YUM GLOBAL HR WEBSITES PRIVACY POLICY

Yum! Brands, Inc. and its global subsidiaries and affiliates, including, but not limited to, Pizza Hut Holdings, LLC, KFC Corporation, Taco Bell Corp and Taco Bell of America, LLC. (“Yum”) provides a variety of websites (each a “Site”) for use by members of the Yum System in connection with human resources administration functions, including recruitment, employment, training and talent management. Access to certain Sites may be limited only to authorized individuals who are current employees or contractors of Yum or its affiliates or franchisees and/or approved agencies or consultants of Yum. Yum, together with independently owned and operated franchisees, is collectively referred to as the “Yum System”.

PRIVACY SHIELD

Yum complies with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data from European Union member countries and Switzerland. Yum! has certified that it adheres to the EU-U.S. and Swiss-U.S. Privacy Shield principles regarding the collection, use, sharing, and retention of personal data from the European Union and Switzerland, as described in our EU-U.S. and Swiss-U.S. Privacy Shield certifications. The Privacy Shield Principles involve notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, and recourse and enforcement. Under certain circumstances, participants may be liable for the transfer of personal data from the EU or Switzerland to third parties outside the EU and Switzerland. To learn more about the Privacy Shield program, and to view the certifications please visit http://www.privacyshield.gov.

NOTICE

Collecting and Processing Personal Information

Information You Provide

For purposes of this Policy we define “Personal Information” as data about an identified or identifiable individual that are within the scope of the applicable EU or Swiss law or regulation, received by an organization in the United States from the EU or Switzerland, and recorded in any form.

In order to administer the Site effectively, Yum collects a variety of information about you and/or your family. This may include your name, address, date/place of birth, work and/or personal e-mail, phone number, appropriate identification number (either issued by a Yum System member or governmental authority), emergency contact information and similar information, as well as all the Personal Information related to specific uses of the Site (e.g. training which you receive via the Learning Zone). We may also collect other information which is relevant to the purposes we describe in this Policy.

Automatically Collected Information
We also collect Personal Information automatically via your use of the Site. As you navigate the Site, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and web beacons (collectively “Website Navigational Information”). Website Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on the Site (such as the web pages viewed and the links clicked).

Cookies

Like many companies, we may use cookies on this Site. Cookies are pieces of information shared between your web browser and a website. Use of cookies enables a faster and easier experience for the user.

There are different kinds of cookies with different functions:

Session cookies: these are only stored on your computer during your web session. They are automatically deleted when the browser is closed. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page. They do not collect any information from your computer.

Persistent cookies: a persistent cookie is one stored as a file on your computer, and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.

First-party cookies: the function of this type of cookie is to retain your preferences for a particular website for the entity that owns that website. They are stored and sent between Yum’s servers and your computer’s hard drive. They are not used for anything other than for personalization as set by you. These cookies may be either Session or Persistent cookies.

Third-party cookies: the function of this type of cookie is to retain your interaction with a particular website for an entity that does not own that website. They are stored and sent between the Third-party’s server and your computer’s hard drive. These cookies are usually Persistent cookies.

We use cookies for the following purposes:

*Where strictly necessary*

These cookies are essential in order to enable you to move around the Site and use its features, such as accessing secure areas of the Site. Without these cookies, the Site will not function in a useful and meaningful way. These cookies do not gather Personal Information which will be used for marketing or similar kinds of tracking.
**Performance**

These cookies collect information about how visitors use a Site, for instance which pages visitors go to most often, and if they get error messages from web pages. They also allow us to record and count the number of visitors to the Site, all of which enables us to see how visitors use the Site in order to improve the way that our Site works. These cookies generally do not collect Personal Information, as all the information these cookies collect is used to improve how our Site works.

**Functionality**

These cookies allow the Site to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, a Site may be able to remember your log in details, so that you do not have to repeatedly sign in to your account when using a particular device to access the Site. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customize. They may also be used to provide services you have requested such as viewing or commenting on content on the Site.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Site. Please consult your web browser’s ‘Help’ documentation or visit www.aboutcookies.org. for more information about how to turn cookies on and off for your browser.

**Google Analytics and Other Analytical Tools**

The Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how users use the Site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity, and providing other services relating to website activity and internet usage for Yum and its affiliates. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. We may also utilize similar analytical tools that are administered by third parties. By using this Site, you consent to the processing of data about you by Google and/or other third party analytical tool providers in the manner and for the purposes set out above and/or in the analytical tool providers’ privacy policy.

“Do Not Track”
The major browsers have attempted to implement the draft “Do Not Track” (“DNT”) standard of the World Wide Web Consortium (“W3C”) in their latest releases. As this standard has not been finalized, Yum’s Sites are not compatible with DNT and so do not recognize DNT settings.

