

EMPLOYEE PRIVACY NOTICE

COMPASS GROUP, UK AND IRELAND LIMITED

What is the purpose of this document?

This is a privacy notice issued by Compass Group, UK & Ireland Limited, a company incorporated in England & Wales under number 02272248 whose registered office is at Parklands Court, 24 Parklands, Birmingham Great park, Rubery, Birmingham B45 9PZ and which covers the data protection obligations of itself and all its subsidiary companies and trading divisions (referred to in this document as "Compass").

When we say "Compass", "Compass Group", "we" or "us" in this Privacy Notice, we mean your employing company. This is the entity with which you have an employment contract. Compass respects the privacy rights of its employees and is committed to protecting the privacy and security of any personal information it might obtain about you and all times act in accordance with the law. This privacy notice describes how Compass collects and uses personal information about you in accordance with the General Data Protection Regulation (GDPR).

For the purposes of the GDPR, Compass is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract we might have with you and we can update it at any time but if we do so, we will provide you with an updated copy as soon as reasonably practical.

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 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.

Data protection principles

We comply with the applicable data protection law which says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. 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.

The online or hard-copy forms and processes we might ask you to complete from time-to-time will vary but, ordinarily, in the scenarios where we are likely to be collecting your personal information to pursue the employer – employee relationship primarily to enable us to perform our contract with you and to enable us to comply with our legal obligations we are likely to collect, store, and use the

following categories of personal information about you in order to fulfil that relationship, some of which will depend on the role for which you are being employed or to which you are transferring. In addition, some of the following types of information might be obtained during your employment in relation to your performance or if any issues or incidents arise in relation to you:

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, post code, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information including enrolling you in a pension arrangement in accordance with our statutory enrolment and liaising with the trustees or managers of a pension arrangement.
- Start date and, if different, the date of your continuous employment.
- Leaving date and your reason for leaving.
- Location of employment or workplace.
- Copy of passport (either as ID evidence or to use for travel arrangements if the role demands it).
- Right to work in the UK status including current immigration status.
- Copy of driving licence (either as ID evidence or qualification evidence if the role demands it).
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of a job application process).
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- Competency certification or other regulatory or industry-related certification necessary for your role.
- In some of our Sectors, we are obliged to obtain from you (and maintain throughout your employment) medical information or certification including blood type where your role is in an industry that requires us to have and be able to provide such information to allow you to work.
- Tax documentation where this is necessary for us to work with national or international tax authorities to administrate your tax status or the status of emoluments you earn either in the UK or aboard, where applicable.

- Compensation history.
- Performance information.
- Credit history. (Some of our clients operate in industries where they are obliged to undertake stringent vetting on their own employees and those of contractors. In such circumstances, we will have to undertake a level of investigation about you that might seem unnecessarily intrusive. We will only do this where our client demands this of us. If we do not do this, our client might not grant you access to their premises and you might be unable to perform your intended role.)
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipe/access card records.
- Information about your use of our information and communications systems.
- Photographs.
- Results of HMRC employment status check, details of your interest in and connection with the intermediary through which your services are supplied (should you provide services in a way that might legally qualify you as an employee in the eyes of the law or in accordance with HMRC guidance and regulation on the status of individuals and their tax affairs).
- Provision of company benefits
- Administering your participation in any share plans operated by a group company, including communication with you about your participation and collection of tax and NICs due on any share awards.
- We may also collect, store and use the following "special categories" of more sensitive personal information:
 - Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
 - Trade union membership.
 - Information about your health, including any medical condition, health and sickness records, including:
 - where you leave employment and the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision;
 - details of any absences (other than holidays) from work including time on statutory parental leave and sick leave; and
 - where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes.
- Genetic information and biometric data (in particular, with biometric data, where we use a time-and-attendance system, an access security system or cashless/cardless payment system for

our own purposes or where those are required by any business client for whom we provide services and on whose business you are deployed).

- Information about criminal convictions and offences (where these are relevant to the role for which you have applied (or to which you are being transferred if already employed by us) and where client expectations and regulation to which they are subject obliges us to obtain such data (for example; working in schools or hospitals where there are children or vulnerable adults and our clients have a safeguarding obligation and standard which we must meet ourselves).

How is your personal information collected?

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider.

We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We may also collect personal information from the trustees or managers of pension arrangements operated by a group company, if relevant.

We will collect additional personal information in the course of job-related activities throughout the period for which you work for us.

How we will use information about you

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

1. Where we need to perform our obligations under the employer - employee contract.
2. Where we need to comply with a statutory obligation.
3. Where it is necessary for our legitimate interests, including business interests and employer best practice (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where we have your express consent (if that is different from 1.)

