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 (“Policy”). We have developed this Policy to describe the types of information we collect from visitors to authorized White Castle websites (the “Site”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Policy is effective from the time it is posted on the Site, as noted above. To make this Policy easy to find, we make it available on our homepage and on every page through which personally identifiable information may be submitted. Please read this Policy carefully to understand our policies and practices regarding your information. If you do not agree after reading our policies and practices listed below and throughout, your choice is not to use our Site. By accessing or using this Site, you agree to this Policy. This Policy may change from time to time. Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

This Policy applies to information we collect:
- On the site.
- In email, text and other electronic messages between Site visitors and the Site.
- Through mobile and desktop applications you download from this Site, which provide dedicated, non-browser-based interaction between you and this Site.

This 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
- Any third party, including through any application or content (including advertising)
that may link to or be accessible from or on the Site.

USE OF OUR SITE CONSTITUTES AGREEMENT TO THE TERMS OF THIS POLICY. DO NOT USE THE SITE IF YOU DO NOT AGREE WITH ALL OF THE TERMS OF USE, INCLUDING THIS POLICY, THE SITE TERMS AND CONDITIONS, AND ANY SUPPLEMENTAL POLICY OR TERMS. WE MAKE WHAT WE BELIEVE TO BE COMMERCIAL REASONABLY REASONABLE EFFORTS TO PROVIDE A REASONABLE LEVEL OF SECURITY FOR PERSONAL INFORMATION WE ARE REQUIRED TO PROTECT, BUT WE DO NOT GUARANTEE THE SECURITY OF PERSONAL INFORMATION OR OTHER INFORMATION IN ANY FORM.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

Information Collected Automatically

As you navigate through and interact with our Site, we may use automatic data collection technologies to collect certain non-personal information. Non-personal information is information that does not personally identify you and can include certain personally identifiable information that has been de-identified; that is, information that has been rendered anonymous. This information can include:

- 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 Site, our servers typically log their IP addresses. We collect IP addresses for purposes of system administration, to report non-personal aggregate information to others and to track the use of our Site. IP addresses are considered non-personal information and 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 Site, the specific web pages you visit and the duration of your visits.

We use non-personal information in a variety of ways, including to help analyze site traffic, understand customer needs and trends, carry out targeted promotional activities, store information about your Site use preferences (allowing us to customize our Site according to your interests), to speed up your on-Site searches, to recognize you when you return to our Site and to improve our services. We may use your non-personal information by itself or aggregate it with information we have obtained from others. We may share your non-personally identifying, anonymous 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. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.

• Flash Cookies. Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.

• Web Beacons. Pages of our Site 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 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. This Site uses 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 Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google. Google will use this information for the purpose of evaluating your use of the Site, 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. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do, you may not be able to use the full functionality of this website. By using this website, you consent to 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 go to https://tools.google.com/dlpage/gaoptout/.

Information You May Choose to Provide to Us

The Site collects only that personally identifiable information which is submitted voluntarily by you, and White Castle uses such information only for the purposes for which it was submitted, as further explained herein. The information you choose to provide us through use of our Site may include both non-personal information and personally identifiable information such as:

• Information that you may provide by filling in forms on our Site at the time of registering for promotions or certain services offered through our Site. 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 (“personal information”);
• 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 Site and of the fulfillment of orders. You may be required to provide financial information before placing an order through our Site.

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, which likely include 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-THE-CRAVE 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 Site to collect information for contests, promotions or sweepstakes. When you enter information for any such contests, promotions or sweepstakes, you will be subject to the official rules of that particular promotion. 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. Winners may be required to return a completed prize acceptance form contained in the notification email by facsimile or U.S. mail and/or to execute (without limitation) tax acknowledgement forms, affidavits of eligibility, liability releases and publicity releases (except where prohibited by law) within a designated time period. Please see the Official Rules located on the respective submission page of the Site for complete details.

