

PRIVACY POLICY

COMPASS GROUP, UK AND IRELAND LIMITED

Introduction

This is the privacy policy of 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 together with all its subsidiary companies and trading divisions ("Compass").

Compass respects your privacy and is committed to protecting your personal data. This privacy policy informs you of who we are, how we collect, share, use and protect your personal data, however you provide it to us, (including via various Compass websites regardless of from where you visit them) and tells you about your privacy rights and legal protections.

You can download a pdf version of the policy from our website.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy tells you how Compass collects and processes your personal data through your provision of that data to us and use of any of our group websites, including but not limited to any data you may provide when you sign up to a newsletter, purchase a product or service, take part in a survey or enter a competition.

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

Who is the Controller and Data Protection Officer

When we use "Compass", "we", "us" or "our" in this privacy policy, we are referring to Compass Group, UK & Ireland Limited. This company is the "controller" for your personal data under the applicable legislation and it is primarily responsible for processing and ensuring proper protection of your data.

As noted in the introduction, Compass has subsidiary companies through which it operates and also operates through trading divisions. Some group subsidiaries will contract in their own legal name but for the purposes of this policy, they will be operating as subsidiaries of Compass Group, UK and Ireland Limited. The trading divisions, by contrast, might have their own names or brands but they have no legal status themselves. Any contact you enter through them will be, legally speaking, with Compass.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy and data protection issues in general. If you have any questions about this privacy policy, including in relation to your legal rights, please contact the DPO using the details set out below.

Contact details

Full name of legal entity:	Compass Group, UK and Ireland Limited
Name or title of DPO:	Data Protection Officer
Email address:	DPO@compass-group.co.uk
Postal address:	Parklands Court, 24 Parklands, Birmingham Great Park, Rubery, Birmingham B45 9PZ

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

Changes to the privacy policy and your duty to inform us of changes

This version of the privacy policy was updated on 16 September 2019. Historic versions can be obtained by contacting us.

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

Third-party links

We will not transmit your data to any other party unless we need to do so to carry out the obligations we have assumed in our relationship with you, where we have a statutory obligation to do so or have your consent.

Outside those circumstances, our websites might include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We do not control these third-party websites and are not responsible for their privacy statements. When you leave any of our websites, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal identification 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).

We may collect, use, store and transfer different kinds of personal data about you when we obtain that data and during the course of any relationship we might have with you. We have grouped the different types of data together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes such things as billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details where this type of data is relevant to the reason underlying our relationship (usually so we are able to provide you with products and services).
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access any of our websites.
- **Profile Data** includes your username and password (in those circumstances where you might have a technological relationship with us through a smartphone or computer), purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our websites and purchase our products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. You will not be contacted for marketing purposes unless you have given us your express consent to do so.

We also collect, use and share **Aggregated Data** such as statistical or demographic data that may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or buy a particular product. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you through most of the standard ways in which we might collect your data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

However, we might collect Special Categories of Personal Data in specific circumstances where that type of data will be relevant for those circumstances. You will be advised at the time of us seeking to collect that Special Category data and we will explain exactly why we need it.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have (or are trying to enter into) with you (for example, to provide you with goods or services). In this case, we may have to cancel access a product or service you wish to obtain from us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** Specifically, when you use any of our websites, and as you interact with them, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please refer to our privacy on all of our websites.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including the circumstances set set out below:
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside outside the EU and which would be generated from the business we transact with you and which it would be natural for us to obtain as a consequence of pursuing a transaction with you;
 - Identity and Contact Data from data brokers or aggregators based inside outside the EEA; or
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.
- **Third Party Social Network Information.** Any information that you share publicly on a third party social network or information that is part of your profile on a third party social network that you allow the third party social network to share with us. Examples include your basic account information (e.g. name, email address, gender, birthday, current city, profile picture, user ID, list of friends, etc.) and any other additional information or activities that you permit the third party social network to share.

4. How we use your personal data

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

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those legitimate interests;
- Where we need to comply with a legal, statutory or regulatory obligation; or

Where we have your express consent to use your personal data for a specific purpose confirmed in that express consent. For the purposes of clarity, a legitimate interest is when we have a business or commercial reason to use your information, that does not conflict with your own data protection rights and interests.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via e-mail or text message. You have the right to withdraw consent to marketing at any time by contacting us.

5. Purposes for which we will use your personal data

We have set out below, in a table format, a description of a number of ways in which we are likely to use your personal data, and which of the legal justification we have to do so.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact us in the event you need more details about the specific legal justification we are relying upon to process your personal data.

