

Last Updated: November 21, 2025

1. Purpose

This Privacy Policy describes how Five Flavors Franchising LLC, and its affiliates (“FFF” “we”, or “us”) may collect, use, and disclose personal information of customers who access or interact with our websites (“Websites”) that link to this Privacy Policy, as well as other personal information about our customers we receive online or offline. The Websites and our related service offerings are referred to in this Privacy Policy as our “Services.”

Before you use the FFF Services, submit any personal information, apply for a job, or place an order through the Services, please read this Privacy Policy (which includes the Supplemental State Disclosures applicable to Consumers that reside in a state that has enacted a consumer privacy law only in Section 7) to be informed about the types of information we may collect about you, how we may collect it, how we may use it, who we may share it with, and your rights and choices regarding your information. We also encourage you to read our Terms of Use.

By accessing the Websites or using the Services, you agree to our Terms of Use and that you have read and understand this Privacy Policy and consent to its contents, including the use of your information described herein. Use of the Services, even if you disagree with or do not understand this Privacy Policy, nonetheless constitutes acceptance of this Privacy Policy. If you do not agree with or understand this Privacy Policy, please do not use or access the Services.

2. What Information Does FFF Collect, and How Is It Collected?

A. Consumers

FFF may collect various types of personal information about customers who use our Services (collectively “Consumer Information”), including:

- Your name, alias, email address, telephone/mobile number, and birth date (“Contact Information”);
- Internet or other electronic network activity, such as browsing history, search history, and information regarding a consumer’s interaction with a website or advertisement;
- Geolocation information, device type, personal identifier, gender, IP address, account name;
- Other personal information you may provide; and

- Inferences drawn from the information above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

FFF collects Consumer Information when you send us an email, register for a mailing list or create an account with us. FFF also collects information using Cookies, as described below. By providing your mobile phone number, you expressly consent to receiving text messages from us regarding services and other FFF news at that number. Standard text message rates may apply. FFF may update your telephone number or other information associated with your account, as provided by you. However, maintaining accurate account information remains, at all times, yours and not FFF's responsibility.

B. Applicants

FFF may collect various types of personal information about team members and applicants who visit our Websites or use the Services (collectively "Applicant Information"), including:

- Your name, alias, email address, telephone/mobile number, mailing address and/or birthdate ("Contact Information");
- Contact Information you submit for someone else;
- Other personal information you may provide.

FFF collects Applicant Information when you send us an email or create an account with us through our Services. FFF also collects information using Cookies, as described below. By providing your mobile phone number, you expressly consent to receiving text messages from us regarding services, and other FFF news at that number. Standard text message rates may apply. FFF may update your telephone number or other information associated with your account, as provided by you. However, maintaining accurate account information remains, at all times, yours and not FFF's responsibility.

3. Use of Cookies and Other Tracking Technologies

When you use FFF's Services, we may, and the vendors we work with, may collect information about your use of the Services through tools such as cookies, pixels, and software development kits. This information may include IP addresses, device identifiers, language preferences, referring URLs, and browser and platform details. We may use these tools to recognize a user's device, store user preferences, and allow us to tailor our Services to better match your interests and preferences.

We may use certain third-party technology vendors (such as Google Analytics V4) in connection with your activity on certain pages, including for advertising purposes and to

understand details about your use of the Site (including referring URL, clicks, cursor movement, and scrolling activity) and personalize content for you.

Please note that we or other parties may collect personal information about your online activities over time and across different devices and online properties when you use the Services. You may see certain ads on other websites based on your use of our Services because we participate in an advertising network administered by a third-party vendor. Ad networks allow us to target our messaging to users through demographics and interests. These networks track your online activities over time by collecting information through automated means, including through the use of cookies, web server logs and web beacons. The networks use this information to show you advertisements that are tailored to your individual interests. The information our ad network vendor collects includes information about your visits to websites that participate in the vendor's advertising networks, such as the pages or advertisements you view and the actions you take on the websites.

