

KDP Career Portal Privacy Notice

Effective 04/04/2025

This Privacy Notice describes how and when Keurig Dr Pepper Inc. (hereafter “we” “our” “us” or “KDP”) and our Affiliates collect, access, use, or disclose (collectively, “process”) your Personal Information when you apply for a job with KDP. In Ireland, Alder Basswood Clover LP is the data controller responsible for your Personal Information in respect of employees of Alder Basswood Clover LP and KDP Global Sourcing Limited is the data controller responsible for your Personal Information in respect of employees of KDP Global Sourcing Limited.

This Privacy Notice does not form part of any contract or guarantee of employment or other contract to provide services. We may update this Privacy Notice at any time without notice to you.

In this Privacy Notice, we refer to “Personal Information,” which is information that identifies or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a job applicant. This Privacy Notice does not apply to other information collected online through our websites, mobile applications, social media pages, direct marketing campaigns, or other online communications (collectively, the “Consumer Services”). For information regarding our privacy practices related to the Consumer Services, please review our consumer privacy policy, which is available [here](#).

1. NOTICE AT COLLECTION OF PERSONAL INFORMATION

A. Information We Collect About You

When you apply for a job with KDP, we may collect Personal Information about you, such as:

- **Identifiers and contact data**, such as your contact information (email address, home address and telephone number), geographical location and government-issued identification numbers and documents.
- **Characteristics of Protected Classifications under Federal, State, or Local Law**, such as your nationality/national origin, veteran status or immigration status.
- **Internet/Electronic Activity**, such as your IP address or activity using the job applicant portal.
- **Education Information**, such as education history, performance, and experience.
- **Professional or Employment-related Information**, such as employment history, references, skills, qualifications, and other information contained in your resume, application, or other documents you provide in support of your application.
- **Inferences** based on the above categories of personal information that we collect, where automated recruitment tools are used.
- **Pre-Employment check information**, such as citizenship and right to work information, accompanying documents such as government identification and visa, or verification of education and employment history.
- **Background check information**, where applicable, criminal records data, results of reference checks.
- While we may collect **sensitive personal information**, (where applicable) information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or data

concerning health or sex life or sexual orientation, we do not use or disclose sensitive personal information to infer characteristics about you or for any purpose other than the limited permissible purposes set forth in applicable law.

- For US residents only: Where we use digital interviewing tools, additional Personal Information may be collected such as your voice, your image, your video image and any information that you specifically disclose about your personal life. You will not be asked questions that deal with categories of sensitive Personal Information.

We may collect your Personal Information from you or from third parties, such as from your references, former employers, or authorized pre-employment/background/credit/driving checks. We may also collect Personal Information that you have provided indirectly, including where your resume or job application provides links to other websites or platforms i.e. LinkedIn or online portfolios. We may combine the Personal Information we receive from and about you.

Personal Information you provide for pre-employment checks. KDP is required to conduct certain pre-employment checks, including to verify your right to work, so we may collect additional Personal Information about you for employment purposes. Depending on your location, KDP may also conduct background checks. Prior to conducting this check, we will provide you with a separate written notice and an opportunity to consent to the background check.

Personal Information collected from you indirectly. We may ask you for your Personal Information in a particular interaction with you as described to you in those circumstances.

Personal Information Collected Automatically. Whenever you visit or interact with the job applicant portal, KDP and our vendor may use a variety of technologies to collect Personal Information, such as:

- **Usage Information.** We collect Personal Information about your activity on the portal, such as login date and time, features you use, and interactivity.
- **Device & Device Usage Information.** We collect Personal Information from and about the electronic devices that you use to access the portal, including IP address, device ID and type, device and app settings and characteristics, browser type and language, operating system, time zones, software version, domain name, identifiers associated with cookies or other technologies that may uniquely identify your device or browser, and information on your wireless and mobile network connection, like your service provider and signal strength.
- **Third Party Analytic Technologies.** KDP may use third parties' analytics tools, such as Google Analytics, and others, to help us analyze usage of the KDP job applicant portal.

