PRIVACY POLICY FOR CALIFORNIA CANDIDATES

Last Updated: May 27, 2025

Chick-fil-A, Inc. ("**CFA**" or "**we**") is committed to protecting the privacy and security of personal information of all individuals, including California candidates and job applicants ("**Candidates**") in compliance with applicable law. CFA collects personal information of Candidates in connection with its recruitment and hiring activities as outlined in this Privacy Policy for California Candidates ("**Privacy Policy**"). We do not sell or share, and in the past 12 months, have not sold or shared, Candidates' personal information as defined under applicable law, including personal information of individuals we know to be under 16 years of age.

If you have any questions about this Privacy Policy or need access to this Privacy Policy in an alternative format for accessibility, please contact us by emailing TalentPrivacy@chick-fil-a.com or calling **1 (833) 907-3207**. This Privacy Policy may be updated from time to time to reflect changes in our personal information practices, and we will post a notice at the time of any such updates on our recruiting website available at https://careers-chickfila.icims.com/jobs/6825/external-leadership-development-program/login.

1. WHAT CATEGORIES OF CANDIDATE INFORMATION DO WE COLLECT?

We collect, and within the past 12 months have collected, the following categories of personal information directly from Candidates and/or through our recruiting websites or our advertising networks, candidate referral agencies, social networks, and other recruiting service providers.

Candidates interact with us in different ways. Please note that the collection and use of different types of information varies depending on the role, the stage of the interviewing process, and applicability. In other words, not all of this information will be collected on every Candidate.

Category	Examples
A. Identifiers.	Name; address; personal identifiers like identification numbers, including governmental identification information*****; online identifiers such as IP address or tracking ID; email addresses; and account or usernames.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	The "identifiers" listed above; date of birth or birthday; signature; vehicle information; financial information like credit history (for certain roles); family information like names and contact details.
C. Protected classification characteristics under California or federal law.	Information provided via voluntary submission, including medical condition and/or disability status for potential accommodations;

Category	Examples
	if applicable, for background check purposes, gender and race* (if voluntarily provided), and age.
D. Commercial information.	Purchasing or consuming histories or tendencies obtained via background checks and credit history, if applicable.
E. Biometric information.	None collected.
F. Internet or other similar network activity.	IP address; tracking ID; information regarding Candidate interaction with an internet website, application, or advertisement email, including the source that led to a Candidate visiting our website; preferences; and content and other data posted on the Internet.
G. Geolocation data.	None collected.
H. Sensory data.	Audio information such as voicemails or audio or video recordings (like recording interviews), or other similar information.
I. Professional or employment-related information.	Employment history; qualifications, skills, professional memberships and certifications, language capabilities, references, recommendations, and interview notes; areas of interest and work preferences, like desired salary or availability; relationships to CFA employees or Franchised Operators; travel information; reimbursement and expense details; pre-employment test results, reference checks or background checks (as applicable); application information; employment status, work-related contact information; training records; and any information needed to comply with reporting or other legal obligations.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Application information and resumes; transcripts and educational information, training history, degrees; and languages spoken.
K. Inferences drawn from other personal information.	Profile reflecting the person's preferences and characteristics.
L. Sensitive personal information	Information with an asterisk (*) above indicates sensitive personal Information. Please note we do not collect sensitive personal information for the purpose of inferring characteristics about our candidates.

To the extent we or our service providers collect additional categories of information beyond those described above, additional notice will be provided, and we or our service providers will ask for

Candidates' consent before collecting such additional categories of personal information, as required by law.

Personal information does not include information excluded from the scope of personal information under applicable law, including (a) truthful information that is a matter of public concern, (b) publicly available information or (c) deidentified or aggregate information.

2. How Do We Use Candidate Personal Information?

CFA collects this information to engage with Candidates, to hire qualified Candidates, and to comply with applicable employment laws. We also use personal information of Candidates for the following business purposes:

(1) Helping to ensure security and integrity to the extent the use of the Candidate's personal information is reasonably necessary and proportionate for these purposes.

(2) Debugging to identify and repair errors that impair existing intended functionality.

(3) Short-term, transient use, provided that the Candidate's personal information is not disclosed to another third party and is not used to build a profile about the Candidate or otherwise alter the Candidate's experience outside the current interaction with CFA.

(4) Performing services on behalf of CFA.

(5) Undertaking internal research for technological development and demonstration.

(6) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned by, manufactured by, manufactured for, or controlled by CFA, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by CFA.

