



# Compass Employee Privacy Notice

# 1. Introduction

**Compass Group PLC of Compass House, Guildford Street, Chertsey, KT16 9BQ ("Compass", "we", "us" or "our") respect the privacy rights of our employees and are committed to handling personal information responsibly and in accordance with applicable law. We have prepared this Privacy Notice to explain how we collect, share and use your personal information in connection with your employment, and the rights you have in connection with that information.**

When we say "Compass", "Compass Group", "we" or "us" in this Notice, we mean your employing company. This is the entity with which you have an employment contract. This document does not form part of your contract of employment, and we may update it from time to time.

If you have any questions or concerns about this Notice or about our use of your personal information, then please contact us using the email address given in Section 11 below.

## 2. What personal information does Compass collect and why?

As part of your employment with Compass, we will collect personal data about you during your job interview process, at the start of and during your employment from you or authorised third parties e.g. a recruitment agency, your supervisor or public authorities.

In addition, we may correspond with you and that may contain certain personal data that we exchange in the ordinary course of business, such as to schedule meetings and calls.

The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information	Why we collect it
<b>Identification data</b> – such as your name, marital status, employee/Staff ID, business email address, business address, business landline, citizenship, nationality, visa status, passport and other identity data, date and place of birth, gender, national insurance number, social security number, health insurance and governmental retirement plan information and tax reference, background check information, curriculum vitae, employment history, application form	To establish and manage our relationship with you and provide you with appropriate support for health, safety and security purposes
<b>Contact details</b> – such as your home address, telephone number and email address	To communicate with you directly and provide you with direct support



<p><b>Reference details</b> (both oral and written) – such as dates of any previous employment, job title or salary</p>	<p>To perform necessary legal background checks as part of hiring process</p>
<p><b>Job-related information</b> – such as position, business title, employee type, management level, time type (full or part time and percentage), your employment contract, work location, division, department, position level, manager (name &amp; ID), matrix manager (name &amp; ID), support roles, start and end date, job history (including position history, title history, effective dates and past pay groups), details of your education, worker history (including log-files of changes in HR databases) and reason for leaving, email correspondence and other documentation regarding projects you are involved with, calendar invitations to meetings / events and your attendance to them, meeting minutes, phone records</p>	<p>To enable us to administer our workforce</p>
<p><b>Dependent details</b> – such as your next of kin, number of dependents, dependents name, telephone number, home address and email address, emergency contact details</p>	<p>To enable us to administer certain health and medical benefits</p>
<p><b>Salary and Benefits data</b> – such as your basic salary, grade, overtime bonus and commission entitlements, compensation for on-call duties, and insurance benefits (including information about you and your dependants that we provide to the insurer), work period (weekly/monthly/etc.), pensions, tax code, medical health insurance, your bank</p>	<p>To enable us to administer and provide you with remuneration</p>



<p><b>Information about your equity compensation</b> – such as units of shares, share options, long term incentive plan award's or directorships held, details of all restricted shares units or any other entitlement to shares of stock awarded, cancelled, exercised, vested, unvested or outstanding in your favour</p>	<p>To enable us to administer and provide you with applicable benefits</p>
<p><b>Performance and disciplinary information</b> – such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances and any outcome, training record, performance rating history</p>	<p>To assess suitability for promotion or other positions and to make determinations for rewards</p>
<p><b>Absence and working time information</b></p>	<p>To help with health and safety and to administer our workforce</p>
<p><b>Organisational data</b> – including identity records for IT systems, company details, cost centre allocations, and organisations.</p>	<p>To enable you and others to perform their work and to enable us to administer our workforce, or to enable us to identify and resolve issues in our IT systems</p>
<p><b>Communication data</b> – including mobile phone records, email addresses, instant messaging addresses.</p>	<p>To enable us to contact you directly and allow you to contact others as part of your work</p>
<p><b>Financial information</b> – such as bank account details and tax information</p>	<p>To make payments to you or to make arrangements for third parties to pay you</p>
<p><b>National identifiers</b> – such as national ID/passport number</p>	<p>To assist you with international travel, e.g. by providing letters of invitation</p>



### 3. How and why do we use your personal information?

As set out above, we collect and use your personal information for a variety of reasons linked to your employment. To help clarify these we have set out below a list of reasons why we collect and use this data (the "Processing Purposes") along with examples of some of the personal information used for each of the Processing Purposes:

#### How your personal information is used

**Administering and providing remuneration** including equity awards, payroll bonus, and other applicable incentives which involves the processing of identification data (please refer above for more details on identification data)

**Administering and providing applicable benefits and other work-related allowances** e.g. reporting or administering of benefit entitlements and use which involves the processing of identification data

**Administering our workforce** e.g. managing rotas, work schedules and activities, filling vacancies, providing performance evaluations and promotions, managing and monitoring business travel, training activities, conducting talent management and career development, leave management, and providing references

**Providing IT systems and support** to enable you and others to perform their work, to enable our business to operate, and to enable us to identify and resolve issues in our IT systems, and to keep our systems secure which involves processing almost all categories of personal information

