

Subcard® Australia Privacy Policy

We are committed to protecting the privacy of your personal information. This privacy policy explains how we collect, use, disclose and hold personal information and how to contact us if you have any queries about our management of your personal information. This privacy policy applies from 1 September 2026.

Subcard Australia Pty Ltd (ABN 81 623 161 026) (we, us and our) operated the Subcard® loyalty, gift and online ordering program in Australia (Subcard® Program) until 31 August 2026. Subcard Australia Pty Ltd is a subsidiary of Independent Purchasing Company (Australasia) Ltd (IPC Asia Pacific).

Closure of the Subcard® Loyalty and Gift Program

The Subcard® Loyalty and Gift Program closed on 31 August 2026. From 1 September 2026, the Subcard® Program includes the Gift Card Refund Program (described in the Subcard® Gift Card Refund Program section below).

From 1 September 2026, the Subway® app, online ordering and website are operated and managed by Subway® (and not Subcard®). Our arrangements with respect to the operation of these functions ended on 31 August 2026. We do not share your personal information with Subway® in connection with the Subway® app or online ordering from 1 September 2026. If you use the Subway® app or online ordering from 1 September 2026, your use is governed by Subway's® own privacy policy.

As a result of the closure of the Subcard® Program, the personal information we hold about you will continue to be managed in accordance with this privacy policy. We will retain personal information for so long as it is required for the purposes described in this policy (including to administer the Gift Card Refund Program), after which it will be de-identified or destroyed in accordance with applicable law.

Subcard® Gift Card Refund Program

From 1 September 2026, a Gift Card Refund Program is available for holders of Subway® Gift cards and Subway® eGift cards with valid and unexpired gift dollar balances. When you submit a refund application, we and any third parties administering, or supporting the administration of the Gift Card Refund Program, collect personal information including your name, email address, contact details, gift card number and gift dollar balance for the purpose of verifying your identity, assessing your eligibility and processing your refund.

By submitting a refund claim, you consent to third parties administering or supporting the administration of the Gift Card Refund Program using your personal information for this purpose. For details of the Gift Card Refund Program, including how to submit a refund claim and how refunds will be issued, please refer to subcardgiftrefund.com.au.

What is personal information?

"Personal information" is information or an opinion, in any form and whether true or not, about an identified individual or an individual who is reasonably identifiable. Examples include an individual's name, address, contact number and email.

The kinds of personal information we collect and hold

The kinds of personal information we collect and hold about you depends on the nature of your dealings with us and the circumstances of collection, including whether we collected the information from you as a member of the Subcard® Program, a guest on the Subway® online ordering platform, a representative of one of our suppliers, a Subway® franchise owner, as a participant in the Gift Card Refund Program, or in some other capacity.

For example, if you registered as a member of the Subcard® Program, we collected and hold personal information such as:

- your personal details such as your name, email, date of birth, telephone number and gender;
- your Subcard® card number;
- your loyalty and/or gift balance/s;
- offers applicable to your membership of the Subcard® Program;
- details of purchases applicable to your membership of the Subcard® Program, including products purchased, date and location of purchase, gift dollars purchased or redeemed and reward dollars earned or redeemed; and

- information about the payment method you might have used for your purchases through one of our websites (including www.subcard.com.au and www.order.subway.com.au) or the Subway® mobile application (Subway app) before 1 September 2026.

If you made a purchase as a guest on one of our websites, we collected and hold personal information such as your name and phone number and details about the payment method you used for your purchases.

If you deal with us in some other capacity, we may collect your name and contact details and any other information you choose to provide to us. We may also collect details of the interactions you have with us.

We do not generally collect sensitive information (such as health information), and we will only collect sensitive information about you with your consent (unless we are otherwise required or authorised by or under law to do so).

How we collect and hold personal information

We collect personal information in a number of ways, including:

- directly from you (such as when you interact with us in writing, electronically or via telephone);
- when you registered as a member of the Subcard® Program on one of our websites or through the Subway® app;
- when you made a purchase on one of our websites or through the Subway® app (before 1 September 2026);
- when you made a purchase using your Subcard® Program card in a participating Subway® restaurant (before 1 September 2026); and
- when you submit a refund application under the Gift Card Refund Program (from 1 September 2026).