With most Internet browsers, you can adjust your browser settings to remove or reject cookies. Please be aware, however, that without Cookies, you may not be able to use all of the features of our Services. The following tools may also allow you to reject their collection of information:

- For more information on how Google Analytics V4 uses data it collects, visit: policies.google.com/technologies/partner-sites. To opt out of Google Analytics V4, visit tools.google.com/dlpage/gaoptout. To adjust your Google advertising settings, visit: myadcenter.google.com.

Please note our Services are not designed to respond to "Do Not Track" signals received from browsers.

4. How We Use the Information Collected

A. Consumers

In addition to the uses identified above, FFF may use the information collected through the Services for various purposes, including to:

- Create and manage your account with us;
- Manage, modify, and improve our Services, including your use of our Services;
- Perform data analysis, audits, fraud prevention and monitoring, and to improve and expand our business activities;
- Offer you products and Services;

- Respond to inquiries from you and send you information that you request;
- Send information to others at your request;
- Communicate with you about FFF opportunities;
- Send online advertising that may be of interest to you;
- Conduct marketing analysis to improve our Services and products;
- Review the number of visitors who use our Services and identify usage trends;
- Provide an enhanced online experience for visitors to our FFF's policies.

B. Applicants

In addition to the uses identified above, FFF may use the information collected through the Services for various purposes, including to:

- Create and manage your account and applicant profile with us;
- Manage, modify, and improve our Services, including your use of our Services;
- Perform data analysis, audits, fraud prevention and monitoring, and to improve and expand our business activities;
- Offer you products and services;
- Respond to inquiries from you and send you information that you request;
- Manage and communicate with you in relation to potential opportunities with us and any application you submit to us;
- Send information to others at your request;
- Provide an enhanced online experience for visitors using our Services; and
- Comply with all applicable laws and requirements and FFF's policies.

5. With Whom Does FFF Disclose the Information Collected?

A. Consumers

FFF may disclose personal information collected via the Services with its vendors to obtain services and provide a positive customer experience. For example, we may engage with vendors to assist us with hosting of the Websites, data analysis, marketing efforts and analysis, and obtaining ratings and feedback on your experiences.

In addition, we may disclose personal information (i) with our affiliates; (ii) when required to do so by law, regulation or legal process (such as court order or subpoena); (iii) in response to requests by government agencies or law enforcement personnel; (iv) in connection with an investigation into suspected criminal activity; (v) when we believe disclosure is necessary to prevent harm; (vi) in the event of a business transaction, such as if we sell or transfer all or a portion of our business or assets (e.g., further to a merger, reorganization, liquidation, or any other business transaction, including negotiations of such transactions); or (vii) for any other purpose disclosed to you and with your consent.

B. Applicants

FFF may disclose personal information collected via the Services with vendors to manage your application review and processing. For example, we may engage vendors to assist with background information and/or verification of information provided in your application.

In addition, we may disclose personal information (i) with our affiliates; (ii) when required to do so by law, regulation or legal process (such as court order or subpoena); (iii) in response to requests by government agencies or law enforcement personnel; (iv) in connection with an investigation into suspected criminal activity; (v) when we believe disclosure is necessary to prevent harm; (vi) in the event of a business transaction, such as if we sell or transfer all or a portion of our business or assets (e.g., further to a merger, reorganization, liquidation, or any other business transaction, including negotiations of such transactions); or (vii) for any other purpose disclosed to you and with your consent.

6. How We Protect the Information you Provide

FFF utilizes reasonable designed programs and security measures to protect the personal information you provide from accidental, unauthorized or unlawful access, alteration, disclosure, use, destruction or loss. Nevertheless, transmission via the Internet is not completely secure and we cannot guarantee the security of your information collected through the Services.

7. Supplemental State Disclosure Notice

This Supplemental State Disclosure Notice section supplements FFF's full Privacy Policy, and applies only to consumers that reside in a state that has enacted a comprehensive privacy law. This Supplemental State Disclosure Notice provides disclosures regarding FFF's online and offline data practices regarding the collection, use, disclosure, sale, and sharing of personal information and privacy rights that may be available to you as a consumer that resides in a state that has enacted a comprehensive privacy law. If you have a disability and cannot access the Privacy Policy, including the Supplemental State Disclosure Notice in this format, please call 708-948-0549 or

email legal@rainbowconeco.com and a paper or electronic version of this notice will be made available to you.

