

	Sector: All 
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Contents

Policy	2
What Is Personal Information and how does Compass Collect it?	2
What Personal Information does Compass Collect?.....	2
Cookies and How Compass Collects Information Through Technological Means.....	3
How Compass Uses Personal Information.....	3
How Compass Discloses Personal Information	4
Your Choices.....	4
How We Protect Personal Information	4
Personal Information may be Transferred Outside of Canada:	4
How to Access and Correct your Personal Information.....	5
Children and Parents.....	5
This Privacy Policy Does Not Apply to Third Party Websites	5
We Can Change this Policy	5
How to Contact Us	5

Policy:

At Compass Group Canada Ltd. (hereinafter referred to as “us”, “we” and/or “Compass”), we respect your privacy. Our privacy policy (“**Privacy Policy**”) summarizes what personal information we may collect, and how we use and disclose this information. This Privacy Policy also describes other important topics relating to your privacy. For purposes of this Privacy Policy, “**Compass**” shall also include its subsidiaries and affiliates.

By using one of our websites or applications we associate with this Privacy Policy, (collectively the “**Site**”), or by choosing to submit personal information to Compass, you signify your consent to all of the terms of this Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use the Site or submit any personal information to Compass.

What Is Personal Information and how does Compass Collect it?

Personal information is information about an identifiable individual, such as your name, address, telephone number or email address, or your health or financial information (“**Personal Information**”).

In some cases, Compass may collect your Personal Information when you interact with us directly. For example, we collect Personal Information when you voluntarily provide it through the Site, or when you provide it to us through other means. We may collect Personal Information if you purchase services (such as food and catering services) from us, or if you are employed by, a member of, a guest, invitee, agent or contractor of one of our clients. On some occasions, we may collect information from third parties such as insurance adjusters, police services and witnesses.

For example, we may collect Personal Information when you:

- a) Submit Personal Information through the “Careers” and “Press Room” sections of the Site;
- b) Contact us through e-mail, telephone, facsimile, mail or other correspondence;
- c) Make a purchase from a server, cafeteria, or other facility operated by Compass;
- d) Use an application or website offered by Compass; and/or
- e) Otherwise provide us with Personal Information.

In other cases, Compass may process your personal information for one of our customers or clients. For example, we may receive personal information from clients such as hospitals, healthcare facilities, or educational facilities. In such cases, the client must, where required by the applicable law, obtain your consent or provide you with notice as to how your Personal Information is collected and processed.

What Personal Information does Compass Collect?

The Personal Information we collect depends on how you interact with us. The Personal Information we may collect may include:

- a) Your name;
- b) Your title;
- c) Your company name;
- d) Contact information, such as your address, telephone number or e-mail address;
- e) If you make a purchase directly from us, information related to your purchase, including items purchased, and your payment information;
- f) If we process your information in providing service to a client, the information needed for us to provide those services, including where applicable, health information such as dietary requirements, medical conditions, or allergies;
- g) If you visit one of our facilities or locations, we may capture images via a security video surveillance system and the names of visitors recorded with the purpose of their visit and contact person on the visitors’ record book; and/or

- h) Any other Personal Information that you submit to us.

Cookies and How Compass Collects Information Through Technological Means:

When you visit our Site, we may collect information that is automatically sent to us by your web browser or your internet service provider. This information may include your domain name, and your numerical IP address. We may also collect other general information (such as the type of browser you use, which pages of our Sites you view, and the files you request). We use this information to better understand how visitors use our Site, and to improve our Site to better meet your needs. The amount of information that is sent by your web browser depends on the browser and settings you use. Please refer to the instructions provided by your browser if you want to learn more about what information it sends to websites you visit, or how you may change or restrict this.

We may use a feature on your Internet browser called a “cookie” and/or other similar devices, such as web beacons and pixels. Cookies are small files that your web browser places on your computer’s hard drive. They are used for a variety of reasons, such as remembering user names and passwords and preferences, tracking click streams, and for load balancing. Information tracked through these mechanisms may include, but is not limited to: (i) your IP address; (ii) the type of web browser and operating system being used; and (iii) the pages of the Site a user visits. By using cookies, we can deliver faster service, consistent, updated results, and a more personalized experience on our Site.

Depending on applicable laws, we may be required to ask for your activation of cookies that enable use to conduct profiling on you, without which we will not be able to use such tools. In any event, your browser also gives you the option to reject cookies. However, setting your browser to reject cookies generally hinders the browser’s performance and will adversely affect your experience while using our Site.

How Compass Uses Personal Information:

The Personal Information we collect may be used by Compass for the purposes for which it was collected, as provided in this Privacy Policy, or for other purposes that are disclosed to you and to which you consent. For example, we may use your Personal Information to:

- a) Respond to your questions or inquiries;
- b) Complete a purchase you make with us, including, based on the nature of your purchase, facilitating payment, notifying you of the status of your order, and facilitating pick-up and/or delivery;
- c) Operate our Sites in accordance with their terms of use;
- d) Supply you with requested information on Compass programs or services;
- e) To evaluate any submissions or applications provided to the “Careers” section of the Site both for current positions, and we may retain them to consider you for future positions that become available;
- f) To send you informational or promotional communications that you have agreed to receive;
- g) To conduct market research and surveys;
- h) To conduct promotional activities;
- i) To improve our products, services and Sites;
- j) To provide services to one of our clients, if we have received your information from a client. For example, we may process health information such as dietary needs, medical conditions, or allergies, to accommodate your needs;
- k) To maintain the security of our facilities and locations;
- l) To settle insurance and/or other claims relating to incidents involving our premises or employees;
- m) To carry out other purposes that are disclosed to you and to which you consent; and/or
- n) To carry out any other purpose permitted or required by law.

