

KRAFT HEINZ 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 detail about how Kraft Heinz deals with Personal Data, please contact our [Data Privacy Team](#)

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

4. HOW WE USE YOUR PERSONAL DATA

5. SHARING YOUR DATA WITH THIRD PARTIES

6. DATA RETENTION

7. YOUR LEGAL RIGHTS

8. IF YOU HAVE CONCERNS ABOUT YOUR PERSONAL DATA

9. 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 who are responsible for overseeing questions in relation to this privacy 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 the EU/EEA and the UK: gdpr@kraftheinz.com

For candidates in the United States: USPrivacy@kraftheinz.com

For candidates in Canada: Canadaprivacy@kraftheinz.com

For candidates in all other countries: privacy@kraftheinz.com

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

You have the right to make a complaint at any time to your local regulatory authority whose detail 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 about an identifiable living individual but does not include information which you cannot link to a specific person. Your Personal Data is therefore information about and linked to you.

We may collect, use, store and transfer different kinds of your Personal Data, 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 website 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.

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.

We may also collect, store and use the Special Categories of Personal Data (“Special Categories”) (which includes 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) and information related to criminal records and convictions, to the extent relevant, necessary and permitted by applicable local law 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 mandatory. 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 required fields are optional.

3. HOW YOUR PERSONAL DATA IS COLLECTED

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 re-organisation 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;
- 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).

5. SHARING YOUR DATA WITH THIRD PARTIES

We may share your data with third parties, including other companies within Kraft Heinz and with third-party 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 including 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.

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, HM Revenue and Customs in the UK) and 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 organisations that are located outside the EEA to assist us in processing Personal Data for the purposes described above in Section 4.

The laws of some jurisdictions outside the EEA may not be as protective as Data Protection Laws in the EEA. Kraft Heinz will ensure that, for such jurisdictions, appropriate measures are in place for compliance with Data Protection Law in relation to transfer of Personal Data to those jurisdictions. This includes implementing Standard Contractual Clauses (or any replacement mechanisms approved by the European Commission) with third parties located in jurisdictions outside the EEA which are not subject to an adequacy decision 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 have 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 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 organisations.

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 sought.

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.

8. 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 same country as your employing entity.

Please see [here](#) for details of national data protection authorities in the European Union and [here](#) for the UK.

9. 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.

Publication Date: 30 January 2024