

McDonald's Corporation
International Human Resources Privacy Statement

Last Updated: October 24, 2025

1. Introduction

McDonald's Corporation, based in Chicago Illinois, USA (referred to as "**McDonald's**", "**we**", "**us**" or "**our**"), is committed to protecting the privacy and security of the information that we collect and use for employment-related purposes and for the administration of our human resources function.

This statement (referred to as the "**International Human Resources Privacy Statement**" or "**Statement**") explains how McDonald's manages the personal information of current and former employees and applicants living outside of the U.S., as defined below.

Please note that nothing in this Statement limits the rights you may have under your local data protection law.

2. Scope

This Statement applies to any current or former employees of our wholly-owned subsidiaries outside of the U.S. (referred to as "**Employees**") as well as applicants. In certain cases, this may also include the information of other parties such as family members, dependents, beneficiaries, and other individuals whose information we collect pursuant to or as a result of the relationship that those parties have with an Employee.

This Statement does not cover the information of individuals that are employed by our franchisees or developmental licensees, which are independently owned and operated. Our franchisees and developmental licensees maintain separate employment policies and practices. If you are an employee of a franchisee/developmental licensee, that franchisee/developmental licensee uses your personal information pursuant to its own privacy policies. Please contact your employer to learn more about its privacy practices.

3. Who is the Data Controller

For the purposes of this Statement, McDonald's is the data controller of your personal information.

4. Information We Collect

This Statement applies to personal information (i.e., any information relating to an identified or identifiable natural person) we collect from Employees, or which is otherwise provided to us in writing, electronically or orally relating to Employees. We collect and process personal information for the administration and management of our human resources function. The actual personal information collected and processed will vary depending on your status as a current or former Employee as well as the nature of your position and role.

In the normal course of human resources activities, we may collect and process the following type of personal information on the basis of the necessity for compliance with a legal obligation to which McDonald's is subject, and McDonald's prevailing legitimate interest to effectively manage its human resources and achieve the purposes set out below under "How we Use your Information":

- Contact information such as your name, home address, telephone numbers (home and mobile), email address and emergency contact information;
- Your gender, date of birth, marital status, birthplace, birth or marriage certificates, nationality;
- Your date of hire, description of current and past title/positions, grade or level, unit/department, work-related contact details, date(s) of promotion, work history, technical skills and training courses attended, location, supervisor(s) and subordinate(s), employee identification number, employment status and type, length of service, promotions;
- Usernames, passwords and other unique identification numbers, whether assigned by McDonald's or selected by you;
- Date of resignation or termination;
- Acknowledgements regarding McDonald's policies, such as our Standards of Business Conduct;
- Photographs/videos; and
- Details on stock options, stock grants and other awards, incentive plan participation details and eligibility for the same.

- Residency and work permit status; dependents, personal details of dependents; children's birth certificates, children's school records;
- Terms of employment;
- Employment history and talent management information such as educational background, military service, professional certifications, language capabilities and other relevant skills, references, letters of recommendation and interview notes; retirement eligibility; details on performance management ratings, training records, development plan and willingness to relocate; evaluations of job performance and qualifications for succession planning and advancement purposes;
- Salary, bonus, benefits, long-term incentives and award history, salary reviews, beneficiary information, leave or workers compensation information, and severance information;
- Working time records and records of work absences (including vacation and other absence records including maternity and paternity leave, leave status, hours worked and department standard hours), sick pay, vacation entitlement and requests, performance appraisals, disciplinary and grievance procedures;
- Electronic content produced or received by you using McDonald's IT systems, including documents, information, and emails and other electronic communications transmitted or received through the use of McDonald's IT systems;
- Pensions, investment accounts, insurance and other related benefits information (which may include information about your spouse, children and other eligible dependents and beneficiaries);
- Information needed in order to comply with local legislation, court requests or law enforcement authorities;
- Reason for resignation or termination, other information relating to termination of employment;
- Records regarding compliance with McDonald's policies such as food safety compliance, employee monitoring information as appropriate under local laws, including information captured on security systems, including key card entry systems and CCTV systems and information from use of computer systems, software, communications systems and devices, and other resources owned, operated or controlled by us or provided on our behalf;
- Voicemails, emails and other work product correspondence and communications created, stored or transmitted using McDonald's computer or communications equipment; and
- Driving license number, vehicle registration and plate information and driving history.