**Complying with applicable laws and employment-related requirements** along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws which involves the processing of identification data



**Recruitment management**, including documenting information collected from job applicants as part of the application process, evaluating the respective suitability of applicants, making a hiring decision, and defining a salary and other basic contract information for a new hire, number of working hours and working schedule, goal management including defining goals for a particular employee or a set of employees and measuring the achievement of such goals, training requirements succession planning including talent search based on employee qualifications and employee performance as well as evaluating employees for their qualification for a particular job

**Monitoring and ensuring compliance with applicable policies and procedures and laws**, including conducting internal investigations, which involves the processing of, for example, identification data and also processing in relation to crime, UN sanctions list and terrorism as set out in the relevant policy for the relevant country, contact details, information about your job, salary and benefits and equity compensation, performance and disciplinary information; absence information and organizational data

**Communicating with you, other Compass employees and third parties** (such as existing or potential business partners, suppliers, customers, end-consumers or government officials) which involves the processing of identification data

**Communicating with your designated contacts in the case of an emergency** which involves the processing of identification data

**Responding to and complying with requests and legal demands from regulators or other authorities** in or outside of your home country which involves the processing of, identification data

**Complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data

**Criminal records data**, in the event that Compass has conducted or received the results of criminal records background checks in relation to you, where relevant and appropriate to your role



**In addition to the collection, processing and use of your personal information, Compass collects, processes and uses special categories of personal information about you which we describe as "Sensitive Personal Information".**

#### How your Sensitive Personal Information is used

**Health and medical data**, such as the number of sick days for purposes of salary payment, workforce planning, and compliance with legal obligations; information on work-related accidents for purposes of insurance compensation, work safety and compliance with legal obligations (such as reporting obligations); information on disability for purposes of accommodating the work place and compliance with legal obligations; information on parental leave for purposes of workforce planning and compliance with legal obligations; and religious affiliations for purposes of salary payment and tax compliance

**Trade union membership or affiliation**, such as for the purposes of administering trade union subscriptions through payroll and any collective bargaining agreements, and information to comply with laws relating to staff representatives and strikes

**Race or ethnicity data**, such as information contained in your passport or other citizenship and right to work documentation, and information which you have voluntarily provided to Compass for the purposes of our equal opportunities and diversity monitoring and initiatives

**Sexual life data** where this has been voluntarily provided to Compass for the purposes of our equal opportunities and diversity monitoring and initiatives





## 4. Legal reasons for collecting, processing and use of personal information

**Both personal information and Sensitive Personal Information are needed by Compass to carry out a variety of activities that are linked to your employment and Compass' compliance with obligations as a result of employing you and to conduct our operations as a business.**

We are required to explain to you the legal bases for our collecting, processing and use of your personal information and Sensitive Personal Information. We have a number of these, and to make sure you have the full picture we have listed them all below:

### For personal information, our legal bases are:

- performance of the contract of employment with you and administration of non-contractual benefits; compliance with legal obligations, in particular in the area of labour and employment law, social security and protection law, data protection law, tax law, and corporate compliance laws; legitimate interest of Compass, Compass affiliates or other third parties (such as existing or potential business partners, suppliers, customers, end-customers or governmental bodies or courts); your consent, where that is appropriate and allowed by local data protection law; protection of vital interest of you or of another individual; performance of a task carried out in the public interest or in the exercise of official authority vested in Compass.

### For Sensitive Personal Information, our legal bases are:

- explicit consent as allowed by local data protection law; to carry out the obligations and to exercise the specific rights of Compass or you in the field of employment and social security and social protection law as permitted by local data protection law and/or a collective agreement; to protect the vital interests of the you or of another individuals where you are physically or legally incapable of giving consent; public data as made public manifestly by you; to establish, exercise or defend a legal claims or whenever courts are acting in their judicial capacity; for substantial public interest as permitted by local data protection law; for assessment of the working capacity of the employee as permitted by local data protection law.



We appreciate that there is a lot of information there, and we want to be as clear with you as possible over what this means. Where we talk about legitimate interests of Compass or third parties, this can include:

- Implementation and operation of a group-wide matrix structure and group-wide information sharing;
- Right to freedom of expression or information, including in the media and the arts;
- Customer Relationship Management and other forms of marketing;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Financial performance;
- Compliance with laws;
- Compliance with contracts;
- Internal Investigations; or
- Intended mergers and acquisitions.

## **5. Does Compass use automated decision making (including profiling)?**

Compass may use automated decision making during its recruitment process. Compass will notify you before any decision is made using an automated process. If you do not wish to have your application processed via automated decision making there will be an opt out button which will notify Compass and allow Compass to handle your application without the use of automated decision making.

