



Data Protection Code of Conduct

We – Burger King Restaurants Italia S.p.A. – believe **data protection is a crucial aspect of the business** and part of our **organizational culture**. Therefore, we strive to protect the personal data processed by us, when conducting the business activities. To this aim we required that those who are involved in the processing of personal data undertake to respect this Data Protection Code of Conduct that reflects our approach to the data protection matter to improve, day by day, the level of the protection of personal data.

The Data Protection PRINCIPLES

We apply the principles that shall govern the personal data processing operations, defined by Article 5, General Data Protection Regulation N. 2016/679 (“**GDPR**”).

Lawfulness, Fairness and Transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

We provide the data subject with online and offline specific privacy policies to give them all the relevant information on the processing of personal data.

Purpose Limitation

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

We carefully assess the purposes of the processing, collecting personal data only for specific purposes.

Data Minimisation

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

We carefully assess which data are strictly necessary to pursue the specified purposes.

Accuracy

Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

We constantly work to evaluate the quality of our database providing data subjects with useful tool to update or delete their personal data.

Storage Limitation

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

We defined specific data retention periods for each purpose.



Integrity and Confidentiality

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

We constantly work to increase our security measures and to provide our employees with specific data protection training.

Accountability

The controller shall be responsible for, and be able to demonstrate compliance with, the principles of the personal data processing principles defined under Art. 5, par. 1, GDPR.

We have adopted a specific Privacy Organizational Model (“Privacy Model”) to specify the organizational and procedural measures to ensure the protection of the processed personal data is effective and efficient.

The ROLE and COMMITMENT of the stakeholders

Our business is supported by several stakeholders: employees, suppliers, counsels and other subjects part of our supply chain.

Each of them plays a critical role in contributing to process the personal data in full compliance with the GDPR and other relevant legislation as applicable.

To this end, we request the **commitment of all the stakeholders to respect and comply with the Privacy Model, the procedures, and this Data Protection Code of Conduct**. In addition, according to Article 28 GDPR, each supplier acting as data processor will be requested to enter into a data processing agreement containing the instructions on the personal data processing operations.

With specific reference to **our suppliers**, we request they ensure sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements of the GDPR.

Therefore, to be included in the suppliers’ list, the third party shall submit, if necessary, our **GDPR assessment process**:

- 1. Phase One:** GDPR checklist. The supplier is required to fulfill a checklist giving evidence of the technical and organizational measures implemented with reference to the processing of personal data.
- 2. Phase Two:** Assessment. We assess answers and evidence provided by the third party, according to a specific methodology. If considered to be relevant to the assessment, we could request additional information.
- 3. Phase Three:** Onboarding of the supplier. If we consider the third party offers satisfactory guarantees, the latter can be included in our suppliers’ list.

We reserve the right to ask the supplier to complete the GDPR assessment process during the execution of the agreement.



FINAL REMARKS

The protection of the personal data we process is up to each of us. Therefore, the commitment of those taking part in the processing of personal data is a key point to maintain a high level of protection.

We continually monitor laws, regulations, and guidelines as applicable from time to time, updating the data protection measures in place and implementing new ones, if necessary, to ensure an adequate level of protection of personal data.

Any infringement of the Code of Conduct may have serious repercussions for us and result, with respect to the offending employee, in the application of disciplinary measures, in accordance with the provisions of the law and the applicable National Labour Collective Agreement, and with respect to third parties (e.g., suppliers) even in the termination of the contractual relationship.