

Compass Employee Share Plan Privacy Notice

Who we are

This is Compass Group's privacy notice for its employee share plans, being the Save As You Earn Scheme (the "SAYE Scheme") and for UK tax residents the Share Incentive Plan (the "SIP Scheme") (together, the "Schemes").

When we use 'Compass', 'we', 'us' or 'our' in this privacy notice, we are referring to Compass Group PLC and, where relevant, the Compass group entity that employs you (your "Employing Entity"). Compass Group PLC is the sponsor of the Schemes. Your Employing Entity is the data controller for your personal identifiable information under the applicable legislation and is primarily responsible for processing and ensuring the proper protection of your data in connection with the Schemes. Because the Schemes are operated globally on a single administration platform, this privacy notice applies across all participating Compass entities and should be read together with the employee privacy notice issued by your Employing Entity, which contains the specific details that apply to you (including the identity and contact details of your Employing Entity as controller, applicable data retention periods and any local law requirements).

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal identifiable information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

In this privacy notice, references to the "data protection legislation" (and to the "applicable legislation") mean the data protection and privacy laws in force in the country in which your Employing Entity is located and which apply to the processing of your personal information in connection with the Schemes. Where those laws differ from the position described in this group-wide notice, the employee privacy notice issued by your Employing Entity will prevail in respect of the matters specific to you.

Purpose of this Privacy Notice

This privacy notice informs you of who we are, how we collect, share, use and protect your personal information, however you provide it to us, in the provision of the Schemes and tells you about your privacy rights and legal protections.

The Schemes are all-employee share plans offered by Compass. Under the SAYE Scheme you can save a fixed amount from your salary each month over a three year period and, at the end, choose to buy Compass shares at a discounted price or take your savings back. Under the SIP Scheme, you may be able to receive free shares and/or buy shares from your salary (with potential tax advantages), which are held for you and can benefit from dividend income and share price growth. Further details of each Scheme are set out in the relevant offer documentation and Plan rules.

It is important that you read this privacy notice together with any other information we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your data. This privacy notice is complementary to the other information which we might provide in specific circumstances and will not override it.

What is personal identifiable information

Personal identifiable information, or personal data, means any information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- can be indirectly identified from that information in combination with other information.

It does not include data where the identity has been removed (anonymous data). There are special categories of more sensitive personal data which require a higher level of protection, such as information about a person's health, religious beliefs or sexual orientation.

In administering the Schemes we will process the following types of personal information about you

Identification Data	includes name, employee number, date of birth, driver's license and passport information, social security/national insurance number.
Contact Data	includes email address, phone number, postal address, other communication details
Communication Data	includes phone calls, email correspondence and hard copy correspondence.
Employment Data	includes occupation or profession, employer.
Financial Data	Includes savings and share allocations, partnership share deductions from salary, dividend and share transactions, salary (where applicable), tax and National Insurance contributions (NICs) or equivalent due on any share awards, balances and transactions, account numbers.

How is your personal information collected?

We collect personal information when you enrol in the Schemes, in the administration of the Schemes, provide the Scheme benefits, and fulfil our legal duties as the Scheme sponsor.

How we will use information about you

We will only use your personal information when the law allows us to. We will use your personal information in the following circumstances:

- Where we need to fulfil our contract with you to deliver the Schemes
- Where we need to comply with a statutory obligation
- Where it is necessary for our legitimate interests, including business interests and best practice (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we have your express consent (for example direct marketing)

Situations in which we will use your personal information

The situations in which we will process your personal information are listed below:

- To enrol you into the Schemes
- Administer and maintain the Schemes

- Provide the Scheme benefits
- Fulfil our legal duties as the Scheme Sponsor
- Grant awards under the Schemes (and any other share plans operated by a group company)
- Invite you to participate in, and administer your participation in, the Schemes, including communicating with you about your participation and collecting any tax and National Insurance contributions (NICs) or equivalent due on any share awards

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. The legal bases on which we rely are as set out in this notice and apply to the processing described above, unless and to the extent that they are supplemented, varied or replaced by the employee privacy notice issued by your Employing Entity to reflect the data protection legislation applicable to it. Where we rely on our legitimate interests (or those of a third party), those interests are the effective operation, administration and promotion of the Schemes and any other share plans operated by a group company, the efficient management of a single group-wide administration platform and login, and compliance with our obligations as sponsor of the Schemes.

Do you have to provide your personal information?

Where we collect personal information in order to enrol you in and administer the Schemes, to provide the Scheme benefits or to comply with a legal obligation, the provision of that information is necessary for those purposes. If you do not provide it, we may be unable to enrol you in the Schemes, administer your participation or provide the related benefits. Where we ask for information on a purely optional basis, we will make this clear to you at the point of collection.

How we use particularly sensitive personal information

Special categories of personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We do not ordinarily process special categories of personal information in connection with the Schemes. In limited circumstances we may process special categories of personal information, such as where a reason for leaving employment is due to health reasons as required pursuant to the relevant Scheme rules. Where we do so, we will rely on a condition for processing permitted under the data protection legislation applicable to your Employing Entity. By default, and unless a different condition is identified in your Employing Entity's employee privacy notice, we rely on the condition that the processing is necessary for the purposes of carrying out our obligations and exercising specific rights in the field of employment and social security law.

