

# Privacy Policy

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## OUR STANDARD

At Compass, we are committed to protecting the privacy of all our customers, employees, potential employees, and agents acting on the companies' behalf. We ensure that personal information collected on applicants, employees, contractors and consultants is responsibly managed and protected and will only be used for purposes for which the information is relevant.

## COMPASS GROUP NEW ZEALAND PRIVACY STATEMENT

This Privacy Statement explains in general terms how Compass protects the privacy of your personal information under the Privacy Act (2020) Principles. Personal information is information about an identifiable individual. This policy sets out how we will collect, use, disclose and protect your personal information.

We will take all reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

## WHAT INFORMATION DO WE COLLECT?

The types of personal information that we collect from you will depend on the circumstances of collection and its relevance to our business. For example, we may collect details such as your name, address, email address, personal and/or work contact details, credit/debit card number and expiry date, billing address, telephone numbers and health information relevant to our services or other operations.

You consent to the collection of all information (including sensitive personal information) which is provided to us for use in accordance with this Privacy Statement unless you tell us otherwise.

We will only collect personal information for our business purposes and to enable us to provide you with our goods and services.

## HOW WE COLLECT INFORMATION

We may collect personal information about you when you deal with us over the telephone, send us correspondence (whether by letter, fax or e-mail), through electronic communications and applications (including mobile apps) or when you have contact with us in person.

We may also collect personal information about you from third parties where you have authorised this or the information is publicly available. If possible, we will collect personal information from you directly.

## HOW WE USE YOUR PERSONAL INFORMATION

We generally use your personal information for the business purposes of the members of the

Compass Group, including to:

- To verify your identity
- Provide services in catering, health, safety, the environment, IT, other support services and in other areas, and for associated business development
- Promote or market the current and future products and services of Compass and our related bodies corporate (Compass Group), to you and otherwise in accordance with this privacy policy
- Conduct research (including but not limited to client surveys) concerning the current and future products and services of the members of the Compass Group pass and our related bodies corporate, and provide you with products
- For any other purpose authorised by you or the Act and Perform analytics.

We will only use your personal information for direct marketing purposes as set out in this Privacy Statement and as otherwise permitted under the Privacy Act 2020 (Act). That includes where we collected the information from you, and you would reasonably expect the information to be used for direct marketing.

In all other circumstances we would only use your personal information with your consent or where it is impracticable to obtain that consent. In all direct marketing correspondence sent to you we will give you the opportunity to "opt out" of receiving any further marketing correspondence.

## DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

We will only disclose your personal information to a third party where we have your consent, or where the disclosure is permitted or required by law.

You consent to our disclosure of your personal information to a member of the Compass Group for the business purposes of the Compass Group or any member of the Compass Group.

Some of our service providers and other members of the Compass Group are located outside of New Zealand. We may need to disclose your personal information to those service providers for the purposes set out in this Privacy Policy.

We may disclose your personal information to:

- Compass's related companies
- Clients where required for specific business purposes
  - External service providers, such as contractors, consultants and agents sometimes for direct marketing (unless you opt out)
  - Recipients overseas as required when providing services (such as payroll) or direct marketing purposes. The countries to which personal information is sent varies depending on the circumstances
  - Suppliers whom we engage in the provision of our services, but only for specific business purposes relating to their engagement
- Tax, financial, audit and legal advisers, and
- Government, regulatory and law enforcement agencies.
  - A person who can require us to supply your personal information (e.g. A regulatory authority) or any other person authorised by the act or another law (e.g. A law enforcement agency)
- Any other person authorised by you.

Other than those above, we will not disclose your personal information to any third party unless:

1. You authorise us to do so
  - a. The disclosure is in connection with the purposes for which we collected your personal information, your safety or the safety of others in the community is at risk, or
2. We are required or permitted by law.

## ADDITIONAL INFORMATION FOR JOB APPLICANTS

If you apply or register your interest for a position with Compass Group we will collect your personal information which may include your name, CV, contact details and other personal information via our recruitment system.

We sometimes engage service providers to assist us in the recruitment process, including recruitment systems, recruitment agencies, security organisation and recruitment website operators. Where we do this, we may exchange your personal information with those service providers, who may be located outside New Zealand. In some cases, those service providers may collect your personal information directly and retain it for their own purposes, so you should ensure that you are aware of their privacy policies.

We may also exchange your personal information with any referees nominated by you. Some of the personal information we request during the recruitment process we are required to collect under workplace and security laws. If we are unable to collect your personal information or required information for assessing your application, we may not be able to consider you for employment with Compass.

All information is collected, processed and stored in line with the Privacy Act 2020. Your personal information in relation to applications made is stored on the recruitment system as an internal employee if you are a successful applicant. Any information not required is archived and not utilised for any purpose. Where possible, the information not required is destroyed.

## ACCESS TO AND CORRECTION OF INFORMATION WE HOLD ABOUT YOU

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email us at [HR@Compass-group.co.nz](mailto:HR@Compass-group.co.nz). Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

## KEEPING YOUR PERSONAL INFORMATION UP TO DATE

We will take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it.

If the personal information we hold about you is inaccurate, incomplete or out-of-date please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

## INTERNET USE

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

If you post your personal information on any Compass Group website's message board, you acknowledge and agree that the information you post is publicly available.

## RESPONSIBILITIES

Management is accountable for implementing this policy in their respective area of responsibility. Compliance will be monitored using the operational audit (for Sites) and a biannual corporate audit conducted by the Human Resources Department.

Management is responsible for:

- Informing employees and other relevant parties that Privacy Policies and Procedures are established, maintained and enforced;
- Complying with the Privacy Policies and Procedures and monitoring compliance within their work area; and Promoting a culture that respects the privacy of individuals.

Employees and Contractors are to:

- Comply with all company policies, procedures and systems of work;
- Report all known or suspected breaches of Privacy to their immediate supervisor or manager via the existing incident reporting avenue;
- Actively participate in Privacy Awareness training and contribute ideas to improve the procedures.

Simon Lipscombe  
Managing Director, New Zealand