B. How We Use Your Personal Information

We will process your Personal Information when we have a legal basis for doing so, including legal obligations or legitimate interests. Depending on your location and our need for processing, we may obtain your consent to processing certain Personal Information about you. Such processing is necessary to evaluate and make decisions about your job application; communicate with you; communicate with third parties about you, such as your references or former employers; comply

with legal requirements; pursue our legitimate interest in operating our business; and provide you with information about KDP and our Affiliates.

We may also use third-party artificial intelligence and advanced automated processing technologies to review your resume or CV, cover letter, application and previous applications and other publicly available Personal Information, including from Google, GitHub and StackOverflow to identify open positions that may be a good match for your background, skills, and interests to assist our recruitment efforts. This amounts to automated decision-making and may include profiling. We also use these tools to support the backend of our application management process.

Using AI to support our decision-making: We may use AI and automated tools to supplement our recruitment decision-making, but we are not solely reliant on such tools for job matching and the recruitment process. For example, our automated tools may suggest whether you would be a good match for a position to which you have applied based on your match score (determined based on factors such as skill, title and experience relevance to the position), but the tools will not reject you for a position or reject you from our platform if an appropriate match cannot be made. We ask that you consent to this processing, though your consent is not a condition of submitting a job application, and you have the right to not be subject to employment opportunity decisions or profiling based on automated processing, which produces legal or similarly significant effects. If you have any questions about how we use AI in our recruitment process, or if you would like to opt-out of automated decision-making during the recruitment process, please contact our HR team at HR_Compliance@kdrp.com.

We will not process Personal Information for any other purpose incompatible with the purposes outlined in this section, including any unlawful purpose, unless such processing is required or authorized by law, authorized by you, or necessary to protect human life, safety or property, to improve public hygiene, or to comply with domestic or international legal processes or government requests.

We do not “sell” or “share” the Personal Information that you submit as a job applicant, as these terms are defined in applicable law. If you accessed the job applicant portal from our website or other Consumer Services, please click [here](#) to learn more about our data practices on our website and other Consumer Services.

Our purpose and legal basis for processing:

Our purpose for processing your personal data	Personal data categories (defined in the table above) that we process for this purpose	Our legal basis
To communicate with you during the recruitment process	<i>Identifiers and contact data Internet/Electronic Activity</i>	Legitimate interests of managing applications for positions with us.
To assess your suitability for the role you have applied for	<i>Education Information Professional or Employment-related Information</i>	Legitimate interests of managing applications for positions with us.

Determine your eligibility to work	<i>Pre-Employment check information</i>	Legal obligation.
To conduct criminal record and background checks (where applicable)	<i>Background check Information</i>	Legal obligation. Legitimate interests of managing applications for positions with us. Consent (where required by applicable local law).
To address access needs and accommodations during the application process	<i>Identifiers and contact data</i> <i>Characteristics of Protected Classifications</i>	Legal obligation.
To manage disputes and legal proceedings	<i>Identifiers and contact data</i> <i>Characteristics of Protected Classifications</i> <i>Internet/Electronic Activity</i> <i>Education Information</i> <i>Professional or Employment-related Information</i> <i>Pre-Employment check information</i> <i>Background check Information</i>	Legitimate interests in managing disputes and legal proceedings to which we are party.

D. Retention of your Personal Information

We will retain your Personal Information consistent with applicable law and our retention policies. Such retention may include satisfying any legal, accounting, or reporting requirements. For some activities, processing of certain Personal Information will continue even if you are denied the position for which you applied. We will endeavor not to keep Personal Information longer than necessary for the fulfillment of the purposes outlined in this Privacy Notice.

We also may aggregate or de-identify the information so that it no longer identifies you, in which case we may use this information indefinitely without further notice to you.

2. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

Authorization to access Personal Information will be limited within KDP and our Affiliates for purposes of reviewing and making decisions about your job application. We will only disclose job applicant Personal Information to our suppliers and other third parties in the following circumstances:

- When required to do so by law;
- In response to a legitimate request for assistance by the police or other law enforcement agency;
- To seek legal advice from our external lawyers or in connection with litigation with a third party;

- To utilize third party service providers that provide business, professional or technical support functions for us, help us operate our business and the website, or administer activities on our behalf;
- To protect the security of our servers, network systems, and databases;
- To investigate, prevent, or take other action regarding suspected illegal activity, fraud, or other wrongdoing;
- In connection with the sale, purchase or merger of a business; and/or
- On a case-by-case basis with your consent.

