

# EMPLOYEE PRIVACY POLICY

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## I. Definitions and scope

The terms used in this document (the "**Employee Privacy Policy**") such as Personal Data or Processing have the meaning given to them by the glossary in **Section VIII** of this Employee Privacy Policy or, failing that, by the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals in relation to the processing of personal data and the free circulation of this data, hereafter "**GDPR**") or the applicable local data protection legislation, if any.

This Employee Privacy Policy applies to the Processing of the Personal data of the following individuals:

- employees working for AccorInvest Entities, including interns and work-study trainees,
- workers and contractors (only applies in the UK) \*;
- candidates for positions within an AccorInvest Entity; and
- former employees of AccorInvest Entities.

For the purposes of this document, these persons are generally referred to as "**Employees**".

For the avoidance of doubt, this Employee Privacy Policy does not apply to the Personal Data of customers or other data subjects such as suppliers, shareholders or visitors (for which you should refer to the **Privacy Policy**).

This Employee Privacy Policy covers all AccorInvest Entities' activities, from hotel operations to asset management and support activities.

This Employee Privacy Policy describes how we collect and use your Personal Data during and after your working relationship with us, in accordance with the applicable data protection legislation.

We reserve the right to update this Employee Privacy Policy at any time. We may also notify you in other ways from time to time about the Processing of your Personal Data.

\*For the Processing of the Personal data of workers and contractors, in the other countries than the United Kingdom, please refer to the **Privacy Policy**

## II. Data processing principles

AccorInvest is committed to complying with all the laws and regulations that govern the Processing of Personal Data. Accordingly, AccorInvest undertakes to apply the following principles:

- **Data collection for specific purposes - lawfulness of Processing**

Personal Data is collected and Processed solely for the purposes and in the contexts described in **Section IV** of this Employee Privacy Policy.

Any Processing of Personal Data by AccorInvest will have a lawful basis (such as consent, the performance of a contract or legal obligation, or the pursuit of a legitimate interest) as required under the GDPR or any other applicable legislation.

- **Data minimisation and storage limitation**

AccorInvest will only collect Personal Data that is adequate, relevant and not excessive, having regard to the purposes for which it is processed as described in **Section IV**.

The Personal Data Processed is kept only for the time required for the purposes described in **Section IV** and the rules that apply to the storage and archiving of data.

- **Data security**

AccorInvest protects Personal Data from destruction, loss, tampering, disclosure or unauthorised use.

Accordingly, technical and organisational measures such as the management of access rights and computer file security (e.g. passwords, encryption) are implemented to ensure the confidentiality, integrity and availability of the Personal Data.

### III. Personal Data collected

As Data Controller, AccorInvest collects and Processes different categories of Employees' Personal Data.

**The Personal Data collected may be:**

- identity and identification data (e.g. surname, first name, gender, nationality, date and place of birth, photographs) and contact information (e.g. postal address, e-mail address and telephone number);
- social information (e.g. social security number, work permit, disability information);
- insurance, pension and benefits information;
- information about the Employee's family situation (e.g. marital status, surname, first name and date of birth of the spouse, partner, children or any dependants, next of kin and emergency contact information);
- information about training and career (e.g. degrees, CV, career planning, annual assessments and appraisals);
- professional information (e.g. employment contract, start date (and, if different, the date of your continuous employment) identification number, positions held, working hours, absences and paid leave, training records, leaving date and your reason for leaving);
- economic and financial information (e.g. tax status, salary, rank, compensation, pension fund contributions, bank details, payroll records);
- disciplinary and grievance information;
- data on the use of AccorInvest's information system (e.g. IP address, login data);
- location data (e.g. travel information);
- data from CCTV and control of access to premises (e.g. security passes);
- data collected in connection with the whistleblowing system;
- copy of your driving licence if you are required drive in the course of your employment;
- any other Personal Data collected in the course of the working relationship or provided by the Employee in his or her application.

AccorInvest may also Process certain Special Categories of Personal Data such as information revealing racial or ethnic origin, religious beliefs\*, union membership, biometric data, health data or sexual orientation.

Where Special Categories of Personal Data are Processed AccorInvest ensures that at least one of the following conditions is met:

- the Employee has given his or her express consent
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of AccorInvest or the Employee in the field of employment, social security and social protection law
- the information is made public by the Employee
- Processing is necessary to protect the vital interests of the Employee
- Processing is justified by public interest
- Processing is necessary for the observation, exercise or defence of a legal claim, or
- Processing is necessary for preventive or occupational medicine, assessment of Employee's fitness for work, medical diagnoses, healthcare or social welfare, or management of health care or social protection services systems.

\* In accordance with the applicable legislation

## IV. Purposes and legal basis

The processing of Personal Data is carried out for one or more specific and legitimate purpose(s).

