

APPENDIX D.3: PERSONAL DATA POLICY FOR CUSTOMERS AND SUPPLIERS

Processing personal data

Compass Group Danmark A/S, Rued Langgaards Vej 8, 1st Floor, 2300 Copenhagen S is responsible for processing our customers' and suppliers' personal data.

Compass Group processes all personal data in accordance with the applicable data protection legislation.

Compass Group enters agreements with customers and suppliers for both purchase and sale of different services and products.

When a customer orders and purchases one or more services from Compass Group and subsequently submits their personal information to Compass Group, they also consent for their personal data to be processed by Compass Group.

The same applies to any personal data that suppliers submit to Compass Group in connection with the submission of tenders to or entering agreements with Compass Group.

Collection of personal data

Personal data is collected by Compass Group in the following ways:

- When a customer or their representative chooses to request a quotation for and/or purchase one of Compass Group's services/products, or when a supplier submits tenders or sells products or services to Compass Group.
- Through browser cookies.
- In connection with the use of Compass Group's digital services.
- Through participation in Compass Group's consumer loyalty program and subscription to Compass Group's newsletter.
- From social media, marketing and analysis providers, as well as public records.
- When suppliers enter into agreements with Compass Group or submit tenders to Compass Group.

The collection and processing of personal data, ref. the above, will always happen in accordance with the applicable data protection legislation.

Compass Group may collect the following personal data:

- Name, address, telephone number, e-mail address, date of birth, as well as other general and not sensitive personal data.
- Card payment information.
- Demographic data.
- Purchase history, including use of Compass Group's app and/or other digital services.
- Use of Compass Group's customer loyalty programme.
- Information from Compass Group's customer surveys.
- Information from any tendered competitions.

- Information from Compass Group's social media and other digital platforms belonging to Compass Group.
- Browser information.
- Information about the customer's company and relevant contact persons.
- Information about the supplier's company, as well as information concerning the relevant contact persons and key management personnel, including key accounts.

A customer or supplier may, voluntarily and of their own free will, provide Compass Group with further personal data that may be significant for Compass Group's ability to provide its services to them, or that the concerned party thinks should be provided for security reasons.

This can be information concerning:

- disabilities,
- allergies,
- particular food preferences,
- other health or medical information.

If a customer/supplier *voluntarily and of their own free will* chooses to submit such information, Compass Group perceives this as consent for registering and retaining any sensitive data about the concerned party.

In addition to the information that Compass Group directly receives from its customers/suppliers, in some cases Compass Group will collect or process more data that we have received from third parties, e.g. an employee of the company where the data subject is employed.

If this is the case, the concerned third party is obliged to inform the customer/supplier in question of Compass Group's terms and conditions, as well as Compass Group's data protection policy. It is also the responsibility of the concerned third party to ensure that there is a necessary legal basis for collecting and processing the information in question, including collecting any consent required for processing any sensitive data.

Card payments

Compass Group uses DIBS www.dibs.dk (Nets) to receive credit and debit card payments. DIBS and Compass Group are approved and certified by PBS (previously "Payment Business Services") (www.pbs.dk).

In addition to processing the order, the submitted information is only used in cases such as if a customer makes an enquiry or if there is a mistake in the order.

The purpose of the collection and processing

Compass Group only collects the personal data that is necessary to fulfil the agreement that is entered into with the customers/suppliers concerning the supply of services, such as the purchase/sale of products or services.

It is the nature of the individual agreement/service that determines which personal data Compass Group collects and processes, as well as the purpose of the collection.

The primary purpose of collecting and processing personal data will be:

- To process customers' purchases of Compass Group's services
- To process the suppliers' offers and sale of products and services.
- To fulfil the customer's requests for offers on or purchases of services.
- For the improvement and development of Compass Group's services
- For the adaptation of Compass Group's marketing and additional information.
- For the analysis of customer's user behaviour and the marketing tailored to this.
- For the adaptation of Compass Group's partners' communication and marketing for customer/suppliers.
- For the administration of customer's/suppliers' relation to Compass Group, including any participation in Compass Group's customer loyalty programme.

The legal basis for our processing

As a rule, Compass Group will process personal data because it is necessary to fulfil an agreement between Compass Group and the customer or supplier. We refer to Article 6 (1)(b) of the GDPR as our legal basis for processing this information. For example, it may be in connection with holding meetings and/or the management and fulfilment of partner and supplier agreements.