In addition, we may process certain special categories of personal information (1) if that information is needed for carrying out obligations and exercising McDonald's or your rights in the field of employment, social security or social protection laws, (2) if that information is needed for the establishment, exercise or defense of legal claims or (3) with your consent (for example in order to enhance inclusiveness within the McDonald's work environment). Such special categories of personal information may include:

- Race and ethnicity;
- Religious or philosophical beliefs;
- Sexual orientation;
- Gender Identity,
- Disability status;
- Refugees status
- Health information as appropriate under local laws in connection with compensation and leave;
- Information on physical limitations, special needs and other medical or health-related workplace accommodations as well as health-related information relevant for the health and safety of other Employees, visitors, customers, or business partners (e.g., vaccination status with respect to communicable diseases); and
- Biometric identifiers and information, such as fingerprint and fingerprint templates.

Only for Employees who perform global roles or otherwise directly report to McDonald's rather than one of our subsidiaries as well as in exceptional cases to the extent necessary for the purposes set out in the next section below and only where permitted by local law:

- Results of credit and criminal background checks, drug and alcohol testing and other screening procedures;
- Your social security number, passport or other national identification number, citizenship, tax reference number; and
- Bank account information.

The types of personal information collected, processed, and used by us pursuant to this Statement may vary from jurisdiction to jurisdiction in accordance with applicable law.

This Statement applies to any personal information (i.e., any information relating to an identified or identifiable natural person) we collect from Employees and applicants, or which is otherwise provided to us in writing, electronically or orally relating to Employees or applicants. This information may be provided by you to McDonald's, internally generated by McDonald's, or may be provided to us by your employer, another McDonald's subsidiary or by third parties for the purpose of managing our relationship with you. How your information will actually be collected and used will depend on whether you are a current or former Employee or an applicant, as well as the applicable law in the jurisdiction at issue which may place certain requirements on the collection, use, and disclosure of this information.

5. Purposes for Which Your Personal Information is Processed

We collect and use personal information for a number of employment-related purposes:

- Staffing and workforce management purposes;
- Training and development, including secondments;
- Strategic planning, succession planning and ensuring business continuity;
- Processing of personal information for job applicants including applications, recruitment and selection purpose;
- Processing of personal information for job applicants and Employees, including promotion and transfer purposes;
- Aggregated predictive and prescriptive benchmarking, statistical reporting and analytics to (i) manage our workforce and carry out our business operations, (ii) gather demographic information about our Employees, (iii) determine how we may better allocate resources and improve our services, and (iv) inform and develop our inclusion initiatives and strategies;
- Enabling electronic communications as well as facilitating communication in general, including via video;
- Operating and managing the IT systems, including providing access to our IT equipment and services, including our computer systems and networks, communication tools and the Internet, and hosting business software systems, as well as third party-provided technology resources and systems (including identity management and authentication services);
- Increasing productivity and/or efficiency, e.g. by training, developing and using appropriate AI tools, including large language models;
- Managing product and service development, improving products and services;
- Managing company assets, including authorization and allowance of access to IT and communication systems;
- Ensuring the security of our IT equipment and services as well as of our office equipment and other property;
- Fulfilling recording, information and reporting obligations and otherwise complying with applicable legal requirements;
- Conducting employee surveys and other similar human resources initiatives for measuring Employee engagement;
- Monitoring and protecting the security and use of our networks, communications and systems, offices and facilities, reports, property and infrastructure;
- The administration of Employee participation in various programs and services offered to eligible Employees;
- Maintaining records relating to food sourcing, food safety and other business activities;
- Compliance with legal obligations;
- Compliance with record-keeping and reporting obligations; Compliance with our inclusion initiatives and strategies;
- Compensation, payroll (to the extent permitted by local law), tax, insurance, pension, savings plans as well as benefit and reward planning, administration and review (including stock options, stock grants and bonuses);
- Administration and maintenance of our occupational health plans, including work-related injury and illness recording obligations (to the extent permitted by local law);
- Budgeting, financial management and reporting, communications, managing mergers, acquisitions and re-organizations, including vendor due diligence standards;
- Travel and relocation management;
- Time and attendance management;
- With your help, recruiting new Employees;
- Performance evaluation and management, including promotions, awards, competitions and employee recognition programs as well as disciplinary matters and terminations;
- Conducting audits, including through independent third party-auditors, to ensure and verify the integrity of our financial records as well as the compliance with internal policies;
- Ensuring the security, health and safety of Employees, visitors, customers, and business partners as well as our

