COMPASS
GROUP

DATA PRIVACY POLICY STATEMENT



DATA PRIVACY AND THE PROTECTION OF PERSONAL IDENTIFIABLE INFORMATION (PII) IS VERY IMPORTANT TO COMPASS.



PURPOSE

This Data Privacy Policy Statement (the "Policy") sets out Compass Group Plc's ("Compass Group", "we") commitment, principles and approach to data privacy compliance.

SCOPE

This Policy applies to all Compass Group personnel, contractors and workers, majority-owned businesses, including subsidiaries and applicable joint ventures.

VALUES



- OPENESS
- TRUST
- INTEGRITY

POLICY STATEMENT

Compass Group is committed to international compliance with data privacy laws through the implementation and continuous improvement of its Data Privacy Programme Framework. We recognise that we have a regulatory, ethical and contractual responsibility (where applicable) to protect and safeguard the Personal Identifiable Information (PII) we process of our employees and stakeholders. Privacy compliance forms part of how we uphold Compass Group's core values and maintain a reputation as a responsible business underpinned by strong governance.

Our Data Privacy Programme Framework reflects that privacy compliance is a responsibility for everyone working for Compass Group.

We require all Compass Group personnel to comply with our Data Privacy Principles and act in accordance with our Code of Business Conduct promoting ethical and responsible practices in relation to privacy and the management of PII within our business.

We equally require all Compass Group suppliers to comply with our Supplier Code of Conduct which promotes ethical and responsible practices in relation to privacy and data management with an expectation on our suppliers to adopt, practise and cultivate the culture and behaviours as outlined in our seven Data Privacy Principles.

By upholding these principles and practices, Compass Group strives to maintain an ethical, transparent, and accountable data privacy programme, reflecting our commitment to responsible handling of PII.

OUR DATA PRIVACY PRINCIPLES

Lawfulness, fairness and transparency - where we process PII we do so in a manner that is clear and transparent, strikes an ethical balance between the individual's right to privacy (observing any individual rights of access they may have) and Compass Group's legitimate business interests, and which is in compliance with applicable data privacy laws;

Purpose limitation – We are clear on the purpose of any PII collected or used to undertake a business activity. We should not collect PII because it would be 'nice to have'. Any PII we collect is necessary for the purposes for which we need to use it, we do not collect any more PII than we need, and we have appropriate controls in place to ensure that the PII we are collecting is accurate and will not be used for further incompatible purposes;

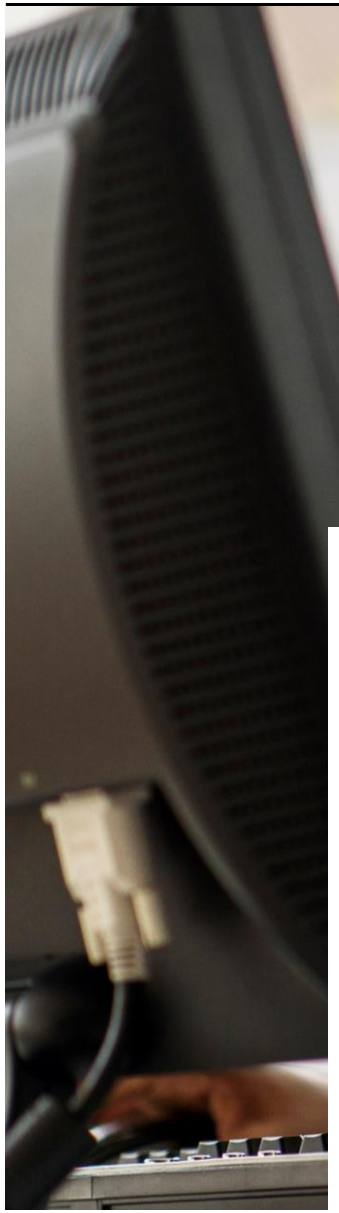
Data minimisation – We only collect PII if necessary for the purposes for which it is processed and only if that purpose could not reasonably be fulfilled by other means. Where viable, we seek to collect and process, only anonymized, deidentified, or aggregate information instead of PII;

Accuracy – PII must be kept accurate and up to date;

Storage limitation – PII must not be stored for longer than is necessary for the purpose for which the PII is processed and in compliance with the applicable Retention Policy;

Data security – PII must be processed in a manner that ensures the confidentiality, integrity and availability of PII including protection against unauthorised access, accidental loss, destruction or damage. Where we may share PII with authorised third parties, we undertake third party due diligence and implement appropriate controls to manage any privacy risks;

Accountability – We shall be responsible for, and be able to demonstrate compliance with, these Data Privacy Principles and applicable data privacy laws.



As a multinational business, there is no universal privacy law that applies to all of our regions, countries or operations.



MONITORING

Our Country Management and their teams, including Data Privacy Leads and/or Officers (where appointed) in each of our businesses are accountable for implementing our Data Privacy Policy and Privacy Programme Framework into their business in compliance with local laws. Day-to-day oversight at Compass Group Plc of the Data Privacy Programme Framework is the responsibility of the Director of Data Privacy who monitors compliance with the Data Privacy Policy via our Group Data Privacy Programme Minimum Reporting Standards.

POLICY REVIEW

Our policies and procedures are updated to maintain alignment with international standards and best practices and, at a minimum, are subject to review every 3 years.

REPORTING

We have established clear governance structures to oversee the continuing implementation of the Privacy Programme Framework in all of our operations.

For more information about how we process your data, please see our Privacy Notice.