KRAFT HEINZ CANDIDATE PRIVACY NOTICE

INTRODUCTION

Welcome to Kraft Heinz's employment candidate privacy notice ("Notice").

Kraft Heinz respects your privacy and is committed to protecting your Personal Data. This Notice tells you about how we collect and look after your Personal Data during the application and recruitment process, the privacy rights you have and how the law protects you.

It is important that you read this Notice, and any other privacy notices we may provide when we are collecting or processing Personal Data about you, so that you are fully aware of how and why we are using your Personal Data in connection with our recruiting activities.

This Notice applies in addition to other privacy notices we may use and is not intended to override them. For more details about how Kraft Heinz deals with Personal Data, please contact our Data Privacy Team.

Unless expressly stated as "as defined under the CCPA" or similar wording indicating that the CCPA specific definition applies, the term "third party" in this Notice refers to companies other than Kraft Heinz and does not refer to the CCPA specific "third party" definition.

You can click on the links below to find out more information:

1. **INFORMATION ABOUT US**

2. **PERSONAL DATA WE COLLECT**

3. **HOW YOUR PERSONAL DATA IS COLLECTED AND SOURCES OF PERSONAL DATA**

4. **HOW WE USE YOUR PERSONAL DATA**

5. **HOW WE MAY DISCLOSE PERSONAL DATA**

6. **DATA RETENTION**

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8. **SECURITY OF PERSONAL DATA**

9. **IF YOU HAVE CONCERNS ABOUT YOUR PERSONAL DATA**

10. **CHANGES TO THIS NOTICE**

1. INFORMATION ABOUT US

Data Controller

Kraft Heinz is made up of different legal entities, details of which can be found here.

This Notice is intended to cover the whole Kraft Heinz Group so when we say "Kraft Heinz", "we", "us" or "our" we are referring to the company in the Kraft Heinz Group responsible for processing your data.

Kraft Heinz is the controller and responsible for Personal Data collected through this website.

Data Privacy Team

We have appointed a Data Privacy Team which is responsible for overseeing questions in relation to this Notice.

If you have any questions about this Notice, including any requests to exercise your Legal Rights, please contact the Data Privacy Team using the details below.

Contact Details

Full name of legal entity: Kraft Heinz

Contact: The Data Privacy Team

Email address: For candidates in

Country/Region	**E-mail Address**
Australia	PrivacyAU@kraftheinz.com
Brazil	brasil.privacidade@kraftheinz.com
Canada	Canadaprivacy@kraftheinz.com
Egypt	EgyptPrivacy@kraftheinz.com
EU/EEA and the UK	gdpr@kraftheinz.com
India	Indiaprivacy@kraftheinz.com
Indonesia	PrivacyNEA@kraftheinz.com
Japan	PrivacyNEA@kraftheinz.com
Korea	PrivacyNEA@kraftheinz.com
Mexico	mexicoprivacy@kraftheinz.com
New Zealand	PrivacyNZ@kraftheinz.com
Saudi Arabia	KSAPrivacy@kraftheinz.com
Turkey	PrivacyTurkiye@kraftheinz.com
UAE	UAEPrivacy@kraftheinz.com

United States	USPrivacy@kraftheinz.com
All other countries	privacy@kraftheinz.com

Postal address: Kraft Heinz, The Shard, 32 London Bridge St, London SE1 9SG, United Kingdom

You have the right to make a complaint at any time to your local regulatory authority whose details can be found here if you are in the European Union and here if you are in the UK. However, we would appreciate the chance to deal with your concerns before you approach the authority so please contact us in the first instance.

Helping Us Keep Your Personal Data Up to Date

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes.

Children and This Website

This website is not aimed at or intended for children under the age of 17.

2. PERSONAL DATA WE COLLECT

"Personal Data" is any information that relates to an identified or identifiable living person but Personal Data does not include aggregated information or information which cannot be linked to a specific person. Your Personal Data is therefore information about and linked to you. Where this Notice refers to "Personal Information" in the sections relating to California residents, that term has the meaning given to it under the CCPA.

We may collect, use, store and transfer different kinds of your Personal Data (including, where the CCPA applies, Personal Data collected in the preceding 12 months), which may include:

(a) **Identity Data** such as first name, last name, title, and date of birth.
(b) **Contact Data** such as home address, email address and telephone numbers.
(c) **Transaction Data** such as details regarding applications you have submitted in response to Kraft Heinz job postings.
(d) **Technical Data** such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
(e) **Profile Data** such as your Platform username and password, jobs you have applied to, CVs, transcripts, cover letters, degrees awarded, previous work experience, type of employment sought, job preferences, desired salary, and information about your interests, and information related to any previous applications to or employment with

Kraft Heinz. We may also collect this information during phone screenings and in-person and videoconference interviews.

