

Subcard® New Zealand 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 NZ Ltd (NZBN 9429034906958) (Subcard NZ, we, us or our) operated the Subcard® loyalty, gift and online ordering program in New Zealand (Subcard® Programme) until 31 August 2026. Subcard NZ Ltd is a subsidiary of Independent Purchasing Company (Australasia) Ltd (IPC Asia Pacific).

All personal information is collected in a fair and non-intrusive manner, with your voluntary consent. Subcard NZ Ltd respects the privacy of Subcard® members, and other visitors to our websites who may have chosen to provide personal information. We recognise the need for appropriate protections and management of personal information that you provide to us. This privacy policy will assist you to understand what types of information we may collect, how that information may be used, and with whom the information may be shared.

If, before 1 September 2026, you used or accessed the website <https://order.subway.com/en-nz>, the Subway® app and/or any of our services, you are deemed to have agreed to be bound by this privacy policy in respect of the personal information collected about you during that period. From 1 September 2026, if you participate in the Gift Card Refund Program or otherwise provide personal information to us, you are also deemed to have agreed to be bound by this privacy policy. If you do not want your personal information to be collected, please do not submit it to us. Please note that if you elect not to provide certain personal information to us, we may not be able to provide you with the services or information you require, including processing a refund application.

When you provide personal information to Subcard NZ about a third-party individual, you agree that you have that individual's permission to provide their personal information to Subcard NZ, for Subcard NZ's collection, storage, use and disclosure in accordance with this privacy policy.

This privacy policy is governed by New Zealand law and is subject to (and must be read in conjunction with) the Subcard® Terms and Conditions which are available at subcardgiftrefund.com.

Closure of the Subcard® Loyalty and Gift Programme

The Subcard® Loyalty and Gift Programme closed on 31 August 2026. From 1 September 2026, the Subcard® Programme 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® Programme, 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 Subcard® gift 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 (as may occur from time to time) collect personal information including your name, email address, contact telephone number, bank account details, gift card number and gift dollar balance for the purpose of verifying your identity, assessing your eligibility and processing your refund.

The refund will be issued directly into your nominated bank account. To submit a refund claim, please send an email to Subcard® New Zealand at SubcardNZ@ipcasiapacific.com. By submitting a refund claim, you consent to Subcard® New Zealand, as refund administrator, using your personal information for the purpose of processing your refund. For details of the Gift Card Refund Program, including how to submit a refund claim, please refer to subcardgiftrefund.com.

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® Programme, 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 Programme, or in some other capacity.

For example, if you registered as a member of the Subcard® Programme, 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 that were applicable to your membership of the Subcard® Programme;
- details of purchases applicable to your membership of the Subcard® Programme, 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 <https://order.subway.com/en-nz>) or the 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 may also keep a record of any information that you acquire from 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);
- directly from you or from third parties acting on your authority or who you authorise us to make contact with about you in the course of conducting customer due diligence;
- publicly available information searches as part of the provision of our services to you;
- from the agents and service providers that we may engage to assist us with fulfilling any of the purposes recorded in this policy;
- from third parties connected with the substance of the matter(s)/purposes(s) for which you have engaged us;
- when you registered as a member of the Subcard® Programme on one of our websites or through the Subway® app (before 1 September 2026);
- 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® Programme 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® Programme, including the Gift Card Refund Program;
- administering the accounts of members of the Subcard® Programme;
- responding to enquiries about our programs and services;
- for verifying your identity, performing customer due diligence and for other administrative purposes;

- processing payments made to us by franchise owners;
- for our administrative purposes and internal record keeping;
- performing research and analysis;
- for complying with any legal requirements, including any applicable law or requirements of a regulator; and
- managing our relationships with Subway® franchisees who participated in the Subcard® Programme.

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® Programme 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 in relation to the Subcard® Programme, including the Gift Card Refund Program.

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 subcardnz@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 International BV Ltd;
- our contracted service providers, including our information technology and loyalty program service providers and professional advisers;
- financial institutions for payment processing;
- the Gift Card Refund Program administrators, including service providers who assist in administering and providing the Gift Card Refund Program as may be applicable from time to time; and
- identification verification and screening agencies (who may temporarily hold such information for the purposes of process audit and error checking);
- any document issuer, official record holder, credit bureau and authorised third parties' data providers for the purposes of customer due diligence (who may retain a record of the fact that we or an intermediary has requested a data comparison);
- credit reporting agencies (who may retain the personal information we share with them on their databases for use in the provision of their credit reporting services); and
- regulatory and enforcement agencies.

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 may use service providers located in the USA, Australia and New Zealand to store and process information about Subcard® Programme members, guests, Subway® franchisees and 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 subcardnz@ipcasiapacific.com.

We note that no data transmission over the internet can be guaranteed as completely secure. Accordingly, we cannot warrant or guarantee the security of information transmitted from or to you.

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 may 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.

Children and Data Collection

We care about the safety of children. We will not knowingly allow anyone under 18 to provide us any personally identifying information unless the following steps have been complied with. Children under 18 years of age are required to obtain the express permission of a parent or guardian before submitting any personal information about themselves (such as their names, email addresses, and phone numbers) over the Internet.

If a child has provided us their information without the consent of a parent or guardian, the parent or guardian of that child should contact us immediately at subcardnz@ipcasiapacific.com. We will use reasonable efforts to promptly delete the child's personal information from our servers.

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 Office of the Privacy Commissioner (<https://www.privacy.org.nz/>).

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 or otherwise provided to you.

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 subcardnz@ipcasiapacific.com.