property and premises;

- With your help, informing interested parties (e.g., customers) about your role, responsibilities and professional activities;
- Performing background checks as appropriate under local laws;
- Operating a compliance hotline, ensuring compliance with internal policies and procedures, managing any internal complaints; ethics issues;
- Dispute and complaint resolution, internal investigations and reviews, auditing, compliance, and risk management;
- Compliance with judicial or administrative orders (including inspections and other requests from government or other public authorities) as well as compliance with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations; and
- Establishing, exercising or defending against legal claims.

To the extent any envisioned use is inconsistent with or outside of the above contemplated uses in this Statement, we will communicate it to you at the point of collection.

6. How We Disclose and Share Your Information

In order to achieve the purposes set out further above, your information may be shared with other affiliates and subsidiaries of McDonald's (the "**McDonald's Group**").

Your information may also be shared with various third parties outside of the McDonald's Group for the purposes set out further above. These third parties may include:

- Third party service providers, including suppliers, subcontractors and consultants that provide services to McDonald's or a McDonald's Group company;
- Government authorities, including regulatory authorities, law enforcement, or public entities such as local tax authorities;
- for Employees who perform global roles or otherwise directly report to McDonald's rather than one of our subsidiaries as well as in exceptional cases; and
- Benefits providers, such as our health and insurance providers.

We may also share information with the third parties above or other third parties when:

- We believe in good faith that the disclosure is required to comply with a judicial proceeding, court order, subpoena, warrant or legal process and such disclosure is in compliance with local law;
- In the event of a merger or acquisition, divestiture, asset sale, a transfer of some or all of McDonald's business, or other related transaction; and
- When we believe in good faith that disclosure is required by law or to protect the safety of our Employees, the public or McDonald's property.

7. International Data Transfers

Like many global businesses, we have both centralized and outsourced various aspects of our business to improve how we manage and administer our human resources program. As a result, and in order to provide you with the services in this Statement, it may be necessary to transfer your information outside of the country where it was originally collected or outside of your country of residence. These transfers may be to any McDonald's Group company around the world (as required) as well as to third party service providers around the world that help McDonald's manage and administer its human resources programs.

If we are subject to the EU General Data Protection Regulation (GDPR), we only transfer your personal information to a non-EU/EEA country or within the U.S. where we have established or confirmed that all data recipients will provide an adequate level of data protection, in particular by way of entering into appropriate data transfer agreements based on Standard Contractual Clauses (e.g., Commission Implementing Decision (EU) 2021/914) and other suitable measures which are accessible from us upon request.

McDonald's Corporation and McDonald's Global Markets LLC's participation in the EU-U.S., the UK Extension, and Swiss-U.S. Data Privacy Frameworks

With respect to data transfers to the US from certain European jurisdictions, these transfers are subject to the EU-U.S. Data Privacy Framework, the U.K. Extension to the European Union-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework (collectively, “**DPF Principles**”). To the extent we receive EU human resources personal information, we are committed to subjecting such information to the DPF Principles or the contractual provisions of the SCCs, as applicable. In compliance with the DPF Principles, McDonald’s commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities, the UK Information Commissioner’s Office, and the Swiss Federal Data Protection and Information Commissioner (collectively, “**DPAs**”) with regard to unresolved complaints concerning our handling of human resources personal information received in reliance on the EU-U.S. DPF in the context of the employment relationship. If there is any conflict between the terms in this Statement and the DPF Principles, the DPF Principles shall govern. To learn more about the DPF Principles, visit the U.S. Department of Commerce’s Data Privacy Framework List [here](#).