(f) **Background Data** such as reference information and background checks, where applicable, including information obtained from third parties.

When you begin an application for a role through the Kraft Heinz career site, you may be prompted to create or update your candidate profile within the recruitment and candidate evaluation platform ("Platform"). As part of this step, you may upload your application materials and review, edit, or supplement information about your experience, education, and skills. You may update, delete, or add to this information, including selecting additional skills, within your Platform profile at any time, and you retain control over what you choose to provide.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your Personal Data but is not Personal Data because it does not directly or indirectly reveal your identity. For example, we may aggregate your Transaction Data with that of other users to find out how many users apply for a specific position.

If we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data and will process it as set out in this Notice.

Note to candidates located in California: In compliance with the CCPA, we identify below how each category of Personal Data listed above (a) - (f) maps to the CCPA's statutory Personal Information categories:

Identity Data: Identifiers, Professional or employment-related information

Contact Data: Identifiers

Transaction Data: Professional or employment-related information

Technical Data: Identifiers, Internet or other electronic network activity information

Profile Data: Identifiers, Internet or other electronic network activity information, Education information, Inferences drawn from personal information

Background Data: Professional or employment-related information

Where permitted by applicable local law, we may also collect, store and use the Special Categories of Personal Data, Sensitive Personal Data, or equivalent (as these terms are defined

under the applicable local law), which, under applicable law, may include information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, citizenship and immigration status, passport and visa information, driver's license information, state identification card number, Social Security/national tax identification number and other national insurance/national ID number and information related to criminal records and convictions, to the extent necessary as follows:

- Race and/or ethnic origin to comply with legal obligations.
- Criminal records where relevant for the position and permitted by applicable local laws.
- Physical health condition, mental health condition, and/or disability status to evaluate fitness for a particular position and to determine appropriate workplace accommodations.

Failure to Provide Personal Data Where Requested

The application form contains a number of required fields that request Personal Data of the types described above. Collection of the Personal Data requested in mandatory fields related to our recruiting activities is required. Failure to provide that data when requested may affect our ability to consider you for the role for which you applied.

Please note that the fields not marked as mandatory fields are optional.

3. HOW YOUR PERSONAL DATA IS COLLECTED AND SOURCES OF PERSONAL DATA

We use various methods to collect your Personal Data, including:

a. Directly from you -- where you give us Personal Data such as your address, identity, and employment data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you apply as a candidate for open positions with Kraft Heinz and information you provide during video and telephonic interviews.

In addition, if you contact us by phone, email or otherwise, we may keep a record of that correspondence.

b. From third parties and publicly available sources -- we may receive Personal Data about you from various third parties such as your references and vendors who provide candidate assessment and background check services.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where you have consented to our processing of your personal data.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We may use your Personal Data for or in connection with the following purposes:

a. Where you have consented to our processing of data for the purposes of:

- identifying and evaluating you as a potential candidate for employment at Kraft Heinz, including assessing your qualifications, skills, and interests to determine suitability for the position applied for;
- retaining and using your Personal Data to inform you about and consider you for other positions that may be appropriate for you with your consent;
- communicating with you about your application and the recruitment process;
- Where necessary for Kraft Heinz's legitimate interests in connection with the purposes listed below, and where our interests are not overridden by your data protection rights:
- verifying your information and carrying out reference, background, and employment checks, where applicable (subject to your consent where required by applicable law);
- creating and submitting reports and conducting investigations, as required, to ensure compliance with or identify/confirm any potential breaches of any applicable procedures, laws or regulations;
- assessing and improving our recruitment process and application forms;
- establishing, exercising or defending legal rights;
- working with suppliers to which Kraft Heinz has outsourced recruitment-related services;
- to maintain the security of our networks and data, including preventing unauthorized access to our communication systems and preventing distribution of malicious software;
- in connection with business acquisition, disposal or reorganization other than where information is exchanged in connection with a legal obligation as set out above; and
- processing necessary for the purposes of other legitimate interests pursued by Kraft Heinz.

You can obtain further information on the legitimate interests balancing exercises which we have carried out by contacting the Data Privacy Team.

b. Where necessary to comply with a legal obligation:

- in connection with any potential or actual corporate transaction or transfer of employment arising in relation to a business transfer or change of service provider in which case Personal Data may only be processed to the extent permitted by applicable law (such as the Acquired Rights Directive in Europe);
- in compliance with applicable procedures, laws or regulations including in relation to retaining records of employee recruiting and other business activities; and
- disclosures to law enforcement agencies or in connection with legal claims, health & safety compliance, regulatory, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation).