The lawful Processing of Personal Data is necessary to achieve the following purposes:

Processing purposes	Legal basis for Processing
<p><b>Compliance with applicable legislation.</b> For example:</p> <ul style="list-style-type: none"> <li>• complying with AccorInvest's obligations relating to:                             <ul style="list-style-type: none"> <li>• sick, maternity and paternity leave;</li> <li>• working hours;</li> <li>• accidents in the workplace and while commuting;</li> <li>• disabilities management;</li> <li>• diversity;</li> </ul> </li> <li>• payroll management: salaries and benefits due under the Employee's employment contract, annual salary increases and other adjustments, annual bonus payments and pension management; income taxes and social security contributions deducted at source;</li> <li>• managing relations with staff representative institutions and organising representative elections;</li> <li>• managing whistleblowing systems and compliance and ethics issues;</li> </ul>	<p>Processing is necessary to comply with a legal obligation.</p>
<p><b>Responding to requests from the police or from judicial or administrative authorities</b> in the event of an inspection, audit or investigation according to the applicable law.</p>	<p>Processing is necessary to comply with a legal obligation.</p>
<p>Applying <b>disciplinary sanctions</b> in accordance with the applicable law.</p>	<p>Processing is necessary for the performance of the contract to which the Employee is party.</p>
<p>Allowing AccorInvest Entities to <b>protect their rights</b> or <b>substantiate any claim</b>, defence or statement in a case or before the judicial</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by</p>

<p>and/or administrative authorities, an arbitration tribunal or a mediator, in connection with actions, disciplinary investigations or an internal or external audit or investigation.</p>	<p>AccorInvest Entities in protecting their rights and interests.</p>
<p>Checking <b>qualifications and other documents during the recruitment process of Employees, and onboarding of new Employees.</b> The candidates' Personal Data is collected either directly or indirectly by an AccorInvest Entity (including collection through recruitment agencies) so that the AccorInvest Entity concerned can assess the candidate's suitability for the role (e.g. checking the candidates skills, psychometric tests, qualifications and references) and, if the candidate is recruited, to facilitate his/her onboarding in the AccorInvest Entity.</p>	<p>Processing is necessary for the performance of a contract to which the Employee is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in organising the integration of their new employees.</p>
<p>Managing the <b>career development and the mobility of Employees</b> within the Group.</p>	<p>Processing is necessary for the performance of a contract to which the Employee is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>
<p>Providing <b>services and benefits to Employees:</b> lunch vouchers, access to a company or inter-company canteen, covering transport costs, expenses claims, etc.</p>	<p>Processing is necessary for the performance of the contract to which the Employee is party.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p><b>Managing performance and talent:</b> facilitating the management of Employees' performance and career development, including annual performance evaluations and annual salary reviews.</p>	<p>Processing is necessary for the performance of the contract to which the Employee is party.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in assessing the Employees' performance.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p>Organising <b>social company events</b> (seminars, conventions, entertainments etc.)</p>	<p>Processing is necessary to comply with a legal obligation.</p> <p>Processing is necessary for the purposes of the legitimate</p>

	<p>interests pursued by AccorInvest Entities in organizing company events.</p>
<p>Managing the <b>Employee leaving process</b>, including exit interview and providing outplacements services.</p>	<p>Processing is necessary to comply with a legal obligation.</p> <p>Consent to the processing of the Employees personal data for one or more specific purposes has been given (where applicable).</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in assisting its Employees.</p>
<p>Allowing Employees to <b>access and use</b> AccorInvest's <b>IT tools</b>.</p>	<p>Processing is necessary for the performance of the contract to which the Employee is party.</p>
<p>Ensuring <b>security</b> in particular in respect of:</p> <ul style="list-style-type: none"> <li>• access to premises (e.g., security passes and CCTV recordings);</li> <li>• access to and use of IT tools, in accordance with AccorInvest's IT Security Policy or specific rules adopted by each AccorInvest Entity.</li> </ul>	<p>Processing is necessary for the performance of the contract to which the Employee is party.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in ensuring the security of premises and infrastructure.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p><b>Day to day management of AccorInvest Entities</b> operations for the following purposes, <i>such as</i>:</p> <ul style="list-style-type: none"> <li>• planning and budgeting;</li> <li>• staff management;</li> <li>• managing directories and social networks;</li> <li>• preparing organisational charts;</li> <li>• managing Employees' files;</li> <li>• financial reporting;</li> <li>• managing restructurings, reorganisations, acquisitions and spin-offs;</li> </ul>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in pursuing their corporate objectives.</p> <p>Processing is necessary to comply with a legal obligation.</p>

<ul style="list-style-type: none"> <li>managing membership of joint internal programmes.</li> </ul>	
<p>Organising internal or external <b>staff training</b>.</p>	<p>Processing is necessary for the performance of the contract to which the Employee is party.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities and/or the Employee.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p>Creation of <b>documents</b> (especially legal) that the AccorInvest Entities require to operate their businesses such as:</p> <ul style="list-style-type: none"> <li>activity reports that may include the personal data of certain categories of Employees.</li> </ul>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in pursuing their corporate objectives.</p> <p>Processing is necessary to comply with a legal obligation.</p>

## **V. Data retention**

The Personal Data Processed is retained by the AccorInvest Entity in accordance with the retention obligations stipulated by applicable legal and regulatory provisions. In the absence of such legal and regulatory provisions, the Personal Data may be retained for the period necessary for the purposes for which it was Processed.