We may also monitor visits to our websites, applications or mobile apps and sessions of Candidates; this monitoring may log the details of your visits to our websites, applications, or mobile apps and information generated in the course of using our websites, applications, or mobile apps, such as mouse movements, clicks, page visits, text entered, how long you spent on a page, and other details of your visits to or actions on our websites or mobile apps. We may also share any of the data collected by these technologies with third parties for our business purposes.

While relatively uncommon, there may be occasions when we use personal information of Candidates for other purposes permitted under applicable law, for example, when we are required to disclose information in connection with contractual or legal matters such as information necessary to respond

to law enforcement and governmental agency requests (i.e., subpoenas); comply with legal and contractual obligations; exercise legal and contractual rights; and initiate or respond to legal claims.

In certain instances, we may maintain and use information in deidentified form. If we do so, we do not attempt to reidentify the information, except for the sole purpose of determining whether our deidentification processes satisfy the requirement under applicable law.

We may use advanced technologies to support our hiring processes. This may include the use of Candidates' information to deploy, operate, improve, or train such advanced technologies, including artificial intelligence (AI) and large language models (LLMs) in ways that align with our hiring practices, such as identifying skills alignment and enhancing the efficiency and fairness of Candidate evaluation. Any such use will be in accordance with applicable laws and subject to appropriate safeguards to protect your personal information as described in this Privacy Policy.

3. How Do We Disclose Personal Information of Candidates?

Limited contact information may be collected by or disclosed to background screening companies to facilitate reference or other background checks, as applicable, to identify qualified candidates. Candidate personal information may also be collected by or disclosed to IT service providers, travel agencies, and other service providers. We disclose, and in the past 12 months have disclosed, all categories of personal information we collect about Candidates to these IT service providers, travel agencies, and other service providers so they can perform services on our behalf.

4. How Long Do We Retain your Personal Information?

We retain and process Candidates' personal information for the length of time needed to carry out the purposes described in this Privacy Policy. We also retain Candidate personal information for related business purposes, and to the extent necessary to manage our relationships with Candidates, comply with our legal obligations, resolve disputes, and enforce our policies and agreements, consistent with our retention policy and as permitted by applicable law.

5. What Rights Do You Have Under California Privacy Law?

California residents have certain rights related to personal information, including:

- The right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.

- The right to request that we delete personal information collected from you. However, please note that we may deny your deletion request as permitted under applicable law.
- The right to request that we correct inaccurate personal information we maintain about you.
- The right to opt out of certain automated decision-making technologies.
- The right to access information about certain automated decision-making technologies.

You may request to exercise these rights by:

- Calling us toll-free at **(833) 907-3207**; or
- Completing our privacy rights request form.

Please note that we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights as required by applicable law. We may require you to provide your name, street address, email address, and mobile phone number you use in connection with your engagement with CFA, and the candidate tracking number to verify your identity in response to exercising requests of the above type. We may limit our response to your exercise of the above rights as permitted under applicable law. When you submit a request to exercise your rights above, we will use the information you provide to process your request and to maintain a record of your request and our response, as permitted under applicable law.

Please note we do not respond to opt-out preference signals from Global Privacy Control (**"GPC"**) with respect to Candidates' personal information because we do not "sell" or "share" such personal information for monetary or other valuable consideration or for cross-context behavioral advertising. You may learn more about GPC by visiting https://globalprivacycontrol.org/.

6. How Can Your Authorized Agent Exercise Your Rights On Your Behalf?

You may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. We will require the agent to provide proof of that written permission. We may require you to verify your own identity in response to a request, even if you choose to use an agent, to the extent permitted by law.

7. Non-Discrimination

We will not discriminate against you because of your exercise of any of the above rights or any other rights, and we will comply with the obligations under the California Consumer Privacy Act. For example, we will not retaliate against you for exercising your rights under applicable law.

8. What Is Our Privacy Policy for Customers?

We respect the privacy of both our Candidates and customers. CFA's privacy policy that applies to our customers, prospective customers and other third parties is located at: https://www.chick-fil-a.com/legal/privacy/chick-fil-a-privacy-policy. We publish metrics regarding the number of requests to exercise certain privacy rights under applicable law that we have received, complied with (in whole or in part) or denied, and also the median number of days in which we responded to such requests, in the previous calendar year, including requests submitted by Candidates, in our privacy policy for customers at: https://www.chick-fil-a.com/legal/privacy/chick-fil-a-privacy-policy.