Use of the Recruitment and Talent Evaluation Platform

Kraft Heinz uses a recruitment and candidate relationship platform ("Platform"), which, among other components, includes artificial intelligence based features to assist with candidate screening and evaluation decisions. The Platform helps facilitate job applications and supports skills-based matching by analyzing information you provide to us during the recruitment process, such as your resume, work history, education, and skills, to create and maintain your candidate profile. The Platform generates a match score indicating how the skills and experience you provided align with the requirements of the role. Kraft Heinz may use this assessment as one factor in evaluating how suitable your application is for the role, but the match score does not, on its own, determine the outcome of your application. Human recruiters are responsible for reviewing all applications and making decisions as to which candidates to advance throughout the recruitment process.

The Platform's matching process evaluates the information you provide by comparing it with job requirements and identifying relevant skills and experience. The resulting score reflects this alignment. A higher or lower score may influence the order in which recruiters review applications, but it does not automatically advance or exclude you from consideration. The information used for this process is limited to the details you provide about your experience, education, and work history, whether entered manually or uploaded as a resume, and the skills you choose to add or select within the Platform. The match score is generated only from this information and reflects factors such as skills and experience fit, role and title relevance, career trajectory and location, and Kraft Heinz-defined calibration criteria (for example, preferred education or ideal candidate experience). It may also incorporate skills that the Platform reasonably infers from the information you provide, such as related or commonly associated skills.

5. HOW WE MAY DISCLOSE PERSONAL DATA

We may share your data with other parties, including other companies within Kraft Heinz and with service providers who provide services to us as further explained below.

Where we provide Personal Data to contractors and suppliers who provide services to us, for example assistance with the processing activities set out in Section 4a of this Notice, we will enter into a data processing agreement (including provisions required by applicable law, such as GDPR) with those contractors and suppliers.

We do not sell or share your Personal Data, as "sell" and "share" are defined under the CCPA.

We do not disclose your Personal Data to third parties for business or commercial purposes, as "third party" is defined under the CCPA.

In order to fulfil our legal and other obligations and in connection with our rights including protection of our legitimate interest, we reserve the right to disclose Personal Data (or Special Category Data as appropriate) to law enforcement agencies, regulatory bodies, government agencies and other third parties as required by law or for administrative purposes (for example, local taxation authorities) to the extent that local law allows and/or requires this.

We may transfer Personal Data to other Kraft Heinz group companies, partners, suppliers, law enforcement agencies and to other organizations that are located outside the jurisdiction where you reside, to assist us in processing Personal Data for the purposes described above in Section 4.

The Data Protection Laws of some jurisdictions may not be as protective as those in the country where you reside. Kraft Heinz will ensure that in such cases appropriate measures are in place to comply with Data Protection Laws in relation to transfer of Personal Data to those jurisdictions. This includes implementing approved standard contractual clauses, or other legal data transfer mechanisms applicable in your jurisdiction, with third parties located in other jurisdictions who assist us in processing your Personal Data for the purposes described above in Section 4.

6. DATA RETENTION

We have legal duties to keep various records, and records need to be held for different periods of time, depending on their contents.

We will therefore keep Personal Data for as long as we reasonably consider we may need to in connection with those obligations.

Where we do not keep Personal Data for a period specified by law we will not keep Personal Data for longer than Data Protection Law allows us to.

Where you have consented to us retaining your Personal Data to inform you about and consider you for other positions that may be appropriate for you as described above in Section 4, we will retain your Personal Data for twelve (12) months from when you provide your consent.

For further information about our approach to data retention, please contact our Data Privacy Team.

7. YOUR LEGAL RIGHTS

Under applicable Data Protection Laws, you may be entitled to ask Kraft Heinz for a copy of your Personal Data and to ask for it to be corrected, edited or have its processing restricted. In certain situations, you may also be entitled to ask Kraft Heinz to transfer some of your Personal Data to other organizations. Where applicable, you have the right to withdraw your consent to the communication or use of the Personal Data collected.

You may also have rights to object to some processing of your Personal Data although Kraft Heinz may continue that processing if it is required in connection with legal obligations.

Your Personal Data rights may be limited or subject to exceptions in some situations, for example, where Kraft Heinz demonstrates that it has a legal requirement to process your data, such as where tax authorities require us to retain it or where it is needed for proper performance of a contract.

