Contractor/Contingent Worker Privacy Notice - Canada

Effective Date: September 30, 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.

American Express will treat all information related to Contractors/Contingent Workers (CWR) in accordance with the Company Employee Privacy and Data Protection Principles.

1. Information We Collect

We will collect personal data from you directly and, where relevant, from your staffing agency

We will also collect information about you when you interact with us in the development of work relationship (for instance, when you interact with American Express employees such us your People Leader) and use American Express resources (such as access to American Express buildings, PC, laptop, intranet and systems) to perform the functions of the role.

If you apply for a direct role with American Express, we may also carry out background checks if they are appropriate for the new role to which you are applying:

(a) through credit checks with credit reference agencies;
(b) through additional checks with external agencies, such as background verification agencies, criminal records checks, sanctions screening agencies

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 Contractor/Contingent Worker relationship with you or as required or permitted by applicable law, such as:

- 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 Contractor/Contingent Worker relationships (such as human resource consultants, lawyers, consulting firms, printing, mailing and other communications services or data processing and outsourced technology services); and
- any party approved by you.

If you are assigned to another Company within the American Express Family of Companies, you understand that we may send, at the request of the Company for whom you are contracted with, your personnel file (which contains personal information about you) to the new Company, so that they can administer your new Contractor/Contingent Worker 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 Contractor/Contingent Worker relationship, as required by law, or for our legitimate interests, including:

- for training and development, planning and organization (including the creation of Contractor/Contingent Worker profiles to facilitate this);
- for communications related to your contract, such as performance and rewards (as applicable);
- for compliance with internal policies and statutory requirements;
- for management and analysis of Contractor/Contingent Worker expenses;
- for the creation of aggregated reports for human resources' analytics;
- for the monitoring of Contractor/Contingent Worker 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 in company surveys or company pilots – as applicable).

Any information that we may 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 Contractor/Contingent Worker relationship with you, or where provided by you with your explicit consent (as applicable).

4. International Transfers

We may process, transfer and access your personal information through our systems within the American Express Family of Companies and our Service Providers throughout the world to administer your employment relationship. Please note that the laws of various jurisdictions may provide for a different level of protection for personal information than exists under Canadian law. Regardless of where we process your information, we will take appropriate steps to ensure the adequate level of protection for your information in the manner described in this Employee Privacy Notice and according to the applicable laws. If you would like more information about our use of service providers located outside of Canada, please contact your Leader or email us at GlobalColleaguePrivacy@amexp.com.

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 a Contractor/Contingent Worker, you will be afforded the same rights with regard to the processing of the personal information as American Express recruitment candidates or employees. More specifically, you have the right to:

- access the personal information we keep about you and to receive an accounting of its use and its disclosure to third parties;
- correct inaccurate or incomplete personal information we have about you;
- request a copy of your personal information to be delivered by mail or electronically.

However, these rights are not absolute and we may restrict access if permitted or required to do so under applicable law.

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.

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 or GlobalColleaguePrivacy@aexp.com