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 will also use this information to improve our products and services. For more information, please see the Terms and Conditions for Site Use (www.whitecastle.com/terms-conditions).
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 Site. Apparel, gift cards and other services may be provided by a third party, and you may have to leave our Site in order to visit the store or to make a purchase. Please note the domain address after clicking a link on our Site, 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 Site. If you click on an advertisement or other link provided by a third party and leave our Site, whether through a link or through visiting another website framed within our Site, 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, sign up for job opening notification, or submit an employment application online through the “Careers” or other similarly titled Site link. All information entered by you through the Employment function of the Site 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. If you choose to have your information remain anonymous, your personal information submitted through the Employment pages will not be shared with White Castle without your permission. 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 clicking the “Apply Online” link. All information entered through the online application will be sent directly to White Castle and will be used only for purposes of review for employment and will not be shared with third parties or used for purposes other than as consistent with the terms of this Privacy Policy.

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 Site can communicate or post photographic or other content (collectively, “User Contributions”). Your User Contributions are posted at your own risk. The protections described in this Privacy Policy do not apply when you provide information (including personal information) in connection with User Contributions. Please note that if a third-party service provider is used in the process of loading photos or other content, you are subject to the privacy policies and terms of use of that third-party service provider. We may
use personally identifiable and non-personal information about you to identify you with a posting in a public forum. Any information you share in a public forum is public information and 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 Site.

**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 Policy. You, however, are solely responsible and liable for any claims relating to your submission and use of that information.

**CHILDREN**

Our Site and the features, programs, promotions and other aspects of our Site 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 personal 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 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.

**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 Site and its 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 Site or any products or services we offer or provide though it.
- To allow you to participate in interactive features on our Site.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers’ target audiences. Even though we do not disclose your
personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

**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 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 Site users is among the assets transferred.
- [To third parties to market their products or services to you if you have [consented to/not opted out of] these disclosures. [We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.]
- To fulfill the purpose for which you provide it. [For example, if you give us an email address to use the “email a friend” feature of our Site, we will transmit the contents of that email and your email address to the recipients.]
- 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 of use (www.whitecastle.com/terms-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:
• **Tracking Technologies and Advertising.** You can set your browser to opt out of all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

• **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 logging into the Site and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to Generalfeedback@whitecastle.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.

California Business & Professions Code Section 22575(b) (as amended effective January 1, 2014) provides that California residents are entitled to know how this Site responds to “Do Not Track” browser settings. We do not currently take any actions with respect to received Do Not Track signals.

**ACCESSING AND CORRECTING YOUR INFORMATION**

You can review and change your personal information by logging into the Site and visiting your account profile page.

You may also 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 Site, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Site users. Proper access and use of information provided on the Site, including User Contributions, is governed by our Terms & Conditions of Use (www.whitecastle.com/terms-conditions).

**CRAVER NATION SIGNUP**

By following the sign-up instructions for creating a Craver Nation account and submitting your name, birthday, email address, phone number, zip code and other information through the Login/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 Site and in the Terms and Conditions (www.whitecastle.com/terms-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 or by accessing your member profile at any time.

RIGHTS FOR CALIFORNIA RESIDENTS
California Civil Code § 1798.83 permits users of our Site 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. 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 (614) 228-5781, or click on the “Contact Us” link located on our Site.

BIOMETRIC INFORMATION PRIVACY POLICY

Biometric Data Defined
As used in this 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.

**OUR COMMITMENT TO 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 also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, 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 Site. The information you share in public areas may be viewed by any user of the Site.

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 Site. 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 Site.

**CHANGES TO OUR PRIVACY POLICY**
We reserve the right to change our Privacy Policy from time to time. If we make any substantial changes, we will notify you by displaying a new “Posted” date at the top of our Privacy Policy. USE OF THE SITE AFTER A CHANGE IN THE POSTED DATE WILL CONSTITUTE YOUR CONSENT TO THE AMENDMENTS TO THIS POLICY. IF YOU DO NOT WANT TO BE BOUND BY AN AMENDED VERSION OF THIS POLICY, DO NOT USE THE SITE AND CEASE AND DESIST ALL USE OF THE CONTENT OR SERVICES.

**HOW TO CONTACT US**
For other information or questions regarding changing information that we have about you, please contact us at (614) 228-5781, or click on the “Contact Us” link located on our Site. You may also reach us at:

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

**SOLE STATEMENT**
This Privacy Policy as posted on this Site is the sole statement of our privacy practices with respect to this Site, and no summary, modification, restatement or other version thereof, or other privacy statement or notice, in any form, is valid unless we post a new or revised notice to the Site. Other privacy notices, policies or terms may apply to particular activities related to White Castle but otherwise unrelated to the Site.

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