Where Kraft Heinz has asked for your consent to process Personal Data and that consent is withdrawn, we will not process that Personal Data further but may also not be able to continue providing the services for which the Personal Data was collected.

Where Kraft Heinz has a legal right or obligation to retain Personal Data or wishes to do so in connection with its legitimate interests, it may do so even if you have withdrawn consent for Kraft Heinz to hold your Personal Data.

Where Kraft Heinz requires Personal Data to comply with legal or contractual obligations, the provision of such data is mandatory. If such data is not provided Kraft Heinz will not be able to manage the employment or engagement relationship, or to meet obligations placed on it. In all other cases, provision of requested Personal Data is optional.

Under the CCPA (California Consumer Privacy Act of 2018, as amended, “CCPA”), candidates located in California are provided with the following additional rights:

Right to Know: You have the right to know the information that we collect, as defined under the CCPA:

- The categories of Personal Data we collected about you;
- The categories of sources of Personal Data we collected about you;
- The business or commercial purpose(s) for which we collected, sold, or shared your Personal Data;
- The categories of third parties with which we share your Personal Data and, where such disclosures were for a business purpose, the Personal Information categories that each category of third-party recipients received and, where such disclosures were "sales" or "shares", the Personal Data categories purchased or received by each category of recipient; and
- The specific pieces of Personal Data we collected about you.

Right to Opt-Out of Selling or Sharing of Personal Information: You have the right to Opt-Out of the selling or sharing of your Personal Information to third parties (as those terms are defined in the CCPA).

Right to Limit the Use and Disclosure of Sensitive Personal Information: You have the right to limit the use and disclosure of your sensitive Personal Information. The sensitive Personal Information we collect about you can be found above.

Right Not to Receive Discriminatory Treatment: You have the right not to receive discriminatory treatment for exercising your privacy rights described by the CCPA.

8. SECURITY OF PERSONAL DATA

The security of your information is important to us. We take reasonable steps to protect your Personal Data from misuse, interference, and loss and from unauthorized access, modification, or disclosure. We do this by means of various physical and electronic security measures, including restricting physical access to our offices and implementing several technological and security policies and procedures. Personal Data is maintained on our servers or those of our service providers and is accessible to authorized employees, representatives and agents who require access for the purposes described in this Notice.

For details of the security measures we have taken, please contact the Data Privacy Team.

9. IF YOU HAVE CONCERNS ABOUT YOUR PERSONAL DATA

For any concerns or questions about how Kraft Heinz processes your Personal Data or have any questions in relation to your rights in respect of your Personal Data, please contact the Data Privacy Team.

In the first instance you should raise all data concerns with the Data Privacy Team but you also have the right to complain directly to data protection authorities at any time. The relevant data protection authority will be the supervisory authority in the country in which you reside.

Please see here for details of national data protection authorities in the European Union and here for the UK.

Note to candidates located in the United Kingdom and India: You have the right to complain to us about how we handle your Personal Data. You can make a complaint by contacting our Data Privacy Team using the Kraft Heinz Data Protection Complaints Webform.

Note to Québec, Canada residents: If you have questions about how your Personal Data is processed in connection with the Platform, or about any choices available to you under applicable privacy laws, please contact our Data Privacy Team.

Note to candidates located in California: the following additional information applies under the CCPA:

To submit a request, please contact us by email at USprivacy@kraftheinz.com, through our Webform, or by phone at 1-855-634-1984.

A verifiable request must provide us adequate information to allow us to (1) reasonably verify that you are the individual whose Personal Information we collected (or an authorized representative) and (2) to understand your request so that we can process and respond to it. Please note that only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may submit a verifiable consumer request for your Personal Information. You may submit verifiable consumer requests on behalf of your minor children. Once we have received and verified your request, we will send a confirmation of our receipt of your request and, within 45 days, either a copy of the requested information or confirmation of deletion or correction, as applicable. If, for any reason, we are unable to fulfill your request, we will notify you and provide an explanation.

Do Not Sell or Share My Personal Information (CCPA)

To opt-out of the sale or sharing of your Personal Information, please call us at 1-855-634-1984, use our Webform here or send an email to USprivacy@kraftheinz.com.

Limit the Use and Disclosure of My Sensitive Personal Information (CCPA)

To limit the use or disclosure of your sensitive Personal Information, please call us at 1-855-634-1984, use our Webform here or send an email to USprivacy@kraftheinz.com.

10. CHANGES TO THIS NOTICE

We may change this Notice at our discretion and in the event we do so we will make the revised Notice available via our websites.

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