McDonald’s Corporation and McDonald’s Global Markets LLC, a wholly-owned subsidiary, participate in and comply with the EU-U.S. Data Privacy Framework (“**EU-U.S. DPF**”), the UK Extension of the EU-U.S. DPF (“**UK-EU DPF**”), and the Swiss-U.S. Data Privacy Framework (“**Swiss-U.S. DPF**”) (collectively, “**DPF**”) as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information from European Union member countries, the United Kingdom, and Switzerland. For the purposes of this DPF notice only, McDonald’s Corporation and McDonald’s Global Markets LLC are each and individually and collectively referred to as “McDonald’s”. To review a list of DPF participants and McDonald’s DPF certification, [click here](#).

You have the right to request access to personal information received by McDonald’s in reliance on the DPF, and to exercise choice in limiting McDonald’s use and disclosure of such information, including with respect to disclosures of such information to third parties and using the information for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals. McDonald’s may use third-party service providers to assist McDonald’s with processing the personal information subject to the International Human Resources Privacy Statement. McDonald’s may be liable under the DPF if these service providers process such personal information in a manner inconsistent with the DPF and McDonald’s is responsible for the event giving rise to the damage.

McDonald’s commitments under the DPF are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. McDonald’s may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

You may contact McDonald’s with questions, concerns or complaints relating to McDonald’s participation in the DPF by sending an email to contact.privacy@us.mcd.com. In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, McDonald’s commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities, the UK Information Commissioner’s Office, and the Swiss Federal Data Protection and Information Commissioner with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship. For information on how to contact the DPA in your country, [click here](#). For information regarding the Swiss DPA, [click here](#). McDonald’s commits to cooperate with your country’s DPA and any panel established by the DPAs, and to comply with the advice they provide with respect to the personal information subject to the Human Resources Privacy Statement that McDonald’s receives in the U.S.. In certain conditions, you may have the right to invoke binding arbitration.

8. Security

We have in place appropriate technical, physical and organizational security measures that are designed to protect against unauthorized access, disclosure, damage or loss of personal information. The collection, transmission and storage of information can never be guaranteed to be completely secure. However, we are taking steps to ensure that appropriate security safeguards are in place to protect your information.

9. Retention

McDonald’s will only retain your personal information for the duration of time necessary to fulfill the purposes described in this Statement and to adhere to our policies on maintaining records (unless a longer period is needed by law). This means that, in some cases, we may retain your personal information for a period of time following termination of your employment relationship with our wholly-owned subsidiary outside of the U.S., in particular where potential legal claims are not yet time-barred.

10. Choice, Access, and Other Rights

We want to ensure that you have the necessary tools at your disposal to control the information that you provide to us. It is also important that you contact us to keep your information accurate and up to date.

Under applicable law, you may have the rights (under the conditions and to the extent set out in applicable law): (i) to check

whether and what kind of personal information we hold about you and to access or to request copies of such data; (ii) to request correction, supplementation, anonymization, blocking or deletion of information about you that is inaccurate, incomplete, outdated, unnecessary, excessive or processed in non-compliance with applicable requirements; (iii) to request the restriction of the collection, processing or use of information about you; (iv) in certain circumstances, to object for legitimate reasons to the processing of your information or to revoke consent previously granted for the processing while the latter does not affect the lawfulness of processing before the revocation; (v) to request data portability; and (vi) to lodge a complaint with the competent authority.

11. How to Contact Us

If you have any questions or concerns in relation to the collection and management of your personal information by McDonald's under this Statement, you can reach us at:

- By email: contact.privacy@us.mcd.com
- By post: McDonald's Corporation
Attn: Global Data Protection Office
Privacy at McDonald's, Dept. 282
110 North Carpenter Street
Chicago, IL 60607-2101, USA

12. Changes to this Statement

From time to time we may change, modify or amend this Statement in order to comply with the evolving regulatory environment or the way we operate our business. Subject to any applicable legal requirements to provide additional notice and/or obtain consent, any changes to this Statement will be communicated to you through existing McDonald's communication channels and resources.