Data sharing

We may have to share your personal information with third parties, including third-party service providers and other legal entities within the same group of companies as Compass.

We require our third-party processors to respect the security of your personal information and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to pursue the relationship we have with you, or where we have another lawful basis for doing so.

Which third-party service providers process my personal information?

Third parties include third-party service providers (including contractors and designated agents) and other entities within our group who we might use to operate and administer the Schemes.

These include:

- Global Shares, a JP Morgan company - The Schemes are administered by Global Shares. When you enrol in the Schemes, we will share with Global Shares your name, email address and employee ID number to enable it to set up an account. From time to time, Global Shares may share with us personal information they have collected from you directly in their administration of the Schemes. For more information about how Global Shares processes your personal data, please see their [privacy notice](#).
- The SIP trustee as detailed in the SIP Plan Rules, who holds shares acquired under the SIP Scheme on your behalf, and details of the savings carrier (a financial institution authorised to hold SAYE savings contracts) associated with your country of tax residence, with whom we share the information necessary to operate your savings contract and shareholding are provided in the FAQs on the platform.
- Other third parties - from time to time we may also share your personal information with other third parties who provide services to us, or otherwise assist us, in connection with the operation and administration of the Schemes, in each case only to the extent necessary for the purposes described in this privacy notice. These may include, for example, professional advisers (such as legal, tax, accounting and audit advisers), banks, savings carriers and other payment or financial services providers, IT, software and platform providers, background screening providers, and any successors or assignees of our business.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies and our Group Data Sharing Agreement. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

What about other third parties?

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making disclosures to stock exchange regulators, tax authorities or other authorities where required by law.

International transfers of your personal information

Where we, or our partners, process your personal information outside the country in which your Employing Entity is located, you can expect an essentially equivalent degree of protection in respect of your personal information (and certainly no less than required under the data protection legislation applicable to your Employing Entity). Where we do process your personal information outside that country, we would only do so in order to carry out activities to operate the Schemes and our business and to support the processing of personal information we need to carry out. This processing may include special categories of personal information and this will depend on the activity being carried out by us or our partners. Such processing would be carried out only on terms that meet the requirements of the data protection legislation applicable to your Employing Entity, including, where required, by putting in place an appropriate transfer mechanism recognised under that legislation (for example, standard contractual clauses (SCCs), an International Data Transfer Agreement (IDTA) in the UK, or another lawful transfer mechanism applicable in your jurisdiction), so that the processing provides an adequate level of protection for your personal information. Your data will be processed in the UK, EU and US, but may be processed in other jurisdictions, such as India or other third countries, where we have service providers or data processors.

We use Microsoft Office 365, which offers a suite of applications we use in our daily operations. These include for example Outlook, Word and Excel, but also other applications are included in our subscription. The data within our Office 365 tenant are processed in the US. Our contract with Microsoft is supported by a Data Processing Agreement which details the controls we have in place to protect and respect personal

information, and which complies with the data protection law applicable to your Employing Entity on international transfers of data.

How long will Compass keep my personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

What other rights do I have in respect of my personal information?

You have rights under data protection laws in relation to your personal information. The rights available to you, and the way in which they apply, depend on the data protection laws in force in the country in which your Employing Entity is located. The rights described below are examples of those that may be available to you; further detail on the rights that apply to you is set out in your Employing Entity's employee privacy notice. Under certain circumstances your rights may include:

- Request access to your personal information (commonly known as a "data subject access request" or "DSAR"). This enables you to receive a copy of the personal information we hold about you in order to check that we are processing it lawfully.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where you believe we have no legitimate reason for continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be obliged to comply fully with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we might demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Again, it is subject to any overriding legal, accounting and reporting rights we might have to retain copies of your data.

- Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact your data privacy lead/legal counsel as identified in your Employing Entity's employee privacy notice, or you can contact us at data.privacy@compass-group.com.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, if your request is clearly unfounded, repetitive or excessive, we may refuse to comply with your request.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Changes to this Notice

Should Compass decide to substantially modify the manner in which Compass collects or uses your personal information, the type of personal information that Compass collects or any other aspect of this Notice, Compass will notify you as soon as possible by reissuing a revised Notice, or taking other steps in accordance with applicable law.

Who can I contact if I have questions?

Full name of legal entity	Compass Employing Entity or Compass Group PLC
Who to contact	Compass Employing Entity privacy lead or legal counsel or Compass Group Director of Data Privacy
Email address	data.privacy@compass-group.com
Postal address	Compass House, Guildford Street, Chertsey, KT16 9BQ

How to make a complaint

You have the right to make a complaint at any time to the data protection supervisory authority in the country in which your Employing Entity is located. In the UK, this is the Information Commissioner's Office (ICO) (www.ico.org.uk); the relevant supervisory authority for your jurisdiction is identified in your Employing Entity's employee privacy notice.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO; so please contact us in the first instance.