**Web Beacons**

The Site may also use web beacons (including web beacons supplied or provided by third parties) alone or in conjunction with cookies to compile information about users’ usage of the Site and interaction with e-mails from Yum. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Site tied to the web beacon, and a description of a Site tied to the web beacon. We use web beacons to operate and improve the Sites and e-mail communications. We may use information from web beacons in combination with other data for the purposes described in this Policy, or any other notice we provide to you at the time we collect Personal Information from you.

**IP Addresses**

When you visit the Site, Yum collects your Internet Protocol (“IP”) addresses to track and aggregate non-Personal Information. For example, Yum uses IP addresses to monitor the regions from which you navigate to the Site. IP addresses are generally be stored in such a way so that you cannot be identified from only the IP address.

*Information Related to Training and Talent Management Sites (e.g. Learning Zone and Talent Zone)*

Information related to your enrollment, evaluations, performance and/or completion of training will be reported to your employer and supervisor and otherwise used in connection with your employer’s human resources administration as well as your training. The Personal Information may also be used by your employer to process your talent information, development plan, succession plan, learning history, performance ratings, monitor career events, manage employee compensation and benefits, and other human resources purposes.

*Information Related to Recruitment and Employment Sites (e.g. Hiring Zone or Talent Zone)*

In order to utilize one of our recruitment or employment sites effectively and to process your resume or application for consideration, you must register on this Site. Once you are registered on the Site, it collects a variety of information about you for use by the employer member of the Yum System, which may include:

- Name
- Contact information, including home address, home telephone, mobile telephone and email address
In some countries, the Site may ask individuals to self-identify certain personal information such as their ethnicity, gender, veteran status, and disability information. That information is voluntary and your decision to provide or withhold any of that information will not negatively impact whether or how Yum or a member of the Yum System will consider you for employment.

Yum and members of the Yum System will treat any personal information considered sensitive under applicable law in accordance with that applicable law. The collection and use of sensitive personal information will be limited to that which is strictly necessary for the purposes for which it was collected. Your explicit consent will be obtained to the processing of your sensitive personal information, unless otherwise permitted by applicable law.

**Purpose for Collection**

After registering, Yum (who administers this Site) and/or its service provider hosting the Site will use your Personal Information for any of the following purposes: (1) to administer the Site (including how this Site is used and how to make any on-going improvements); (2) to comply with applicable law or legal process (3) to protect the security or integrity of this Site, if necessary; and (4) for those purposes we describe below as reason for disclosing your Personal Information to third parties. For training sites, your Personal Information will also be used by your employer to process your talent information, development plan, learning history, in performance scores, and other human resources purposes. For recruitment/employment sites, your Personal Information will also be used by a
member of the Yum System to process your application or resume and otherwise consider you for relevant employment opportunities and other human resources purposes.

You will have the choice whether or not to disclose such Personal Information on this Site; however, some parts of this Site and some services may be more difficult or impossible to use if you choose not to disclose Personal Information. In addition to the Personal Information identified above, Yum’s web servers, along with its service providers’ web servers, automatically identify computers by their IP addresses. Yum’s service providers may use IP addresses to analyze trends, administer this Site, track users’ movement and gather broad demographic information for aggregate use. To emphasize, IP addresses are not linked to Personal Information.

Sharing Personal Information

By registering for this Site, you give consent for your Personal Information to be shared with individuals or entities (which may include your employer and Yum’s service providers) who have a legitimate need to know the Personal Information for the purposes of the proper and efficient operation of this Site and for human resources administration. If you are based outside of the United States, this will require that your Personal Information be transferred to, processed, and stored on central servers in the United States or sent to or accessed by individuals in the United States. The laws regarding data privacy in the USA and other countries outside the European Economic Area (the “EEA”) may provide less adequate protection for the rights and freedoms of individuals than do the laws which apply within the EEA. However, your Personal Information will be processed in accordance with this Privacy Policy no matter where it is transferred.

In the case of processing a submitted resume and/or employment application, the Site or a member of the Yum System may, where permitted by law, disclose your Personal Information to a background check service provider and/or any other third party necessary for a member of the Yum System to further process your resume and/or employment application.

When your Personal Information is transferred to service providers, it is done under a contract which requires the companies to use the shared Personal Information for the limited purposes for which it is provided to them, not to transfer the Personal Information to another party, and to agree to hold the information securely and confidentially. The service provider may have its own privacy practices and policies by which you may have the opportunity to consent to other uses of your Personal Information by the service provider. Please review the service provider’s disclosures and privacy policy carefully.