## 6. Who might Compass share my personal information with?

**As you know, we are part of the global Compass Group, and several entities in this group are involved in the Processing Purposes. To ensure that the Processing Purposes can be completed, your information may be shared with any of the entities within the Compass Group. Where we do share data in this way, however, it is our policy to limit the categories of individual who have access to that personal information.**

Compass may transfer personal information to third parties, including to entities within and outside the Compass Group located in any jurisdictions where Compass Group entities are located, for the Processing Purposes. You may exercise the rights available to you under applicable data protection laws, which in the European Economic Area (“EEA”) are as follows (similar rights may be available in some countries outside of the EEA):

- **Within the Compass Group.** As your Compass employing entity is part of a wider group, which all partially share management, human resources, legal, compliance, finance and audit responsibility, Compass may transfer the personal information and Sensitive Personal Information to, or otherwise allow access to such data by other entities within the Compass Group, which may use, transfer, and process the data for the following purposes: to maintain and improve effective administration of the workforce; to maintain a corporate directory; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.
- **Communication with third parties.** As necessary in connection with business operations, work contact details and communication contact details may be transferred to existing or potential business partners, suppliers, customers, end-customers or government officials and other third parties.

- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g. tax and law enforcement authorities), independent external advisors (e.g. auditors), Directors within the Compass Group, insurance carriers, and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Acquiring entities.** If the Compass business for which you work may be sold or transferred in whole or in part (or such a sale or transfer is being contemplated), your personal information may be transferred to the new employer or potential new employer as part of the transfer itself or as part of an initial review for such transfer (i.e. due diligence), subject to any rights provided by applicable law, including jurisdictions where the new employer or potential new employer are located.

- **Data processors.** As necessary for the Processing Purposes described above, personal information may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to workforce administration, IT system support, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal information, and to process the personal information only as instructed.

Some of the recipients we may share personal information and Sensitive Personal Information with may be located in countries outside of Europe. In some cases, this may include countries located outside the European Union and/or European Economic Area ("EAA").

If recipients are located in other countries without adequate level of protection for this data, Compass will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law.



## 7. How long will Compass keep my personal information for?

Your personal information will not be kept in a form that allows you to be identified for any longer than is reasonably considered necessary by Compass for achieving the Processing Purposes for which it was collected or processed or as it is established in the applicable laws related to data retention periods. Your personal information will, in any case, be retained for the duration of your employment relationship as well as thereafter as long as there are statutory retention obligations (such as tax or pension obligations) or potential claims resulting from the employment relationship are not yet time-barred.

## 8. International Data Transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country. Specifically, other Compass Group companies and our third-party service providers, clients and partners operate in countries worldwide. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice and applicable data protection laws.

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

You have a number of rights in relation to your personal information and Sensitive Personal Information. You may exercise the rights available to you under applicable data protection laws, which in the European Economic Area (“EEA”) are as follows (similar rights may be available in some countries outside of the EEA). These rights can differ by country, but can be summarized in broad terms as follows:

### (i) Right of access

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed; the purpose of the processing; the recipients or categories of recipients; the envisaged period for which the personal data will be stored; or, if not possible, the criteria used to determine that period; the right to lodge a complaint with a supervisory authority; where the personal data is not collected from you; any available information as to its source and the existence of automated decision-making, including profiling. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee to cover the administrative costs.

### (ii) Right to rectification

You have the right to rectify inaccurate or incomplete personal data concerning you. In particular, you have the right to have incomplete personal data completed. Compass will communicate any rectification of personal data to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.

### (iii) Right to erasure

You may have the right to ask us to erase personal data concerning you. Compass will communicate any erasure of personal data to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.

#### **(iv) Right to restriction of processing**

In limited circumstances, you may have the right to request that we restrict processing of your personal data. Compass will communicate any restriction of personal data to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort.

#### **(v) Right to data portability**

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

For each of these rights, Compass will aim to provide information to you without undue delay and in any event within one month of receipt of the request. This period may be extended by two further months where necessary, taking into account the complexity and number of requests. If this is the case, the Human Resource team will inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Also, if there are any doubts concerning your identity, Compass may request you to provision additional information to confirm your identity as well as asking you to specify the information or processing activities to which the request relates.

If you make a request in electronic form, we will aim to provide the information by electronic means, unless otherwise requested by you. The information will also be provided free of charge unless the requests are manifestly unfounded or excessive where Compass reserves the right to charge a reasonable fee to take into account the administrative costs of providing the information.

#### **(vi) Right to object and rights relating to automated decision-making**

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, if conducted by us and we can be required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.



If Compass does not action your request, we shall inform you without undue delay and in any event within one month of receipt of the request of the reasons for not taking action and on any rights, you may have to lodge a complaint with a supervisory authority and seek judicial remedy (if applicable).

To exercise any of these rights, please contact us as stated in Section 11. Compass is committed to protecting our employee's personal data assisting individuals in exercising their rights in reporting potential violations of privacy principles or in filing complaints, and further pledges not to retaliate or discriminate against individuals for doing so.

You also have the right to lodge a complaint with the competent data protection supervisory authority, Information Commissioner's Office.

## 10. 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.

## 11. Who can I contact if I have questions?

Compass is the Controller of your personal information. If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, please contact [data.privacy@compass-group.com](mailto:data.privacy@compass-group.com).