The purposes for which we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for a range of purposes, including:

- conducting and administering the Subcard® Program, including the Gift Card Refund Program;
- administering the accounts of members of the Subcard® Program;
- responding to enquiries about our programs and services;
- processing payments made to us by franchise owners;
- for our administrative purposes and internal record keeping;
- performing research and analysis; and
- managing our relationships with Subway® franchise owners who participated in the Subcard® Program.

We may use and disclose your information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

If we are unable to collect personal information from or about you, we may not be able to provide our services to you, respond to your enquiries or engage in certain other dealings with you, including processing a refund application.

Direct communications

If you registered for the Subcard® Program or made a purchase through one of our websites, the app or in a restaurant, or applied for a gift card refund, we may use your personal information to contact you, or to enable a third party assisting in administering the Gift Card Refund Program to contact you.

We may send these communications by email, mobile, SMS, social media or via a survey. You can let us know at any time if you no longer wish to receive these communications, by emailing us at subcardclosure@ipcasiapacific.com.

Disclosure of personal information to third parties

We may disclose personal information we collect to third parties for the above purposes. These third parties include:

- Subway® entities as set out in the opt-in notice that was provided in the Subway® app before 1 September 2026, if you previously consented to your personal information being provided to Subway® via the opt-in notice;
- Subway® entities, including Franchise Worldwide Headquarters, LLC and Subway Systems Australia Pty Ltd;
- our contracted service providers, including our information technology and loyalty program service providers and professional advisers;

- the Gift Card Refund Program administrators, including service providers who assist in administering and providing the Gift Card Refund Program; and
- financial institutions for payment processing.

Disclosure of personal information to overseas recipients

Some of our service providers and Subway® entities are located overseas and, as a result, personal information collected and held by us may be transferred overseas. We use service providers located in the USA, Australia and New Zealand to store and process information about Subcard® Program members, guests and Subway® franchise owners Gift Card Refund Program applicants on our behalf.

How we hold personal information, and quality and security of personal information

We generally hold personal information in computer systems, including computer systems operated for us by our service providers. We take reasonable steps to protect the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. This includes taking appropriate security measures to protect electronic materials, and requiring our service providers to do so too.

We take reasonable steps to ensure that personal information we collect, use and disclose is accurate, complete, up to date and relevant. You can help by letting us know about any changes to your personal information (such as your address or phone number) by contacting us at or subcardclosure@ipcasiapacific.com.

Access to and correction of your personal information

Please contact us (using the contact details at the end of this policy) if you would like to access or correct the personal information we hold about you. We will generally provide you with access to your personal information (subject to some exceptions permitted by law), but may charge an access fee to cover the cost of retrieving the information and supplying it to you.

Collection of information other than personal information

Some of the information collected about your visit to our websites is not personal information, because it does not reveal your identity. For example, we may record your server address, the date and time of your visit, the pages you viewed, any documents you downloaded and the type of browser and operating system you used.

If collected, this information will be used and disclosed by us in anonymous, aggregated form only, for purposes including statistical analysis and web site development. You are not individually identified, however we reserve the right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our websites, or where we are otherwise required or authorised by law to do so.

Cookies

We use data collection devices such as "cookies" on certain web pages to help analyse our web page flow and measure promotional effectiveness. Cookies are pieces of information a website sends to an individual's browser while they are viewing the website. Cookies allow the website to remember important information that will make your visit to the site more useful. If you do not wish to receive a cookie or if you wish to set your browser to warn you each time a cookie is being sent, or if you wish to turn off all cookies, use the options on your browser to assist you. The Help option on your browser may assist you in changing your cookie preferences. Please note that by turning cookies off, you may not have access to all features available on our website.

Complaints

Please contact us (using the contact details at the end of this policy) if you have any concerns or complaints about the manner in which we have collected or handled your personal information. We will inquire into your complaint and respond to you in writing within 30 days. If you are not satisfied with our response, you can contact us to discuss your concerns or lodge a complaint with the Australian Information Commissioner (www.oaic.gov.au).

Changes to this privacy policy

We may amend this privacy policy from time to time at our discretion. Amended versions will be posted at subcardgiftrefund.com.au.

Contact details and additional information

If you would like more information about our approach to privacy, or if you wish to contact us regarding the information set out in this privacy policy, please contact us by email at subcardclosure@ipcasiapacific.com.