Additionally, Compass Group will process personal data in connection with conducting meetings, seminars, conferences etc., as well as prior to entering the supplier agreement.

In some cases, Compass Group's processing of personal data will take place as a part of pursuing a legitimate/objective interest that precedes the interests of the customer/supplier (the data subject). We refer to the legitimate interest clause in Article 6 (1)(f) of the GDPR as our legal basis for this processing.

Such a legitimate interest may be in support of the compilation of statistics, customer surveys, and marketing and analysis of general customer behaviour with the purpose of generally improving the customer experience at Compass Group and the quality of Compass Group's services and products.

Your rights

According to the General Data Protection Regulation (GDPR) and the Danish Data Protection Act, you as a customer or supplier have a number of rights in relation to how we process your personal data. If you want to exercise your rights, please contact us.

Send your enquiry to persondata@compass-group.dk.

Your rights are as follows:

The right of access by the data subject, Article 15

You have the right to access any data that we're processing on you.

The right to rectification, Article 16

You have the right to have any incorrect data that we're processing on you corrected.

The right to erasure, Article 17

You have the right to have any data that Compass Group is processing on you on erased. If you exercise this right, all your data that Compass Group is not legally obliged to retain will be deleted. In some cases, the erasure of your personal information may restrict Compass Group's ability to fulfil any entered agreements or supply certain services.

If some of the data that Compass Group is processing on you was provided on the basis of your consent, you have the right to withdraw your consent at any time, which means that the data will be deleted or no longer be used by Compass Group. This does not apply to the data, ref. above, that Compass Group is legally obliged to retain.

The possibility of exercising this right may be limited due to trade secrets and intellectual property, as well as the possibility of enforcing potential legal claims.

The right to restriction of processing, Article 18

In certain circumstances, you have the right to have the processing of your personal data restricted. If you exercise your right to restriction, Compass Group may only process your data – except from storage – with your consent, or when it is required for the establishment, exercise or defence of a legal claim, or to protect the rights of another person, or for reasons of important public interest.

The right to object, Article 21

You have the right to object to Compass Group's processing of your personal information if you believe that your personal information is being processed contrary to the applicable legislation or our other legal obligations, such as our agreement/contract with you.

The right to data portability, Article 20

In certain cases, you have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format, as well as to have this information securely transferred from one data controller to another.

The right to complain

If you are dissatisfied with the way that we process your personal information. you have the right to submit a complaint to the Danish Data Protection Agency. You can find the Danish Data Protection Agency's contact information at www.datatilsynet.dk

Processing your request

If you exercise your right to access, Compass Group will generally seek to answer your request within one month. If your request is complicated, Compass Group can extend the deadline for response by two

months. If your deadline for response is extended, you will receive a notification of this within one month of receiving the original request. If we require clarification of your request, the time spent waiting for your reply could impact the administrative processing time and thus extend the deadline for response. If your request appears to be obviously groundless or excessive, we reserve the right to reject your request or charge a fee for the processing. If we reject your request or decide to charge a fee, we will immediately inform you of this before we take action. If you have consented to our processing of certain data, e.g. the use of your photos, you may withdraw your consent at any time. If you withdraw your consent, it will only have an impact from that point of withdrawal.

You can read more about your rights in the Danish Data Protection Agency's guidelines on the data subject's rights, at www.datatilsynet.dk.

Protection of your personal data

Compass Group has taken a number of technological and organisational security precautions to protect your personal data from manipulation, loss etc. as well as attempts by other unauthorised to gain users access to your information.

This information can only be accessed by Compass Group employees who need to do so for their work.

Compass Group regularly backs up the registered personal data.

In cases of security breaches with a high risk of misuse of registered personal data, such as identity theft, financial loss, reputational damage, or another form of misuse, Compass Group will report the breach to the data subject as soon as possible.

Compass Group's security procedures are continuously revised based on the newest technological developments.

Compass Group uses a number of external providers of IT services, IT systems, payment solutions etc.

Compass Group enters ongoing data processing agreements with all of Compass Group's providers that, in relation to external data processors, ensure that they maintain the high level of protection required for the data subject's personal data.

Compass Group erases your personal data when its legal obligations expire or when the purpose of collecting and processing the information is no longer relevant.