

## Dine Brands Global, Inc. Applicant and Employee Privacy Notice

Last Updated/Effective Date: December 1, 2024

### 1.0 Introduction

In this Applicant and Employee Privacy Notice ("**Notice**"), Dine Brands Global, Inc. and its subsidiaries ("**Dine Brands**", "**we**", or "**us**") describe the types of information that we may collect from job applicants and current and former employees ("**you**"), how we may use that information, and how we may share that information.

This Notice applies to current and former Dine Brands employees as well as applicants to open positions at Dine Brands. This Notice does not form a part of any contract of employment offered to job applicants hired by Dine Brands. Provisions of this Notice dealing with individuals employed with Dine Brands are not applicable until they begin working for us.

We may change this Notice from time to time, and we will post changes in an area of our website that is accessible to job applicants and current and former Dine Brands employees.

When you apply to work for Dine Brands via one of our websites ("**Sites**"), you will be re-directed to a website operated by our third-party service provider (e.g., Workday). Our third-party service provider will provide us with the information necessary for us to consider your application. Any information that you provide directly to our third-party service provider is also governed by its own privacy policy.

This Notice is available to consumers with disabilities. To access this Notice in an alternative downloadable format, please click [here](#).

### 2.0 Categories of Personal Information We May Collect

"**Personal Information**" means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. We may collect the following types of Personal Information when you apply for a job with Dine Brands or during the course of your employment at Dine Brands:

- Your name, address, email address, telephone number, and other contact information;
- Your resume or CV, cover letter, previous and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of an application and/or the application and recruitment process;
- Information from interviews you may have, if any;
- Details of the type of employment you are looking for, current and/or desired salary, other terms relating to compensation and benefits packages, and job preferences;
- Details of how you heard about the position you are applying for;
- Any sensitive and/or demographic information obtained during the hiring process such as Social Security number, gender, information about your citizenship and/or nationality, medical or health information, and/or your racial or ethnic origin;

- Reference information and/or information received from background checks (as applicable), including information provided by third parties;
- Information relating to any previous applications you may have submitted to Dine Brands and/or any previous employment history with Dine Brands;
- Information about your educational and professional background from publicly available sources that we believe is relevant to your application or a potential future application (e.g., your LinkedIn profile);
- Banking information for direct deposit purposes, income history, income information, benefits information, and information regarding your beneficiaries;
- Audiovisual information captured through our surveillance systems at our Restaurant Support Center (“**RSC**”) and/or restaurants (collectively, “**Facilities**”); and
- Information collected from you automatically when you use our Sites, while using a Dine Brands device, or while connected to Dine Brands’ internet through cookies, web beacons, pixel tags, and other online tracking mechanisms.

### 3.0 Information Collected From Other Sources

We may obtain information about you from various third-party and public sources, and we may combine that data with Personal Information we have. For example:

- Dine Brands may collect application information from recruiters;
- Dine Brands may collect information regarding your past employment (including performance information) from former employers;
- Dine Brands may collect information regarding your citizenship or eligibility to work in the country where you would be employed from government agencies;
- Dine Brands may collect your credit history and/or criminal record if you consent to a credit check or background check\*;
- Dine Brands may collect information relating to your qualifications to work with Dine Brands from your references;
- Dine Brands may collect your drug test results from the third-party services provider; Dine Brands may collect information to perform applicant and employee drug tests; and
- Dine Brands may collect tax-related information from the Internal Revenue Service.

\* Qualified applicants with arrest or conviction records will be considered for employment in accordance with the Los Angeles County Fair Chance Ordinance for Employers and the California Fair Chance Act and/or other applicable laws and regulations in other jurisdictions.

### 4.0 Children Under 18

We only employ those who are legally eligible to work at the location of employment, which is typically the age of majority (18 years old). Please do not send us application materials if you are under the legal age eligible for employment.

