

PRIVACY POLICY

This is the Privacy Policy for SUBWAY FRESH FIT® Video and Poster Competition (the “Competition”) sponsored by Subway Franchise Advertising Fund Trust Ltd. representing Markets 34, 037, 37-1, 99, 108, 124 and 159 (“SFAFT” or “we”).

SFAFT values privacy. We want to give the Competition participants the opportunity to know what information we collect about them and how we collect, protect, use, disclose and otherwise manage the information gathered, in conformance with applicable law for this Competition between the dates of August 23, 2011 and September 27, 2011.

COLLECTION AND USE OF PERSONAL INFORMATION

The Competition requires participants complete an entry form and send in via mail. The types of Personally Identifiable Information we collect includes name, address, contact information (e.g., e-mail, address, home and mobile telephone numbers) and/or other Personal Information (e.g., information about your school attendance) in order to participate in the Competition.

We use your Personal Information for one of several different purposes, for example:

- to administer your participation in a contest and for other purposes stated on the entry form, such as to allow us to contact you for notification of prize award;
- to allow us to send you the specific information or materials that you have requested, such as a SUBWAY® Card for entering, or other materials; and
- to enable us to communicate with your school, for example, about the Competition, or to respond to an email or other inquiry or request.

SHARING OF PERSONAL INFORMATION

We may share Personal Information with agents or service providers who act for or on behalf of SFAFT for further processing in accordance with the purpose(s) for which the data were originally collected (e.g., third party maintenance of secure listing databases). We require our agents and service providers to agree in writing to maintain the confidentiality and security of Personal Information they maintain on behalf of SFAFT and not to use it for any purpose other than the purpose for which we retained them. This includes the announcement of contest winners through news media.

We destroy Personal Information submitted via the entry form and contest submission (poster or video) for all non-winning entries 60 days following the close of the contest on November 1, 2011. Per the contest guidelines stated on the entry form, we retain the right to use any entries submitted for future commercials or ads.

A NOTE TO PARENTS/GUARDIANS - ADDITIONAL INFORMATION ABOUT CHILDREN'S PRIVACY

A parent or guardian may submit the entry form information on behalf of the child. We collect participant information such as phone, age, grade, state/country, and zip/postal code. The name and school of participants selected as winners may be published online and to media outlets.

We do not share children’s personally identifiable information with third parties other than stated above.

DATA INTEGRITY AND SECURITY

We strive to keep the personally identifiable information you provide secure and we also require our agents and service providers to do so. We have implemented technical and organizational measures designed to help secure your Personally Identifiable Information from theft, accidental loss, and from unauthorized access, use, alteration, disclosure or destruction.

SFAFT takes reasonable steps to ensure that data is reliable for its intended use, accurate, complete and current.

CHANGES

SFAFT will maintain Personal Information in accordance with this Privacy Policy. In the future, we may modify this Privacy Policy. If we decide to materially change our Privacy Policy, we will post those changes to this Privacy Policy. We will use information in accordance with the Privacy Policy under which the information was collected. However, if we are going to use Personally Identifiable Information in a manner different from that stated at the time of collection we will notify users by email. Users will have a choice as to whether or not we use their information in this different manner.

HOW YOU CAN ACCESS, CONTROL AND UPDATE INFORMATION ABOUT YOU

We want to be sure that we keep accurate and up-to-date Personal Information in our records. Therefore, whenever you believe that your Personal Information needs to be updated, you can email us at freshfitprivacyofficer@summitslc.com to update your contact information.

To protect your privacy, we will take reasonable steps to help verify your identity before granting access or making changes.

CONTACT US

If you have any questions or complaints, please contact the Privacy Officer by telephone at: 864-242-4665; by email at: freshfitprivacyofficer@summitslc.com or contact us at the following mailing address:

Attn: Privacy Officer
330 Mills Ave.
Greenville, SC 29605
Office: 864-242-4665
Fax: 864-232-8828

Updated date: 8/26/11