Situations in which we will use your personal information

Depending on the nature of the role for which you are employed, from time-to-time, we are likely to need most of the categories of information in the list above to allow us properly to perform the employer – employee relationship we have with you. Some we will need to comply with legal obligations.

In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

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

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee or deemed employee for tax purposes (PAYE), deducting tax and National Insurance contributions (NICs).

- Managing your and our tax affairs related to your employment where you work or are paid in a jurisdiction outside the UK.
- Managing travel arrangements in roles where you are required to work outside the UK which could include the disclosure to third parties of your competency or medical certification or identification documents (such as a copy of your passport).
- Communicating with you about your employment with us, including providing you with opportunities and news about the business by way of staff magazines and newsletters.
- Granting awards under any share plans operated by a group company.
- Inviting you to participate in and administering your participation in any share plans operated by a group company, including communicating with you about your participation and collecting any tax and NICs due on any share awards.
- Enrolling you in a NEST pension arrangement in accordance with our statutory automatic enrolment duties.
- Liaising with the trustees or managers of a pension arrangement operated by a group company, your pension provider and any other provider of employee benefits.
- Administering the employment contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Keeping your details on Compass systems (including Apps) that allow our contract managers to offer or select you for casual work, overtime or emergency cover.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our employment relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To detect or prevent fraud.

- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the employment contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of other workers) or our client might not permit you to enter their premises, thus preventing you from fulfilling the role you had intended to perform.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our statutory or contractual obligations or exercise rights in relation to the contract we have with you (most importantly so that we perform it properly and safely).
3. Where we need to provide a third party with health certification or evidence to allow you to undertake your role, including providing clients with such information to allow you to access their premises.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision arrived at through the automated process and given you 21 days to request some human intervention into that decision.
2. Where it is necessary to perform the employment contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are

in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Data sharing

We may have to share your data with third parties, including third-party service providers and other legal entities within the same group of companies as Compass Group, UK and Ireland Limited. This privacy notice is provided in this company name so that it can cover in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We rarely transfer your personal information outside the EEA but should we do so, you can expect a similar degree of protection in respect of your personal information (and certainly no less than expected in the data protection legislation in relation to the countries and entities to which that data might be transferred).

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 contract or relationship we have with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group who we might use to help administer the employment contract we have with you.

The following are the activities which are most likely to be carried out by third-party service providers for us, in relation to supporting the employment contract we have with you: payroll, pension administration, benefits provision and administration, IT services, travel arrangements, foreign jurisdiction permission to work, security vetting.

We will share personal data relating to your participation in any share plans operated by a group company with third party administrators, nominees, registrars and trustees for the purposes of administering the share plans.

We will share personal data regarding your participation in any pension arrangement operated by a group company with the trustees or scheme managers of the arrangement in connection with the administration of the arrangements.

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. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share personal data relating to your participation in any share plans and pension arrangements operated by a group company with other entities in the group for the purposes of administering those share plans and pension arrangements.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business or where there is a change in service provider which triggers our obligation to disclose anonymised data under the Transfer of Undertakings (Protection of Employment) Regulations 2006 ("TUPE").

In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction or by TUPE.

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to HMRC, disclosures to stock exchange regulators and disclosures to shareholders such as directors' remuneration reporting requirements.

Transferring information outside the EU

We will not ordinarily transfer the personal information we collect about you outside the EEA. Where we might transfer your personal data outside the EEA, we would only do so in order to perform the employment contract we have with you.

Such a transfer would be made only on terms that meet the EU's expectations in terms of the countries to which that data is transferred and the specific terms on which the data processor is retained by us so that the process provides an adequate level of protection for your personal information.

Data security

We have put in place measures to protect the security of your information through our Data Security and Incident Reporting Policy.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my 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.

Details of retention periods for different aspects of your personal information are available in our Document and Data Retention Policy.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data 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.

Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with the Document and Data Retention Policy which is informed by the applicable laws and regulations that we are entitled to take into account.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **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 particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your line manager in writing.

No fee usually required

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

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 the information (or to exercise any of your other rights).

This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact your line manager, who will be able to escalate your request to the correct support function within Compass.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law or statute.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice.

If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the DPO at:

Data Protection Officer
Compass Group, UK & Ireland Limited
Parklands Court
24 Parklands
Birmingham Great Park
Rubery
Birmingham
B45 9PZ

or by e-mailing DPO@compass-group.co.uk

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time-to-time about the processing of your personal information.