A. Categories of Personal Information Collected and How We Use Personal Information

The table below provides details as to the personal information we collect, why it is collected and how we use it. In this Section, we may use the terms “personal information” and “personal data” interchangeably to refer to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an identified or identifiable person. Personal Information does not include information that is publicly available. Please note that the specific types of Personal Information we collect about you will vary depending on how you interact with us and may not include all of the examples listed. Unless otherwise noted, the disclosures that describe how and why we collect and use your personal information also describe how and why we collected and used your personal information within the past twelve (12) months.

Category	Examples	Purposes for Collection/Use
Identifiers	Name, alias, telephone number, email address, unique personal identifier, account name, online identifier, IP address or other similar identifiers.	To process requests and provide products and services. To provide support, respond to inquiries, investigate and address concerns and monitor and improve our responses. To personalize FFF’s Services, Website, experiences and to deliver content and product and service offerings relevant to interests, including targeted opportunities through our Services, third party sites, and via email or text message. To create and manage accounts and administer participation in our Services and other offerings. To prevent fraud or to respond to law enforcement requests and as required

		by applicable law, court order or governmental regulations. To protect the rights and interests of us and/or our affiliates, to resolve any disputes, to enforce this Policy or any other policy, to protect the rights or property of others or to prevent harm.
Personal Information categories listed in the California customer records statute (Cal. Civ. Code §1798.80(e))	Name, address, telephone number, signature, insurance policy number, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.	To process requests and provide products and services. To provide support, respond to inquiries, investigate and address concerns and monitor and improve our responses. To personalize FFF's Services, Website, experiences and to deliver content and product and service offerings relevant to interests, including targeted opportunities through our Services, third party sites, and via email or text message. To create and manage accounts and administer participation in our Services and other offerings. To prevent fraud or to respond to law enforcement requests and as required by applicable law, court order or governmental regulations. To protect the rights and interests of us and/or our affiliates, to resolve any disputes, to enforce this Policy or any other policy, to protect the rights or property of others or to prevent harm.

Internet or other similar network activity	Browsing history, search history, information on a consumer's interactions with FFF websites, ads and email communications.	To process requests and provide products and services. To provide support, respond to inquiries, investigate and address concerns and monitor and improve our responses. To personalize FFF's Services, Website, experiences and to deliver content and product and service offerings relevant to interests, including targeted opportunities through our Services, third party sites, and via email or text message. To create and manage accounts and administer participation in our Services and other offerings. To prevent fraud or to respond to law enforcement requests and as required by applicable law, court order or governmental regulations. To protect the rights and interests of us and/or our affiliates, to resolve any disputes, to enforce this Policy or any other policy, to protect the rights or property of others or to prevent harm.
Geolocation data	Physical location or movements.	To personalize FFF's Services, Website, experiences and to deliver content and product and service offerings relevant to interests, including targeted opportunities through our Services, third party sites, and via email or text message.

		To create and manage accounts and administer participation in our Services and other offerings. To prevent fraud or to respond to law enforcement requests and as required by applicable law, court order or governmental regulations. To protect the rights and interests of us and/or our affiliates, to resolve any disputes, to enforce this Policy or any other policy, to protect the rights or property of others or to prevent harm.
Sensory data	Audio, electronic and visual information, recorded phone calls and security video recordings.	To provide support, respond to inquiries, investigate and address concerns and monitor and improve our responses. To communicate with applicants and other individuals. For auditing, research, analysis and development, including maintaining and improving our Websites, products and services, and for other internal business purposes. To prevent fraud or to respond to law enforcement requests and as required by applicable law, court order or governmental regulations. To protect the rights and interests of us and/or our affiliates, to resolve any disputes, to enforce this Policy or any other policy, to protect the rights or property of others or to prevent harm.