Your Personal Information may be disclosed for the purposes described in this policy, and

- When you have consented
- Within the Yum System in order to provide human resource administration, general business organization and governance purposes;
- In the event of an acquisition of the restaurant or business where you are employed;
- To comply with applicable laws;
- To third parties as required by law or court order;
- To cooperate with government authorities in a criminal investigation or to detect or investigate crime;
• To defend your legal rights or the rights of others, including members of the Yum System and their service providers and vendors;
• To respond to a lawful request by public authorities, including to meet national security or law enforcement requirements; and
• To obtain legal advice on behalf of Yum, members of the Yum System and service providers.

CHOICE

Your knowledge of and consent to Yum’s collection, use and disclosure of your Personal Information is important. We rely on the following actions by you as indications of your consent to our existing and future Personal Information practices:

• Your voluntary provision of Personal Information to us directly;
• Your express consent or acknowledgement contained within a written, verbal or electronic application process; and
• Your verbal consent solicited by Yum (or our agent) for a specified purpose.

Where Yum relies on consent for the fair and lawful processing of Personal Information, the opportunity to consent will be provided when the Personal Information in question is collected. Your consent may be given through your authorized representative such as a legal guardian, agent or holder of a power of attorney.

Yum maintains servers and other storage facilities in the United States. As a consequence of your use of the site, your Personal Information may be used or stored in the United States. By using the Site you hereby affirmatively consent to the processing of your Personal Information in a country which may not have the same level of privacy protection as your country of residence. Should you withdraw this consent, you agree that you will not use or visit the Site subsequent to your withdrawal of such consent.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw this consent at any time. Yum will inform you of the consequences of withdrawing your consent. In some cases, refusing to provide certain Personal Information or withdrawing consent for Yum to collect, use or disclose your Personal Information could mean that we cannot provide the requested services or information for you, for example, with respect to employment a member of the Yum System would not be able to continue to consider you for relevant employment opportunities.

If you wish to withdraw your consent please refer to the contact information section below.

There are a number of instances where Yum does not require your consent to engage in the processing or disclosure of Personal Information. Yum may not solicit your consent for the processing or transfer of Personal information for those purposes which have a statutory basis, such as where:

• The transfer or processing is necessary for the performance of a contract between you and Yum (or one of its affiliates);
• The transfer or processing is necessary for the performance of a contract, concluded in your interest, between Yum (or one of its affiliates) and a third party;
• The transfer or processing is necessary, or legally required, on important public interest grounds, for the establishment, exercise, or defense of legal claims, or to protect your vital interests; or
• The transfer, processing and/or disclosure is in response to a lawful request by public authorities, including to meet national security or law enforcement requirements; or
• The transfer or processing is required by applicable law.

ACCOUNTABILITY FOR ONWARD TRANSFER

As noted above, Yum may share an individual's information with contractors, government agencies and/or partners of Yum in connection with services that these individuals or entities perform for, or with, Yum or members of the Yum System. In cases of onward transfers of data, received pursuant to the EU-U.S. and Swiss-U.S. Privacy Shield, Yum is potentially liable. When your Personal Information is transferred to service providers, it is done under a contract which requires the companies to use the shared Personal Information only for the limited purposes for which it is provided to them, not to transfer the Personal Information to another party, and to agree to hold the information securely and confidentially. To the extent possible, all third parties to whom we disclose information are required by law and contractual undertakings to keep your Personal Information confidential and secure, and to use and disclose it only for purposes necessary for the performance of their obligations to Yum, or where a reasonable person would consider such processing appropriate in the circumstances.

DATA INTEGRITY AND PURPOSE LIMITATION

Yum will collect, use, or disclose Personal Information that is necessary for the purposes as described in this Policy, or as permitted by law. If we require Personal Information for any other purpose, you will be notified of the new purpose, and subject to your consent (where appropriate), that new purpose will be included as a purpose included in this Policy.

Yum takes reasonable steps to ensure that Personal Information is reliable for its intended use; as well as being current, accurate, and complete. As part of maintaining Personal Information which is accurate, current, and complete; we need your help. If you know that your Personal Information which you have provided to us is no longer accurate or complete, please let us know by updating your Personal Information on the Site, or contacting us via the point of contact described below. Yum cannot be responsible for the accuracy or completeness of information whose source Yum does not control.

We will normally retain Personal Information as long as necessary for the fulfillment of the purposes identified in this Policy. However, some Personal Information may be retained for longer periods as required by law, contract, or auditing requirements.

ACCESS

You have the right to reasonable access to review your Personal Information, and, if you believe the information is incorrect, the ability to correct the information.

