

Yum China Holdings, Inc.

Privacy Policy

Yum China Holdings, Inc. (referred to as “**we**”, “**our**”, or the “**Company**” hereinafter) cares about the privacy and personal information (“**personal data**”) of individuals we interact with and is strongly committed to keeping secure any personal data we obtain. This Privacy Policy is adopted by the Company in accordance with the Personal Information Protection Law of the People’s Republic of China (“**PRC**”), the Data Security Law of the PRC, the Cybersecurity Law of the PRC and applicable laws and regulations on the protection of privacy and personal data in the PRC, to guide and manage our compliance activities. Our Privacy Policy specifically aims to direct our personnel to protect personal data of persons we interact with, including customers, suppliers, visitors, website users, investors or shareholders, and job applicants (“**data subjects**”), and supervises our collection, processing and disclosure of personal data in strict accordance with this Privacy Policy and/or other similar requirements. We also require our suppliers (including vendors, contractors, and external consultants) to comply with this Privacy Policy and cooperate with us in protecting personal data.

1. “Personal data” refers to various information related to an identified or identifiable natural person recorded electronically or by any other means, not including anonymized information. We collect personal data on a necessary, reasonable and legal basis, and limit our collection to the minimum scope required by the purpose of the relevant activity. We may collect personal data that data subjects provide to us, such as names, contact details, as well as data we receive automatically during the use of our products or services, such as device information and cookies.
2. We use and process personal data as disclosed to data subjects at the point of collection. We may use and process personal data for the following purposes:
 - Providing services to the data subject
 - Accomplishing our business purposes
 - Analysis of personal data to provide personalized services
 - Other purposes we may indicate when we collect such data

3. Retention of personal data

We will retain personal data in compliance with applicable laws and regulations or for as long as needed or permitted for the purposes for which it was obtained. Generally, we will retain personal data until: (i) all purposes for which we collect and use such data are realized; (ii) termination of data subjects’ use of our products or services; (iii) explicit request of data subjects to delete their personal data. Upon the expiration of the retention period of personal data, all personal data will be deleted, anonymized or treated by other methods prescribed by applicable laws and regulations.



4. Security of personal data

We deploy a variety of security measures to minimize the risk of leakage, destruction, misuse, unauthorized access, unauthorized disclosure, and/or alteration of personal data stored on our systems. Such measures include encrypted transmission via secure sockets layer (SSL) networks, encrypted storage of information, and strictly controlled access to data centers. When transmitting and storing sensitive personal data (including personal biometric information), we adopt anonymization, de-identification, encryption, access control and other related security measures.

5. Subject rights

In accordance with applicable laws and regulations, data subjects will be entitled to access, obtain, rectify, delete, and withdraw their personal data.

6. Others

6.1 Personal data protection controls and systems have been embedded in our internal compliance management infrastructure. To ensure the implementation of this Privacy Policy and protection of personal data, we conduct periodical risk assessments and compliance audits to ensure compliance with this Privacy Policy as well as applicable laws and regulations.

6.2 We adopt a zero-tolerance policy for any violation of personal data protection. Any personnel handling or making decisions regarding personal data who, after relevant investigation, is found to be in breach of this Privacy Policy will be subject to disciplinary action. Where warranted, we may take further action in accordance with applicable laws and regulations.