Professional or employment-related information	Current or past job history or performance evaluations. Information about a consumer's business, operations, revenue or creditworthiness.	As part of FFF's application process for potential participation in our program and prospective business affiliates. To contact vendors and third-party providers and communicate with them concerning application information provided and other relevant background information.
Inferences	Information reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes derived from other Personal Information collected by FFF.	To personalize FFF's website and to deliver content and product and service offerings relevant to interests, including targeted offers and ads through our Website, Services, third-party sites, and via email or text message. To evaluate prospective partners, applicants, vendors, and for other internal business purposes.

FFF has obtained the personal information listed above from the following sources:

- Directly from consumers. We may collect certain personal information when you interact directly with us or FFF Services. For example, when you enter data while using our Services, when you create an account or when you submit an application.
- Other sources. We may get personal information from other companies. For example, third party platforms may provide us the personal information who place an order to FFF through their platforms.

B. Sensitive Personal Information

FFF may collect the types of sensitive personal information indicated in the chart below:

Category of Sensitive Personal Information	Purposes for Collection/Use
	For applicants, FFF may use or disclose your personal and/or sensitive personal information we collect for one or more of the purposes listed in the chart below:
Government identifiers (social security, driver's license, state	To maintain contact with applicants

identification card or passport number)	To comply with applicable laws and regulations
Complete account access credentials (account log-in, financial account, usernames, account numbers, or debit or credit card numbers combined with required access/security code or password, or credentials allowing access to an account)	To review and evaluate applicants and candidates for partnership To conduct background checks or otherwise collect background information. To manage an applicant's relationship with FFF, including for: • partnership evaluation • the creation, maintenance and security of online applicant accounts
Precise geolocation	
Racial or ethnic origin, religious or philosophical beliefs or union membership)	To comply with applicable tax, health and safety, anti-discrimination, immigration, labor and employment, social welfare, and other applicable laws and regulations
Citizenship or immigration status	To monitor, investigate and enforce compliance with potential breaches of FFF's policies and procedures and legal and regulatory requirements
Genetic data	
Mail, email or text message contents	To comply with civil, criminal, judicial or regulatory inquiries, proceedings, investigations, subpoenas, summons and litigation matters To exercise or defend the legal rights of FFF and its team members, affiliates, guests, contractors, agents, vendors and third party providers

C. Disclosures of Personal Information for a business purpose

In the preceding twelve (12) months, FFF has disclosed the following categories of consumer personal information for a business purpose:

- Identifiers
- California Customer Records personal information categories
- Commercial Information
- Internet or other similar network activity
- Geolocation data

We disclose the above categories of personal information to the following categories of recipients: service providers, business partners, and affiliates who assist FFF with business operations. In addition to the purposes for disclosures as described in Section 5 above, FFF may disclose the above categories of personal information for the following business purposes: providing advertising and marketing services (except for cross-context behavioral advertising), short-term, transient use, including non-personalized advertising, auditing related to ad impressions, ensuring security and integrity of personal information, debugging to identify and repair errors that impair existing intended functionality, and detecting, investigating, or protecting against malicious, deceptive, fraudulent, or illegal activity.

In the preceding twelve (12) months, FFF has disclosed the following categories of applicant or personal information for a business purpose:

- Identifiers
- California Customer Records personal information categories
- Commercial Information
- Internet or other similar network activity
- Geolocation data
- Professional or employment-related personal information

In the preceding twelve (12) months, FFF has disclosed the following categories of applicant Sensitive Personal Information for a business purpose:

- Social security, driver's license, state identification card or passport number
- Complete account access credentials (account log-in, financial account, usernames, account numbers, or debit or credit card numbers combined with required access/security code or password, or credentials allowing access to an account)
- Mail, email or text message contents
- Racial or ethnic origin, religious or philosophical beliefs or union membership)
- Citizenship or immigration status
- Financial information

D. Sales or Sharing of Personal Information

Although we do not sell Personal Information in exchange for money, some of the way we disclose personal information for targeted or cross-context behavioral advertising may be classified as “sales” or “sharing” under certain laws.