Purpose/ Activity	Type of data	Legal Justification for Processing including basis of Legitimate Interest
<p>Marketing activities, research and analytics</p> <p>We may send you marketing communications either by email, SMS, phone or post.</p> <p>We may also share your details for electronic marketing communications with subcontractors appointed by us to assist us with marketing campaigns.</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Profile e) Usage f) Marketing and Communications g) Public Sources 	<p>Consent</p> <p>Legitimate Interests for purposes of intending to deal with continuing customers.</p>
<p>Maintaining and Supporting your Website/ App Use</p> <p>Where you use our website and/or subscribe to any of our Apps we and our specialist subcontractors may process your data to support these services.</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Profile 	<p>Legitimate Interests in ensuring our websites are effective and in developing the customer experiences in relation to the use of our website.</p>

<p>We also may want to improve our services to strengthen our internal processes and your experience as a customer.</p>	<p>e) Usage</p>	
<p>Social Networks</p> <p>When you interact with our Facebook page, twitter account or other social media presence.</p>	<p>a) Identity</p> <p>b) Profile</p> <p>c) Public</p> <p>d) Usage</p>	<p>Legitimate Interests in ensuring our social media presence is effective and up to date.</p>
<p>Your Requests</p> <p>When you fill out 'contact us' forms to make an enquiry we process your personal data in order to manage such request and ensure it is actioned accordingly.</p>	<p>a) Identity</p> <p>b) Contact</p>	<p>Consent</p> <p>Contractual</p> <p>Legitimate Interests in ensuring the customer's request is actioned accordingly.</p>
<p>Legal and Regulatory Obligations</p> <p>Where we need to manage legal and regulatory requests such as the prevention/detection of crime and liaising with regulatory bodies and/or law enforcement agencies such as the Police, HMRC, etc we have a legal obligation to process and/or transfer your personal data.</p>	<p>a) Identity</p> <p>b) Contact</p> <p>c) Profile</p> <p>d) Public</p> <p>e) Usage</p> <p>f) Technical</p>	<p>Statutory</p>
<p>Premises</p> <p>We may monitor CCTV on our own</p>	<p>a) Identity</p> <p>b) Contact</p>	<p>Legitimate interests in being able to monitor CCTV for health and safety, security and the prevention of crime.</p>

account or for our clients.	c) Profile	
Transactions If you purchase goods or services from us we may process your personal data in order to provide you with the goods and services that you have contracted for.	a) Identity b) Contact c) Financial Data	Contractual Legitimate interest in providing you with the services requested.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising which could include any of the following depending on the nature of the relationship we have with you:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive these sorts of marketing communications from us only if you have consented to receiving such information from us either in direct response to a question as to whether you wish to receive such information or by providing your contact details in response to an enquiry from us as to whether you wish to be included in such communications.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Compass for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links or process on any marketing message sent to you (or by contacting us at any time).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any sort of transaction that we have undertaken with you and which we are entitled by law to keep for durations determined by statute and the common law.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For more information about the cookies we use, please see our website.

Change of purpose

We will only use your personal data for the purposes for which we have 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law, statute or regulation.

6. Disclosures of your personal data

We may have to share your personal data with the following types of parties for the purposes set out in paragraph 5, above:

- Compass subsidiaries and/or affiliates for internal administration purposes;
- Service providers acting as processors who provide essential elements of the transaction with which we are both associated, including for website activity IT and system administration services;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services; or
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Other third parties we may appoint from time to time in order for the purposes of internal business administration only for the purposes set out in the table above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Additionally we impose contractual obligations (such as a data processing agreements) on third parties to ensure they process and secure your data lawfully with the appropriate technical and organisational measures in place.

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

7. International transfers

We do not ordinarily transfer your personal data outside the European Economic Area (EEA). However, it would be possible for processors we might use to process your data (in accordance with this privacy policy) to export your data outside the EEA.

If your data is exported outside the EEA we ensure your personal data is protected by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission ("white-listed countries"). For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. Data security

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

In addition, we limit access to your personal data strictly to those employees, agents, contractors and other third parties who have a need to know that data in order to further the transaction in which we are both concerned. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Whilst we are in control of our own data environment unfortunately the transmission of information via the internet is not always completely secure. Our organisations policy is to only send personal data through an encrypted format.

This makes it as secure as possible, but it is still not completely secure. You should be aware that if you send us anything in an unencrypted format that we will not be able to secure it until it has securely entered our network. As such any transmission is at your own risk. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator (usually the ICO) of a breach where we are legally required to do so and, in a format, and within timescales stipulated by the applicable regulator or the applicable data protection legislation.

9. Data retention

For how long will we retain your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it; including for the purposes of any legal, accounting, or reporting requirements following its legitimate use.

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.

For example; by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being customers for tax purposes and in order to defend ourselves against any contractual claims arising from the transaction in question or the end of the contractor other relationship .

In some circumstances you can ask us to delete your data: see below for further information. That will not necessarily oblige us to delete all of it because, as above, we might need to retain some aspects of it to meet legal, accounting or reporting obligations to which we are subject.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we are allowed to use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- **Request access to your personal data** (commonly known as a "data subject access request" or "DSAR"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **Request correction of the personal data 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 data.** This enables you to ask us to delete or remove personal data 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 data 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 data 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 data** 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 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 data.** This enables you to ask us to suspend the processing of your personal data 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 data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data 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; and
- **Withdraw consent at any time where we are relying on consent to process your personal data.** 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 us.

No fee usually required

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

Time limit to respond

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 a number of requests. In this case, we will notify you and keep you updated.

Compass Group, UK and Ireland Limited

16 September 2019