### 5.0 Purposes for Which We May Collect Personal Information

Dine Brands may process your Personal Information as described in this Notice for the following purposes:

- **To manage the application process.** We may use your Personal Information to process your job application, verify the information you have provided in your application, communicate with you regarding your application, answer your questions regarding the application process, and confirm your eligibility for a position. We may also save your information for future job openings within Dine Brands.
- **To manage the hiring process.** We may use your Personal Information in the hiring process to conduct interviews. We may also use your Personal Information to perform background and reference checks—with your consent—if you are offered a position.
- **To communicate with you.** We may use your Personal Information to provide information to you, respond to your questions, notify you of changes to your compensation and benefits program, or notify you of emergencies.
- **To manage the onboarding process.** Upon being hired by Dine Brands, we may collect Personal Information when you complete new hire paperwork to assist us in administering salary and benefits and to assist us with complying with governmental and legal requirements.
- **To administer compensation and benefits programs.** We may use the Personal Information you provide to process payroll, pay taxes, help employees address employment-related tax issues, administer benefits, and handle work-related expense reimbursements. We may also use this Personal Information to manage requests for accommodation requests and administer employee claims such as workers' compensation or unemployment benefits.
- **Recruiting.** We may use Personal Information to communicate with you regarding the recruiting process, learn where you heard about Dine Brands, and evaluate and improve our recruiting process.
- **For performance management.** Dine Brands may collect Personal Information to assess your performance, assist in career development, conduct pay and grading reviews, and handle any employment-related disputes. We may also use Personal Information to respond to violations of company policies and gather information for disciplinary actions. We may monitor any activity you perform online while using a Dine Brands device or while connected to Dine Brands' internet such as monitoring the websites you visit and your activity on those websites. We may also track the emails you send using your Dine Brands-provided email address, the phone calls you make using a Dine Brands-provided device, and the chat messages you are involved in using the Dine Brands-provided instant messaging program.
- **Educational and professional services.** We may use your Personal Information to assist with education, training, and professional development.
- **Law enforcement and courts.** We may disclose your Personal Information in response to a subpoena, a search warrant, or other legally valid process. We may use your Personal Information to cooperate with law enforcement or other government entities if you are suspected of having violated applicable laws.
- **Recordkeeping.** We may use Personal Information to comply with applicable legally required or industry standard business and employment recordkeeping requirements and to respond to governmental requests for information.

- **Health and safety.** We may use Personal Information to protect your health and safety or the health and safety of others, including the use of technology to allow contact tracing if you may have been exposed to communicable diseases such as COVID-19. We may also use this information to respond to an employee-related emergency. We may also use this Personal Information to protect our Facilities and personal property.
- **Protect our legal rights.** We may use your Personal Information to protect our legal rights, defend a claim or lawsuit, and investigate or prevent actual or suspected loss or harm to persons or property. We may use your Personal Information to seek legal, accounting, or other professional advice. We may use your Personal Information when necessary to identify, contact, or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, Dine Brands or any other party.
- **Security.** We may use your Personal Information to monitor the use of our information systems and electronic resources, to conduct internal audits or investigations, and for the safety and security of Dine Brands employees, visitors, and Facilities. We may also use such information to protect Dine Brands against illegal activity and misconduct such as fraud, deceptive practices, and security investigations. We may use this to offer, operate, maintain, deliver, troubleshoot, and update the Sites, programs, network, and systems used by Dine Brands in the course of its business.

## 6.0 How We May Share Your Personal Information

We may share your Personal Information in the following circumstances:

- **Within Dine Brands.** We may share your Personal Information internally within Dine Brands and among Dine Brands' affiliates for purposes of recruiting and/or evaluating applicants, resource planning, talent retention, human resources, and business administration functions. All Dine Brands employees who access or process applicant personal information are required to comply with Dine Brands' privacy and security policies.
- **Service providers.** We may share your Personal Information with third parties that help us provide and administer our talent and recruiting, human resources, and business functions.
- **Legal requirements.** We will cooperate with law enforcement and other governmental agencies. We may disclose Personal Information for the following legal purposes:
  - If we believe in good faith that we are legally required to disclose that Personal Information.
  - If we are advised to disclose Personal Information by our legal counsel.
  - When necessary to identify, contact, or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, Dine Brands or any other party.
  - For tax and payment purposes (e.g., Internal Revenue Service).
  - To protect our rights or property, your health and safety, or the health and safety of others.
  - To detect and investigate fraud or illegal activity or to respond to a government request.
  - To respond to an emergency.