FFF has sold or shared the following categories of personal information to third parties, including marketing and advertising companies and social media platforms, for the purposes of providing analytics, targeted or cross-context behavioral advertising, remarketing:

- Identifiers
- Customer Records
- Commercial Information
- Internet or Other Electronic Network Activity Information

We do not have actual knowledge that we sell or share personal information of consumers under 13 years of age.

E. Retention of Personal Information

We keep the categories of personal information described above for as long as necessary for the purposes described in this Privacy Policy or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your personal information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your personal information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected;
- The personal information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your personal information by applicable laws or regulations.

Where personal information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

F. Submitting Requests Relating to Your Personal Information

Depending on your state of residency, you may have the right to submit certain requests relating to your personal information as described below. To exercise these you rights, you can either call 708-948-0549 to make the request, or submit the form in person at one of our California locations.

G. Authentication and Verification Process

Please note that FFF has the right and obligation to verify your identity prior to processing certain privacy requests. FFF will verify your identity as follows:

- **Password Protected Accounts.** If you have a password protected FFF account, FFF will match the information provided by you in your request to the personal information that FFF already maintains. FFF may also require you to re-authenticate yourself before disclosing your personal information to you via the same method above.
- **No Password Protected Account.** If you do not have or cannot access a password protected FFF account, FFF will verify your request by matching at two to three data points that you provide in your request with those data points already maintained by FFF. The number of data points required to be verified depends upon the sensitivity of the personal information requested. If you are requesting to know your specific pieces of personal information or access your personal information in a portable format, you may be required to sign a declaration under penalty of perjury.

H. Your Consumer Privacy Rights

Depending on your state of residency, you may have the following consumer privacy rights.

Right to Know. You may have the right to know what personal information we have collected about you. This right includes:

1. California consumers may have the right to know the categories of personal information we have collected about you, such as
 - a. The categories of sources from which the personal information was collected
 - b. Our business or commercial purposes for collecting, selling, sharing, or disclosing personal information
 - c. The categories of recipients to which we disclose personal information
 - d. The categories of personal information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of Personal Information

- e. The categories of personal information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information
2. California consumers may have the right to know the specific pieces of personal information we have collected about you.
3. Oregon and Delaware consumer may have the right to know certain information about the third parties to which we have disclosed personal information.

Right to Access and Data Portability. You may have the right to confirm whether we are processing your personal information, to access your personal information, and to obtain a copy of personal information. You may also request that we send the copy of the personal information you provided to us in a portable format.

Right to Delete. You may have the right to request the deletion of your personal information collected or maintained by FFF, subject to certain exceptions.

Right to Correct. You may have the right to request that we correct any of the personal information or sensitive personal information that we collected from you and retained, subject to certain exceptions. We may request additional information from you to understand the persona information you would like to correct.

Right to Opt-Out of the Sale and Sharing of Personal Information. You may have the right to opt-out of the sale of your personal information by FFF and to request that we do not share your personal information for targeted or cross-context behavioral advertising. To opt out of the sale of or sharing of your personal information through tracking technologies, you may call 708-948-0549 or email us at legal@rainbowconeco.com. You may also opt out of the sale of or sharing of your personal information through tracking technologies by using an opt-out preference signal such as the Global Privacy Control. If you wish to opt-out of the offline sale of your personal information, you can make such a request by calling 708-948-0549 or emailing us at legal@rainbowconeco.com.

Right to Opt-Out of Profiling. We do not profile individuals in furtherance of decisions that produce legal or similarly significant effects under applicable state privacy laws.

Right to Limit Sensitive Personal Information Processing. FFF only uses sensitive personal information for legally-permitted purposes, and does not offer the right to limit such uses.

Right to Withdraw Consent. If you have provided consent for the processing of your personal information, you may have the right to withdraw such consent.

Right to Appeal. Sometimes we are unable to process requests relating to your personal information, in which case, your request will be denied. If you have previously submitted a privacy rights request to us that has been denied and you believe we denied it in error, you may have the right to appeal for reconsideration of your request using our webform or toll-free phone number.

Right to Non-Discrimination/No Retaliation for the Exercise of Privacy Rights. You have the right not to receive discriminatory and/or retaliatory treatment by FFF for the exercise of your privacy rights. We will not discriminate and/or retaliate against you for exercising your privacy rights.

