choose to submit the information of someone other than yourself without White Castle’s knowledge, the information will be handled in accordance with this Privacy Policy. You, however, are solely responsible and liable for any claims relating to your submission and use of that information.

CHILDREN

Our Sites and the features, programs, promotions and other aspects of our Sites requiring the submission of personally identifiable information are not intended for children. We do not knowingly collect personally identifiable information from children under the age of 13. Do not provide any information unless you are at least 13 years of age. If you are a parent or guardian of a child under the age of 13, and believe he or she has disclosed personally identifiable information to us, please contact us as provided in this Privacy Policy. 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. A parent or guardian of a child under the age of 13 may review and request deletion of such child’s personally identifiable information as well as prohibit the use thereof. If you believe we might have any information from or about a child under 13, please send us an email at Generalfeedback@whitecastle.com.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Sites and the Sites' contents to you.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account or subscriptions.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Sites or any products or services we offer or provide through the Sites.
- To allow you to participate in interactive features on our Sites.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

CRAVER NATION SIGNUP

By following the sign-up instructions for creating a Craver Nation account and submitting your name, email address, zip code and other information through the Sign-up link, you may establish a Craver Nation account in accordance with the Terms and Conditions. The personally identifiable information you submit in establishing a Craver Nation account will be used solely for the purpose of enabling your personalized Craver Nation experience and will not be shared with third parties (with the exception of third-party service providers for purposes of their assisting us with administering the Program) or to track your online activities in a personally identifiable manner. Certain aspects of the information you submit in signing up for a Craver Nation account may be used in an anonymized context so that we can learn about and better serve our Cravers.

Upon signing up as Craver Nation member, you are given a choice of options for opting to receive email notifications as described on the Sites and in the [Terms and Conditions](#). You may opt out of (or opt-in to) receiving email messages and notifications by following the opt-out instructions included with all messages delivered to your inbox.

DISCLOSURE OF YOUR INFORMATION

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

We may disclose personal information that we collect or that you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties for the support of our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of White Castle's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by White Castle about our Sites' users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted

out of these disclosures.

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including responding to any government or regulatory request.
- To enforce or apply our [Terms and Conditions](#) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property or safety of White Castle, our customers or others.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Promotional Offers from White Castle.** If you do not wish to have your email address used by White Castle to promote our own or third parties' products or services, you can opt out at any time by sending us an email stating your request to Generalfeedback@whitecastle.com. If we have sent you a promotional email, you may unsubscribe through the link or other "unsubscribe" instructions provided in the footer of the applicable email.

CALIFORNIA DO NOT TRACK DISCLOSURES

California Business & Professions Code Section 22575(b)(5) (as amended effective January 1, 2014) provides that California residents are entitled to know how the Sites respond to "Do Not Track" browser settings. We do not currently take any actions with respect to received Do Not Track signals. In general, our system will issue cookies when you direct your browser to our Sites, as described in this Privacy Policy.

RIGHTS FOR CALIFORNIA RESIDENTS

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. California's "Shine the Light" law (California Civil Code § 1798.83) permits users of our Sites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. White Castle does not disclose personal information to third parties for their direct marketing purposes. Nonetheless, to make such a request, please call us at 1-800-843-2728 (1-800-THE-CRAV), or click on the "Contact Us" link located on our Sites.

BIOMETRIC INFORMATION PRIVACY POLICY

Biometric Data Defined

As used in this Biometric Information Privacy Policy, biometric data includes "biometric identifiers" and "biometric information" as defined in the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, et seq. "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric identifiers do not include

writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color. Biometric identifiers do not include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996.

“Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

Purpose for Collection of Biometric Data

White Castle collects, retains, and uses biometric data and/or information for the purpose of identifying an employee’s signature when utilizing White Castle’s proprietary software. Biometric scanners are computer-based systems that scan a team member’s finger for purposes of identification. The computer system extracts unique data points and creates a unique mathematical representation used to verify the team member’s identity, prevent fraud, and for pre-employment hiring purposes.

Biometric Information Disclosure and Authorization

To the extent that White Castle collects, captures, or otherwise obtains biometric data relating to an employee, White Castle must first:

- Inform the employee in writing that White Castle is obtaining the employee’s biometric data, and that White Castle is internally storing such biometric data;
- Inform the employee in writing of the specific purpose and length of time for which the employee’s biometric data is being collected, stored, and used; and
- Receive a written release signed by the employee (or his or her legally authorized representative) authorizing White Castle to collect, store, and use the employee’s biometric data for the specific purposes disclosed by White Castle.

White Castle will not sell, lease, trade, or otherwise profit from employees’ biometric data.

Biometric Information Disclosure

White Castle will not disclose or disseminate any biometric data to anyone.

Biometric Information Retention Schedule

White Castle shall retain employee biometric data only during the course of the employee’s tenure with White Castle. White Castle permanently deletes/destroys such biometric data and/or information when an employee’s employment with White Castle ends.

Biometric Information Data Storage

White Castle shall use a reasonable standard of care to store, transmit and protect from disclosure any paper or electronic biometric data collected. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which White Castle stores, transmits and protects from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as account numbers, PINs, driver's license numbers and social security numbers.

ACCESSING AND CORRECTING YOUR INFORMATION

For our food ordering Sites, you can review and change your personal information by logging into the Sites and visiting your account profile page.

You may send us an email at Generalfeedback@whitecastle.com to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. 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.

If you delete your User Contributions from the Sites, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other users of our Sites. Proper access and use of information provided on the Sites, including User Contributions, is governed by our [Terms & Conditions](#).

TRANSFER OF INFORMATION

The Sites and information provided on or through the Sites may be stored and processed in the United States, and is intended only for users located in the United States. If you are located in the European Union or elsewhere outside of the United States, please do not use the Sites or provide any information to us or otherwise through the Sites. Please be aware that information we collect will be transferred to and processed in the United States. By using the Sites or providing us with any information, you acknowledge any related transfer and the processing of information in the United States.

DATA SECURITY

The security of your personal information 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.

The safety and security of your information depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Sites, 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 Sites. The information you share in public areas may be viewed by any user of the Sites.

Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the security of your personal information transmitted to our Sites. 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 Sites.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to change our Privacy Policy from time to time. If we make material changes to how we treat our user's personal information, we will notify you by updating the Effective Date of this Privacy Policy and placing a banner on the main page of our Sites indicating that changes were made.

HOW TO CONTACT US

For other information or questions regarding changing information that we have about you, please contact us at 1-800-843-2728 (1-800-THE-CRAV), or click on the "Contact Us" link located on our Sites. You may also reach us at:

White Castle Management Co.
555 West Goodale St.
Columbus, OH 43215

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