- **Professional advisors.** We may share Personal Information with our professional advisors, such as our attorneys and accountants, in their capacity as advisors, including for advice on potential or actual litigation matters.
- **Change in ownership.** We may use and disclose Personal Information in connection with the evaluation of a change of control of Dine Brands such as in the event of a merger, acquisition, or sale of assets. We may provide Personal Information in connection with a due diligence process, or it could be transferred as part of the change in control to subsequent owner(s). If we (or our assets) are acquired or if we go out of business, enter bankruptcy, or go through some other change in control or reorganization, Personal Information and other information could be one of the assets transferred to or acquired by a third party or reviewed as part of the due diligence process.

#### 7.0 De-Identified/Aggregate Information

We may collect or create information that is de-identified or aggregate information that does not identify a natural person ("**De-Identified Information**"). Dine Brands is the sole and exclusive owner of De-Identified Information and may use or share such information for any legal business purpose. For example, Dine Brands may create aggregate information about applicants to learn about the success of its recruiting processes.

#### 8.0 Data Security

Dine Brands makes commercially reasonable efforts to protect your Personal Information. We protect Personal Information using technical and organizational measures designed to reduce the risks of loss, misuse, and unauthorized access, disclosure, alteration, and destruction of Personal Information appropriate to the type of Personal Information processed.

Notwithstanding our security safeguards, it is impossible to guarantee 100% security in all circumstances. You are responsible for safeguarding the security of any password, user ID, or other forms of authentication involved in obtaining access to password-protected or secure areas of any Dine Brands-owned or licensed platforms.

If you have reason to believe that your interaction with us is no longer secure, you must immediately notify us of the problem. If a breach of your Personal Information occurs, we will notify you of the breach if and as required under applicable law. In order to protect you and your Personal Information, Dine Brands may suspend your use of any Dine Brands programs or platforms without notice pending an investigation if any breach of security is suspected.

#### 9.0 Retention of Your Personal Information

Personal Information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law, taking into consideration any statutorily required minimum periods of time in applicable jurisdictions. Generally, this means your Personal Information will be retained until the end of your employment or work relationship with us plus a reasonable period of time thereafter to respond to employment or work-related inquiries or to deal with any legal matters, document the

proper termination of your employment or work relationship, or to provide you with any ongoing benefits.

Personal Information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our systems, and we will also require third parties to destroy or erase such Personal Information where applicable.

10.0 Notice to California Residents

This Section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations (“CCPA”), as amended by the California Privacy Rights Act (the “CPRA”), where “**Personal Information**” has the definition set forth in the CCPA, as amended by the CPRA.

Dine Brands makes the following disclosures regarding Personal Information it has collected within the 12-month period preceding the Effective Date of this Notice:

Sources of Personal Information

We may collect Personal Information from the categories of sources detailed in Sections 2.0 (“**Categories of Personal Information We May Collect**”) and 3.0 (“**Information Collected From Other Sources**”) above.

Use of Personal Information

We may collect Personal Information for the business and commercial purposes detailed in Section 5.0 (“**Purposes for Which We May Collect Personal Information**”) above.

Disclosure of Personal Information

The categories of third parties to whom we may disclose Personal Information for a business or commercial purpose are detailed in Section 6.0 (“**How We May Share Your Personal Information**”) above. In the employment context, we do not “sell” (i.e., for monetary or other valuable consideration) or “share” (i.e., for cross-context behavioral advertising) your Personal Information as those terms are defined under the CCPA, as amended by the CPRA.

Category of Personal Information	Third Parties to Whom Personal Information is Sold or Shared	Retention Period
Identifiers.	We do not sell or share this category of Personal Information.	Applicants: 3 years. Employees: Length of your employment plus 8 years.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	We do not sell or share this category of Personal Information.	Applicants: 3 years. Employees: Length of your employment plus 8 years.



Protected classification characteristics under California or federal law.	We do not sell or share this category of Personal Information.	<u>Applicants</u> : 3 years. <u>Employees</u> : Length of your employment plus 8 years.
Internet or other similar network activity.	We do not sell or share this category of Personal Information.	Varies depending on the website and the type of cookie collecting this PI, but generally no more than 2 years. One exception is a cookie associated with the Sitecore Content Management System, used for web analytics to identify repeat visits by unique users, that has a lifespan of 10 years.
Geolocation data.	We do not sell or share this category of Personal Information.	1 year from the date of your last interaction with us.
Sensory data.	We do not sell or share this category of Personal Information.	60 days from the date of your last visit.
Professional or employment-related information.	We do not sell or share this category of Personal Information.	<u>Applicants</u> : 3 years. <u>Employees</u> : Length of your employment plus 8 years.
Sensitive Personal Information.	We do not sell or share this category of Personal Information.	<u>Applicants</u> : 3 years. <u>Employees</u> : Length of your employment plus 8 years.