I. Authorized Agent

Depending on your state residency, you may designate an authorized agent to make certain types of requests on your behalf. In order to designate an authorized agents, you must:

(1) provide the authorized agent with signed, written permission identifying what action he/she may take on your behalf, a copy of which written permission must be provided to FFF upon request; and

(2) complete the authorized agent appointment available upon request by emailing legal@rainbowconeco.com.

The authorized agent may be asked to verify his/her identity.

J. California Shine the Light Law

Subject to certain limitations under California Civil Code § 1798.83, California residents may request a list of certain categories of Personal Information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and for the identity of those third parties. California residents may contact us at [708-948-0549](tel:708-948-0549) or by mail to Five Flavors Franchising LLC, Attn: General Counsel, 7075 Veteran's Blvd., Burr Ridge, IL 60527, to make such a request.

K. Notice of Financial Incentives and Additional Loyalty Program Disclosures

The FFF Rewards Program may be considered a financial incentive under California law. If you are a California resident, you opt in and consent to the terms described in our California Notice of Financial Incentive Disclosures.

8. Special Rules for Minors

FFF may collect personal information about minors, but only with prior parental or guardian consent. FFF Services are not intended for, and are not intentionally targeted to, children

under 13 years of age. We do not knowingly request or seek to collect personal information from any person under 13 years of age through the Sites. If we learn that the online Services have received personal information directly from a child who is under the age of 13, we will delete the information in accordance with applicable law.

9. Third-Party Links to Other Sites and Social Network Sites

Our Websites may contain links to other sites that are operated by companies not affiliated with FFF. We are not responsible for the content or privacy practices on any of these non-FFF sites. If you are accessing these non-FFF sites, we strongly encourage you to review the privacy policy and practices associated with those sites.

If you use Website features operated by third-party vendors, such as when you use the online ordering app, and third party social networking services (such as Facebook, X (formerly Twitter), Instagram, TikTok etc.), we may receive information you have made available to those vendors or services. Some of the social networking services allow you to push content from our Services to your contacts or to pull information about your contacts so you can connect with them on our Websites and through our Services. Some of these services also will facilitate your registration for our Services or enhance or personalize your experience on our Services. You should make sure you understand the information your third-party social networking services may make available to our Services. We may use and disclose the information we receive through our Services through third-party vendors and social networking services as described in this Privacy Policy.

10. What Are Your Options?

You are not under any obligation to provide us with personal information. However, if you choose not to provide us with your personal information, we may not be able to provide you with certain Services or use of our Websites and/or App.

Accessing, Reviewing & Changing Your Personal Information. If you have created an account on our Websites, you may login to your account to edit or delete the certain information provided.

Communications Preferences. We offer choices about your communication preferences. If you do not wish to receive our mailings or promotional materials, you can unsubscribe using the link in our emails, or send us a request to be removed from our mailing list via email at legal@rainbowconeco.com, or via regular mail to:

Five Flavors Franchising LLC
Attn: General Counsel
7075 Veteran's Blvd.

Burr Ridge, IL 60527

FFF Websites also provide an option to unsubscribe from our communications. You can log into your FFF account and select “off” in “Communication Preferences” to unsubscribe. Please note that you may still receive transactional or informational emails from us after you unsubscribe.

11. Changes to this Privacy Policy. FFF may at any time revise its Privacy Policy, and the revised versions will be posted on the Websites. We will indicate changes to the Privacy Policy by updating the “Last Updated” date at the bottom of this Privacy Policy. Your continued use of the Services after any update to this Privacy Policy will constitute your acceptance of the changes.

12. Contact for Questions Regarding the Privacy Policy

Thank you for reading our Privacy Policy. We hope you have a better understanding of our commitment to safeguarding online privacy. If you have any questions or concerns about our Privacy Policy or Terms and Conditions, please contact us using one of the following methods:

Email: legal@rainbowconeco.com

Mail:

Five Flavors Franchising LLC

7075 Veteran’s Blvd.

Burr Ridge, IL 60527

Phone: 708-948-0549