We may further retain the Personal Data for legal purposes and to protect AccorInvest's rights and interests until the end of the retention period as prescribed by applicable laws.

After the retention period the Personal Data will either be destroyed or anonymised. The anonymisation of the Personal Data means that it can no longer be associated with the Employees.

## VI. Data recipients and transfers

AccorInvest may transfer Personal Data internally or externally to Recipients if this is necessary to achieve the purposes specified in **Section IV**.

The Personal Data is shared with AccorInvest's personnel authorized to receive it, and may also be transferred to external Recipients such as:

- suppliers - acting as a data processor - that need the Personal Data to provide services to AccorInvest (e.g. IT service providers, payroll providers, pension administration, benefits provision and administration, recruiters, training companies, hotel managers and the administrators, nominees, registrars and trustees of any share plan operated by an AccorInvest Entity);
- partners using the data to conduct analyses or surveys (e.g. hotel managers in connection with a remuneration scheme, third-party organisations conducting remuneration surveys);
- government and judicial authorities, if required by law or in connection with a criminal investigation or proceedings and in accordance with local regulations;
- external advisers (such as lawyers) to assert its rights and defend itself in legal proceedings;
- third-party companies involved in transactions involving the Group's assets (e.g. assets purchasers, notary).

AccorInvest takes appropriate steps to ensure that Personal Data is protected when sharing it with staff or third-party Recipients. In all cases, the transferred data is limited to what is strictly necessary for the purposes for which it is being transferred.

If Personal Data is sent to countries that do not afford the same level of protection as the country in which the Personal Data was collected, AccorInvest will ensure that appropriate safeguards are implemented to manage this transfer (for example through standard contractual clauses or Binding Corporate Rules).

## VII. Rights of Employees

As data subjects, Employees are entitled to exercise the rights set out in the GDPR and domestic data protection legislation.

The GDPR provides that data subjects have, subject to certain conditions and limits, a right of access, to rectify and erase their Personal Data collected by an AccorInvest Entity. Data subjects also have the right to data portability, to request its restriction or to object to the Processing of their Personal Data. In the limited circumstances where you may have provided your consent to the collection, Processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific Processing at any time.

These rights can be exercised by sending either:

1. An email to one of the following:
  - (i) the relevant country's data protection e-mail address as specified in the Appendix to this Employee Privacy Policy;
  - (ii) any other e-mail address indicated by the AccorInvest Entity that collected the Personal Data; or
  - (iii) [group.dataprivacy@accorinvest.com](mailto:group.dataprivacy@accorinvest.com);
2. A letter marked for the attention of the Legal department to either:
  - (i) the registered office address of the AccorInvest Entity that collected the Personal Data; or
  - (ii) AccorInvest Group SA  
26A, boulevard Royal  
L- 2881 Luxembourg, Grand Duchy of Luxembourg.

To protect the Personal Data of the data subject exercising their rights AccorInvest will need to identify the data subject before responding to the request. If there are reasonable doubts about their identity, the data subject may be asked to provide a copy of an official identity document, such as an identity card or passport, to support his or her request.

The data subjects are entitled to file a complaint with a Supervisory Authority.

## VIII. Glossary

**AccorInvest (or Group):** refers to all AccorInvest Entities.

**AccorInvest Entity:** refers to all the legal entities of the AccorInvest Group, i.e., companies controlled directly or indirectly by AccorInvest Group SA.

**Data Controller:** the person who, alone or jointly with others, determines the purposes and means of Processing Personal Data.

**Personal Data:** any information relating to an identified or identifiable individual. An individual who can be identified, directly or indirectly, including by reference to an identifier, such as a name, identification number, location data, online or to one or more specific elements specific to one's physical, physiological, genetic, psychological, economic, cultural or social identity is deemed to be an identifiable individual.

**Processing:** any operation or set of operations performed or not in an automated manner and applied to data or data sets such as collection, recording, organisation, structuring, retention, adaptation or modification, extraction, consultation, use, communication by transmission, circulation or any other form of dissemination, reconciliation or interconnection, limitation, erasure or destruction.

**Recipient:** whether a third party or not any individual or legal entity, public authority, department or any other organisation to which Personal Data is disclosed.

**APPENDIX  
DATA PRIVACY CONTACT E-MAIL ADDRESSES**

- **France & Luxembourg head offices:** donnees.personnelles@accorinvest.com
- **UK:** gdpr\_uk@accorinvest.com
- **Belgium, Netherlands, Luxembourg (except Luxembourg head offices):**  
gdpr\_benelux@accorinvest.com
- **Germany:** datenschutz@accorinvest.com
- **Portugal :** accorinvest.pt.protecao.dados@accorinvest.com
- **Spain:** accorinvest.sp.proteccion-datos@accorinvest.com