## [11.0 Notice to Individuals in the European Union, European Economic Area, Switzerland, and the United Kingdom](#)

This Section provides additional information regarding Dine Brands’ processing of Personal Information of individuals located in the European Union (“EU”), European Economic Area (“EEA”), Switzerland, and the United Kingdom (“UK”) in accordance with the EU General Data Protection Regulation, the Swiss Federal Act on Data Protection, and the UK Data Protection Act.

### Legal Basis for Processing

Our legal basis for processing Personal Information depends on the Personal Information concerned and the context in which we process it. We may process Personal Information from you where we need it to perform a contract with you, where the processing is in our legitimate interests (including the purposes described in this Notice), where the processing is necessary for us to meet our applicable legal obligations, or if we otherwise have your consent.

### Special Category Data

To the extent you provide Dine Brands with any Special Category Data, Dine Brands will ensure it has obtained prior express consent from you, or it has another lawful basis to collect this data. “Special Category Data” is data that reveals your racial or ethnic origin, political opinions, religious, moral, or philosophical beliefs, trade union membership, political views, genetics,

biometrics for the purpose of identifying a person, and health or a person's sex life and/or sexual orientation.

### Automated Decision Making

Dine Brands does not make any automated decisions on your behalf or about you without first obtaining your express, opt-in consent. In the event we secure your consent to do so, you have the right to object to the processing of Personal Information via automated decision making at any time by contacting us at [privacydesk@dinebrands.com](mailto:privacydesk@dinebrands.com).

### Transfers to Third Parties and Countries

Personal Information that we may collect or receive may be transferred to and/or processed by third parties that are located outside of the EU, EEA, Switzerland, or the UK, some of which applicable authorities may not consider to have an adequate level of protection for Personal Information. Dine Brands will only transfer Personal Information to third parties located outside of the EU, EEA, Switzerland, and the UK when it has ensured appropriate safeguards for such Personal Information through use of the standard contractual clauses or other lawful and approved methods.

## 12.0 Your Privacy Rights and How to Exercise Them

Depending on where you live, you may have the following rights with respect to your Personal Information under applicable data protection laws:

- *Access* – The right to know what Personal Information we have collected about you and to access such Personal Information.
- *Data Portability* – The right to receive a copy of your Personal Information in a portable and readily usable format.
- *Deletion* – The right to delete your Personal Information that we have obtained, subject to certain exceptions.
- *Correction* – You may have the right to correct inaccuracies in your Personal Information.
- *Opt Out of Certain Processing* – The right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising and (b) opt out of the sale or sharing of your Personal Information, if applicable. As set forth above, we do not sell or share your Personal Information.
- *Objection/Restriction of Processing* – The right to object or restrict us from processing your Personal Information in certain circumstances.



- *Withdraw Consent* – The right to withdraw your consent where we are relying on your consent to process your Personal Information.
- *Lodge a Complaint* – The right to lodge a complaint with a supervisory authority or other regulatory agency if you believe we have violated any of the rights afforded to you under applicable data protection laws. We encourage you to first reach out to us, so we have an opportunity to address your concerns directly.

To exercise any of the privacy rights afforded to you under applicable data protection laws, please submit a request to us by one of the following methods:

- Calling us toll free at (866) 926-5019
- Submitting a request through our [webform](#).

You will not be discriminated against in any way for exercising your rights listed in this Notice. Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information.

We must verify your identity before fulfilling your requests, and if we cannot verify your identity, we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

### [13.0 Changes to this Notice](#)

We may change this Notice from time to time, and we will post any changes on this page. Each version of this Notice is identified at the top of the page by its Effective Date.

### [14.0 Contact Us](#)

For any questions or concerns, please contact us as follows:

Legal Department  
[privacydesk@dinebrands.com](mailto:privacydesk@dinebrands.com)  
10 West Walnut Street, 4th Floor  
Pasadena, California 91103  
(866) 926-5019