3. SAFEGUARDING YOUR PERSONAL INFORMATION

KDP uses appropriate technical and organizational measures to protect the Personal Information that we collect and store. The measures are designed to provide a level of security appropriate to the risk of processing your Personal Information i.e., by ensuring that we allow access to personal data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access your Personal Information, we will implement appropriate measures to ensure the Personal Information is used in a manner consistent with this Privacy Notice and that the security and confidentiality of the Personal Information is maintained.

4. YOUR PRIVACY RIGHTS

If you have any questions, complaints, comments, or requests to access, correct, or delete your Personal Information (including deleting your job applicant account), please contact our HR Compliance team via email at HR_Compliance@kdrp.com or by mail at:

Keurig Dr Pepper
6425 Hall of Fame Lane
Frisco, TX 75034

California residents

If you are a resident of California, you are entitled to the following privacy rights:

- **Right to Know:** You have the right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.
- **Right to Delete:** You may request that we delete the Personal Information that we have collected from or about you.
- **Right to Correct:** You have the right to correct inaccurate Personal Information that we may maintain about you, subject to appropriate verification.

How to Submit a Request. Please contact HR_Compliance@kdrp.com to submit your request. We may request certain information to verify your identity before we can respond to your privacy rights request. You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you've authorized them to act on your behalf or must demonstrate they have power of attorney pursuant to applicable probate law. KDP retains the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity. An authorized agent shall not use a consumer's personal information, or any information collected from or about the consumer, for any purpose other than to fulfill the consumer's requests, for verification, or for fraud prevention.

We value your privacy and will not discriminate in response to your exercise of your privacy rights.

EEA Residents:

If you are a resident of the EEA, you are entitled to the following privacy rights:

- You may **access, correct, update** or **request deletion** of your Personal Information.
- You can **object** to the processing of your Personal Information, ask us to **restrict** processing of your Personal Information or **request portability** of your Personal Information (i.e. for your Personal Information to be transferred in a readable and standardized format.
- If we have collected and processed your Personal Information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on a legal basis other than consent.
- You have the right to **complain to a relevant data protection authority** about our collection and use of your Personal Information. We encourage you to first raise your concerns with KDP directly to allow us the opportunity to investigate and address your issues or concerns.

How to Submit a Request. Please send all requests to exercise these rights to our HR Compliance team at HR_Compliance@kdrp.com.

5. YOUR REASONABLE ACCOMMODATION RIGHT

KDP is committed to providing equal employment opportunities to disabled individuals. Should you feel as if you need any form of assistance during the application process or feel as if the Personal Information processing described in this Notice, including any automated processing technologies, will either improperly take into account your disability or fail to allow you to properly establish your qualifications for the position, you may request a reasonable accommodation. To do so, please contact HR Compliance using the contact information below.

6. INTERNATIONAL DATA TRANSFERS

Your Personal Information is stored on servers in the United States; however, some of our subsidiaries, our parent company, and service providers may store information on servers hosted in other countries. As such, your Personal Information may be subject to the laws of other countries, where the data protection and other laws may differ from those of your country of residence. Where we transfer your information outside the EEA, we use Standard Contractual Clauses. To find out more about how we safeguard your information (including obtaining a copy of such safeguards) in relation to transfers outside the EEA, please contact us via the details in the “Contact” section below.

7. REVISIONS TO THIS PRIVACY NOTICE

We reserve the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Notice at any time. We will communicate material revisions to the policy to you.

8. CONTACT

Please contact KDP’s HR Compliance team if you have questions or concerns regarding this policy or how we process your Personal Information, or for information on exercising your rights as described in Section 4.

Via email at HR_Compliance@kdrp.com[mailto:](#) or by mail at:

Keurig Dr Pepper
Attention: HR Compliance
6425 Hall of Fame Lane
Frisco, TX 75034