With regard to the Learning Zone database, if you believe any of your Personal Information is incorrect, contact your manager. Your employer, Yum and its service providers will take reasonable
steps to assist in the correction, amendment, or deletion of the Personal Information that is
demonstrated to be inaccurate or incomplete.

With regard to recruitment/employment sites you control the accuracy of your Personal Information.
If you applied for a restaurant position, your application is active for 90 days in Yum’s application
system. You may update your Personal Information by completing a new application. Conversely, if
you applied for a position other than at a restaurant, you may update your Personal Information or
review your Personal Information that Yum has on record, by contacting HZAdministrator@yum.com.
Please note that this email address is only for inquiries related to the application process.

For other Sites, please contact the Yum Privacy Department as noted in the contact section below.

There are some circumstances where Yum cannot grant an individual access to Personal Information.
Yum will not provide access or correction rights to an individual where the granting of such access or
correction rights will impose a burden on Yum to provide such access or correction that is
disproportionate to the risk to the individual’s privacy; or where the access to the individual’s
Personal Information places another individual’s privacy rights at risk. If Yum does not allow the
individual the right of access or correction under this section, we will provide the impacted individual
with the reasons why they are not permitted such access.

SECURITY

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of your Personal
Information, Yum has put in place, and has required its service providers to put in place, certain
reasonable physical, electronic, managerial and security procedures to safeguard and secure the
Personal Information collected through the Site. It is very important that you maintain the secrecy of
your password. No method of transmission over the Internet, or method of electronic storage, is
100% secure. Therefore, we cannot guarantee its absolute security.

ENFORCEMENT AND DISPUTE RESOLUTION

Yum will conduct compliance audits of its privacy practices to verify adherence to this Policy. All
reported breaches or potential breaches will be investigated by appropriate personnel of Yum, who
will take such action as deemed appropriate in the investigation.

Any questions or concerns regarding the use or disclosure of Personal Information collected or used
as it relates to the Site should be directed to the Yum Privacy Department as noted below. Yum will
investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal
Information in accordance with the principles contained in this Privacy Policy. In addition to such
investigations, we monitor adherence to this Privacy Policy and investigate suspected infractions. Any
employee that is determined, in your employer’s and/or in Yum’s discretion, to be in violation of this
Privacy Policy or engages in misuse of a Site, including an employee’s disclosure of his/her password
to other individuals or allowing unauthorized individuals to access the Site, will be subject to
disciplinary action, which may include termination.

Yum’s privacy practices and its self-certification under the Privacy Shield Framework is subject to the
investigatory and enforcement powers of the Federal Trade Commission. As the Personal
Information collected and processed via the Site is considered human resources data under the Privacy Shield Framework, Yum has agreed to cooperate in investigations by, and comply with the advice of, the appropriate EU and/or Swiss authorities in managing any dispute. If you have questions or complaints regarding the use or disclosure of Personal Information in compliance with the principles of this privacy policy, you should contact us first. If contacting us does not resolve your concern or complaint, you may raise your complaint with the relevant data protection regulator where you live.

Additional Provisions Relating to Existing Employees’ Use of Employment/Recruitment Sites

The provisions of this Privacy Policy apply to all existing Yum System employees who utilize employment/recruitment sites. In addition to the Privacy Policy provisions set forth above, the following additional provisions apply exclusively to existing Yum System employees.

A. Use of Personal Information
If you apply for a position through the Site, your employer may contact your HR Manager and/or your supervisors as part of evaluating your qualifications for the position(s) applied for.

B. Access to and Correcting Information
If you applied for a position other than in a restaurant, as an alternative to updating your Personal Information, you may contact HZAdministrator@yum.com to access or correct any Personal Information submitted through this Site.

C. Questions/Concerns
Any questions or concerns you have regarding the use or disclosure of Personal Information related to the application and hiring process through this Site should be directed to privacypolicy@yum.com.

D. Compliance
Yum will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Privacy Policy. In addition to such investigations, Yum monitors adherence to this Privacy Policy and will investigate suspected infractions in partnership with members of the Yum System. Any employee who misuses this Site will be subject to disciplinary action by his/her employer, which may include termination.

Changes To This Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by means of a notice on this site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Information

If you have log in or technical questions regarding the operation of this Site, please address your inquiries to your employer’s Helpdesk. Please do not contact the Yum! Privacy Department with questions regarding the operation of this Site.
Questions or complaints regarding this Privacy Policy and/or our use of Personal Information should be submitted to the Yum Privacy Department by email at privacypolicy@yum.com or by writing to the following address:

Yum! Brands, Inc.
Attn: Law Department – Privacy Policy
1441 Gardiner Lane
Louisville, KY 40213

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