
Privacy Policy

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 describes how we collect, hold, use and disclose your personal information, and explains how we protect the privacy of your personal information. We will take all reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

We have adopted the Privacy Principles contained in the Privacy Act 2020. A copy of the Privacy Principles may be obtained from the website of The Office of the Privacy Commissioner.

This Privacy Statement does not apply to employee records, which are generally exempt from privacy laws. In this Privacy Statement, "we", "us" and "Compass" means Compass Group New Zealand and/or any of its subsidiaries, as applicable.

WHAT IS PERSONAL INFORMATION?

"Personal Information" is information that relates to a living person or information that can be used, alone or in combination with other information, to identify a living person. Examples of Personal Information include, but are not limited to, names, addresses, email addresses, phone and credit card numbers.

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.

We may collect details such:

- Your name
- Address
- Email address
- Personal and/or employment contact details
- Credit/debit card number and expiry date
- Billing address
- Telephone numbers
- 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 collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing analysis. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

HOW WE COLLECT INFORMATION

We collect personal information directly from you wherever it is reasonable and practicable to do so. This may be when you visit our sites, use our services, apply for a job with us, or otherwise interact with us.

At the time of collection, or as soon as practicable afterwards, we will take reasonable steps to ensure you are aware of the fact that information is being collected, the reasons for collection, how it may be used, and your rights of access and correction. In some cases, we may refer you to this Privacy Statement at the point of collection to provide you with further detail.

We may also collect personal information from third parties, including our related entities, publicly available

sources, or trusted service providers (e.g. recruitment agencies, referees, credit reporting bodies, or analytics partners), where permitted by law and where it is unreasonable or impracticable to collect the information directly from you.

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:

- 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 and our related bodies corporate, and provide you with products
- Perform analytics
- For any other purpose authorised by you or the Act

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.

HOW WE PROTECT YOUR PERSONAL INFORMATION

Compass will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- Having robust physical security of our premises and databases/records;
- Taking measures to restrict access to only personnel who need that personal information to effectively provide services to you; and
- Having technological measures in place (for example, anti-virus software, fire walls).

When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information.

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.

We may disclose your personal information to recipients located outside New Zealand, including to our service providers, data hosting facilities, and related entities in Australia and other countries where we or our service providers operate.

When we do so, we take reasonable steps to ensure that those recipients are either subject to privacy laws that provide comparable safeguards to the New Zealand Privacy Act 2020 or that contractual or other safeguards are in place to protect your personal information to a comparable standard.

By providing us with your personal information, you consent to such overseas disclosures on this basis.

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
- 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
2. 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
3. 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.

We will not charge any fee for your access request, but may charge reasonable costs for providing a copy of your personal information.

In order to protect your personal information, we may require identification from you before releasing the requested information.

If you want to exercise either of the above rights, email us at 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.

PRIVACY POLICY COMPLAINTS AND ENQUIRIES

If you wish to gain access to your personal information, have a complaint about a breach of your privacy or you have any query on how your personal information is collected or used please forward your request, complaint or query to the address below. We will respond to your query or complaint as soon as possible.

Compass Group New Zealand

Attention: The Privacy Officer

[ADDRESS]

T: [PHONE NUMBER]

E: HR@Compass-group.co.nz

It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with Compass's response to a complaint, you have the right to contact the Office of the Privacy Commissioner to lodge a complaint.

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.

CHANGES TO THIS PRIVACY STATEMENT

We may amend this Privacy Statement as our business requirements or the law changes. Any changes to this Privacy Statement will be updated on this website, so please visit periodically to ensure that you have our most current privacy statement.

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.

Paul Harvey

Managing Director, New Zealand