We may use the Personal Information and other information to compile statistics which are non-specific to you and do not identify you directly, and to create other aggregated and deidentified information. We may use and disclose such aggregated information to maintain and improve our Site, or for any other purpose we choose.

How Compass Discloses Personal Information:

We may transfer your Personal Information to third parties to assist us with carrying out the purposes we describe in this Privacy Policy. For example, we may use a data processing contractor to operate computer systems on our behalf, or a payment processor to facilitate payment. Other types of third parties to which Personal Information may be disclosed are:

Compass Canada's affiliates;

Professional advisors (financial, legal, etc.);

We reserve the right to transfer any Personal Information we have about you in the event that we, or any part of our business, amalgamates, merges with, or is acquired by, a third party to the extent such information is necessary to proceed with those transactions.

We may also disclose your Personal Information to third parties if we have reason to believe that disclosing such information is necessary to: (i) be provided to our external auditor for the purpose of complying with Compass's financial reporting obligations; (ii) conduct investigations of possible breaches of law; (iii) identify, contact or bring legal action against someone who may be violating an agreement they have with us; or (iv) to protect our rights, safety or property, or those of third parties such as our customers or clients.

We may also use your Personal Information to investigate security breaches or cooperate with government authorities pursuant to a legal matter.

Lastly, we may disclose your Personal Information for any other purpose to which you consent, or that is permitted or required by law.

Personal Information collected online may also be combined with information you have provided to Compass through other sources, such as over the telephone.

Your Choices:

If you have provided us with your Personal Information, but later decide you no longer want us to send you any information about us, simply contact us [here](#). If you receive commercial email from us, you can also opt-out by using the "unsubscribe" tool in our commercial email.

How We Protect Personal Information:

The security of your Personal Information is important to us. We maintain physical, organizational and technological safeguards to help protect against unauthorized use, disclosure or access. Personal Information may be accessed by persons within our organization, or any of our third party service providers, who require such access to carry out the purposes we describe in this Privacy Policy. Personal Information we collect is managed from our offices located in Canada.

No security measures can provide absolute protection, and you should know that we cannot fully eliminate security risks associated with Personal Information. As a result, we cannot ensure or warrant the security of any information you provide to us.

Personal Information may be Transferred Outside of Canada:

Some or all of the Personal Information we collect may be stored or processed outside your jurisdiction of residence, including in the United States, whose data protection laws may differ from the jurisdiction in which you live. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions. By providing us with Personal Information, you understand and expressly agree that we may transfer it outside of Canada or your jurisdiction of residence. If you do not agree to

the transfer of your Personal Information outside of Canada or your jurisdiction of residence, do not provide us with Personal Information.

How to Access and Correct your Personal Information:

You have a right to request access to your Personal Information and to request a correction to it if you believe it is inaccurate. If you have submitted Personal Information to Compass and would like to have access to it, or if you would like to have it removed or corrected, please contact us [here](#). We will use reasonable efforts to comply with your request. However, in some cases we may not be able to allow you to access certain Personal Information in certain circumstances, for example if it contains Personal Information of other persons or for legal reasons. Typically, requests to access Personal Information we process for one of our clients must be directed to that client. In such cases, we will endeavour to provide you with a reasonable explanation of why it is not possible to grant access to your Personal Information.

You also have the right to withdraw your consent to the use and disclosure of your personal information. However, withdrawing your consent may affect or compromise the services we are able to provide you with.

To help protect against fraudulent requests for access to your Personal Information, we may ask you for information to allow us to confirm that the person making the request is you or is authorized to access your Personal Information before granting access. For example, we may require you to verify your identity before you access your Personal Information.

Children and Parents:

Compass does not knowingly collect Personal Information directly from children under 13. If a child under 13 has already provided us with Personal Information directly, their parent or guardian may contact us for the purpose of deleting this information. Where we process Personal Information of a child under 13 for one of our clients, such as a health care facility, such request may be directed to our client.

This Privacy Policy Does Not Apply to Third Party Websites:

The Compass Site may contain links to other third party websites. These other websites may have their own privacy policies and terms and conditions that are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of any website(s) owned and operated by any such third parties. Other websites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy for each website you visit. Any links from this Site to other websites, or references to products, services or publications other than those of Compass, do not imply the endorsement or approval of such websites, products, services or publications by Compass.

We Can Change this Policy:

Compass reserves the right to modify this Privacy Policy at any time. We will promptly reflect any such modifications to this Privacy Policy on the Site and will indicate at the bottom of this page the date this Privacy Policy was last amended. Your continued access to and/or use of the Site or provision of Personal Information to us after any such changes constitute your acceptance of, and agreement to be legally bound by, this Privacy Policy, as revised. Please periodically review this Privacy Policy so that you know what Personal Information we collect, how we use it, and with whom we may share it.

How to Contact Us:

If you have any questions regarding this Privacy Policy, any Personal Information you have submitted to us, or if you would like to: access Personal Information that you have already provided to us so that you can correct or update it, or request that it be deleted; request the deletion of Personal Information regarding your minor child; or report any violation of this Privacy Policy please advise us by contacting us [here](#) or by writing to Compass Group Canada Ltd., 1 Prologis Blvd. Suite 400, Mississauga Ontario L5W 0G2, Attention: Privacy Officer or by sending an email to generalcounsel@compass-canada.com.