Employee Privacy Notice – United Kingdom

Effective Date: May 25, 2020

American Express Company (we, our, us) and any affiliate, subsidiary, and any other company owned or controlled by us (American Express Family of Companies) would like to take this opportunity to tell you about the personal information we collect about you and how we use it.

1. Information We Collect

We will collect information about you from your resume, new hire form and associated documentation, your benefits enrolment forms and when you interact with us in the development of your employment relationship (for instance, when you interact with Human Resources or Payroll Services). We also may collect information about you from people you have named as references, from previous employers and educational and professional institutes. We may also collect information in the following ways:

(a) through credit checks with credit reference agencies;
(b) through additional checks with external agencies, such as background verification agencies, sanctions screening agencies, and in rare cases, medical professionals;

If you are an existing employee applying for a different role at American Express, we may also carry out these checks if they are appropriate for the new role to which you are applying.

We may also ask you to provide us with personal information of an emergency contact. By providing us with emergency contact details you are confirming that you have gained the authority of your emergency contact(s) to provide us with this information.

2. Information We Share

We do not share your personal information with anyone except as described below. We will share your personal information only to administer the employment relationship with you or as required or permitted by applicable law, such as:

- with credit reference agencies and similar institutions to report or ask about your financial circumstances;
- with worker representatives, regulatory authorities, courts, law enforcement and governmental agencies to comply with legal orders, legal or regulatory requirements, and law enforcement requests;
- within the American Express Family of Companies to provide services or as noted below**;**
- with our service providers who help manage our employment relationships (such as human resource consultants, payroll companies, lawyers, consulting firms, employee benefits companies, printing, mailing and other communications services or data processing and outsourced technology services); and
- any party approved by you (such as your bank or your beneficiaries).

If you transfer to another company within the American Express Family of Companies, you understand that we may send, at the request of your new employer, your personnel file (which contains personal information about you) to your new employer, so that they can administer your new employment relationship. We will retain any information that is required for compliance with statutory requirements or legitimate business purposes.

3. How We Use Your Information

Your personal information will be solely used for the purpose of administering and fulfilling the employment relationship, as required by law, or for our legitimate interests, including:

- to verify your credentials, prior employment and personal history;
- to provide payroll and employee benefits, including insurance and pensions;
- for training and development, planning and organisation (including the creation of employee profiles to facilitate this);
- for communications related to your employment, such as performance ratings, service anniversaries, goal setting and rewards;
- for compliance with internal policies and statutory requirements, such as record keeping and reporting for public health care, pension programs and tax purposes;
- for management and analysis of employee expenses;
- for the creation of aggregated reports for human resources' analytics;
- for the monitoring of employee activity and electronic communications in the workplace (including records of incoming/outgoing telephone calls, images, electronic communication systems and internet use) in accordance with our internal policies and applicable law, for security, prevention of misconduct or crime, staff training and quality assurance. You will be advised if you work in an area where video/images are monitored and/or recorded in accordance with applicable law; and
- for security purposes, such as crisis preparedness and emergency notifications, or for the protection of your health or the safety of others.

Additionally, American Express will also process your personal information in certain circumstances when you provide your consent for us to do so (for instance, when taking part on company surveys or company pilots).

Any information that we collect about you regarding health, race, ethnic origin, sexual orientation, beliefs, biometric data, trade union membership, the commission of any offences or your emergency contact details will be collected, used and stored only to satisfy legal requirements, for other purposes essential to administering the employment relationship with you, or where provided by you with your explicit consent.

4. International Transfers

We process, transfer and access your personal information through our systems in the UK and outside the European Economic Area, such as in the United States (where our main operational data centres are located) to administer your employment relationship. Regardless of where we process your information, we will take appropriate steps to ensure the adequate level of protection for your information in other countries outside the UK or European Economic Area including the USA, where data protection laws may not be as comprehensive as the UK or EEA.

Please note that data transfers within the American Express Family of Companies are made under our Binding Corporate Rules which are available on the privacy section of our corporate website and on our intranet.

5. Safeguarding and Retention

We use organizational, administrative, technical and physical security measures to protect your personal information. These measures include computer safeguards and secured files and facilities. We only give authorized personnel access to your personal information, and require them to only use it for the purposes we specify. Personal information will not be kept for longer than is appropriate for the purposes set forth above, as required by applicable laws or regulations, or for litigation and regulatory investigations.

When your personal information is no longer necessary for these purposes, we will take reasonable steps to securely destroy such information or permanently de-identify it. For more information about our data retention practices, you can request additional information through the channels identified below.

6. Your Rights

As an employee, you have certain rights over the personal information that we have about you in the context of this employment relationship. More specifically, you have the right to:

- access the personal information we keep about you;
- correct inaccurate personal information we have about you;
- restrict and/or object to the use of your personal information;
- request a copy of your personal information, in a structured, commonly used and machine-readable format; and
- withdraw your consent for those activities where we obtained your consent to process your personal information.

You are encouraged to access My Info, an on-line web based, User ID and password protected tool, which will allow you to check and update your personal information. Please note that if you decide to restrict or object to the processing of your personal information, we may not be able to administer properly the employment relationship with you.

7. Questions or Complaints

If you have questions about this privacy notice or how your information is handled or wish to make a complaint or exercise your rights, please, contact your Leader, Human Resources or our Data Protection Officer at AmexUKDPO@aexp.com. You may also write to American Express Services Europe Limited, Dept. 2007, Upper Ground Floor, 1 John Street, Brighton, East Sussex, BN88 1NH. You also have the right to contact the Information Commissioner directly at www.ico.gov.uk.